

Subject: Public consultation on four draft market analysis reports under Competition Rules No. 01 of 2024

Publication date	05 October 2026
Consultation period	30 days
Submission deadline	04 November 2026, 5.00 PM (Sri Lanka time)

General information

The Telecommunications Regulatory Commission of Sri Lanka (TRCSL) invites public and stakeholder comments on four draft market analysis reports, prepared under Competition Rules No. 01 of 2024 (Competition Rules). The reports assess whether the relevant markets warrant ex-ante regulation, identify any operator with significant market power (SMP), and propose remedies where appropriate.

The following reports are published for consultation:

- 1. Retail cellular mobile voice and broadband markets (two separate markets)**
- 2. Wholesale mobile network access market**
- 3. Retail fixed voice and retail fixed broadband markets (two separate markets)**
- 4. Wholesale local access at a fixed location market**

In line with the Competition Rules, and regulatory practice, the first round of market analysis was started at the retail level. Wholesale markets were then assessed to identify upstream bottlenecks, so that regulation can facilitate competition in downstream retail markets. This first round therefore covers all retail markets identified in Annex 1 of the Competition Rules and the immediate upstream wholesale markets. In subsequent rounds, TRCSL intends to analyse the remaining pre-defined markets and any other markets where a need is identified.

TRCSL has conducted the market analyses presented in the four reports listed above, prioritizing these markets because of their central importance to Sri Lanka's telecommunications sector, particularly the provision of affordable, reliable and high-quality broadband and voice services. Assessing the retail markets alongside the relevant upstream wholesale access markets enables TRCSL to examine both consumer outcomes and the bottlenecks that may restrict competition, service availability and investment. Annex 1 to the Competition Rules, published in Gazette Extraordinary No. 2394/04 dated 22 July 2024, predefines seven markets at the retail and wholesale levels. This predefined list provides a practical starting point intended to streamline market identification and reduce the time required for the analysis; it does not replace the evidence-based market-definition process required under Rules 6.2 and 7. Accordingly, taking account of prevailing and foreseeable market conditions and the information available, TRCSL may refine the product and geographic boundaries of the markets initially identified and identify additional relevant markets, including associated upstream wholesale markets, where justified by the analysis and in accordance with the applicable procedures. Market analysis, particularly the first round, is a lengthy and resource-intensive process requiring substantial efforts from both the regulator and the industry, including data collection and validation, assessment of competitive conditions, development of appropriate proposals and stakeholder consultation. TRCSL is therefore proceeding step by step, with analyses of the remaining predefined markets and any other markets requiring assessment to follow. This phased approach allows each assessment to receive the necessary attention while prioritizing the markets most directly relevant to broadband development and effective competition at this stage.

The overall objective of the market analysis process is to promote effective and sustainable competition for the benefit of consumers, in terms of choice, price, quality and investment. Regulation should be targeted at enduring competition problems, proportionate to the problems identified, and withdrawn where ex ante regulation is no longer justified.

TRCSL invites stakeholders to comment on the analysis, findings and proposed remedies in each report. The Annex to this notice indicates areas where TRCSL would particularly welcome views. Public and Stakeholders are not required to address each area and may comment on any aspect of the reports.

Status of the consultation

The published reports contain proposals, not final regulatory decisions and remedies. This consultation provides an opportunity to examine the evidence, assumptions, analytical findings and proposed regulatory approaches before TRCSL reaches its final conclusions.

Publication of the reports does not, by itself, impose new obligations, designate an operator as having SMP, or amend or remove obligations under existing instruments. Any such action will be taken through the applicable regulatory process. Depending on the findings for each market, the outcome may include the introduction, maintenance, modification or withdrawal of particular obligations, or a conclusion that additional market-specific intervention is not justified.

How to read the reports and prepare comments

Public and Stakeholders are encouraged to review the relevant reports as a whole rather than considering proposed remedies in isolation. Comments may address the factual information and assumptions, market definitions, assessment of competitive conditions and SMP, identified competition concerns, and proposed regulatory measures.

Where a retail report refers to an upstream wholesale market, or a wholesale report relies on findings from a related retail analysis, the relevant documents should be read together.

Where revised information differs from data previously submitted to TRCSL, the reason for the difference should be explained in the responses. Supporting evidence should identify relevant sources, definitions, reference periods, assumptions and limitations. Reasoned estimates or qualitative explanations are welcome where precise data are not reasonably available.

Applicability and practical implementation of proposed remedies

TRCSL welcomes comments on the necessity, suitability, proportionality and practical applicability of the proposed remedies, including their scope, intended beneficiaries and relationship with existing obligations, implementation cost and any necessary safeguards or transitional arrangements..

Where a proposed measure is considered technically difficult, operationally impracticable or insufficiently clear, respondents are encouraged to identify the precise requirement concerned and explain the constraint and where possible propose an alternative approach that would achieve the regulatory objective.

TRCSL also welcomes evidence on implementation costs and expected benefits, including effects on access providers, access seekers and end users. Where costs or lead times are cited, respondents should explain their basis, distinguish one-time and ongoing requirements, and identify key dependencies.

