Illustrative Application of the ACT Self-Assessment: The Case of Meridia

A fictional example– Using the Actionable Core Toolkit: Governance Essentials in Practice, anchored in the GSR-26 Best Practice Guidelines

A. Purpose of this case study

This document provides an illustrative, fictional example of how the ACT self-assessment can be applied by a national regulatory authority. It follows the sequence used in the live ACT country workspace so that country teams can see, end to end, how raw self-assessment answers become a sequenced, owned implementation plan. As with any illustrative case, the country, regulator, and all figures below are invented for demonstration purposes only and are not drawn from any real jurisdiction:

Assessment (Done / Not done)

→ Gap Analysis (applicability, impact, effort, urgency, momentum)

→ Roadmap (short / medium / long term)

→ Action Plan (owners, dates, status)

→ Track progress (heatmap)

B. Country context: Meridia

Meridia is a fictional, digitally transitioning economy of approximately 11 million people, with a single converged regulator, the Meridia Digital Markets and Communications Authority (MDMCA), responsible for telecommunications, spectrum, and an expanding digital-platforms mandate. Mobile broadband coverage is broad but data affordability and rural connectivity remain uneven. Two comparable-scale operators dominate the market alongside a small number of ISPs and two significant digital platforms. MDMCA adopted a National Digital Markets Outcomes Statement in 2025 and has invested in a dedicated market-intelligence function, but institutional coordination with peer authorities and cross-border engagement remain at an early stage.

C. Methodology note

The assessment was conducted in the ACT country workspace by MDMCA's national focal point, working with a small cross-departmental team (Strategy & Policy, Legal Affairs, Market Intelligence & Data, Compliance & Enforcement, and Market Development). The workspace profile was recorded as follows:

- Assessment title: MDMCA Governance Essentials Self-Assessment 2026
- Organization: Meridia Digital Markets and Communications Authority (MDMCA)
- Jurisdiction: Meridia
- Assessment status: 55 of 55 questions answered (100% completion); Roadmap, Action Plan, and Track progress steps completed for the first cycle.

D. Summary of findings

Meridia's regulator answered all 55 practices across the seven Regulatory Essentials, with 32 marked Done (57.1%) and 24 marked Not done. In particular, Essential 3 (Observability and credible evidence) is the strongest area, while Essential 7 (Domestic and cross-border regulatory coherence) and Essential 4 (Incentive-based market shaping) and Essential 2 (Risk-based and proportionate calibration) show the widest gaps. In addition, the Track progress heatmap shows that most Essentials remain at an early implementation stage even where the underlying gaps have been identified and prioritized.

ID	Essential	Questions	Done	Not done	% Done
E1	Public-interest outcomes and strategic focus	9	6	3	66.7%
E2	Risk-based and proportionate calibration of obligations	7	3	4	42.9%
E3	Observability and credible evidence	8	6	2	75%
E4	Incentive-based market shaping	7	3	4	42.9%
E5	Graduated supervision, due process and de-escalation	8	5	3	62.5%
E6	Adaptive regulation and structured learning	8	5	3	62.5%
E7	Domestic and cross-border regulatory coherence	8	4	4	50%
	Total (55 practices)	**56**	**32**	**24**	**57.5%**

E. Essential-by-essential assessment

The following tables reproduce, for illustration, all 55 self-assessment practices as they would appear on ACT's "02 Assessment" screen, with the Done / Not done status, evidence status, and the evidence or context note recorded by the assessment team.

