



Role of zero rating offers: review of selected countries during the pandemic

International benchmark study



Research by Cullen International for Meta
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EXECUTIVE SUMMARY

As acknowledged by the International Telecommunication Union (ITU)¹ and the World Bank², coordination between international organisations, national governments and mobile operators was key to ensure consumers continued to access relevant information and services during the COVID-19 pandemic, including via zero rating offers.

This report³ aims to put zero rating offers into context, outlining information on:

- government initiatives that promoted access to zero-rated content, particularly during the COVID-19 pandemic, in selected countries around the world;
- different types of zero rating offers, especially those available during the COVID-19 pandemic; and
- how zero rating offers addressed affordability concerns and public interest needs, in particular during the pandemic.

The research analysed data from 20 countries around the world, jointly selected by Cullen International and Meta based on economic and social characteristics of particular relevance during the pandemic⁴. The research found evidence that:

- Zero rating offers played a significant role to ensure people in need stayed connected and accessed relevant information during the pandemic. Some form of zero-rated content was made available in all 20 surveyed countries in Africa, Asia-Pacific, Europe and Latin America since early 2020⁵, when the COVID-19 outbreak was declared by the World Health Organisation.
- In 17 out of 20 countries, voluntary initiatives or agreements between governments and the industry were implemented to make zero-rated access widely available. Voluntary initiatives and general support for zero rating were also found even where governments imposed an obligation to offer zero-rated content⁶.
- Besides access to healthcare and educational materials, operators worldwide commonly made available zero rating offers granting access to social networks, communications tools, entertainment, remote working services, resources for small and medium businesses or other types of content. As a result, the population in the respective countries had access to a wide range of benefits.

¹ International Telecommunication Union (ITU) Global Network Resiliency Platform (2020), available at: <https://sway.office.com/4AcrIY9R4BMemONI>

² World Bank (2021). Global Digital Development Policy Response Database, available at: https://dataviz.worldbank.org/views/DD-COVID19/Overview?embed=y&isGuestRedirectFromVizportal=y&display_count=n&showAppBanner=false&origin=viz_share_link&showVizHome=n

³ Funding for this report was provided by Meta Platforms, Inc. The contents and conclusions contained in the report are based on research conducted by Cullen International, and the report reflects the independent views of the authors.

⁴ The 20 countries covered in this research are: Argentina, Bangladesh, Benin, Brazil, Chile, Colombia, Côte d'Ivoire, Ghana, Indonesia, Ireland, Italy, Kenya, Mexico, Nigeria, Philippines, Peru, South Africa, Spain, Thailand, and the United Kingdom. The sample of countries, jointly selected by Cullen International and Meta, was used to investigate how zero rating offers providing educational, healthcare or other types of content were used during the COVID-19 pandemic.

Countries where zero rating offers did not play any role, for commercial or regulatory reasons, were not considered sufficiently illustrative for the scope of the research. The country sample also considered factors such as: balanced representation of all world's regions; level of economic development (mix of developed and emerging countries, prioritizing emerging countries); balanced representation of both large and small countries in terms of population; countries highly affected by the pandemic based on publicly available indicators. Particularly vulnerable economies (e.g. some small countries, countries with high level of 'informal' economy) were also chosen to illustrate if and how zero-rated services were made available to address specific social and economic challenges during the pandemic. Overall, the research methodology (see specific section) demonstrated that the sample of countries is representative in terms of population: the sample of 20 out of 195 countries in the world, i.e. around 10% of total, covers 22% of the global population. Despite representing 22% of the global population, the countries selected represent only 16% of the global total gross domestic product (GDP). This figure would be even lower excluding the most developed countries from the sample, reflecting that the research prioritised emerging economies with a higher exposure to certain risks bound to the pandemic, e.g. in terms of unemployment and inflation rate.

⁵ Out of 20 surveyed countries, healthcare materials and educational content was available in 18 and 19 countries, respectively. However, the research found evidence of other types of zero-rated content offered where no healthcare materials or educational content could be accessed via zero rating.

⁶ Argentina, Colombia and South Africa.

- As access to data services increased the economic resilience against the pandemic⁷, COVID-19 would likely have affected emerging economies more severely without access to zero rating.
- Data gathered during the research suggests that most of the surveyed countries already had some form of zero rating offer available before the pandemic.
- COVID-19 made zero rating offers and their benefits more prominent. However, zero rating is still offered by at least one operator in 17 out of 20 surveyed countries⁸. Especially in the emerging countries analysed, zero rating is often seen as a tool to make connectivity more affordable for consumers and small businesses.

While 85% of the world's population lives in areas covered by mobile services, only 60% of the global population has access to internet services.

While a wide range of business models and policy instruments can contribute to closing the gap, there is evidence that zero rating offers contributed to address affordability issues during the pandemic and may still contribute to connecting the unconnected as the pandemic fades out.

⁷ ITU Telecommunication Development Bureau (2021). The Economic impact of broadband and digitization through the COVID-19 pandemic: Econometric modelling. Available at: <http://handle.itu.int/11.1002/pub/819126c2-en>

⁸ As of October 2022, among the surveyed countries commercial zero rating offers were not available to new customers in Ireland, Italy and Spain. However, the research found evidence of zero rating offers being previously available in these countries. More generally in EU member states it should be noted that rulings by the Court of Justice of the EU deemed zero rating offers generally incompatible with the EU Open Internet Regulation. The body of European regulators, BEREC, updated its net neutrality guidelines in June 2022 to reflect the Court decision. The next review of the Open Internet Regulation is foreseen by 30 April 2023.

INTRODUCTION

This report aims to contribute to the ongoing international and national debates on zero rating offers and their relevance to reduce inequality and address affordability issues to connect the unconnected, especially in developing economies.

As the negative effects of the pandemic refuse to cease, consumers continue struggling to adapt. Social inequalities in emerging markets threaten low-income families, limiting their access to healthcare, education and entertainment.

Despite their efforts to innovate, small and medium businesses suffer with an unequal economic recovery, a generalised disruption in global supply chains and rising inflation rates.

Governments and operators have joined efforts since the spread of COVID-19 to offer consumers and small businesses alternatives to access certain types of content, with zero rating offers being a popular instrument among others.

First, the report presents the research methodology and a short description of zero rating offers considered for the purpose of this research.

Specific sections then cover the key takeaways of two separate benchmarks.

The first benchmark addressed government initiatives to mandate or support access to zero-rated content. The research covered in more detail zero rating including healthcare and educational materials, and other types of public interest information, if any.

The second benchmark covered zero rating offering other types of content and applications, including:

- social networks and communications tools;
- entertainment content (e.g. video and music streaming services);
- remote working services;
- resources for small and medium businesses; and
- other types of content, where applicable.

Both sections cover specific countries in more detail to highlight the impact of zero rating offers in diverse contexts⁹.

A conclusion summarises the main findings and is followed by two annexes provided with the data gathered during the research.

A. Methodology

The research design focused on an analysis of 20 countries from Africa, Asia-Pacific, Europe and Latin America. The 20 countries were jointly selected by Cullen International and Meta based on relevant economic and social characteristics, giving emphasis particularly to emerging countries severely affected by the pandemic.

The research emphasised the coverage of developing countries in Africa, Asia-Pacific and Latin America, although the geographic scope also included specific developed countries in Europe. As the report will show, zero rating offers are common in emerging economies but may also play a role in developed countries.

Despite representing 22% of the global population, the sample of 20 surveyed countries represents only 16% of the global economy¹⁰. The average unemployment rate in 2021 in the surveyed countries was 34% higher than the global average¹¹. Similarly, the average inflation rate in 2021 in the surveyed countries was 41% higher than the global average¹².

⁹ Where useful, details per country may include data on internet usage and mobile coverage, a brief description of the telecoms market structure and more information on the status of zero rating offers.

¹⁰ Considering the gross domestic product (GDP) as of 2021 expressed in USD. World Bank, 2021. <https://data.worldbank.org/region/world>

¹¹ World Bank, 2021. <https://data.worldbank.org/region/world>

¹² World Bank, 2021. <https://data.worldbank.org/region/world>

According to data gathered by the World Bank, the impact of the pandemic varied widely among the surveyed countries.

- The highest unemployment rate in 2021 was found in South Africa (34%, significantly higher than the global average of 6.2%), while Thailand had the lowest unemployment rate (1%).
- The highest inflation rate in 2021 was found in Nigeria (17%, much higher than the global average of 3.4%), while Thailand had the lowest inflation rate (1.2%).

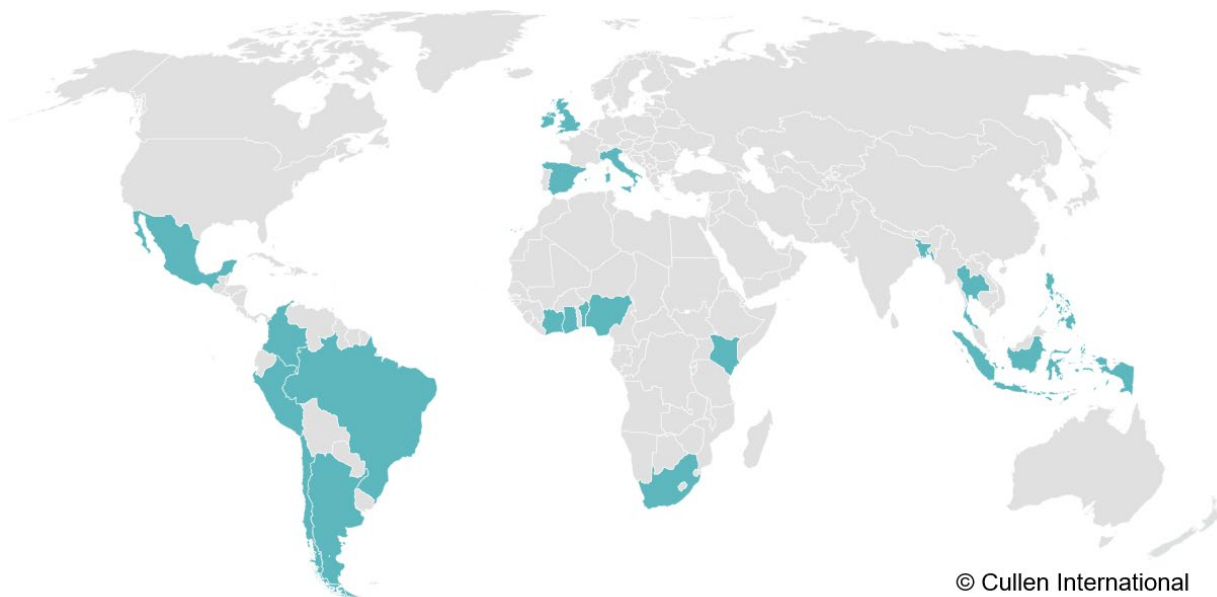
Summary of geographic coverage (Cullen International)

Africa	Asia-Pacific	Europe	Latin America
Benin Côte d'Ivoire Ghana Kenya Nigeria South Africa	Bangladesh Indonesia Philippines Thailand	Ireland Italy Spain United Kingdom	Argentina Brazil Chile Colombia Mexico Peru

Average unemployment and inflation rate in 2021 (World Bank)

	Global average	Sample of 20 surveyed countries (comparison with global average)
Unemployment (% of total labour force)	3.4	4.8 (+41%)
Inflation, consumer prices (annual %)	6.2	8.3 (+34%)

The surveyed countries represent 22% of the population and 16% of the economy worldwide in 2021 (World Bank¹³)



As mobile coverage reaches at least 85% of the world's population according to the World Health Organisation¹⁴, the research gathered data on how zero rating offers played a role to ensure consumers remained connected during the pandemic, and how they are still used in many countries.

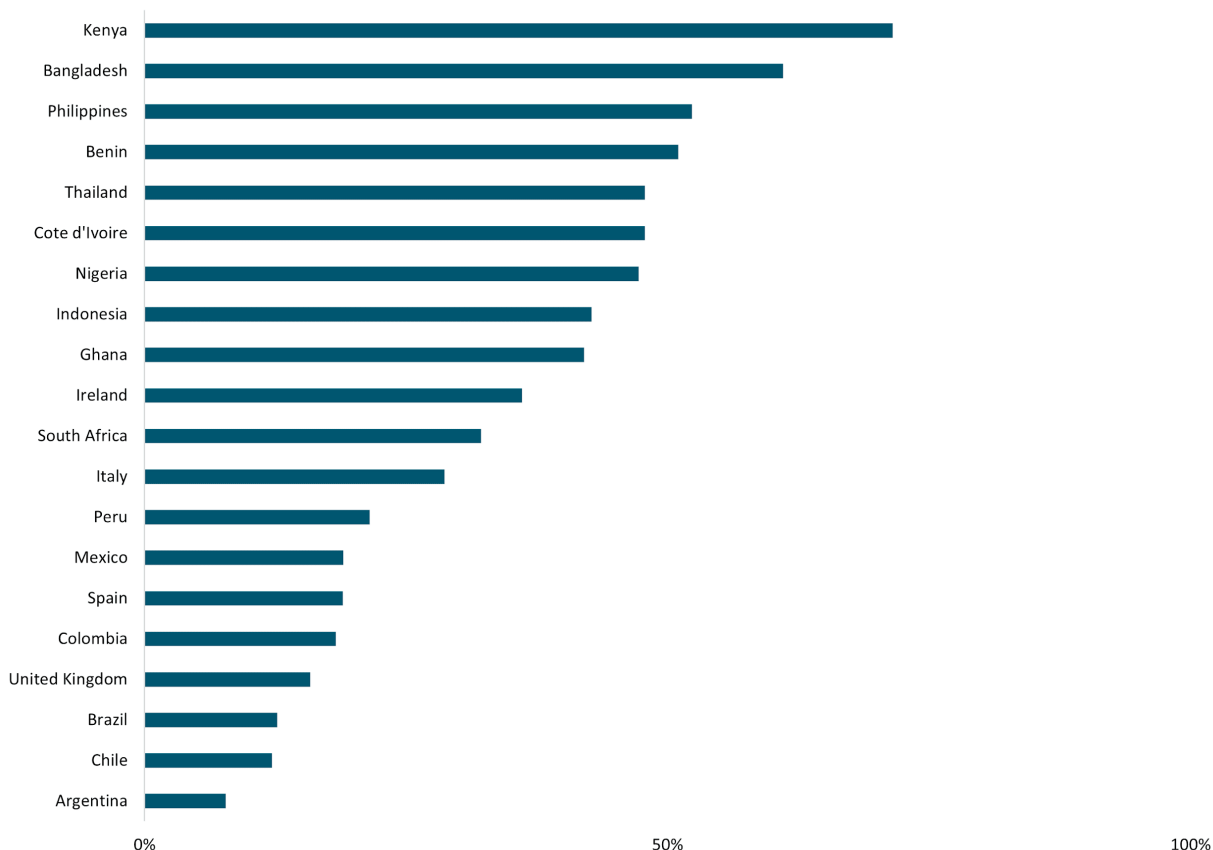
¹³ World Bank, 2021. <https://data.worldbank.org/region/world>

¹⁴ World Health Organisation, 2021. <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

Among the surveyed countries, on average 65% of individuals used internet services in 2020 according to the World Bank. The lowest percentage of individuals using internet services in 2020 was found in Bangladesh (25%), Benin (26%) and Kenya (30%). The United Kingdom, Spain and Ireland had the highest percentage of individuals using internet services in the same period (95%, 93% and 92%, respectively).

Out of 20 surveyed countries, 45% have over 40% of the population living in rural areas¹⁵. People living in rural areas are typically more vulnerable to social and economic distress, making policy instruments and innovative business models that address affordability issues to stay connected more relevant.

Rural population in 2021 among surveyed countries (World Bank)



The research covered official documents, government reports, commercial offers and other relevant sources to understand the status of government initiatives and zero rating offers per country. Where applicable, the research covered historical data on zero rating offers¹⁶ and other relevant initiatives launched in the context of the COVID-19 pandemic¹⁷.

¹⁵ World Bank, 2021. <https://data.worldbank.org/indicator/SP.URB.TOTL.IN.ZS>

¹⁶ Based on information publicly available and considering the limited availability of historical data in specific countries.

¹⁷ The scope of the research is focused on the role of zero rating offers as an instrument to address connectivity issues. Therefore, the research covered specific government initiatives launched during the pandemic useful as background, even if not strictly related to zero rating. Government initiatives unrelated to zero rating were not included in this report.

B. What is zero rating?

For the purpose of this research, zero rating refers to commercial offers that grant access to certain content and applications free of data charges.

Zero rating offers either directly provide connectivity to access certain online content or do not apply data charges for traffic from specific content and applications.

The research made no distinction between specific forms of zero rating offers. For example, “zero rating” may be interpreted as access to content free of data charges regardless of a mobile subscription (e.g. basic access to social network applications and content of public interest).