Some proposed remedies may require the development or refinement of regulatory methodologies, models, procedures, technical specifications or reporting arrangements. Where these are

necessary for measures ultimately adopted, TRCSL will undertake the relevant development and approval work through the appropriate regulatory process.

Confidentiality and treatment of information

TRCSL has taken appropriate measures in preparing the public consultation documents to protect confidential and commercially sensitive information submitted by operators and other stakeholders, while retaining information necessary for meaningful consideration of the analysis and proposals. Where a response contains confidential information, public and stakeholders should clearly identify the relevant passages and where possible, provide a separate non-confidential version suitable for publication.

TRCSL will assess confidentiality requests under the applicable legal framework. Non-confidential submissions may be published or summarized as part of the consultation process.

Clarification questions and Q&A session

TRCSL invites interested parties to review and analyse the reports and to submit any questions for clarification by 19th October 2026 to dgtsl@trc.gov.lk. TRCSL intends to organise a Q&A session during the week of 26 October 2026. Details of the session will be shared with interested parties in advance.

These are TRCSL-led consultation meetings. Advance questions and discussion points will help TRCSL and its supporting consultants prepare focused discussions. The preferred date for clarification questions does not shorten the consultation period or prevent respondents from raising additional relevant matters within that period.

The meetings complement, but do not replace, written consultation. Discussion during a meeting should not be treated as a final regulatory decision or a formal amendment to the published proposals.

Submission of responses

The consultation will remain open for 30 days from the date of publication in line with Section 14.2 of the Competition Rules.

Final responses should be submitted by 04th November 2026, 5.00 pm Sri Lanka time to dgtsl@trc.gov.lk, with the subject line "Market Analysis Consultation – [stakeholder's name]".

Note- Should clearly identify any information you consider confidential and provide reasons for requesting confidential treatment.

Submissions should identify and indicate an authorized contact person. Public/Stakeholders may provide a single consolidated response covering several reports or separate responses for individual reports. Submissions received after the aforementioned deadline will not be entertained.

Public and StakeholdersNext steps

TRCSL will review all submissions before adopting its final decision. It intends to publish/discuss a summary of responses and its views on the main issues raised.

TRCSL may seek targeted clarification or additional information where necessary. Its assessment will consider the substance and evidential support of submissions and whether they warrant corrections, further analysis, changes to proposed findings, or adoption, revision or withdrawal of proposed measures.

Final decisions will explain the conclusions reached and specify the scope, application, effective dates and implementation requirements of any obligations adopted or changed, including relevant transitional arrangements and dependencies on subsequent instruments.

Queries about this consultation may be addressed to Mr. Indrajith Handapangoda (Director – Competition) at director.competition@trc.gov.lk or +94 11 2676740 or +94 11 2689345 (ext.2402).

TRCSL appreciates the cooperation of public and stakeholders and encourages constructive, evidence-based participation to support justified, proportionate and practically implementable regulatory measures.

Director General

Telecommunications Regulatory Commission of Sri Lanka

05 October 2026

Annex. Areas for comment

This Annex is intended as guidance and identifies areas on which TRCSL would particularly welcome comments, to help focused submissions. Submissions are not required to address each area and may comment on any aspect of the reports.

A1. Accuracy. Factual information and data quality.

Does the report accurately describe the services, operators, network arrangements and market developments relevant to the assessment? Please identify any substantive factual inaccuracies, misinterpretations or market developments not taken into account in the reports that could materially affect the results of the market analysis, providing supporting evidence and sources where possible.

Where a correction is proposed, please identify the reference period and explain whether it changes an analytical finding or only the presentation of information.

A2. Methodology. Please comment on the methodology applied in the reports, including market definition, the three-criteria test and the SMP assessment.

A3. Effectiveness of Remedies. Please comment on whether the proposed remedies appropriately address the identified market problems and support effective competition. Where Public and Stakeholders consider they do not, TRCSL would welcome proposals for alternative or modified remedies, together with an explanation of the specific competition problem that the proposed modification would address.

A4. Remedy design and implementation. TRCSL would welcome views on the design of the proposed remedies, including their proportionality, technical feasibility, timing, implementation costs and monitoring arrangements. In particular, TRCSL would welcome comments on the Radio Access Network (RAN) sharing access obligations proposed in the wholesale reports. Views on the proposed non-discrimination requirements would be especially helpful, including how they should be specified, implemented and monitored in practice.

Where a proposed measure is considered technically or operationally difficult, public and stakeholders are encouraged to identify the specific constraint and, where possible, propose an alternative approach that would achieve the regulatory objective.

A5. Other comments. Please provide any other comments on the reports, including matters not covered by the areas identified above.

These areas are non-exhaustive. Public and stakeholders are encouraged to raise any other topic relevant to the market analyses or proposed regulatory measures.

Suggested response format

For each substantive comment, Public and Stakeholders may identify the report, relevant Section reference and relevant reference wording from the report in one column and the comment in the next column, including their position and reasons, supporting evidence, any proposed amendment or alternative; practical implementation implications and any specific confidentiality request, preferably submitted MS Excel format.