Essential 1 – Public-interest outcomes and strategic focus

#	Practice	Status	Evidence status	Evidence / context note
1	A published/adopted set of priority public-interest outcomes exists (connectivity, affordability, accessibility, resilience, consumer protection, contestability).	**Done**	Documented	*National Digital Markets Outcomes Statement (2025) adopted by the Board and published on the regulator's website.*
2	The outcomes are technology-neutral and cross-sectoral, not tied to a single technology or service.	**Done**	Documented	*Outcomes framed around access, affordability and trust rather than specific network technologies.*
3	The same outcomes are used consistently across strategy, licensing, spectrum and oversight decisions.	**Done**	Self-declared	*Outcomes referenced in the 2025 licensing framework and the annual regulatory work plan.*
4	Regulatory performance is periodically assessed against the stated outcomes.	**Done**	Documented	*Annual performance report tracks four of the six outcomes; two (resilience, contestability) added only in the latest cycle.*
5	A process exists to review whether existing instruments still serve the stated outcomes.	**Not done**	No evidence	*No standing review mechanism; reviews occur only when a rule is legally challenged.*
6	Obsolete or duplicative requirements are identified and formally withdrawn.	**Not done**	No evidence	*Several reporting obligations from a superseded 2014 framework remain formally in force.*
7	New regulatory instruments are screened for alignment with the priority outcomes before adoption.	**Not done**	No evidence	*No formal screening checklist; alignment is assessed informally by drafting staff.*
8	The outcomes are communicated publicly to market actors and consumers.	**Done**	Verified	*Outcomes featured in consumer-facing communications and industry consultation notices.*

#	Practice	Status	Evidence status	Evidence / context note
9	Outcomes are linked explicitly to sector or national digital development strategies.	**Done**	Self-declared	*Cross-referenced in the National Digital Economy Strategy 2024–2028.*

Essential 2 – Risk-based and proportionate calibration of obligations

#	Practice	Status	Evidence status	Evidence / context note
1	The regulator maps the main actors and functions across the digital value chain.	**Done**	Documented	*Value-chain mapping completed for telecom operators, ISPs and two dominant digital platforms.*
2	Criteria exist for determining when differentiated obligations are warranted (function, market position, risk).	**Not done**	No evidence	*Differentiation happens case-by-case; no published criteria.*
3	Obligations are assigned by role/function rather than by legacy licensing category alone.	**Done**	Self-declared	*New unified authorisation regime (2025) assigns obligations by activity, not by legacy licence class.*
4	A lighter-touch regime exists for lower-risk market segments or new entrants.	**Not done**	No evidence	*All authorised actors currently face the same baseline obligations regardless of scale.*
5	Stronger obligations are triggered by evidence of market failure or harm.	**Not done**	No evidence	*No documented trigger mechanism linking market-failure evidence to enhanced obligations.*
6	The differentiation approach is documented and applied consistently across cases.	**Not done**	No evidence	*Decisions are made ad hoc by case teams without a shared internal methodology.*
7	The calibration criteria are reviewed periodically to reflect market evolution.	**Done**	Self-declared	*Authorisation regime scheduled for a three-year statutory review; first review due next year.*

Essential 3 – Observability and credible evidence

#	Practice	Status	Evidence status	Evidence / context note
1	An internal monitoring/evaluation function manages core market and public-interest indicators.	**Done**	Documented	*Market Intelligence & Data Unit established in 2023 with a standing mandate.*
2	A limited, decision-relevant set of indicators is defined and linked to priority outcomes.	**Done**	Documented	*12 core indicators aligned to the six priority outcomes.*
3	Reporting obligations specify who reports what, from which data source, on what timetable.	**Done**	Documented	*Quarterly reporting template in force for all major operators since 2024.*
4	Reporting formats are standardized across regulated actors.	**Done**	Verified	*Standard XML template validated through an independent data-quality audit in 2025.*
5	Reporting intensity is proportionate to actor scale, market position or risk.	**Not done**	No evidence	*All operators, regardless of size, currently submit the same full reporting package.*
6	Targeted verification mechanisms exist to check accuracy of reported data.	**Done**	Self-declared	*Spot-check audits conducted for the two largest operators in 2025.*
7	An internal dashboard consolidates core indicators for routine monitoring.	**Done**	Documented	*Internal Power BI dashboard used monthly by senior management.*
8	A public-facing, proportionate subset of indicators is published for transparency.	**Not done**	No evidence	*Indicators remain internal only; no public dashboard or open report exists yet.*

Essential 4 – Incentive-based market shaping

#	Practice	Status	Evidence status	Evidence / context note
1	Licensing, market entry and spectrum assignment procedures are reviewed to remove avoidable barriers.	**Done**	Documented	*2025 licensing reform reduced application timelines from 120 to 45 days.*
2	Targeted economic/regulatory incentives exist (fee reductions, performance-based obligations, fast-tracking).	**Not done**	No evidence	*No formal incentive instruments beyond the general fee schedule.*
3	Infrastructure-sharing incentives are in place.	**Not done**	No evidence	*Passive infrastructure sharing is*