In contrast, “special pricing” may involve not counting traffic from certain services against the total data allowance, thus requiring a mobile subscription or purchase of a prepaid mobile data package.

These and other distinctions were not relevant for the purpose of this research, considering that consumers benefit from zero rating regardless of the underlying business model. Details on underlying business models are often not publicly available, making it difficult to apply specific categories in practice.

Therefore, different forms of data cap exemption were considered simply as zero rating offers¹⁸.

¹⁸ A more detailed set of categories of data cap exemption was considered by specific government agencies, e.g. see report by the Brazilian competition authority CADE.
https://sei.cade.gov.br/sei/modulos/pesquisa/md_pesq_documento_consulta_externa.php?DZ2uWeaYicbuRZEFhBt-n3BfPLlu9u7akQA8mpB9yOTVltdzdZLqhkflgLcg20sp2COFkT0u4F6kpO2C8HmeI4kRnRnEVbwvcVZhI5-Ryodazm-kfXdvuF-MMocM8XW.

GOVERNMENT RESPONSE SUPPORTING OR MANDATING OPERATORS TO OFFER ZERO RATING




In all surveyed countries, government authorities either imposed an obligation to offer, actively promoted or accepted the offer of zero rating by operators on a voluntary basis.

A. Mandating access to zero rating

Only three out of 20 surveyed countries formally obliged operators to grant zero-rated access to content: Argentina, Colombia and South Africa.

Details of the corresponding initiatives are presented below.

Summary of obligations adopted in Argentina, Colombia and South Africa (Cullen International)

	<p>In Argentina, following a presidential decree¹⁹ of August 2020 Enacom defined²⁰ the scope of the basic universal service²¹ including mobile telephony and data services. These services have been available from 1 January 2021.</p> <p>The basic service must be available²² to beneficiaries of social programmes, retired and low-income people, social and sports clubs and firemen stations.</p> <p>The mobile basic plan includes zero-rated access to the messaging application WhatsApp and public websites²³.</p>
	<p>In Colombia, the government mandated the offer of zero rating in April 2020, establishing specific thresholds to determine the scope of offers by mobile operators:</p> <ul style="list-style-type: none">• postpaid users with monthly package costing over US\$18 had free access to 20 websites²⁴ following a decision by the Ministry of ICT (MinTIC Resolution 639²⁵ of April 2020); and• postpaid and prepaid users with monthly package costing less than US\$18 had free access to the educational website Colombia Aprende²⁶ (Decree 555²⁷ of April 2020).
	<p>In South Africa, the Electronic Communications, Postal and Broadcasting Directions²⁸ by the Ministry of Communications and Digital Technologies included an obligation for service providers to offer zero-rated access to local websites with information on COVID-19 and educational content as approved by the departments of health, basic education and higher education and training.</p> <p>In order to qualify, a website must be hosted on a server located in South Africa, rather than be hosted internationally or on some form of cloud-based platform. Some operators²⁹ have voluntarily zero-rated websites that fall outside the scope of these obligations.</p> <p>The websites of over 1,000 institutions were zero-rated as a result of the obligations³⁰.</p>

¹⁹ <https://www.boletinoficial.gob.ar/detalleAviso/primera/233932/20200822>

²⁰ <https://www.boletinoficial.gob.ar/detalleAviso/primera/238916/20201221>

²¹ https://www.enacom.gob.ar/prestacion-basica-universal_p4792

²² https://www.enacom.gob.ar/noticias/institucional/como-tramitar-la-prestacion-basica-universal-y-obligatoria--pbu-_n2964

²³ The scope of public websites was not specifically defined.

²⁴ https://www.mintic.gov.co/portal/715/articles-126471_resolucion_639_2020_anexo_u20200415.xlsx

²⁵ https://www.mintic.gov.co/portal/715/articles-126471_res_639.pdf

²⁶ <https://movil.colombiaaprende.edu.co/>

²⁷ <https://dapre.presidencia.gov.co/normativa/normativa/DECRETO%20555%20DEL%2015%20DE%20ABRIL%20DE%202020.pdf>

²⁸ https://www.gov.za/sites/default/files/gcis_document/202004/43209gon451.pdf

²⁹ Example: <https://www.vox.co.za/education-website-zero-rated>

³⁰ <https://www.timeslive.co.za/news/south-africa/2022-03-31-zero-rated-online-content-for-public-benefit-bodies-hailed-as-breakthrough/>

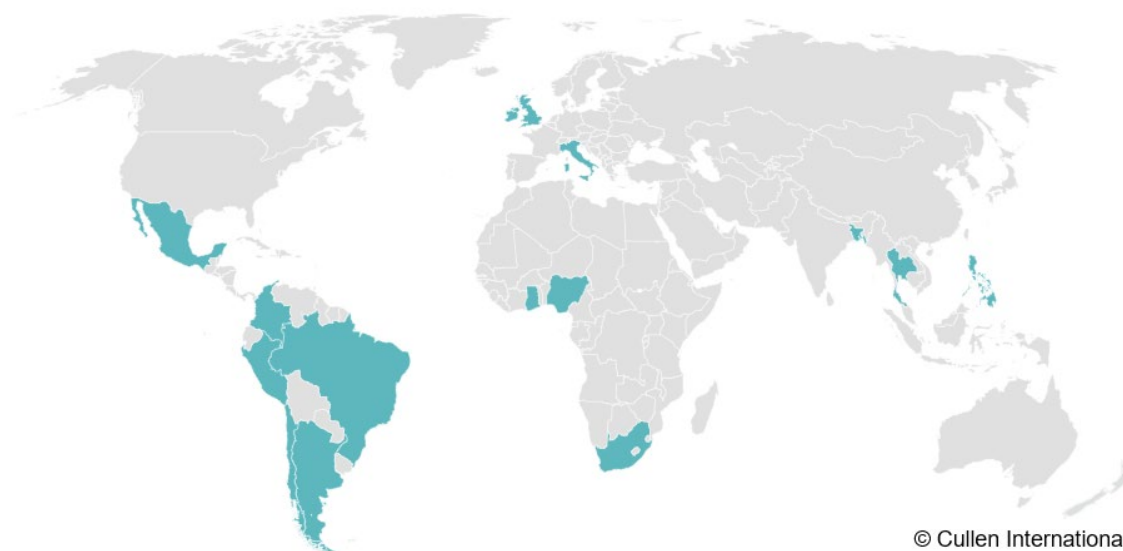
In Argentina and Colombia, no data on the adoption of zero rating offers provided under the corresponding obligations was found in publicly available sources.

In all three countries voluntary initiatives complemented the mandatory offer of zero rating, as discussed in the next section of this report.

B. Promoting access to zero rating

Out of 20 surveyed countries, 75% actively promoted access to zero-rated content following the pandemic outbreak³¹. Active government support often materialised through an agreement with operators to grant zero-rated access to certain types of content³².

Countries that actively supported zero rating offers (Cullen International)



In practice, the research found evidence that consumers accessed:

- zero-rated healthcare materials in 90% of surveyed countries³³; and
- zero-rated educational materials in 95% of surveyed countries³⁴.

Both types of content and applications were expected to be valued by consumers and the society in general during the pandemic. In practice each category of content included:

- Healthcare materials: information on how to avoid getting infected with COVID-19, official information on government guidelines to prevent the spread of the disease (e.g. mandatory isolation), where vaccine shots are available, etc.;
- Educational materials: online educational materials and tools to mitigate the negative effects of lockdowns on students of all levels (primary, high school and college students).

As unemployment rates increased during the pandemic and did not affect all types of jobs evenly, access to educational materials was expected to help accessing more qualified jobs. These materials could also support workers struggling to adopt remote working tools to perform their tasks online.

The high availability of zero-rated healthcare and educational materials among surveyed countries demonstrate how governments can effectively coordinate with the mobile industry to tackle short-term emergencies. On the other hand, the mobile industry proved its capacity to address social needs, despite expected network constraints following lockdowns imposed by many government authorities worldwide.

³¹ All countries except for Benin, Côte d'Ivoire, Indonesia, Kenya and Spain.

³² In some cases, governments also supported an increase of mobile data caps and operators temporarily offered a specific data allowance per day for certain groups free of charge, e.g. healthcare workers or students.

³³ All countries except for Italy and Spain.

³⁴ All countries except for Spain.

The coordination between national governments and the mobile industry was complemented by:

- efforts by international organisations, in particular the World Health Organisation (WHO); and
- voluntary initiatives granting access to healthcare and educational materials.

Both types of initiatives explain why healthcare and educational materials were zero-rated in specific countries even if no specific action to support zero rating was taken by the government.

Besides zero-rated access to healthcare and educational materials, many voluntary initiatives also provided zero rating including various other types of content, which will be discussed in the next section.

More details about specific initiatives adopted by the World Health Organisation and key takeaways from selected countries are explained below.

Partnership between the World Health Organisation, Meta and Praekelt Foundation: Discover and Free Basics used against the pandemic

In August 2021, the World Health Organisation (WHO) announced a partnership with Facebook³⁵ and Praekelt.org, to make available “information to the world’s most vulnerable people through Discover and Free Basics in a mobile-friendly format.”

In countries where Discover or Free Basics are available, people may access WHO’s COVID-19 information without incurring data charges with participating operators on the web or via an Android application.

According to the WHO, “this initiative enabled underserved communities to access life-saving COVID-19 health information through participating operators in **more than 55 countries**”. As of August 2021, the WHO COVID-19 information had reached more than 2m people in nine languages. The organisation added that other languages would be included in the coming months.

Discover and Free Basics

Discover is a mobile web and Android app that can be used to browse any website on the internet using a daily balance of free data from participating mobile operators.

Free Basics³⁶ enables people with participating operators to access basic services such as health information, job sites, communication tools, education resources, and local government information without data charges. Both Discover and Free Basics are part of Meta Connectivity’s efforts.

Other initiatives by the WHO

The WHO led other relevant initiatives to fight the pandemic, including:

- WHO Health Alert on WhatsApp³⁷: dedicated messaging services in Arabic, English, French, Hindi, Italian, Spanish and Portuguese with partners WhatsApp and Meta to keep people safe from coronavirus by enabling the WHO to potentially reach 2 billion people and deliver COVID-19 facts directly into the hands of the people that need it;
- WHO interactive chatbot on Rakuten Viber³⁸: once subscribed to the WHO Viber chatbot, users receive notifications with the latest news and information on COVID-19 directly from WHO. Users can also learn how to protect themselves and test their knowledge on coronavirus through an interactive quiz that helps bust myths;
- WHO interactive chatbot on Facebook Messenger: WHO’s Health Alert accessed in English, French, Spanish, and Arabic through WHO’s official Facebook page³⁹ by selecting “Send Message” or through the dedicated Messenger link⁴⁰.

³⁵ Facebook at that point. More details about the partnership available at: <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

³⁶ <https://healthalert.whofreebasics.org/>

³⁷ <https://www.who.int/news-room/feature-stories/detail/who-health-alert-brings-COVID-19-facts-to-billions-via-whatsapp>

³⁸ <https://www.who.int/news-room/feature-stories/detail/who-and-rakuten-viber-fight-COVID-19-misinformation-with-interactive-chatbot>

³⁹ <https://www.facebook.com/WHO/>

⁴⁰ <https://m.me/who>

<https://www.who.int/news-room/feature-stories/detail/who-launches-a-chatbot-powered-facebook-messenger-to-combat-COVID-19-misinformation>

In total, these initiatives to spread reliable information on COVID-19 could reach up to 4.2 billion people worldwide according to the WHO⁴¹.

Africa: approaches adopted in Ghana and Kenya

Ghana and Kenya respectively have 42% and 72% of their population living in rural areas⁴², where the use of mobile devices to browse content online tends to be more prominent. Ghana and Kenya have an estimated population of 31m and 53.7m inhabitants, respectively.

Ghana

In Ghana, the government prioritised agreements to zero-rate a number of websites from government authorities and universities, and other educational resources⁴³. For example:

- April 2020: MTN Ghana zero-rated access to the Ministry of Education website⁴⁴ and many educational websites⁴⁵; and
- January 2021: Vodafone Ghana zero-rated access to the Ghana Library application.⁴⁶

Moreover, the National Information Technology Authority (NITA) coordinated an effort to zero-rate Government of Ghana Smart Workplace Portal to enable government workers to work from home. Calls to the National COVID-19 response number 112 were also zero-rated.

In Ghana, official mobile applications were also used to fight the pandemic⁴⁷, making access to mobile connectivity more relevant.

From April 2020, various packages offered by different operators included zero-rated access to:

- communications tools and social networks (e.g. Facebook, Twitter, Instagram, etc);
- entertainment content (e.g. YouTube videos); and
- productivity applications (e.g. Facebook Business Suite, Zoom Cloud Meetings, etc), which supported both remote workers and small and medium businesses.

Kenya

In Kenya, although the government did not specifically support zero rating offers, operators voluntarily offered access to healthcare and educational materials.

In Kenya there are:

- **Zero-rated service users**, who can access specific websites without consuming their mobile data allowance in their subscription. For years all operators in Kenya have been offering access to zero-rated services. With the COVID-19 outbreak zero rating services were important to also ensure affordable or free access to essential services such as health and education.
- **Service-specific (or 'concessional') rates**, i.e. subscribers purchasing data bundles that give them access only to certain services and applications⁴⁸ and websites at a lower price than a full-cost data bundle. For example, during COVID-19 Safaricom provided concessional rates for data access to specific educational content for various universities and other learning institutions.

Safaricom declared⁴⁹ in April 2020 that they had implemented measures to cushion customers and Kenyans at large from negative impact, valued at KES 5.5bn (approx. US\$48.5m), including zero-rated and service-specific packages among other initiatives.

⁴¹ <https://www.who.int/news-room/feature-stories/detail/who-launches-a-chatbot-powered-facebook-messenger-to-combat-COVID-19-misinformation>

⁴² World Bank, 2021

⁴³ COVID-19 – MTN Ghana: <https://mtn.com.gh/personal/COVID-19/>

⁴⁴ COVID-19 – Ministry of Education: <https://moe.gov.gh/fr/COVID-19-and-absenteeism/>

⁴⁵ COVID-19 – MTN Ghana: <https://mtn.com.gh/personal/COVID-19/>

⁴⁶ GhLA zero rates Ghana Library App for Vodafone users – EducationWeb: <https://educationweb.com.gh/education/ghla-zero-rates-ghana-library-app/>

⁴⁷ <https://theconversation.com/how-digital-technology-helped-support-ghanas-COVID-response-171060>

⁴⁸ This approach has existed also prior to the COVID-19 pandemic.

⁴⁹ <https://www.safaricom.co.ke/about/media-center/publications/press-releases/release/925>

Airtel Kenya also offered zero-rated educational services.

Both operators also zero-rated other types of content. For example:

Airtel Kenya offers various packages including zero-rated access to communications tools (e.g. WhatsApp)⁵⁰ and to video content (e.g. Airtel TV)⁵¹.

Safaricom sells low-cost packages (concessional rates) to access content available on YouTube (specific quota applies).

Asia-Pacific: ensuring affordable connectivity in Indonesia and Thailand

Both Indonesia and Thailand are major mobile markets in Asia-Pacific, with an estimated population of 276.3m and 69.9m, respectively⁵².

Indonesia

Indonesia has 46% of its population living in rural areas. With over 345.6m active SIM cards at end 2020, the internet is mainly accessed via smartphones, according to an independent survey⁵³. According to Statista estimates, there were approximately 199m smartphone users in Indonesia (expected to surpass 232m in 2025).

However, connectivity remains highly concentrated in the western part of Indonesia despite increasing penetration rates and improved infrastructure, particularly on the more urbanized island of Java⁵⁴.

The Indonesian government did not specifically impose an obligation to offer or support zero-rated content⁵⁵. Nevertheless, consumers could access zero-rated healthcare and educational materials through Free Basics and text-only Facebook, and operators made available other types of content as well.

For example, **Axiata** launched Xtra Unlimited Turbo⁵⁶, which includes zero-rated access to various communications tools and social media applications even if they run out of balance (e.g. WhatsApp, Gojek, Facebook, Instagram). The same package also grants zero-rated access to entertainment applications (e.g. Youtube and Netflix).

In 2020 **Telkomsel** launched the Combo Unlimited/Internet Merdeka Package for low-income households, at IDR 10,000 (US\$0.70) and IDR 20,000 (US\$1.40) for a 30-day unlimited WhatsApp (zero-rated access) and voice calls on Telkomsel's network, with data quota of 4 GB and 10 GB, respectively.

Operators IndoSat Ooredoo and Telkomsel launched low-cost packages with specific quotas for video streaming services (e.g. Netflix, YouTube, Spotify, Joox), social networks and communications tools (e.g. Snapchat, Webex, Microsoft Teams, Skype, Google Classroom, Instagram, TikTok, Facebook, WhatsApp and Line). Some of these communications tools were also used by remote workers and small and medium enterprises (e.g. Webex, Microsoft Teams, Skype, Google Classroom).

Thailand

In July 2021, as part of the reinforcement of COVID-19 measures⁵⁷ the National Broadcasting and Telecommunications Commission and operators agreed to provide monetary support to low-priced or free internet packages for online students including zero-rated access to educational apps, free calls to emergency numbers and SMSs on COVID-19 information.

⁵⁰ <https://www.airtelkenya.com/internet-amazing-data-bundle>. Quotas may apply.

⁵¹ <https://www.airtelkenya.com/internet-amazing-data-bundle>. Quotas may apply.

⁵² World Bank, 2021

⁵³ Indonesian Internet Service Providers Association (APJII), 2Q 2020. <https://apjii.or.id/content/utama/39>

⁵⁴ <https://www.ecoi.net/en/document/2060915.html>

⁵⁵ However, government agencies and mobile operators agreed on several initiatives to support consumers during the pandemic, including low-cost packages with specific quotas to access educational materials. On a side note, government efforts to increase network availability in underserved regions of Indonesia included allocating resources from the universal service fund.

⁵⁶ <https://www.xlaxiata.co.id/en/news/xtra-unlimited-turbo-new-feature>

⁵⁷ <https://www.bangkokpost.com/business/2155811/measures-unveiled-to-assist-the-public>

In 2020 the government and operators had agreed on other initiatives to support consumers⁵⁸.

Consumers in Thailand could also use Free Basics, Discover and text-only Facebook to access both healthcare and educational materials.

To access other types of content, various zero rating offers granted access to social networks, communications tools, entertainment applications, remote working services and support for small and medium companies. As an example:

- April 2020: Happy@Home – package for new postpaid subscribers including zero-rated access to Office 365, Zoom, YouTube, FreeFire, Line, Facebook, Twitter⁵⁹;
- May 2020: GOMO – package including 50GB of data and zero-rated access to Office 365 and Zoom⁶⁰
- January 2021: Immigrant package – including zero-rated access to LINE, Facebook and Viber (amongst other applications) to more easily communicate with friends and relatives in other countries⁶¹;
- June 2021: Happy work and Learn – package including zero-rated access to Microsoft 365, Zoom, WebEx, Shopee applications, amongst others⁶².

Bangladesh: a dynamic Asian market

Bangladesh is an interesting case of adoption of zero rating offers. With a population over 167.1m, the country has an estimated 52.6m unique internet users, corresponding to 31.5% of the population⁶³.

An estimated 49.5m are social media users almost exclusively accessing the internet and social media using mobile devices, which increase the impact of zero rating offers.

Following years of adoption by operators, the offer of zero rating was temporarily suspended in July 2020. The Bangladesh regulator (BTRC) ordered telecoms operators and other internet providers to stop providing zero-rated access to social media services. One of the reasons mentioned was the misuse of social media to commit crimes – which suggests the decision was not related to concerns with net neutrality.

This decision was revised in 4Q 2021. The minister of the Posts and Telecommunications Division and BTRC actively supported the launch of text-only Facebook and Discover by telecoms operators (GP, Robi and Banglalink) in cooperation with Meta⁶⁴.

Robi also introduced zero-rated access to mobile financial service provider Upay⁶⁵.

This example suggests that zero rating offers may contribute to the financial inclusion of mobile subscribers. According to the World Bank, only 52.8% of the population over 15 years old in Bangladesh had an account in 2021. The average percentage of account holders in the population worldwide is significantly higher (76.2%).

This case also suggests that there is room for innovative commercial offers relying on sponsored access to online services for the benefit of consumers⁶⁶.

⁵⁸ These initiatives include free calls to emergency hotlines (4-digit numbers) to access information on COVID-19, a free 100-minute voice package (45 days validity) and a free 10 GB per month (3 months validity) of internet usage. More details at: <https://www.nbtc.go.th/News/Press-Center/50763.aspx>

<https://www.bangkokpost.com/tech/1910628/100-free-minutes-for-phone-call-support>
<https://dtacblog.co/en/dtac-supports-mental-health-hotlines-facing-COVID-19-related-surge/>

⁵⁹ <https://dtacblog.co/en/dtac-never-stops-taking-care-of-customers-by-delivering-simpler-happier-and-worry-free-lifestyle-at-home/>
⁶⁰ https://investor.ais.co.th/news.html/id/780985/group/newsroom_press

⁶¹ <https://dtacblog.co/en/dtac-assists-migrant-communities-affected-by-COVID-19/>

⁶² <https://dtacblog.co/en/dtac-happy-work-learn-package-keeps-everyone-connected/>

⁶³ <https://datareportal.com/reports/digital-2022-bangladesh>

⁶⁴ <https://www.tbsnews.net/bangladesh/grameenphone-launches-text-only-facebook-discover-327250>

⁶⁵ <https://www.robi.com.bd/en/corporate/news-room/press-release/robi-customers-can-now-use-upay-app-without-internet-charge>

⁶⁶ Although details on the agreement between Robi and Upay are not publicly available, sponsored access to internet services has been adopted in other countries. For example, in Brazil the mobile operator Vivo offers sponsored access to internet services

Italy: innovation to fight against the pandemic and promote access to education online

The Italian case is worth highlighting considering the uniquely innovative combination of access to connectivity and use of applications to mitigate the negative effects of the pandemic in cooperation with the private sector.

Education

In terms of education, the main mobile operators in Italy gave free SIMs and devices to schools and offered unlimited data traffic plans to students.

In cooperation with the Italian Ministry for Education, and University and Research (MIUR), Telecom Italia (TIM) promoted digital distance learning⁶⁷ and inequality reduction during COVID-19. From May 2020, TIM provided an E-learning Card⁶⁸ so all prepaid mobile phone users with an active data subscription could benefit from zero-rated access to the main remote learning platforms for one year.

As announced on 18 November 2020, TIM, Vodafone and Wind Tre accepted the government's invitation⁶⁹ to identify solutions to ease students in following lessons remotely. Operators (TIM, Vodafone, Wind Tre, and mobile virtual network operator (MVNO) COOP) accepted to exclude distance learning platforms from the gigabyte consumption foreseen in the subscriptions for a certain period of time, depending on operators.

A report by UNICEF (February 2021) recommended on the Italian case study "the private sector should be more involved in supporting distance learning by subsidising equipment, connectivity, and zero-rated access to educational content"⁷⁰.

Healthcare

Italy implemented a number of platforms to facilitate access to healthcare during the pandemic:

- **TRIS.2** a digital platform in Italy supporting schooling for students with chronic diseases, provided for free by TIM Foundation⁷¹. TRIS.2 is an I-MOOC (Interactive Massive Open Online Course) platform.
- **UFIRST**⁷², a free app provided by TIM, allowing avoid queuing at pharmacies, or supermarkets, and to be informed when its own turn.
- **DOUBLE ROBOTICS**⁷³ (provided by TIM in partnership with the Turin municipality) was used to facilitate contacts between hospitalised people and their families.

Other types of content

Following the pandemic various offers by Italian operators granted access to other types of content as well:

- TIM subscribers had zero-rated access to various social media applications for €4.99 per month⁷⁴;

(<https://internetgratis.vivo.com.br/>). There is evidence that this type of offer was already available in Brazil in 2017, with several companies sponsoring data for mobile users at that time, including online marketplaces (Privalia, Mercado Libre, Magazine Luiza), food delivery services (iFood), and financial institutions (bank Santander and insurance provider Liberty Seguros). More details at: <https://www.meioemensagem.com.br/home/marketing/2017/09/28/aumenta-a-demanda-por-internet-patrocinada.html>

⁶⁷ <https://www.telecompaper.com/news/tim-launches-e-learning-card-with-free-access-to-italian-online-education-platforms--1338669>

⁶⁸ <https://www.tim.it/e-learning>

⁶⁹ <https://innovazione.gov.it/notizie/articoli/la-didattica-a-distanza-senza-consumare-gigabyte/>

⁷⁰ UNICEF, La didattica a distanza durante l'emergenza COVID-19: l'esperienza italiana (February 2021) <https://www.unicef-irc.org/publications/pdf/la-didattica-a-distanza-durante-l%E2%80%99emergenza-COVID-19-l%27esperienza-italiana.pdf>

⁷¹ <https://www.gruppotim.it/it/sostenibilita/news/coronavirus-a-scuola-stando-a-casa.html>

⁷² <https://ufirst.com/corporate/it/>

⁷³ <https://www.corrierecomunicazioni.it/telco/robot-connessi-negli-ospedali-torinesi-cosi-tim-abbatte-il-distanziamento-COVID-19/>

⁷⁴ <https://www.tim.it/fisso-e-mobile/mobile/social-chat-card>. Specific offer not available anymore as of October 2022.

- Offer by Vodafone included zero-rated access to social media and messaging applications (e.g. Facebook, Instagram, Twitter, LinkedIn, Snapchat, WhatsApp, Telegram, etc.), and streaming services (e.g. Spotify, Deezer, Netflix, etc.)⁷⁵.

Moreover, to face the COVID-19 emergency students had free access to Vodafone Pass Smart Meeting for three months during the pandemic, including zero-rated access for specific applications such as Google Meet, Skype, Zoom, Microsoft Teams, Google Classroom, GoToMeeting, WebEx, Amazon Chime, WeSchool, Slack.

⁷⁵ <https://www.vodafone.it/portal/Privati/Tariffe-e-Prodotti/Tariffe/Giga-per-le-app>. Specific offer not available to new customers as of October 2022.

ZERO RATING OFFERS INCLUDING OTHER TYPES OF CONTENT

Besides health information and educational resources, operators offered access to various types of zero-rated content, including to support small and medium enterprises (SME) and address social distress caused by the pandemic.

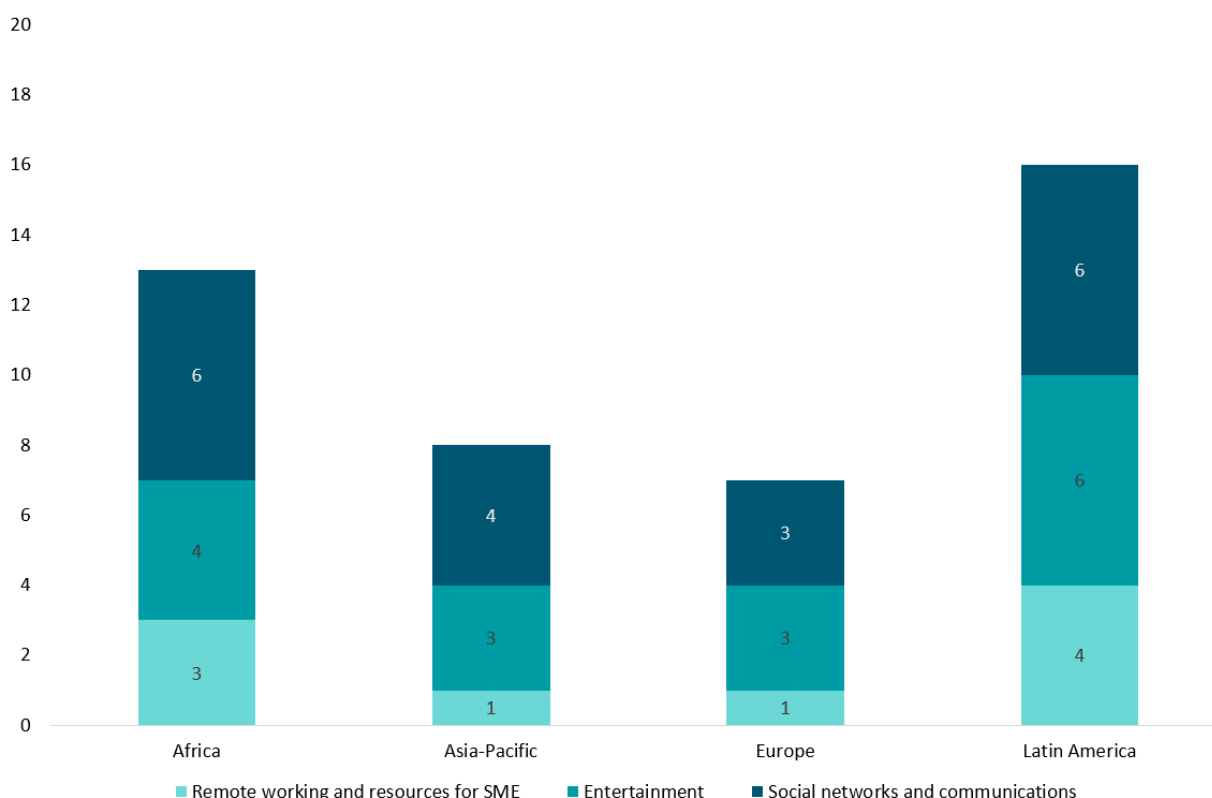
The research gathered data on the availability of the following types of zero-rated content per country:

- social media networks and communications tools;
- entertainment content;
- remote working services; and
- resources for small and medium businesses.

Social networks and communications tools and entertainment content were the most popular type of zero-rated content available in the 20 surveyed countries (Cullen International)

Social networks and communications tools	Entertainment content ⁷⁶	Remote working services and resources for small and medium enterprises ⁷⁷
95% ⁷⁸	80% ⁷⁹	45% ⁸⁰

Frequency of zero rating offers per region according to type of content included⁸¹ (Cullen International)



⁷⁶ For example, video and music streaming services or gaming content.

⁷⁷ The research found that similar services and zero rating offers supported remote workers and small and medium enterprises in practice.

⁷⁸ All surveyed countries except for Ireland.

⁷⁹ All surveyed countries except for Côte d'Ivoire, South Africa, Bangladesh and Ireland.

⁸⁰ See annex for more details.

⁸¹ A single commercial offer may cover multiple types of zero-rated content.

Zero-rated access to social networks and communications tools was popular among surveyed countries in all regions. This is not surprising: both social media networks and communications tools serve multiple purposes, including among others:

- obtaining information about COVID-19;
- communications with family and friends;
- collaborating with co-workers;
- buying goods and services from online businesses.

Specific zero-rated services and applications per type of content varied significantly across countries. Examples per category include:

- social media networks and communications tools: Facebook, Instagram, Kumu, Line, LinkedIn, Skype, Snapchat, Telegram, TikTok, Twitter, Viber, WhatsApp;
- entertainment content: Airtel TV, Ayoba, Cignal Play, Claro Musica, Deezer, FreeFire, iWantTFC, Joox, Movistar Play, MTN Yellow Game, NBA League Pass, Netflix, Personal Flow, Spotify, YouTube, YouTube, Apple Music;
- remote working services and resources for small and medium businesses: Amazon Chime, Facebook Business Suite, Google Meet, GoToMeeting, Microsoft Teams, Skype, Slack, WebEx, WeSchool, Zoom Cloud Meetings.

Ireland: focus on education and healthcare

In April 2020 all major telecommunications providers in Ireland committed to a number of measures to help people stay in touch and work from home during the COVID-19 pandemic. Among others, these commitments included zero-rated access to healthcare and educational websites identified by the government for all customers, where technically feasible. The regulator ComReg monitored compliance with these commitments, including the offer of zero rating.

The Body of European Regulators for Electronic Communications (BEREC) reported in December 2021 that operators made zero rating available for:

- educational content in **Bulgaria, Germany, Greece, Hungary, Ireland, Italy, Romania, Serbia and Turkey**;
- COVID-19 tracing applications in **25 European countries**; and
- websites dedicated to COVID-19 issues in the **Czech Republic, Norway and Serbia**, besides **Ireland**⁸².

There is evidence that various zero rating offers were available before the pandemic⁸³:

- mobile operators used to offer zero-rated access to various communications tools (e.g. Facebook, WhatsApp, Instagram); and
- Eir Ireland used to offer zero-rated access to gaming content (e.g. Pokémon Go).

No zero-rated offers were available in Ireland as of October 2022⁸⁴.

Zero rating offers including access to social media networks and communications tools and entertainment content were widely available among the surveyed countries.