#	Practice	Status	Evidence status	Evidence / context note
				mandated by a separate 2016 statute, not incentivised by the regulator.
4	Regulatory safe harbours exist for lower-risk compliance approaches.	**Not done**	No evidence	*Concept discussed internally but not yet adopted.*
5	Time-bound flexibilities are available to support investment or service extension.	**Done**	Self-declared	*Temporary spectrum-fee waivers granted in underserved districts (2024–2026).*
6	The effectiveness of incentive measures is periodically reviewed against intended outcomes.	**Done**	Self-declared	*Waiver programme reviewed at the 18-month mark; coverage gains documented.*
7	Incentives are adjusted based on review findings.	**Not done**	No evidence	*Review findings exist but have not yet translated into an updated incentive package.*

Essential 5 – Graduated supervision, due process and de-escalation

#	Practice	Status	Evidence status	Evidence / context note
1	A clear, sequenced pathway for regulatory intervention exists (guidance → remediation → heightened supervision → corrective measures).	**Done**	Documented	*Four-stage compliance ladder set out in the 2023 Enforcement Manual.*
2	Criteria for escalation between stages are published or formalized.	**Not done**	No evidence	*Escalation triggers are described internally but not published for regulated parties.*
3	Regulated parties receive transparent notice and an opportunity to respond before measures are imposed.	**Done**	Documented	*Standard notice-and-response procedure applied in all enforcement files since 2023.*
4	Procedural safeguards (due process) are documented and applied consistently.	**Done**	Verified	*Confirmed through an independent legal review commissioned in 2025.*
5	Conditions for de-escalation or scaling back measures are defined.	**Not done**	No evidence	*No documented criteria for lifting or reducing supervisory measures once compliance improves.*
6	Case studies or precedents on de-escalation are published to build market trust.	**Not done**	No evidence	*Not applicable at this stage legal counsel advises against publicising individual enforcement outcomes pending the de-escalation policy above.*
7	Escalation and de-escalation decisions are evidence-based and documented.	**Done**	Self-declared	*Case files include a documented evidentiary basis for each escalation decision taken to date.*
8	The supervisory pathway is reviewed periodically for proportionality.	**Done**	Self-declared	*Enforcement Manual reviewed annually by the Compliance & Enforcement Directorate.*

Essential 6 – Adaptive regulation and structured learning

#	Practice	Status	Evidence status	Evidence / context note
1	At least one structured mechanism for controlled testing exists (sandbox, pilot, phased implementation).	**Done**	Documented	*Fintech-adjacent digital payments sandbox launched jointly with the*

#	Practice	Status	Evidence status	Evidence / context note
				central bank in 2024.
2	Review points are built into major interventions at the design stage (what/when/trigger for revision).	**Not done**	No evidence	*New rules rarely specify a review date or trigger at the point of adoption.*
3	Structured public consultation processes are used to gather evidence from market actors, consumers and experts.	**Done**	Documented	*Formal consultation procedure in place since 2022; used for all major rulemaking.*
4	Consultation inputs are recorded and traceable to regulatory decisions.	**Done**	Documented	*Consultation response registers published alongside final decisions.*
5	Lessons from pilots/sandboxes feed back into regulatory design, not only into consultation records.	**Not done**	No evidence	*Sandbox findings are reported internally but have not yet led to a documented rule change.*
6	AI or other digital tools are used to supplement regulatory functions (monitoring, risk detection, compliance analysis).	**Not done**	No evidence	*Exploratory discussions only; no tool has been piloted.*
7	Sandbox/pilot mechanisms include clear objectives, entry criteria and evaluation methods.	**Done**	Self-declared	*Sandbox rulebook specifies entry criteria and a defined evaluation window.*
8	Conditions exist for scaling, adjusting or closing adaptive measures.	**Done**	Self-declared	*Sandbox rulebook includes exit and scale-up provisions.*