⁸² In the case of Ireland, BEREC reported that “there was a lag in putting in place the websites that would be included for zero rating purposes, resulting in a slower than anticipated implementation by service providers”. https://www.berec.europa.eu/sites/default/files/files/document_register_store/2021/12/BoR_%2821%29_180_BEREC_Report_on_COVID19.pdf

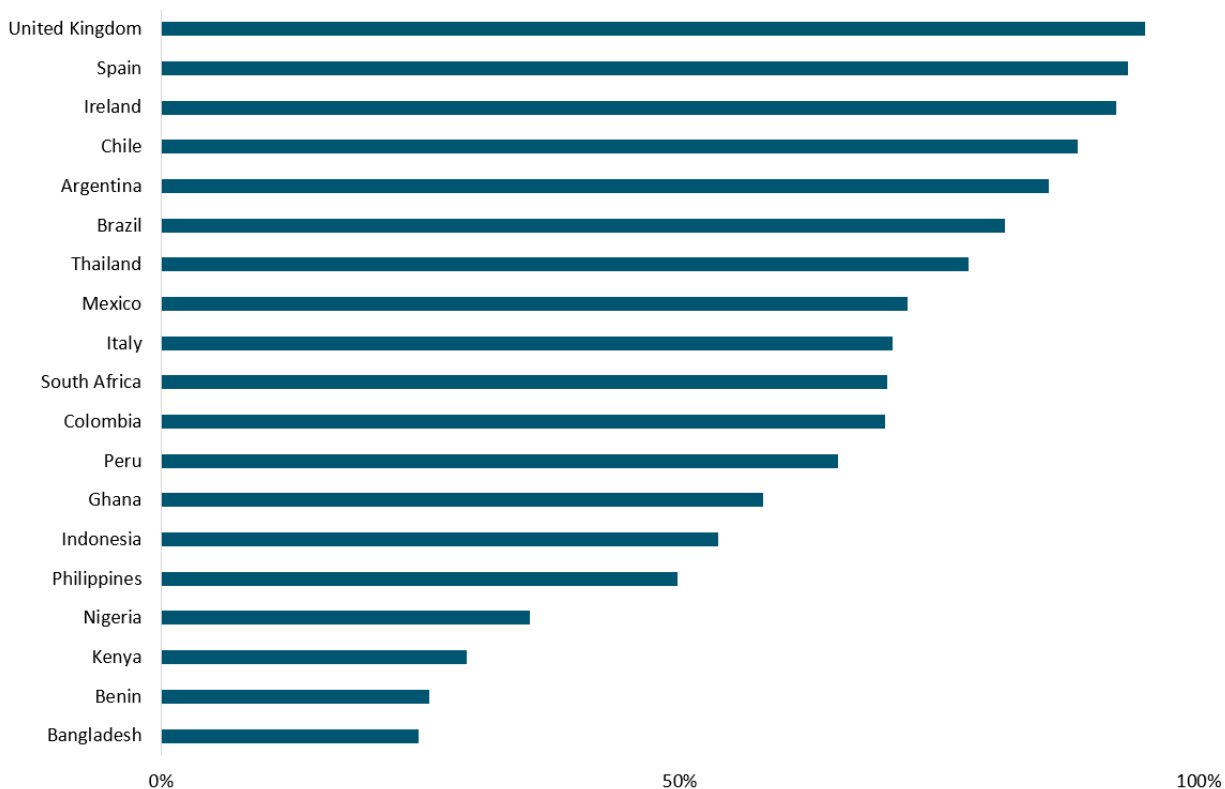
⁸³ European Commission. Zero rating practices in broadband markets. February 2017. Available at: <https://ec.europa.eu/competition/publications/reports/kd0217687enn.pdf> (p. 13 and 19)

⁸⁴ More generally in EU member states, it should be noted that rulings by the Court of Justice of the EU deemed zero rating offers generally incompatible with the EU Open Internet Regulation. The body of European regulators, BEREC, updated its net neutrality guidelines in June 2022 to reflect the Court decision. The next review of the Open Internet Regulation is foreseen by 30 April 2023.

For both types of zero-rated content, commercial offers were similarly available in practice in surveyed countries in Africa, Asia-Pacific, Europe and Latin America – despite significant differences in the percentage of internet users across countries. This suggests that:

- Zero rating offers can benefit consumers in practice regardless of socioeconomic differences across countries and regions; and
- Use of zero rating is not limited to emergency situations such as the COVID-19 pandemic. In many countries operators remain willing to zero-rate certain services and applications, modulating the scope of offers according to local needs.

Individuals using internet services across surveyed countries (% of total population)⁸⁵ (World Bank, 2020)



⁸⁵ Data for Côte d'Ivoire was not available.

Relevance of zero rating in developed countries: case of the United Kingdom

As demonstrated by several examples included in this report, zero rating offers have supported consumers in need particularly in emerging markets. However, the research indicates that zero rating offers also played a role in developed economies, potentially less severely affected by the pandemic⁸⁶.

In the United Kingdom, in March 2020 several operators announced that they would zero-rate access to the latest NHS health information about coronavirus⁸⁷, which included several official websites in practice⁸⁸. A specific operator decided to grant zero-rated access to educational resources⁸⁹.

The government considered a package to support remote learning for vulnerable children in April 2020, including access to educational resources such as Google Education, Microsoft 365, Oak Academy and BBC Bitesize. However, the proposal did not move forward⁹⁰.

Regarding other types of content, zero rating offers have been available for many years, and evidence suggests it remains available for British consumers⁹¹:

- Virgin Mobile granted zero-rated access to voice and messaging applications⁹²;
- O2, Three and EE offered zero-rated access to music streaming services; and
- Sky and EE offered zero-rated access to video streaming services.

Following Brexit, the UK regulator, Ofcom, started a review of the UK's net neutrality framework. In October 2022 Ofcom launched a consultation until January 2023 to revise its guidance on how net neutrality rules should apply, including regarding zero rating.

The objective of this review is, according to Ofcom, to "... make sure that as technology evolves and more of our lives move online, net neutrality continues to support innovation, investment and growth, by both content providers and ISPs. Getting this balance right will improve consumers' experiences online, including through innovative new services and increased choice"⁹³.

Brazil: relevance of zero rating in the largest market in Latin America

Brazil is the largest market in Latin America with a population over 214m⁹⁴, of which 16% living in rural areas⁹⁵. Over 80% of individuals have access to internet services⁹⁶.

Overall, mobile services play a very significant role to connect vulnerable families, with lower income and living in rural areas. Therefore, zero rating offers are particularly impactful in the country.

⁸⁶ According to the World Bank, in 2021 the average inflation rate in Ireland, Italy, the UK and Spain (2.5%) was 49.1% lower than the average inflation rate among all surveyed countries in the same period (4.8%). This suggests that that these European countries were less severely affected by the pandemic compared to emerging markets covered by the research.

⁸⁷ Ofcom's 2021 annual report on monitoring compliance with the Open Internet Regulation. https://www.ofcom.org.uk/__data/assets/pdf_file/0028/227485/Monitoring-compliance-with-the-EU-Open-Internet-Regulation_2021.pdf

⁸⁸ Examples: nhs.uk, 111.nhs.uk, wales.nhs.uk, nhsinform.scot, indirect.gov.uk and publichealth.hscni.net. <https://www.gov.uk/government/news/mobile-networks-remove-data-charges-for-online-nhs-coronavirus-advice>

⁸⁹ Ofcom's 2021 annual report on monitoring compliance with the Open Internet Regulation. https://www.ofcom.org.uk/__data/assets/pdf_file/0028/227485/Monitoring-compliance-with-the-EU-Open-Internet-Regulation_2021.pdf

⁹⁰ https://www.ofcom.org.uk/__data/assets/pdf_file/0033/197709/net-neutrality-report-2020.pdf, paragraph 3.22.

⁹¹ https://www.ofcom.org.uk/__data/assets/pdf_file/0014/148100/ofcom-approach-net-neutrality.pdf, p. 11–12, and https://www.ofcom.org.uk/__data/assets/pdf_file/0033/197709/net-neutrality-report-2020.pdf, paragraphs 3.9 and 3.14.

⁹² https://www.ofcom.org.uk/__data/assets/pdf_file/0014/148100/ofcom-approach-net-neutrality.pdf, p. 11.

⁹³ Ofcom. https://www.ofcom.org.uk/__data/assets/pdf_file/0028/245926/net-neutrality-review.pdf

⁹⁴ World Bank, 2021

⁹⁵ IBGE. <https://educa.ibge.gov.br/jovens/conheca-o-brasil/populacao/18313-populacao-rural-e-urbana.html>

⁹⁶ World Bank, 2020

An independent survey by CETIC.br⁹⁷ estimated that 58% of internet users exclusively use mobile phones to go online. Approximately **90% of low-income internet users go online using exclusively mobile devices**⁹⁸.

Internet users exclusively using mobile devices are more common in rural areas (84%) compared to urban areas (54%)⁹⁹. Not surprisingly, the North and Northeast regions have more internet users that only use mobile devices, with 60% and 72% of users respectively. Other geographic regions with higher average income per capita have less internet users relying exclusively on mobile devices.

According to CETIC.br, the percentage of the population with ten years or older using internet services increases from **81% to 87% if zero rating offers are taken into account**¹⁰⁰. This difference of 6 percentage points represents approximately **11.3m people** – which demonstrates the relevance and specific impact of zero rating offers in the country.

In response to the pandemic, the telecoms regulator Anatel and operators agreed¹⁰¹ in March 2020 on various initiatives to support consumers, including to offer access to zero-rated content on healthcare.

Operators offered zero-rated access to educational materials, including access to exam preparation courses for young students¹⁰². Mobile operator Claro reported that **200,000 students** accessed these courses¹⁰³.

Regarding other types of content, some operators offered zero-rated access to entertainment services, online newspapers, e-books¹⁰⁴, gaming applications and streaming services in general and curated for kids¹⁰⁵.

Low-income consumers applied for an emergency subsidy granted by the government using a mobile application¹⁰⁶, which further contributed to making mobile internet access more popular among low-income families. Access to this application was also zero-rated by specific operators¹⁰⁷.

Several mobile operators continue offering zero-rated access to social networks and other communications tools, both for prepaid¹⁰⁸ and postpaid subscribers¹⁰⁹. Out of mobile internet users, **97% reported that using communications tools is the most important reason why they access the internet**¹¹⁰.

Therefore, zero rating offers including access to communications tools directly address consumer needs in the country.

⁹⁷ CETIC.br, 2021. <https://cetic.br/pt/pesquisa/domicilios/indicadores/>

⁹⁸ Only 11% of high-income people exclusively use mobile phones to access internet services. Low-income users from D and E socioeconomic strata and high-income users from A socioeconomic stratum (CETIC.br)

⁹⁹ CETIC.br, 2021. <https://cetic.br/pt/tics/domicilios/2020/individuos/C16A/>

¹⁰⁰ CETIC.br, 2021. https://cetic.br/media/docs/publicacoes/2/20211124201233/tic_domicilios_2020_livro_eletronico.pdf, p. 77

¹⁰¹ <https://www.gov.br/anatel/pt-br/assuntos/noticias/acoes-do-setor-de-telecomunicacoes-no-combate-ao-coronavirus>. See also Anatel report on the impact of COVID-19 in the Brazilian telecoms market (July 2021) at: https://sei.anatel.gov.br/sei/modulos/pesquisa/md_pesq_documento_consulta_externa.php?eEP-wqk1skrd8hSlk5Z3rN4EVg9uLJqrLYJw_9INcO5BitmjawlrUf6lt6H5yefTqyMayOylzRWIKE7CzLQ2BN9zIRTAUIDhNvEkBlaiNBGhewfZfmi9-_Z0xYmPVzG

¹⁰² Example: <https://www.claro.com.br/coronavirus>

¹⁰³ <https://www.claro.com.br/coronavirus>

¹⁰⁴ Example: Oi (<https://oicomunica.com.br/>)

¹⁰⁵ Example: Oi (<https://www.oi.com.br/lp/assets/pdfs/regulamento-COVID.pdf>), TIM (<https://tiinside.com.br/03/04/2020/tim-tambem-envia-carta-a-anatel-reforcando-compromisso-institucionais-no-combate-a-COVID-19/>) and Claro (<https://teletime.com.br/02/04/2020/claro-envia-carta-compromisso-a-anatel-com-medidas-durante-crise-do-coronavirus/>).

¹⁰⁶ <https://www.caixa.gov.br/atendimento/aplicativos/auxilio-brasil/Paginas/default.aspx>

¹⁰⁷ Example: Claro. <https://www.claro.com.br/coronavirus>

¹⁰⁸ Examples: Claro (<https://www.claro.com.br/celular/planos-pre/prezao>), Vivo (<https://www.vivo.com.br/para-voce/produtos-e-servicos/para-o-celular/pre-pago/vivo-pre>), Oi (<https://www.oi.com.br/celular-pre-pago/>).

¹⁰⁹ Examples: Claro (<https://www.claro.com.br/celular/plano-pos>), Oi (<https://www.oi.com.br/celular/>), TIM (<https://www.tim.com.br/rj/para-voce/planos/controle>), Vivo (<https://www.vivo.com.br/para-voce/produtos-e-servicos/para-o-celular>).

¹¹⁰ Interamerican Development Bank, 2021 (<https://publications.iadb.org/pt/transformacao-digital-dos-governos-brasileiros-satisfacao-dos-cidadaos-com-os-servicos-publicos>).

Colombia: zero rating offers specifically assessed by telecoms regulator

In March 2022, the Colombian telecoms regulator CRC published a study covering zero rating offers available in the country and other issues in the context of net neutrality rules¹¹¹.

The CRC analysed 174 prepaid and postpaid offers of Colombian mobile operators:

- 22 postpaid plans included zero-rated applications, e.g. Facebook, WhatsApp, Twitter, TikTok, Waze, among others.
- 76 prepaid plans included zero-rated applications, e.g. Facebook, WhatsApp, Twitter, TikTok, Waze and YouTube.

Following a consultation by the regulator, mobile service providers said that they do not always sign agreements with social media networks or content providers to put their applications under the scope of zero rating offers – suggesting that mobile operators are able to design and operate zero rating offers relatively independent from application and content providers.

According to the study, in Latin America zero rating offers are beneficial for end users since they allow expenditure control and allow users to stay connected even if a data cap is reached. CRC added that zero rating offers are highly appreciated and demanded by users in Colombia.

In this sense, the government and voluntary initiatives¹¹² adopted to offer zero rating in the country complement each other in addressing consumer needs, not only during the pandemic.

Finally, the study concludes that net neutrality rules in Colombia remain applicable and no changes are needed.

¹¹¹ <https://www.crcm.gov.co/es/biblioteca-virtual/estado-neutralidad-red-en-colombia-2021>

¹¹² See more details in the annex.

KEY TAKEAWAYS

By analysing data from 20 countries around the world, jointly selected by Cullen International and Meta based on a number of criteria, including amongst others, economic and social characteristics of particular relevance during the pandemic¹¹³, the research found evidence that:

- Zero rating offers played a significant role to ensure people in need stayed connected and accessed relevant information during the pandemic. Some form of zero-rated content was made available in all 20 surveyed countries in Africa, Asia-Pacific, Europe and Latin America since early 2020¹¹⁴, when the COVID-19 outbreak was declared by the World Health Organisation.
- In 17 out of 20 countries, voluntary initiatives or agreements between governments and the industry were implemented to make zero-rated access widely available. Voluntary initiatives and general support for zero rating were also found even where governments imposed an obligation to offer zero-rated content¹¹⁵.
- Besides access to healthcare and educational materials, operators worldwide commonly made available zero rating offers granting access to social networks, communications tools, entertainment, remote working services, resources for small and medium businesses or other types of content. As a result, populations in the respective countries had access to a wide range of benefits.
- As access to data services increased the economic resilience against the pandemic¹¹⁶, COVID-19 would likely have affected emerging economies more severely without access to zero rating.
- Data gathered during the research suggests that most of the surveyed countries already had some form of zero rating offer available before the pandemic.
- COVID-19 made zero rating offers and their benefits more prominent. However, zero rating is still offered by at least one operator in 17 out of 20 surveyed countries¹¹⁷. Especially in the emerging countries analysed, zero rating is often seen as a tool to make connectivity more affordable for consumers and small businesses.

The COVID-19 pandemic still looms. However, the benefits of zero rating offers will likely continue in the future¹¹⁸ and remain more pronounced in emerging economies, where many low-income families mostly

¹¹³ The 20 countries covered in this research are: Argentina, Bangladesh, Benin, Brazil, Chile, Colombia, Côte d'Ivoire, Ghana, Indonesia, Ireland, Italy, Kenya, Mexico, Nigeria, Philippines, Peru, South Africa, Spain, Thailand, and the United Kingdom. The sample of countries, jointly selected by Cullen International and Meta, was used to investigate how zero rating offers providing educational, healthcare or other types of content were used during the COVID-19 pandemic.

Countries where zero rating offers did not play any role, for commercial or regulatory reasons, were not considered sufficiently illustrative for the scope of the research. The country sample also considered factors such as: balanced representation of all world's regions; level of economic development (mix of developed and emerging countries, prioritizing emerging countries); balanced representation of both large and small countries in terms of population; countries highly affected by the pandemic based on publicly available indicators. Particularly vulnerable economies (e.g. some small countries, countries with high level of 'informal' economy) were also chosen to illustrate if and how zero-rated services were made available to address specific social and economic challenges during the pandemic. Overall, the research methodology (see specific section) demonstrated that the sample of countries is representative in terms of population: the sample of 20 out of 195 countries in the world, i.e. around 10% of total, covers 22% of the global population. Despite representing 22% of the global population, the countries selected represent only 16% of the global total gross domestic product (GDP). This figure would be even lower excluding the most developed countries from the sample, reflecting that the research prioritised emerging economies with a higher exposure to certain risks bound to the pandemic, e.g. in terms of unemployment and inflation rate.

¹¹⁴ Out of 20 surveyed countries, healthcare materials and educational content was available in 18 and 19 countries, respectively. However, the research found evidence of other types of zero-rated content offered where no healthcare materials or educational content could be accessed via zero rating.

¹¹⁵ Argentina, Colombia and South Africa.

¹¹⁶ ITU Telecommunication Development Bureau (2021). The Economic impact of broadband and digitization through the COVID-19 pandemic: Econometric modelling. Available at: <http://handle.itu.int/11.1002/pub/819126c2-en>

¹¹⁷ As of October 2022, among the surveyed countries commercial zero rating offers were not available to new customers in Ireland, Italy and Spain. However, the research found evidence of zero rating offers being previously available in these countries. More generally in EU member states it should be noted that rulings by the Court of Justice of the EU deemed zero rating offers generally incompatible with the EU Open Internet Regulation. The body of European regulators, BEREC, updated its net neutrality guidelines in June 2022 to reflect the Court decision. The next review of the Open Internet Regulation is foreseen by 30 April 2023.

¹¹⁸ Although there is limited data on the actual use of zero rating offers, future research might propose specific proxies to assess the economic impact of zero rating and to estimate the economic value of benefits to consumers.

or exclusively rely on mobile devices to access essential online services, particularly in rural and remote areas.

ANNEXES

A. Government response supporting or mandating operators to offer zero rating

The benchmark below covered details on government response either mandating or supporting operators to offer access to zero-rated content especially since the COVID-19 pandemic, including details on zero-rated access to healthcare and educational materials and applications per country.

Government response supporting or mandating operators to offer zero rating (Cullen International)

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
Argentina	<p>Yes</p> <p>Enacom defined¹¹⁹ the scope of the basic universal service¹²⁰ including mobile voice and data services following a presidential decree¹²¹ of Aug.2020. These services are available from 1 Jan. 2021. The mobile basic plan includes zero-rated access to WhatsApp and government websites (further undefined).</p>	<p>Yes</p> <p>The telecoms regulator, Enacom, the Innovation Secretariat and the Ministry of Education agreed with operators on offering zero-rated access to:</p> <ul style="list-style-type: none"> educational content for national universities¹²³ the platform Seguimos educando¹²⁴ for primary education to the official COVID-19 application Cuidar¹²⁵ 	<p>Yes</p> <p>Agreement to offer zero-rated access to the application Cuidar¹²⁶, which included health information and permission to transit during the lockdown.</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹²⁷ between Meta and the World Health Organisation – WHO).</p>	<p>Yes</p> <p>The three national mobile network operators agreed to offer zero-rated access to university websites and to the educational website Seguimos educando.</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹²⁸ between Meta and the World Health Organisation – WHO).</p>	No

¹¹⁹ <https://www.boletinoficial.gob.ar/detalleAviso/primera/238916/20201221>

¹²⁰ https://www.enacom.gob.ar/prestacion-basica-universal_p4792

¹²¹ <https://www.boletinoficial.gob.ar/detalleAviso/primera/233932/20200822>

¹²³ https://www.enacom.gob.ar/institucional/enacom-y-el-ministerio-de-educacion-gestionan-datos-libres-para-las-universidades_n2282

¹²⁴ <https://www.argentina.gob.ar/noticias/cero-rating-de-datos-moviles-para-plataformas-educativas>

¹²⁵ <https://www.argentina.gob.ar/jefatura/innovacion-publica/acciones-coronavirus/acuerdos-con-empresas-de-telecomunicaciones>

¹²⁶ <https://www.argentina.gob.ar/jefatura/innovacion-publica/acciones-coronavirus/acuerdos-con-empresas-de-telecomunicaciones>

¹²⁷ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹²⁸ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

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	This basic service is available ¹²² to beneficiaries of social programmes, retired and low-income people, social and sports clubs and firemen stations.				
Bangladesh	No	Yes In Nov. 2021 the minister of the Posts and Telecommunications Division and the Bangladesh regulator BTRC actively supported the launch of text-only Facebook/Discover by telecoms operators (GP, Robi and Banglalink) in cooperation with Meta, following approval by BTRC ¹²⁹ .	Yes In Nov. 2021, operators Robi ¹³⁰ , Grameenphone ¹³¹ and Banglalink ¹³² started offering text-only Facebook and Discover to their subscribers. Both include zero-rated access to educational sites and COVID-19 information (partnership ¹³³ between Meta and the World Health Organisation – WHO).	Yes In Nov. 2021, operators Robi ¹³⁴ , Grameenphone ¹³⁵ and Banglalink ¹³⁶ started offering text-only Facebook and Discover to their subscribers. Both include access to educational sites and COVID-19 information (partnership ¹³⁷ between Meta and the World Health Organisation – WHO).	No

¹²² https://www.enacom.gov.ar/noticias/institucional/como-tramitar-la-prestacion-basica-universal-y-obligatoria--pbu-_n2964

¹²⁹ <https://www.tbsnews.net/bangladesh/grameenphone-launches-text-only-facebook-discover-327250>

¹³⁰ <https://www.robi.com.bd/en/corporate/news-room/press-release/robi-brings-text-only-version-of-facebook-and-discover-features-with-meta>

¹³¹ <https://www.thedailystar.net/business/news/grameenphone-users-now-can-use-facebook-messenger-without-internet-2225756>

¹³² <https://www.daily-sun.com/printversion/details/590522/Banglalink-introduces-textonly-Facebook>

¹³³ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹³⁴ <https://www.robi.com.bd/en/corporate/news-room/press-release/robi-brings-text-only-version-of-facebook-and-discover-features-with-meta>

¹³⁵ <https://www.thedailystar.net/business/news/grameenphone-users-now-can-use-facebook-messenger-without-internet-2225756>

¹³⁶ <https://www.daily-sun.com/printversion/details/590522/Banglalink-introduces-textonly-Facebook>

¹³⁷ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

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Benin	No	No	Yes Free Basics and text-only Facebook are available and offer access to educational sites and information related to COVID-19 (partnership between Meta and the World Health Organisation – WHO).	Yes Free Basics and text-only Facebook are available and offer access to educational sites and information related to COVID-19 (partnership ¹³⁸ between Meta and the World Health Organisation – WHO).	No
Brazil	No	Yes The telecoms regulator Anatel and operators agreed ¹³⁹ in March 2020 on various initiatives to support consumers, including to offer access to zero-rated content on healthcare. Specific operators voluntarily increased data caps and offered access to other sorts of zero-rated content.	Yes Besides the official healthcare application from the Ministry of Health, operators offered zero-rated access to healthcare materials and services, and increased data caps of mobile subscribers ¹⁴⁰ . Claro reported 8.5m downloads of the official application to fight against COVID-19 ¹⁴¹ . Text-only Facebook is available and include zero-rated access to educational materials and information on COVID-19 (partnership ¹⁴² between Meta and the World Health Organisation – WHO).	Yes Operators offered zero-rated access to educational materials, including access to SAT exam preparation courses ¹⁴³ . Claro reported that 200,000 students accessed these courses ¹⁴⁴ . Text-only Facebook is available and include zero-rated access to educational materials and information on COVID-19 (partnership ¹⁴⁵ between Meta and the World Health Organisation – WHO).	No

¹³⁸ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹³⁹ <https://www.gov.br/anatel/pt-br/assuntos/noticias/acoes-do-setor-de-telecomunicacoes-no-combate-ao-coronavirus>. See also Anatel report on the impact of COVID-19 in the Brazilian telecoms market (July 2021) at: https://sei.anatel.gov.br/sei/modulos/pesquisa/md_pesq_documento_consulta_externa.php?eEP-wqk1skrd8hSlk5Z3rN4EVg9uLJqrLYJw_9INcO5BitmjawlrUf6lt6H5yefTqyMayOylzRWIKE7CzLQ2BN9ziRTAUIIhNvEkBlalNBGhEwfZfmi9-_Z0xYmPVzG

¹⁴⁰ See specific offers from various operators: Claro (<https://www.claro.com.br/coronavirus>), TIM (<https://www.tim.com.br/rj/para-voce/atendimento/maisconectados>), Oi (<https://oicomunica.com.br/>).

¹⁴¹ <https://www.claro.com.br/coronavirus>

¹⁴² <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁴³ Example: <https://www.claro.com.br/coronavirus>

¹⁴⁴ <https://www.claro.com.br/coronavirus>

¹⁴⁵ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

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Chile	No	Yes The Ministry of Transport and Telecommunications, the regulator Subtel and operators agreed on a temporary offer to eligible consumers ¹⁴⁶ , which includes zero-rated access to educational content ¹⁴⁷ and social networks ¹⁴⁸ .	Yes Following agreement with the government, specific operators granted zero-rated access to information about COVID-19 ¹⁴⁹ . Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership ¹⁵⁰ between Meta and the World Health Organisation – WHO).	Yes Example: Claro offered zero-rated access to educational materials ¹⁵¹ , including for children and unemployed workers. Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership ¹⁵² between Meta and the World Health Organisation – WHO).	No

¹⁴⁶ <https://www.subtel.gob.cl/mtt-activa-plan-solidario-para-que-los-usuarios-no-pierdan-la-conectividad-durante-la-emergencia-por-coronavirus/>

¹⁴⁷ <https://www.subtel.gob.cl/mineduc-mtt-y-atelmo-impulsan-la-teleduccion-con-acceso-gratuito-a-contenido-educativo-frente-a-contingencia-por-coronavirus/>

¹⁴⁸ <https://www.subtel.gob.cl/empresas-de-telecomunicaciones-se-suman-a-solicitud-de-subtel-y-establecen-medidas-a-favor-de-los-usuarios-para-abordar-contingencia-por-coronavirus/>

¹⁴⁹ <https://www.subtel.gob.cl/mtt-activa-plan-solidario-para-que-los-usuarios-no-pierdan-la-conectividad-durante-la-emergencia-por-coronavirus/>

¹⁵⁰ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>
¹⁵¹ <https://www.clarochile.cl/personas/beneficios-clientes/>

¹⁵¹ <https://www.clarochile.cl/personas/beneficios-clientes/>

¹⁵² <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

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Colombia	<p>Yes</p> <p>Postpaid and prepaid users with monthly plan costing less than US\$18 had zero-rated access to the education website Colombia Aprende¹⁵³ (Decree 555¹⁵⁴ of April 2020).</p> <p>Postpaid users with monthly plan costing over US\$18 had zero-rated access to 20 websites following a decision by the Ministry of ICT (MinTIC Resolution 639 of April 2020).</p>	<p>Yes</p> <p>The ICT associations Asomovil¹⁵⁵ and Andesco¹⁵⁶ announced¹⁵⁷ that all their affiliated companies would provide zero-rated access to five websites of public interest selected by the government for at least 30 days.</p>	<p>Yes</p> <p>Zero-rated access to the Ministry of Health website</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹⁵⁸ between Meta and the World Health Organisation – WHO).</p>	<p>Yes</p> <p>Zero-rated access to the Ministry of Education website</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹⁵⁹ between Meta and the World Health Organisation – WHO).</p>	No
Côte d'Ivoire	No	No	<p>Yes</p> <p>MTN offers text-only Facebook and Free Basics¹⁶⁰, which include zero-rated access to educational materials and information on COVID-19.</p>	<p>Yes</p> <p>MTN offers text-only Facebook and Free Basics¹⁶¹, which include zero-rated access to educational materials and information on COVID-19.</p>	No

¹⁵³ <https://movil.colombiaaprende.edu.co/>

¹⁵⁴ <https://dapre.presidencia.gov.co/normativa/normativa/DECRETO%20555%20DEL%2015%20DE%20ABRIL%20DE%202020.pdf>

¹⁵⁵ <http://www.asomovil.org/>

¹⁵⁶ <https://www.andesco.org.co/>

¹⁵⁷ <https://www.wradio.com.co/noticias/actualidad/asomovil-y-andesco-anuncian-servicios-gratuitos-de-comunicaciones-por-COVID19/20200323/nota/4024977.aspx>

¹⁵⁸ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁵⁹ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁶⁰ Technokrate – Facebook gratuit en Côte d'Ivoire avec Free. | Facebook: <https://ms-my.facebook.com/Technokrate/posts/1559726507554585/>

¹⁶¹ Technokrate – Facebook gratuit en Côte d'Ivoire avec Free. | Facebook: <https://ms-my.facebook.com/Technokrate/posts/1559726507554585/>

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Ghana	No	<p>Yes</p> <p>In April 2020, the government and MTN Ghana agreed on zero rating access to various websites from ministries and government agencies¹⁶².</p> <p>In April 2020, there was also an agreement with the National Information Technology Authority (NITA) to zero-rate access to the Government of Ghana Smart Workplace Portal to enable government workers to work from home.</p> <p>Calls to the national COVID-19 response number 112 were zero-rated in April 2020.</p>	<p>Yes</p> <p>April 2020: Zero-rated access to the Ministry of Health website¹⁶³</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹⁶⁴ between Meta and the World Health Organisation – WHO).</p>	<p>Yes</p> <p>Jan. 2021: Vodafone Ghana zero-rated access to the Ghana Library application¹⁶⁵</p> <p>April 2020: MTN Ghana zero-rated access to the Ministry of Education website¹⁶⁶ and many educational websites¹⁶⁷</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹⁶⁸ between Meta and the World Health Organisation – WHO).</p>	No
Indonesia	No	No ¹⁶⁹	<p>Yes</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹⁷⁰ between</p>	<p>Yes</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership¹⁷¹ between Meta and the World Health Organisation – WHO).</p>	No

¹⁶² COVID-19 – MTN Ghana: <https://mtn.com.gh/personal/COVID-19/>

¹⁶³ Ministry Of Health: <https://www.moh.gov.gh/>

¹⁶⁴ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁶⁵ GhLA zero rates Ghana Library App for Vodafone users – EducationWeb: <https://educationweb.com.gh/education/ghla-zero-rates-ghana-library-app/>

¹⁶⁶ COVID-19 – Ministry of Education: <https://moe.gov.gh/fr/COVID-19-and-absenteeism/>

¹⁶⁷ COVID-19 – MTN Ghana: <https://mtn.com.gh/personal/COVID-19/>

¹⁶⁸ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁶⁹ However, government agencies and mobile operators agreed on several initiatives to support consumers during the pandemic, including low-cost packages with specific quotas to access educational materials.