Essential 7 – Domestic and cross-border regulatory coherence

#	Practice	Status	Evidence status	Evidence / context note
1	Whole-of-government coordination mechanisms exist among authorities with overlapping digital-market mandates.	**Done**	Documented	*Inter-agency Digital Markets Committee (regulator, competition authority, data protection office) meets quarterly.*
2	Responsibility allocations and escalation pathways are clearly set out for cross-mandate issues.	**Not done**	No evidence	*Committee exists but has no written terms of reference on who leads on overlapping cases.*
3	Multi-agency platforms exist for rapid incident response where appropriate.	**Not done**	No evidence	*No joint incident-response protocol for cross-cutting digital-market or cyber incidents.*
4	Cross-border issues requiring sustained cooperation have been jointly identified.	**Not done**	No evidence	*Not currently pursued regional peer regulators have not yet been engaged on this; deferred pending domestic coordination maturing first.*
5	Routine information-sharing arrangements exist with relevant domestic authorities.	**Done**	Self-declared	*Data-sharing memorandum in force with the competition authority since 2024.*
6	Coordinated supervisory processes and compatible remedies exist to reduce duplication.	**Done**	Self-declared	*Joint case-handling protocol used once, in a 2025 platform-competition matter.*
7	Key regulatory terms and evidentiary standards are aligned across overlapping mandates (e.g., market power, consumer harm).	**Not done**	No evidence	*Each authority still applies its own definitions; no glossary alignment exercise undertaken.*
8	Domestic coordination arrangements are reviewed periodically for continued relevance.	**Done**	Self-declared	*Committee's terms reviewed at its annual retreat.*

F. Gap analysis — prioritizing the 23 unmet practices

Of the 23 practices marked Not done, the assessment team judged 4 as currently Not applicable to Meridia's context (excluded from the roadmap, with a documented rationale) and 20 as Applicable, each rated for Impact, Effort, Urgency and Momentum on ACT's Low / Medium / High scale. These ratings generate ACT's suggested roadmap timeframe (higher impact, urgency and momentum, combined with lower effort, pulls an item toward the short term).

ID	Unmet practice	Applicable?	Impact	Effort	Urgency	Momentum	Timeframe
E1.5	Review process for whether existing instruments still serve the outcomes	**Yes**	High	Low	Medium	High	Short term
E1.6	Identify and withdraw obsolete or duplicative requirements	**Yes**	Medium	Medium	Medium	Medium	Medium term
E1.7	Screen new instruments for outcome alignment before adoption	**Yes**	High	Low	High	High	Short term
E2.2	Publish criteria for when differentiated obligations are warranted	**Yes**	High	Medium	Medium	Medium	Medium term
E2.4	Lighter-touch regime for lower-risk market segments or new entrants	**No**	—	—	—	—	*Excluded*
E2.5	Market-failure evidence trigger for stronger obligations	**Yes**	Medium	Medium	Low	Medium	Medium term
E2.6	Document and apply the differentiation approach consistently	**Yes**	Medium	Medium	Low	Medium	Medium term
E3.5	Make reporting intensity proportionate to actor scale, position or risk	**Yes**	Medium	Medium	Medium	Medium	Medium term
E3.8	Publish a proportionate, public-facing subset of core indicators	**Yes**	Medium	Low	Medium	Medium	Short term
E4.2	Introduce targeted economic/regulatory incentives (fee reductions, fast-tracking)	**Yes**	High	Medium	Medium	Medium	Medium term
E4.3	Regulator-led infrastructure-sharing incentives	**No**	—	—	—	—	*Excluded*
E4.4	Establish regulatory safe harbours for lower-risk compliance approaches	**Yes**	Medium	Medium	Low	Low	Medium term
E4.7	Adjust incentive measures based on review findings	**Yes**	Medium	Low	Medium	Medium	Short term
E5.2	Publish/formalize criteria for escalation between supervisory stages	**Yes**	High	Low	High	High	Short term
E5.5	Define conditions for de-escalation or scaling back measures	**Yes**	Medium	High	Low	Low	Long term
E5.6	Publish case studies of successful de-escalation	**No**	—	—	—	—	*Excluded*
E6.2	Build review points into major interventions at the design stage	**Yes**	Medium	Medium	Medium	Medium	Medium term