¹⁷⁰ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁷¹ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

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			Meta and the World Health Organisation – WHO).	<p>Other relevant initiatives supporting remote learning:</p> <p>Telkomsel's #DiRumahTerusBelajar¹⁷²: collaboration with e-learning platforms, higher education institutions, and the Ministry of Education and Culture (MEC) to ensure learning from home. Access to application including educational materials.</p> <p>Telkomsel supported the government policy to promote education during the COVID-19 pandemic through the specific packages for students and teachers from elementary to university level including access to zero-rated content.</p> <p>To respond with affordability concerns during the pandemic, Telkomsel deployed the Merdeka Distance Learning (MBJJ)¹⁷³ program, offering a special starter pack with a dedicated learning package.</p> <p>With the Directorate General of the MEC, Telkomsel launched the Affordable Quota Assistance¹⁷⁴ program for higher education institutions. Special internet data packages offered to lecturers, educators, employees, and students. This data package has a quota of up to 50 GB, with prices starting from IDR 40,000 (US\$2.8).</p> <p>Axiata continued¹⁷⁵ its support to the digital learning programme for Islamic</p>	

¹⁷² <https://www.telkomsel.com/en/paket/belajar/ruangguru>

¹⁷³ <https://seameo-ceccep.org/web/2021/09/07/supporting-the-program-merdeka-belajar-kampus-merdeka-mbkm-seameo-ceccep-collaborated-with-the-faculty-of-education-universitas-pendidikan-indonesia/>

¹⁷⁴ <https://www.telkomsel.com/en/paket/belajar/kuota-belajar>

¹⁷⁵ <https://www.axiata.com/investors/2020/pdf/Axiata-IAR2020.pdf>

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				<p>primary school in collaboration with the Directorate General of Islamic Education.</p> <p>Axiata also supports e-learning by providing free internet packages for students in various regions across Indonesia. Students and teachers exchange educational materials with this free internet package, through WhatsApp, Microsoft Teams, Zoom, Google Meet, Google Hangout, and Google Classroom. Moreover, the facility can also be used to access Udemy, Ruang Guru, Zenius, Sekolahmu, and access to Rumah Belajar of the Ministry of Education and Culture in the websites: https://belajar.kemendikbud.go.id https://spada.kemdikbud.go.id https://lmsspada.kemdikbud.go.id/</p>	
Ireland	No	<p>Yes</p> <p>The largest mobile network operators committed to provide access to healthcare and educational resource websites selected by the Government. Such access was zero-rated for all customers where technically feasible, meaning data consumed on these sites is not considered for billing purposes¹⁷⁶.</p>	<p>Yes</p> <p>Access to healthcare resource websites selected by the Government have been zero-rated for all customers where technically feasible¹⁷⁷.</p>	<p>Yes</p> <p>Access to educational resource websites identified by the Government have been zero-rated for all customers where technically feasible¹⁷⁸.</p>	No
Italy	No	Yes	No	Yes	No

¹⁷⁶ <https://www.comreg.ie/media/2020/04/ComRegPressReleaaseR15April20.pdf>

¹⁷⁷ <https://www.comreg.ie/media/2020/04/ComRegPressReleaaseR15April20.pdf>

¹⁷⁸ <https://www.comreg.ie/media/2020/04/ComRegPressReleaaseR15April20.pdf>

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		<p>The government invited the mobile operators Telecom Italia (TIM), Vodafone and WindTre to propose solutions that would allow children to follow lessons remotely during the second wave of COVID-19 infections. The three operators accepted the invitation and zero-rated distance learning platforms, according to a statement from Italy's ministries of Education, Equal Opportunities and Technological Innovation and Digitisation from Nov. 2020¹⁷⁹.</p>	<p>However, TRIS.2, a digital platform in Italy supports schooling for students with chronic diseases, provided for free by TIM Foundation¹⁸⁰. TRIS.2 is an I-MOOC (Interactive Massive Open Online Course) platform. UFIRST¹⁸¹, a free app provided by TIM, allows avoiding queueing at pharmacies, or supermarkets, and to be informed when it's own turn.</p> <p>DOUBLE ROBOTICS¹⁸² (provided by TIM in partnership with the Turin municipality) was used to facilitate contacts between hospitalised people and their families.</p>	<p>Mobile operators Telecom Italia (TIM), Vodafone and WindTre agreed to grant zero-rated access to distance learning platforms.</p> <p>In cooperation with the Italian Ministry for Education, and University and Research (MIUR), Telecom Italia (TIM) promoted digital distance learning¹⁸³ and inequality reduction during COVID-19. From May 2020, TIM provided an E-learning Card¹⁸⁴ so all prepaid mobile phone users with an active data subscription can access the main remote learning platforms without using up their data bundle (zero-rated access).</p> <p>As announced on 18 Nov. 2020, TIM, Vodafone and Wind Tre accepted the government's invitation¹⁸⁵ to identify solutions to ease students in following lessons remotely. Operators (TIM, Vodafone, Wind Tre, and mobile virtual network operator (MVNO) COOP accepted to exclude distance learning platforms from the gigabyte consumption foreseen in the subscriptions for a certain period of time, depending on operators.</p> <p>Other relevant initiatives to support consumers:</p>	

¹⁷⁹ <https://www.telecompaper.com/news/tim-vodafone-and-windtre-to-provide-data-free-distance-learning-access--1362331>

¹⁸⁰ <https://www.gruppotim.it/it/sostenibilita/news/coronavirus-a-scuola-stando-a-casa.html>

¹⁸¹ <https://ufirst.com/corporate/it/>

¹⁸² <https://www.corrierecomunicazioni.it/telco/robot-connessi-negli-ospedali-torinesi-cosi-tim-abbatte-il-distanziamento-COVID-19/>

¹⁸³ <https://www.telecompaper.com/news/tim-launches-e-learning-card-with-free-access-to-italian-online-education-platforms--1338669>

¹⁸⁴ <https://www.tim.it/e-learning>

¹⁸⁵ <https://innovazione.gov.it/notizie/articoli/la-didattica-a-distanza-senza-consumare-gigabyte/>

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				Telecom Italia (TIM), Vodafone and WindTre gave free SIMs and devices to schools and offered unlimited data traffic plans to students ¹⁸⁶ .	
Kenya	No ¹⁸⁷	No Other relevant initiatives: Mobile operators offered free internet access to support students learning from home during lockdown, e.g. Airtel ¹⁸⁸ and Safaricom ¹⁸⁹ .	Yes Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership ¹⁹⁰ between Meta and the World Health Organisation – WHO). Other relevant initiatives: Moreover, COVID-19 hotlines were activated by Airtel Kenya ¹⁹¹ and by Safaricom ¹⁹² to provide information on COVID-19 free of charge.	Yes Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership ¹⁹³ between Meta and the World Health Organisation – WHO). Airtel Kenya offers zero-rated access to more than 20 educational websites ¹⁹⁴ . Other relevant initiatives: Mount Kenya University students and staff connect to online portals with ease owing to the subsidised connection via Telkom Kenya ¹⁹⁵ in the context of the Open, Distance and Electronic Learning (ODEL ¹⁹⁶) programme. The Kenya Education Network (KENET) started collaborating with mobile operators to provide data bundles at	No

¹⁸⁶ Cullen International research

¹⁸⁷ However, the government established other ICT-based [measures](#) to fight against the spread of COVID-19.

¹⁸⁸ [Airtel offers free internet to support home learning during quarantine in Kenya | Nextv News](#)

¹⁸⁹ [\[Kenya\] Safaricom extends free digital learning as schools remain closed \(africabusinesscommunities.com\)](#)

¹⁹⁰ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁹¹ <https://www.airtelkenya.com/COVID-19>

¹⁹² <https://www.youtube.com/watch?v=g-XxnERIB5o>

¹⁹³ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

¹⁹⁴ <https://www.airtelkenya.com/COVID-19>

¹⁹⁵ <https://nairobi.news.nation.co.ke/mku-turns-to-online-learning-televised-lectures-over-coronavirus-threat/>

¹⁹⁶ <https://www.odel.mku.ac.ke/>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
				<p>discounted prices¹⁹⁷ to KENET institutions' students and faculty members during the pandemic.</p> <p>Under the deal, Safaricom would provide monthly 10 GB data bundles at US\$5 from the normal rate of US\$12 representing a 40% discount, while Telkom Kenya would be selling 30 GB data bundles at just US\$9.28.</p> <p>KENET issued¹⁹⁸ up to 5,000 Telkom Kenya SIM cards loaded with the 30 GB bundles per month and full access to all educational and internet resources (i.e., no whitelisting). Telkom Kenya started charging member institutions for this service with effect from 1 April 2021 at cost of KES 350 (US\$3.1) per 10 GB bundle.</p>	
Mexico	No	<p>Yes</p> <p>In April 2020, the telecoms regulator IFT, the Secretariat of Communications and Transport and operators agreed¹⁹⁹ on zero rating access to several websites (including the federal COVID-19 official website²⁰⁰), mobile applications and sending free SMS content to prevent the</p>	<p>Yes</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²⁰³ between Meta and the World Health Organisation – WHO).</p> <p>In April 2020, the telecoms regulator IFT, the Secretariat</p>	<p>Yes</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²⁰⁷ between Meta and the World Health Organisation – WHO).</p> <p>In April 2020, the telecoms regulator IFT, the Secretariat of Communications and Transport and ISPs agreed²⁰⁸ on zero</p>	No

¹⁹⁷ <https://www.kenet.or.ke/content/kenet-launches-discounted-bundles-promote-e-learning>

¹⁹⁸ <https://registration.kenet.or.ke/apn-registrations>

¹⁹⁹ <http://www.ift.org.mx/sites/default/files/comunicacion-y-medios/comunicados-ift/comunicado33.pdf>

²⁰⁰ <https://coronavirus.gob.mx/>

²⁰³ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁰⁷ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁰⁸ <http://www.ift.org.mx/sites/default/files/comunicacion-y-medios/comunicados-ift/comunicado33.pdf>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
		spread of COVID-19. Operators also agreed ²⁰¹ to provide a free unlimited fixed data service with 1 Mbps of download speed package from 1 May 2020 to the end of June 2020 ²⁰² .	of Communications and Transport and ISPs agreed ²⁰⁴ on zero rating access to several websites, mobile applications, and sending free SMS content to prevent the spread of COVID-19. Among them was a free online course on the New Normal of COVID-19 ²⁰⁵ published in 2020 on aprende.org, a site launched several years ago by a charitable organisation created by America Móvil's founder. All aprende.org ²⁰⁶ content is accessible at no cost over Telcel's network.	rating access to several websites, mobile applications, and sending free SMS content to prevent the spread of COVID-19. In April 2020, the telecoms regulator IFT, the Secretariat of Communications and Transport and ISPs agreed ²⁰⁹ on the provision of free access to several sites, mobile applications, and SMS content (including the federal COVID aggregator hotspot/application coronavirus.gob.mx ²¹⁰). Among them were multiple educational resources ²¹¹ aimed at teachers, students, and institutions from the Telefonica Movistar Foundation that carrier Movistar promoted as free ²¹² and offered because of the pandemic.	

²⁰¹ <http://www.ift.org.mx/sites/default/files/comunicacion-y-medios/comunicados-ift/comunicado37actualizado.pdf>

²⁰² Package does not include access to video and gaming content.

²⁰⁴ <http://www.ift.org.mx/sites/default/files/comunicacion-y-medios/comunicados-ift/comunicado33.pdf>

²⁰⁵ <https://fundacioncarlosslim.org/aprende-org-imparte-el-curso-nueva-normalidad-COVID-19/>

²⁰⁶ <https://www.telcel.com/personas/servicios/otros/app-prende>

²⁰⁹ <http://www.ift.org.mx/sites/default/files/comunicacion-y-medios/comunicados-ift/comunicado33.pdf>

²¹⁰ <https://coronavirus.gob.mx/>

²¹¹ <https://www.fundaciontelefonica.com.mx/endigital/>

²¹² <https://www.telefonica.com.mx/prensa/2020/medidas-de-apoyo-de-telefonica-movistar-durante-la-contingencia-del-COVID-19/>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
Nigeria	No	Yes The Nigerian Communications Commission (NCC) and mobile network operators agreed ²¹³ on zero rating access to information websites such as those of the Nigeria Centre for Disease Control (NCDC), World Health Organisation (WHO) and the Federal Ministry of Health. Mobile operators also agreed on providing free SMS for subscribers to help them communicate.	Yes Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership ²¹⁴ between Meta and the World Health Organisation – WHO). EMTS ²¹⁵ (9Mobile) zero-rated access to health websites like Nigeria Health Watch, World Health Organization, MobiHealth, Nigeria Centre for Disease & Control, and Health Line, to help keep people informed about the COVID-19 pandemic.	Yes Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership ²¹⁶ between Meta and the World Health Organisation – WHO). In partnership with UNICEF, Airtel ²¹⁷ zero-rated selected websites hosting educational content, which provided children with remote access to digital content at no cost. Other relevant initiatives: MTN ²¹⁸ got approval from the NCC to provide a free daily data package of 500 MB for students, teachers, and parents to access Edves, an edtech company to foster access to educational content.	No

²¹³ <https://digital-world.itu.int/nigerian-communications-commission-ncc-response-to-the-COVID-19-pandemic/>

²¹⁴ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²¹⁵ <https://guardian.ng/features/access-educational-and-health-sites-at-zero-cost-with-9mobile/>

²¹⁶ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²¹⁷ <https://www.unicef.org/press-releases/unicef-and-airtel-africa-announce-partnership-support-children-and-families-affected>

²¹⁸ <https://techpoint.africa/2021/05/26/mtn-backs-edves-to-digitize-learning-and-administration-in-schools/>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
Peru	No	<p>Yes</p> <p>The telecoms regulator Osiptel²¹⁹ asked mobile network operators (MNOs) to provide free and unlimited access to instant messaging via SMS and WhatsApp (zero rating access to WhatsApp). The ministry of transport and communications²²⁰ (MTC) agreed with operators on zero rating access to the official educational website.</p> <p>Other relevant actions:</p> <p>Osiptel also asked MNOs to increase data allowances of commercial offers with no extra cost.</p>	<p>Yes</p> <p>Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²²¹ between Meta and the World Health Organisation – WHO). MNOs (e.g. Entel²²², Telefonica²²³) granted zero-rated access to various websites related to COVID-19, such as:</p> <ul style="list-style-type: none"> platform of Peruvian volunteers to take care of the elderly and people with disabilities monitoring portal for elderly people at risk and people with severe disabilities with relevant information to mitigate the symptoms of COVID-19 	<p>Yes</p> <p>Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²²⁴ between Meta and the World Health Organisation – WHO).</p> <p>The four mobile operators granted zero-rated access²²⁵ to the educational platform www.aprendoencasa.pe designed by the Peruvian government²²⁶.</p>	<p>Yes</p> <p>MNOs (e.g. Entel²²⁷, Telefonica²²⁸) granted zero-rated access to various websites related to COVID-19, such as a website to check eligibility to receive emergency grant.</p>

²¹⁹ <https://repositorio.osiptel.gob.pe/bitstream/handle/20.500.12630/679/300620%20BOLETIN%20OSIPTEL%20N29%20PAGINAS%20JUNTAS.pdf?sequence=1&isAllowed=y>

²²⁰ <https://www.gob.pe/institucion/mtc/noticias/111960-mtc-brinda-soporte-tecnologico-para-impulsar-la-estrategia-educativa-aprendo-en-casa-implementada-por-minedu>

²²¹ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²²² <https://www.entel.pe/noticias/cuarentena-entel-facilita-acceso-a-webs-de-utilidad-durante-el-estado-de-emergencia/>

²²³ <https://www.telefonica.com.pe/documents/142094031/146025580/Memoria+anual+2020+Telefo%CC%81nica+Peru%CC%81.pdf/b69e7f23-399f-3c19-01a4-eacec5d2933b>

²²⁴ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²²⁵ <https://twitter.com/AfinPeru/status/1245009527226929153>

²²⁶ <https://www.gob.pe/institucion/mtc/noticias/111960-mtc-brinda-soporte-tecnologico-para-impulsar-la-estrategia-educativa-aprendo-en-casa-implementada-por-minedu>

²²⁷ <https://www.entel.pe/noticias/cuarentena-entel-facilita-acceso-a-webs-de-utilidad-durante-el-estado-de-emergencia/>

²²⁸ <https://www.telefonica.com.pe/documents/142094031/146025580/Memoria+anual+2020+Telefo%CC%81nica+Peru%CC%81.pdf/b69e7f23-399f-3c19-01a4-eacec5d2933b>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
Philippines	No	<p>Yes</p> <p>In June 2020, the Commission on Higher Education (CHED) launched PHL CHED CONNECT²²⁹, a landmark initiative made possible with the support of its international and local education and institutional partners who donated or loaned their online resources. Students and faculty members who subscribe to Globe benefit from zero-rated access to PHL CHED CONNECT, a platform with various educational materials available at phlconnect.ched.gov.ph.</p>	<p>Yes</p> <p>Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²³⁰ between Meta and the World Health Organisation – WHO). Globe²³¹ offers zero-rated access to websites of the Department of Health (DOH) to provide its customers with reliable updates on COVID-19. PLDT²³² Home granted zero-rated access to government websites with information on COVID-19.</p>	<p>Yes</p> <p>Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²³³ between Meta and the World Health Organisation – WHO). Students and faculty members who subscribe to Globe benefit from zero-rated access to PHL CHED CONNECT²³⁴, a platform with educational materials.</p>	<p>Yes</p> <p>Globe²³⁵ zero-rated the Philippine Institute of Volcanology and Seismology (Phivolcs) website during the Taal volcanic crises in 2020,</p>

²²⁹ <https://ched.gov.ph/learning-gets-more-accessible-as-globe-offers-free-data-access-to-phlched-connect/>

²³⁰ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²³¹ <https://www.globe.com.ph/about-us/newsroom/consumer/globe-offers-free-data-access-doh-phivolcs-ndrrmc.html#gref>

²³² https://pldt.com/docs/default-source/annual-reports/2020/main_pldt-2020-ar.pdf?sfvrsn=2

²³³ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²³⁴ <https://ched.gov.ph/learning-gets-more-accessible-as-globe-offers-free-data-access-to-phlched-connect/>

²³⁵ <https://www.pna.gov.ph/articles/1133125>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
South Africa	<p>Yes</p> <p>The ECPB Directions²³⁶ oblige all telecoms operators to provide zero-rated access to local educational content websites.</p> <p>According to the rules, all telecoms operators must zero-rate all COVID-19 sites as identified by the Department of Health and all calls to the national number for COVID-19 as published by the Department of Health.</p> <p>According to the ICT Regulations²³⁷, all telecoms operators must zero-rate access to:</p> <ul style="list-style-type: none"> all educational sites upon approval by the Department of Basic Education and the Department of Higher Education and Training; and all COVID-19 sites upon approval by the Department of Health. 	<p>Yes</p> <p>Operators must zero-rate local educational websites or websites with COVID-19 related health information approved by the government. The websites of over 1,000 institutions were reportedly²³⁸ zero-rated as a result.</p> <p>In order to qualify as local, a website must be hosted on a server located in South Africa. Some operators²³⁹ have voluntarily zero-rated websites outside the scope of this obligation, but they were not required to do so.</p> <p>Other relevant actions:</p> <p>The ICT Regulations established that a licensee assigned with temporary spectrum must connect “district virtual classroom platforms” free of charge.</p>	<p>Yes</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²⁴⁰ between Meta and the World Health Organisation – WHO).</p> <p>According to the ECPB Directions operators must zero-rate all COVID-19 sites as identified by the Department of Health and all calls to the national number for COVID-19 as published by the Department of Health.</p> <p>According to ICT Regulations²⁴¹ all telecoms operators must zero-rate access to all COVID-19 sites upon approval by the Department of Health.</p> <p>To be zero-rated any website must apply to the Department of Health.</p> <p>For example, see Vodacom ConnectU Zero rating Application²⁴² for healthcare and education websites.</p>	<p>Yes</p> <p>Free Basics and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²⁴³ between Meta and the World Health Organisation – WHO).</p> <p>The ECPB Directions²⁴⁴ oblige all telecoms operators to provide zero-rated access to local educational content websites as approved by the Department of Basic Education and the Department of Higher Education and Training.</p> <p>To be zero-rated any website must apply to the Department of Basic Education, or the Department of Higher Education and Training.</p> <p>For example, Cell C, Telkom, Vodacom and MTN agreed to University of Cape Town (UCT)’s request to zero-rate access to certain UCT websites²⁴⁵.</p>	<p>Yes</p> <p>In June 2020 Vodacom²⁴⁶ extended zero rating to specific government and emergency-related websites, including access to job portals, healthcare services (not related to COVID-19), etc.</p> <p>MTN²⁴⁷ provided customers with a free daily package of 20 MB and expanded its list of zero-rated websites to include 500 websites focusing on healthcare, job searches, and public benefit organizations.</p>

²³⁶ Electronic Communications, Postal and Broadcasting Directions. https://www.gov.za/sites/default/files/gcis_document/202004/43209gon451.pdf

²³⁸ <https://www.timeslive.co.za/news/south-africa/2022-03-31-zero-rated-online-content-for-public-benefit-bodies-hailed-as-breakthrough/>

²⁴⁰ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁴³ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁴⁴ Electronic Communications, Postal and Broadcasting Directions. https://www.gov.za/sites/default/files/gcis_document/202004/43209gon451.pdf

²⁴⁶ <http://www.compcom.co.za/wp-content/uploads/2020/03/Vodacom-consent-agreement-press-conf-Speaking-notes-for-Commissioner-.pdf>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
Spain	No	No However, the four largest fixed and mobile operators (Telefónica, Vodafone, Orange and MasMovil/Yoigo) and other smaller operators signed a connectivity deal ²⁴⁸ in March 2020 “with the support of” the Ministry for Digital Transformation, in charge of telecommunications. The operators voluntarily agreed to several measures, including to offer additional connectivity allowances and entertainment to clients during the state of emergency.	No	No	No

²⁴² <https://www.vodacom.co.za/vodacom/terms/vodacom-connectu-zero-rating>

²⁴³ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt-org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁴⁴ Electronic Communications, Postal and Broadcasting Directions. https://www.gov.za/sites/default/files/gcis_document/202004/43209gon451.pdf

²⁴⁵ <http://www.icts.uct.ac.za/Zero-rated-access-some-UCT-websites>

²⁴⁶ <http://www.compcom.co.za/wp-content/uploads/2020/03/Vodacom-consent-agreement-press-conf-Speaking-notes-for-Commissioner-.pdf>

²⁴⁷ <http://www.compcom.co.za/wp-content/uploads/2020/05/COMMISSION-REACHES-AGREEMENT-WITH-MTN-ON-REDUCTION-OF-DATA-PRICES.pdf>

²⁴⁸ https://www.mineco.gob.es/stfls/mineco/prensa/ficheros/noticias/2020/200320_np_Pacto_por_la_conectividad_COVID-19.pdf

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
Thailand	No	<p>Yes</p> <p>In July 2021, as part of the reinforcement of COVID-19 measures²⁴⁹, NBTC and operators agreed to provide monetary support to low-priced or free internet packages for online students including zero-rated access to educational apps, free calls to emergency numbers and SMS with COVID-19 information.</p> <p>In 2020 the government and operators had agreed on other initiatives to support consumers²⁵⁰.</p>	<p>Yes</p> <p>Free Basics, Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²⁵¹ between Meta and the World Health Organisation – WHO). Other relevant initiatives include zero-rated calls to government emergency numbers free of charge (agreement between government and operators) and to mental health hotlines offered by operator Dtac (validity 100 days)</p>	<p>Yes</p> <p>Free Basics, Discover and text-only Facebook are available and offer zero-rated access to educational sites and information related to COVID-19 (partnership²⁵² between Meta and the World Health Organisation – WHO). Other relevant initiatives: the government and operators provided extensive support for students to continue studying during the pandemic. For example, in Aug. 2021 the telecoms operator Dtac provided 2000 SIMs with unlimited internet to disadvantaged children in cooperation with Thailand's Equitable Education Fund to allow the children to continue to study during COVID-19 lockdown²⁵³</p>	No

²⁴⁹ <https://www.bangkokpost.com/business/2155811/measures-unveiled-to-assist-the-public>

²⁵⁰ These initiatives include free calls to emergency hotlines (4-digit numbers) to access information on COVID-19, a free 100-minute voice package (45 days validity) and a free 10 GB per month (3 months validity) of internet usage. More details at: <https://www.nbt.go.th/News/Press-Center/50763.aspx>
<https://www.bangkokpost.com/tech/1910628/100-free-minutes-for-phone-call-support>
<https://dtacblog.co/en/dtac-supports-mental-health-hotlines-facing-COVID-19-related-surge/>

²⁵¹ <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁵² <https://www.who.int/news/item/11-08-2021-who-facebook-and-praekelt.org-provide-critical-mobile-access-to-COVID-19-information-for-vulnerable-communities>

²⁵³ <https://dtacblog.co/en/dtac-partners-with-eef-2/>

Country	Government response supporting or mandating operators to offer zero rating		Zero rating offers granting access to		
	Specific government action mandating access to zero-rated content?	Specific government action supporting access to zero-rated content?	Healthcare materials and applications	Educational materials	Other types of public interest information (if any)
United Kingdom	No	Yes March 2020: several operators announced they would zero-rate access to the latest NHS health information about coronavirus ²⁵⁴ , which included several official websites in practice ²⁵⁵ .	Yes March 2020: several operators agreed to grant zero-rated access to official information on COVID-19 ²⁵⁶ .	Yes A specific operator decided to grant zero-rated access to educational resources ²⁵⁷ . The government considered a package to support remote learning for vulnerable children in April 2020, including access to educational resources such as Google Education, Microsoft 365, Oak Academy and BBC Bitesize. However, the proposal did not move forward ²⁵⁸ .	Yes In June 2020, the government announced that mobile network operators ²⁵⁹ agreed to grant zero-rated access for people accessing websites providing support to victims of domestic and sexual abuse.

²⁵⁴ Ofcom's 2021 annual report on monitoring compliance with the Open Internet Regulation. https://www.ofcom.org.uk/__data/assets/pdf_file/0028/227485/Monitoring-compliance-with-the-EU-Open-Internet-Regulation_2021.pdf

²⁵⁵ Examples: nhs.uk, 111.nhs.uk, wales.nhs.uk, nhsinform.scot, indirect.gov.uk and publichealth.hscni.net. <https://www.gov.uk/government/news/mobile-networks-remove-data-charges-for-online-nhs-coronavirus-advice>

²⁵⁶ Examples: nhs.uk, 111.nhs.uk, wales.nhs.uk, nhsinform.scot, indirect.gov.uk and publichealth.hscni.net. <https://www.gov.uk/government/news/mobile-networks-remove-data-charges-for-online-nhs-coronavirus-advice>

²⁵⁷ Ofcom's 2021 annual report on monitoring compliance with the Open Internet Regulation. https://www.ofcom.org.uk/__data/assets/pdf_file/0028/227485/Monitoring-compliance-with-the-EU-Open-Internet-Regulation_2021.pdf

²⁵⁸ https://www.ofcom.org.uk/__data/assets/pdf_file/0033/197709/net-neutrality-report-2020.pdf, paragraph 3.22

²⁵⁹ EE, Vodafone, O2, Three, Sky Mobile, Virgin Media, Tesco Mobile and Giffgaff granted access to these websites at least until 31 October 2020. <https://www.gov.uk/government/news/data-charges-removed-for-websites-supporting-victims-of-crime>

B. Zero rating offers including other forms of content

The benchmark below includes details on zero rating offers including content not related to healthcare or educational purposes²⁶⁰.

The research covered in detail access to:

- social networks and communications tools;
- entertainment content
- remote working services and applications
- various resources for small and medium businesses; and
- other forms of content.

Zero rating offers may fall under more than one category, depending on the specific scope of zero-rated content included.

Where applicable, the benchmark refers to other relevant initiatives from each category of zero-rated content that have supported consumers, particularly since the pandemic.

Zero rating offers including other forms of content (Cullen International)

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Argentina	Yes The three MNOs (Personal ²⁶¹ , Movistar ²⁶² , Claro ²⁶³) offered zero-rated access to WhatsApp including if data cap is reached. Some restrictions apply to calls and video content.	Yes Movistar ²⁶⁴ Play Personal ²⁶⁵ Flow ²⁶⁶	No	No	No

²⁶⁰ The previous section covered zero-rated access to healthcare and educational materials and applications.

²⁶¹ <http://www.movistar.com.ar/tienda/planes>

²⁶² <https://www.movistar.com.ar/legales/planes/one>

²⁶³ <https://www.claro.com.ar/personas/planes-prepago-pospago/terminos-condiciones-1gb>

²⁶⁴ <https://www.movistar.com.ar/productos-y-servicios/planes>

²⁶⁵ <https://www.personal.com.ar/form-porta?idOferta=100596&localidad=ARGENTINA%2FCAPITAL+FEDERAL%2FCAPITAL+FEDERAL%2FCAPITAL+FEDERAL>

²⁶⁶ In this case zero-rated access to Flow was limited to 10 GB per month.

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Bangladesh	Yes Nov. 2021: Launch of Facebook / Discover in text-only versions ²⁶⁷ . Operators GP, Robi and Banglalink all launched zero rated access to Facebook / Discover.	No	No	No	Yes Sep. 2021: Operator Robi introduced zero-rated access to mobile financial service provider Upay ²⁶⁸ . Other relevant initiatives: May 2021: Operator Robi provided free data (up to 50 MB) and minutes (up to 10 min) upon consumer request to prepaid lines with no balance ²⁶⁹ . May 2020: Operator Banglalink provided free data (up to 100 MB) and minutes (up to 10 min) upon consumer request to prepaid lines with no balance ²⁷⁰ .
Benin	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to communications tools (Facebook, WhatsApp Messenger, Ayoba ²⁷¹ , Instagram, Twitter, etc).	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to entertainment apps (Ayoba, MTN Yellow Game, Spotify, etc).	Yes From April 2020 onwards: various packages offered by different operators (MTN Benin, Moov) including zero-rated access to remote working services (Facebook Business Suite, Zoom Cloud Meetings, etc).	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to remote working services used by small and medium businesses (Facebook Business Suite, Zoom Cloud Meetings, etc).	Yes Magic Banking: zero-rated access to UBA's banking services by subscribers of mobile operators MTN and Moov ²⁷² (offer was already available before the pandemic). Feb. 2020: MTN Benin offered zero-rated access to ride hailing application Gozem, allowing drivers and

²⁶⁷ <https://www.robi.com.bd/en/corporate/news-room/press-release/robi-brings-text-only-version-of-facebook-and-discover-features-with-meta> and <https://www.thedailystar.net/business/news/grameenphone-users-now-can-use-facebook-messenger-without-internet-2225756> and <https://www.daily-sun.com/printversion/details/590522/Banglalink-introduces-textonly-Facebook>. This follows a previous decision by the national regulator to ban zero rating on social media adopted in July 2020 (<https://techcrunch.com/2020/07/21/bangladesh-regulator-orders-telcos-to-stop-providing-free-access-to-social-media/>).

²⁶⁸ <https://www.robi.com.bd/en/corporate/news-room/press-release/robi-customers-can-now-use-upay-app-without-internet-charge>

²⁶⁹ <https://www.robi.com.bd/en/corporate/news-room/press-release/robi-providing-emergency-free-data-minute-to-customers>

²⁷⁰ <https://www.banglalink.net/en/media/press-release>

²⁷¹ *Bienvenue Benin - Ayoba - Français*

²⁷² « Magic Banking », *la nouvelle option digitale d'UBA Bénin - Financial Afrik*

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
					passengers to use the platform ²⁷³ .
Brazil	Yes Many operators continue offering zero-rated access to social networks and other communications tools, both for prepaid ²⁷⁴ and postpaid subscribers ²⁷⁵ .	Yes Some operators offered zero-rated access to entertainment services, online newspapers, e-books ²⁷⁶ , gaming applications and streaming services in general and curated for kids ²⁷⁷ .	Yes Specific operators offered increased data allowances ²⁷⁸ and zero-rated access to virtual conferencing services and other tools to allow companies to work remotely ²⁷⁹ .	Yes Specific operators offered increased data allowances ²⁸⁰ and zero-rated access to virtual conferencing services and other tools to allow companies to work remotely ²⁸¹ .	No However, specific operators offered extra data allowance for international roaming services ²⁸² .

²⁷³ *Communiqué: Gozem facilite la tâche à ses clients en sortant une application qui ne consomme pas le forfait internet (afrikmag.com)*

Gozem, MTN Benin announce zero-rating partnership | Mobile News in Benin (biztechafrica.com)

²⁷⁴ Examples: Claro (<https://www.claro.com.br/celular/planos-pre/prezao>), Vivo (<https://www.vivo.com.br/para-voce/produtos-e-servicos/para-o-celular/pre-pago/vivo-pre>), Oi (<https://www.oi.com.br/celular-pre-pago/>).

²⁷⁵ Examples: Claro (<https://www.claro.com.br/celular/plano-pos>), Oi (<https://www.oi.com.br/celular/>), TIM (<https://www.tim.com.br/rj/para-voce/planos/controle>), Vivo (<https://www.vivo.com.br/para-voce/produtos-e-servicos/para-o-celular>).

²⁷⁶ Example: Oi (<https://oicomunica.com.br/>)

²⁷⁷ Example: Oi (<https://www.oi.com.br/lp/assets/pdfs/regulamento-COVID.pdf>), TIM (<https://tiinside.com.br/03/04/2020/tim-tambem-envia-carta-a-anatel-reforcando-compromisso-institucionais-no-combate-a-COVID-19/>) and Claro (<https://teletime.com.br/02/04/2020/claro-envia-carta-compromisso-a-anatel-com-medidas-durante-crise-do-coronavirus/>).

²⁷⁸ Example: Oi (<https://oicomunica.com.br/>). The offer was valid until 31 July 2021.

²⁷⁹ Examples: Claro (<https://www.claro.com.br/coronavirus>), Oi (<https://oicomunica.com.br/>) and TIM (<https://tiinside.com.br/03/04/2020/tim-tambem-envia-carta-a-anatel-reforcando-compromisso-institucionais-no-combate-a-COVID-19/>).

²⁸⁰ Example: Oi (<https://oicomunica.com.br/>). The offer was valid until 31 July 2021. See also TIM: <https://tiinside.com.br/03/04/2020/tim-tambem-envia-carta-a-anatel-reforcando-compromisso-institucionais-no-combate-a-COVID-19/>

²⁸¹ Examples: Claro (<https://www.claro.com.br/coronavirus>) and Oi (<https://oicomunica.com.br/>).

²⁸² Examples of operators include: Claro (<https://www.claro.com.br/coronavirus>) and TIM (<https://www.tim.com.br/rj/para-voce/atendimento/maisconectados>).

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Chile	<p>Yes</p> <p>Examples:</p> <p>Claro: postpaid plans with zero-rated access to social networks and communications tools, including Facebook, Twitter, WhatsApp, Instagram, Messenger and Telegram²⁸³.</p> <p>Entel: postpaid plans with zero-rated access to WhatsApp, Instagram, Facebook, Messenger, Twitter²⁸⁴. Entel also offers Discover and text-only Facebook.</p> <p>Movistar: prepaid²⁸⁵ and postpaid²⁸⁶ plans with zero-rated access to WhatsApp, Messenger, Facebook, Instagram, Twitter.</p>	<p>Yes</p> <p>Examples:</p> <p>Claro: postpaid plans with zero-rated access to music application²⁸⁷.</p> <p>Entel: postpaid plans with zero-rated access to Spotify and Apple Music²⁸⁸.</p> <p>Movistar: postpaid plans with zero-rated access to Spotify and Apple Music²⁸⁹.</p>	No	<p>Yes</p> <p>Examples:</p> <p>For corporate users, Claro doubled data caps for one year and offered zero-rated access to social media and unlimited voice calls²⁹⁰.</p> <p>Other relevant initiatives:</p> <p>Entel did not enforce data caps of mobile plans from corporate customers.</p>	<p>No</p> <p>Other relevant initiatives:</p> <p>Claro: postpaid users could share up to 50% of their data allowance with other users²⁹¹.</p>

²⁸³ <https://www.clarochile.cl/personas/beneficios-clientes/> and <https://www.clarochile.cl/personas/servicios/servicios-moviles/planes-moviles/>

²⁸⁴ <https://www.entel.cl/planes/oferta-portabilidad/>

²⁸⁵ <https://ww2.movistar.cl/movil/plan-para-todos/>

²⁸⁶ <https://ww2.movistar.cl/movil/planes-portabilidad/>

²⁸⁷ <https://www.clarochile.cl/personas/servicios/servicios-moviles/planes-moviles/> . During the COVID-19 the operator also offered access to Claro Video free of charge for postpaid users (<https://www.clarochile.cl/personas/beneficios-clientes/>).