ID	Unmet practice	Applicable?	Impact	Effort	Urgency	Momentum	Timeframe
E6.5	Feed sandbox/pilot lessons back into regulatory design, not only consultation records	**Yes**	Medium	High	Low	Low	Long term
E6.6	Use AI or other digital tools to supplement regulatory functions	**Yes**	Medium	Medium	Medium	High	Short term
E7.2	Set out responsibility allocation and escalation pathways for cross-mandate issues	**Yes**	High	High	Medium	Low	Long term
E7.3	Establish a multi-agency platform for rapid incident response	**Yes**	High	High	Low	Low	Long term
E7.4	Jointly identify cross-border issues requiring sustained cooperation	**No**	—	—	—	—	*Excluded*
E7.7	Align regulatory terms and evidentiary standards across overlapping mandates	**Yes**	High	High	Low	Low	Long term

Notes on excluded (Not applicable) practices:

- E2.4 – Lighter-touch regime for lower-risk market segments or new entrants: Market currently has only two comparable-scale operators; a differentiated lighter-touch tier is not yet meaningful. To be revisited once new entrants appear.
- E4.3 – Regulator-led infrastructure-sharing incentives: Infrastructure sharing is already mandated under the 2016 Infrastructure Sharing Act; an additional regulator-led incentive scheme is not considered necessary at this time.
- E5.6 – Publish case studies of successful de-escalation: Legal counsel advises against publicising individual enforcement outcomes until the de-escalation policy (E5.5) is formally adopted.
- E7.4 – Jointly identify cross-border issues requiring sustained cooperation: Deferred until domestic inter-agency coordination (E7.2, E7.3) is more firmly established; regional peer regulators have not yet been engaged.

G. Roadmap — short / medium / long term

The 20 applicable gaps were distributed across the roadmap's three columns. As in the live tool, these are suggested placements that the team can drag to another column if priorities change.

Short term (7)	Medium term (8)	Long term (5)
E1.5 Review process for whether existing instruments still serve the outcomes **E1.7** Screen new instruments for outcome alignment before adoption **E3.8** Publish a proportionate, public-facing subset of core indicators **E4.7** Adjust incentive measures based on review findings **E5.2** Publish/formalize criteria for escalation between supervisory stages **E6.6** Use AI or other digital tools to supplement regulatory functions	**E1.6** Identify and withdraw obsolete or duplicative requirements **E2.2** Publish criteria for when differentiated obligations are warranted **E2.5** Market-failure evidence trigger for stronger obligations **E2.6** Document and apply the differentiation approach consistently **E3.5** Make reporting intensity proportionate to actor scale, position or risk **E4.2** Introduce targeted economic/regulatory incentives (fee reductions, fast-tracking) **E4.4** Establish regulatory safe harbours for lower-risk compliance approaches **E6.2** Build review points into major interventions at the design stage	**E5.5** Define conditions for de-escalation or scaling back measures **E6.5** Feed sandbox/pilot lessons back into regulatory design, not only consultation records **E7.2** Set out responsibility allocation and escalation pathways for cross-mandate issues **E7.3** Establish a multi-agency platform for rapid incident response **E7.7** Align regulatory terms and evidentiary standards across overlapping mandates

H. Action Plan — owners, dates and implementation status

For the seven short-term roadmap items, MDMCA completed the Action Plan step, assigning a lead entity, coordinating entities, an action manager, planned dates, and an initial implementation status.

ID	Action	Lead entity	Coordinating entities	Start / target	Status
E1.5	Establish an annual instrument-review cycle against the six priority outcomes	Strategy & Policy Department	Legal Affairs Unit	Month 1 → Month 4	**Initiated**
E1.7	Adopt a one-page outcome-alignment screening checklist for all new instruments	Legal Affairs Unit	Strategy & Policy Department	Month 1 → Month 3	**In progress**
E3.8	Publish a quarterly public dashboard covering a proportionate subset of core indicators	Market Intelligence & Data Unit	Digital Services / IT	Month 2 → Month 6	**Not started**
E4.7	Update the spectrum-fee waiver package based on the 18-month review findings	Market Development Unit	Finance & Licensing	Month 3 → Month 6	**Not started**
E5.2	Formalize and publish the escalation-criteria annex to the Enforcement Manual	Compliance & Enforcement Directorate	Legal Affairs Unit	Month 1 → Month 5	**Initiated**
E6.6	Pilot an AI-assisted anomaly-detection tool for compliance monitoring in one market segment	Market Intelligence & Data Unit	Compliance & Enforcement Directorate, Digital Services / IT	Month 2 → Month 9	**Not started**

I. Track progress — heatmap (by Essential)

The heatmap reflects Action Plan implementation status where one has been set; Not done practices without an explicit status default to “Not started”, and fully Done Essentials roll up to “Completed”. One In progress or Initiated practice is enough to keep an Essential's tile off “Completed”.

ID	Essential	Rolled-up status	Done / Total
E1	Public-interest outcomes and strategic focus	**In progress (orange)**	6 / 9
E2	Risk-based and proportionate calibration of obligations	**Not started (red)**	3 / 7
E3	Observability and credible evidence	**Not started (red)**	6 / 8
E4	Incentive-based market shaping	**Not started (red)**	3 / 7
E5	Graduated supervision, due process and de-escalation	**Initiated (yellow)**	5 / 8
E6	Adaptive regulation and structured learning	**Not started (red)**	5 / 8
E7	Domestic and cross-border regulatory coherence	**In progress (orange)**	4 / 8

Key finding: although the self-assessment itself is complete and several quick wins are already Initiated or In progress (Essentials 1, 5 and 7), most Essentials remain at “Not started” on implementation. This is the expected pattern early in an ACT cycle and underlines the toolkit's own caution: the record, roadmap and action plan support institutional reflection and follow-up – but they do not, by themselves, do the work of implementation.

J. Priority recommendations beyond the short term

Medium-term priorities (approx. 6–18 months)

Priority action	Suggested lead	Rationale
E1.6 Withdraw obsolete/duplicative reporting requirements	Legal Affairs Unit	*Reduces compliance burden and reinforces credibility of the outcome-alignment screen introduced short term.*
E2.2 Publish differentiation criteria for obligations	Strategy & Policy Department	*Provides transparency and predictability as new entrants are expected within 18–24 months.*
E2.5 / E2.6 Define market-failure trigger and document differentiation approach	Strategy & Policy Department, Legal Affairs Unit	*Completes the proportionality architecture begun with E2.2.*
E3.5 Make reporting intensity proportionate to actor risk/scale	Market Intelligence & Data Unit	*Reduces burden on smaller/new actors once the differentiation criteria (E2.2) exist.*
E4.2 / E4.4 Introduce targeted incentives and regulatory safe harbours	Market Development Unit	*Builds on the 2025 licensing reform to further support investment.*
E6.2 Build review points into major interventions at design stage	Legal Affairs Unit, Strategy & Policy Department	*Institutionalizes structured learning beyond the existing sandbox.*

Longer-term priorities (approx. 18–36 months)

Priority action	Suggested lead	Rationale
E5.5 Define conditions for de-escalation of supervisory measures	Compliance & Enforcement Directorate	*Prerequisite for eventually publishing de-escalation case studies (E5.6).*
E6.5 Systematize feedback from sandbox/pilot lessons into rule design	Strategy & Policy Department	*Converts isolated learning exercises into a repeatable regulatory practice.*
E7.2 / E7.3 Formalize cross-mandate responsibility allocation and a rapid incident-response platform	Office of the Director-General, Digital Markets Committee	*Addresses Meridia's weakest Essential; requires legal and institutional groundwork.*
E7.7 Align regulatory terms and evidentiary standards across mandates	Digital Markets Committee	*Depends on the responsibility allocation exercise (E7.2) being completed first.*

K. Illustrative conclusion

Meridia's illustrative assessment reveals a regulator that has made genuine progress on strategic focus and observability it has published outcomes, built an internal market-intelligence function, and reduced licensing barriers, but that still relies on informal, case-by-case judgment where ACT expects published criteria (risk-based calibration, escalation thresholds, cross-mandate responsibility allocation). None of the four practices marked Not applicable are treated as permanently out of scope: each carries a documented rationale and a condition for re-opening (e.g., once new entrants appear, or once domestic coordination matures).

The case illustrates ACT's central design point: the self-assessment, gap analysis, roadmap and action plan form a structured, custom-built and owned sequence rather than a score. For Meridia, the practical next step is not another round of self-assessment, but following through on the seven short-term actions already Initiated or In progress, so that the next Track progress snapshot shows genuine movement rather than a repeat of the same starting picture.