²⁸⁸ <https://www.entel.cl/planes/oferta-portabilidad/>

²⁸⁹ <https://ww2.movistar.cl/movil/planes-portabilidad/>

²⁹⁰ <https://www.clarochile.cl/personas/beneficios-clientes/>

²⁹¹ <https://www.clarochile.cl/personas/beneficios-clientes/>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Colombia	<p>Yes</p> <p>Movistar²⁹²: Zero-rated access to Twitter, WhatsApp and Facebook.</p> <p>Claro²⁹³: Zero-rated to Instagram, Twitter, WhatsApp and Facebook.</p> <p>Tigo²⁹⁴: Zero-rated to Instagram, WhatsApp and Facebook.</p> <p>Wom²⁹⁵: Zero-rated to WhatsApp, Facebook and Facebook Messenger. Some plans also include free access to Instagram and Waze.</p> <p>In all offers the zero-rated access is limited, e.g. zero-rated access to WhatsApp includes chat, but not media download, voice calls or videoconferencing.</p>	<p>No</p> <p>Claro: zero-rated access to Claro Musica²⁹⁶</p>	<p>Yes</p> <p>Following a decision by the ministry of ICT, operators must offer zero-rated access to official website with remote working tools²⁹⁷.</p>	<p>Yes</p> <p>Following a decision by the ministry of ICT, operators must offer zero-rated access²⁹⁸ to official tax information, labour rules and other information relevant to small and medium businesses.</p> <p>Movistar²⁹⁹: Zero-rated access to Waze and, in partnership with Microsoft³⁰⁰, to the Teams application for three months.</p>	<p>No</p>

²⁹² https://www.movistar.co/pospago?_ga=2.179633956.145851839.1627222963-1271393861.1627222963

²⁹³ <https://www.claro.com.co/personas/servicios/servicios-moviles/postpago/planes-power/>

²⁹⁴ https://compras.tigo.com.co/movil/pospago?_ga=2.11032244.1831397565.1627223079-353141660.1627223079

²⁹⁵ <https://www.wom.co/tyc-pospago>

²⁹⁶ <https://www.claro.com.co/portal/recursos/co/pdf/Terminos-condiciones-Planes-POWER-Enero-2022.pdf>

²⁹⁷ https://normograma.mintic.gov.co/mintic/docs/resolucion_mintic_0639_2020.htm

²⁹⁸ https://www.mintic.gov.co/portal/715/articles-126471_resolucion_639_2020_anexo_u20200415.xlsx

²⁹⁹ <https://www.movistar.co/documents/115573275/413333792/Terminos+y+Condiciones+Vigentes+Oferta+Prepago+Enero+21+de+2022.pdf/220b5ef3-652d-39f5-4ce4-810c07448622>

³⁰⁰ <https://news.microsoft.com/es-xl/movistar-empresas-y-microsoft-ponen-a-disposicion-herramientas-de-teletrabajo-en-colombia/>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Côte d'Ivoire	Yes During the COVID-19 pandemic, MTN ³⁰¹ has started offering “unlimited free access to social media 24 hours a day”. MTN offers via Free Basics ³⁰² zero-rated access to a variety of sources of information, including text-only Facebook.	No	No	No	No
Ghana	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to communications tools and social networks (Facebook, Twitter, Instagram, etc).	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to video content (YouTube).	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to productivity applications (Facebook Business Suite, Zoom Cloud Meetings, etc).	Yes From April 2020 onwards: various packages offered by different operators including zero-rated access to productivity applications (Facebook Business Suite, Zoom Cloud Meetings, etc).	No
Indonesia	Yes Axiata offers Xtra Unlimited Turbo ³⁰³ , which includes zero-rated access to various communications tools and social media applications even if they run out of balance (e.g. WhatsApp, Gojek, Facebook, Instagram). In 2020 Telkomsel launched the Combo Unlimited/Internet Merdeka	Yes Axiata offers Xtra Unlimited Turbo ³⁰⁶ , which includes zero-rated access to various entertainment applications even if they run out of balance (e.g. Youtube and Netflix). Other relevant initiatives: IndoSat Ooredoo launched ³⁰⁷ Freedom U, a low-cost package with a	No Other relevant initiatives: IndoSat Ooredoo launched ³⁰⁹ Freedom U, a low-cost package with a specific quota for various applications (e.g. Webex, Microsoft Teams, Skype, Google Classroom,).	No Other relevant initiatives: Telkomsel 's B2C CloudX package to access CloudX video conference services, allowing customers to use 30 GB data for a 30-day active period at a highly discounted price. IndoSat Ooredoo launched ³¹⁰ Freedom U, a low-cost package with a	No Other relevant initiatives: Axiata 's Gerakan Donasi Kuota ³¹¹ , a crowd funding programme that allows customers to donate data packages to schools nationwide. The programme delivered 3,079 routers and over 96,000 GB of data to support 141,200 students access online

³⁰¹ <https://www.mtn.ci/article/stop-coronavirus-COVID-19/>

³⁰² <https://www.mtnonline.com/personal/freebasics-autoflex/>

³⁰³ <https://www.xlaxiata.co.id/en/news/xtra-unlimited-turbo-new-feature>

³⁰⁶ <https://www.xlaxiata.co.id/en/news/xtra-unlimited-turbo-new-feature>

³⁰⁷ <https://indosatooredoo.com/portal/id/psfreedomu>

³⁰⁹ <https://indosatooredoo.com/portal/id/psfreedomu>

³¹⁰ <https://indosatooredoo.com/portal/id/psfreedomu>

³¹¹ <https://www.xlaxiata.co.id/en/gerakan-donasi-kuota>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
	<p>Package for low-income households, at IDR 10,000 (US\$0.70) and IDR 20,000 (US\$1.40) for a 30-day unlimited WhatsApp (zero-rated access) and voice calls on Telkomsel's network, with data quota of 4 GB and 10 GB, respectively.</p> <p>Other relevant initiatives:</p> <p>IndoSat Ooredoo launched³⁰⁴ Freedom U, a low-cost package with a specific quota for various applications (e.g. Snapchat, Webex, Microsoft Teams, Skype, Google Classroom, Instagram, TikTok, Facebook, WhatsApp and Line).</p> <p>Telkomsel's Kuota Ketengan Package³⁰⁵ includes a specific quota for specific applications (e.g. Twitter, TikTok, Facebook, Instagram).</p>	<p>specific quota for various applications (e.g. Netflix, YouTube, Spotify, Joox).</p> <p>Telkomsel's Kuota Ketengan Package³⁰⁸ includes a specific quota for specific applications (e.g. YouTube).</p>		<p>specific quota for various applications (e.g. Webex, Microsoft Teams, Skype, Google Classroom,).</p>	<p>learning platforms throughout COVID-19 lockdowns.</p>
Ireland	<p>No</p> <p>However, mobile operators used to offer zero-rated access to various communications tools (e.g. Facebook, WhatsApp, Instagram)³¹².</p>	<p>No</p> <p>However, Eir Ireland used to offer zero-rated access to gaming content (e.g. Pokémon Go)³¹³</p>	<p>No</p> <p>However, RED Business Unlimited Max provides virtual conferencing tools, access to Microsoft Office 365 Online tools and a robust security offering.</p>	No	No

³⁰⁴ <https://indosatooredoo.com/portal/id/psfreedomu>

³⁰⁵ <https://www.telkomsel.com/en/paket/kuota-ketengan>

³⁰⁸ <https://www.telkomsel.com/en/paket/kuota-ketengan>

³¹² European Commission. Zero rating practices in broadband markets. February 2017. Available at: <https://ec.europa.eu/competition/publications/reports/kd0217687enn.pdf> (p. 19)

³¹³ European Commission. Zero rating practices in broadband markets. February 2017. Available at: <https://ec.europa.eu/competition/publications/reports/kd0217687enn.pdf> (p. 13)

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Italy	<p>Yes</p> <p>TIM³¹⁴ subscribers had zero-rated access to various social media applications for €4.99 per month.</p> <p>Offer by Vodafone³¹⁵ included zero-rated access to social media and messaging applications (e.g. Facebook, Instagram, Twitter, LinkedIn, Snapchat, WhatsApp, Telegram, etc.).</p>	<p>Yes</p> <p>Offer by Vodafone³¹⁶ included zero-rated access to streaming services (e.g. Spotify, Deezer, Netflix, etc.).</p>	<p>Yes</p> <p>To face the COVID-19 emergency, students had free access to Vodafone Pass Smart Meeting³¹⁷ for three months during the pandemic. Zero-rated access for specific applications: Google Meet, Skype, Zoom, Microsoft Teams, Google Classroom, GoToMeeting, WebEx, Amazon Chime, WeSchool, Slack.</p>	<p>No</p> <p>Other relevant initiatives: Promotional rates for businesses by TIM³¹⁸, including to enable social distancing measures (TIM Workforce Safe Distance), or facilitate online businesses.</p>	No
Kenya	<p>Yes</p> <p>Airtel Kenya offers various packages including zero-rated access to communications tools (e.g. WhatsApp)³¹⁹.</p>	<p>Yes</p> <p>Airtel Kenya offers various packages including zero-rated access to video content (e.g. Airtel TV)³²⁰.</p> <p>Other relevant initiatives: Safaricom sells low-cost packages to access content available on YouTube³²¹ (specific quota applies)</p>	No	No	No

³¹⁴ <https://www.tim.it/fisso-e-mobile/mobile/social-chat-card>. Specific offer not available anymore as of October 2022.

³¹⁵ <https://www.vodafone.it/portal/Privati/Tariffe-e-Prodotti/Tariffe/Giga-per-le-app>. Specific offer not available to new customers as of October 2022..

³¹⁶ <https://www.vodafone.it/portal/Privati/Tariffe-e-Prodotti/Tariffe/Giga-per-le-app>. Specific offer not available to new customers as of October 2022..

³¹⁷ <https://www.vodafone.it/portal/Privati/Tariffe-e-Prodotti/Tariffe/Giga-per-le-app>. Specific offer not available to new customers as of October 2022..

³¹⁸ <https://www.timbusiness.it/soluzioni-tim-contenimento-COVID-imprese>

³¹⁹ <https://www.airtelkenya.com/internet-amazing-data-bundle>. Quotas may apply.

³²⁰ <https://www.airtelkenya.com/internet-amazing-data-bundle>. Quotas may apply.

³²¹ <https://www.safaricom.co.ke/youtubebundles/>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Mexico	Yes All three major carriers offer zero-rated access to certain major, popular social network applications through a variety of consumer offers (examples from Telcel ³²² , Movistar ³²³ , and AT&T ³²⁴).	Yes Movistar ³²⁵ offers packages including zero-rated access to entertainment content (e.g. Spotify, Deezer). Other relevant initiatives: Telcel makes available ³²⁶ media content (games, music, and video) under existing consumer plans at no additional cost ³²⁷ .	Yes Both Telcel ³²⁸ and Movistar ³²⁹ offer packages with zero-rated access to certain applications.	Yes Both Telcel ³³⁰ and Movistar ³³¹ offer packages with zero-rated access to certain applications. AT&T ³³² offers some business plans with unlimited access to certain applications (e.g. WhatsApp, Twitter, Microsoft Teams).	Yes Movistar ³³³ offers packages including zero-rated access to maps and ride-hailing applications (e.g. Waze, Uber).

³²² <https://www.telcel.com/personas/telefonía/amigo/paquetes-end/paquetes-amigo-sin-limite>

³²³ <https://tienda.movistar.com.mx/parrillas>

³²⁴ <https://tienda.att.com.mx/simple>

³²⁵ <https://tienda.movistar.com.mx/parrillas>

³²⁶ <https://www.telcel.com/personas/servicios/entretenimiento/hola-amigo-telcel>

³²⁷ Data charges apply.

³²⁸ <https://www.telcel.com/empresas/planes-y-equipos/tarifas-y-opciones>

³²⁹ <https://www.movistar.com.mx/web/empresas/soluciones-moviles>

³³⁰ <https://www.telcel.com/empresas/planes-y-equipos/tarifas-y-opciones>

³³¹ <https://www.movistar.com.mx/web/empresas/soluciones-moviles>

³³² <https://www.att.com.mx/negocios/planes/con-todo-negocios>

³³³ <https://tienda.movistar.com.mx/parrillas>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Nigeria	Yes MTN offers text-only Facebook ³³⁴ . 9Mobile offers unlimited access to social media applications ³³⁵ .	Yes SuperTV ³³⁶ launched its service in Nigeria, providing video-on-demand (VoD) using a zero-rated application from Oct. 2021. The company is working in partnership with MTN Nigeria. With SuperTV, subscribers do not incur internet charges to stream after subscription.	No	Yes Glo ³³⁷ unveiled a service tagged “sponsored data” that allows companies and organisations to give the access to their websites on the Globacom network at zero cost. Companies can purchase data buckets and thereby grant access to their existing and prospective customers to access their websites, applications and other data services free of charge by bearing the cost.	No
Peru	Yes Various packages offered by different operators grant to subscribers zero-rated access to social media applications ³³⁸ (WhatsApp, Instagram, Facebook, etc.) according to government report from Nov. 2020.	Yes Movistar offers zero-rated access to Movistar Play according to government report from November 2020 ³³⁹ .	Yes Various packages offered by different operators (e.g. Bitel ³⁴⁰ , Claro ³⁴¹) grant to subscribers zero-rated access to productivity apps (Skype, Google Meets, Zoom, Microsoft Teams, etc.).	Yes Various packages offered by different operators (e.g. Bitel ³⁴² , Claro ³⁴³) grant to subscribers zero-rated access to productivity apps (Skype, Google Meets, Zoom, Microsoft Teams, etc.).	No

³³⁴ https://m.facebook.com/MTNLoaded/photos/a.748452805169130/2630828453598213/?type=3&source=57&__tn__=EH-R

[https://www.mtnonline.com/personal/Free Basics-autoflex/](https://www.mtnonline.com/personal/Free-Basics-autoflex/)

³³⁵ <https://9mobile.com.ng/data-internet/data-smart-packs/>

³³⁶ <https://www.vanguardngr.com/2021/09/supertv-debuts-with-zero-data-app-offering/>

³³⁷ <https://guardian.ng/technology/glo-offers-package-that-gives-public-access-to-websites-free/>

³³⁸ <https://cdn.www.gob.pe/uploads/document/file/1469673/2020-05-noviembre-reporte-estadistico.pdf>

³³⁹ <https://cdn.www.gob.pe/uploads/document/file/1469673/2020-05-noviembre-reporte-estadistico.pdf>

³⁴⁰ <https://bitel.com.pe/planes/movil/paquetes/reunion>

³⁴¹ <https://www.claro.com.pe/personas/hogar/planes-teletrabajo/>

³⁴² <https://bitel.com.pe/planes/movil/paquetes/reunion>

³⁴³ <https://www.claro.com.pe/personas/hogar/planes-teletrabajo/>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Philippines	Yes PLDT launched offer (UNLI GIGA) including zero-rated access to social media (Facebook, Instagram, TikTok, Twitter, and Kumu) ³⁴⁴ . The offer includes 2 GB data to access any websites and application for seven days for only PHP 149 (US\$2.9).	Yes PLDT launched offer (UNLI GIGA) including zero-rated access to video streaming applications (YouTube, iWantTFC, NBA League Pass, and Signal Play) ³⁴⁵ . The offer includes 2 GB data to access any websites and application for seven days for only PHP 149 (US\$2.9).	No However, Globe ³⁴⁶ offered free or discounted access to work-from-home tools for businesses, free telehealth, and mental health services.	No However, Globe ³⁴⁷ offered free or discounted access to work-from-home tools for businesses, free telehealth, and mental health services.	No
South Africa	Yes From 1 April 2020, Vodacom has provided customers with text-only Facebook. Consumers can also access local and international news headlines.	No	Yes Vodacom provided a zero-rated Internet search function powered by Wikipedia. Vodacom also allows customers to view and apply for job opportunities as advertised on seven zero-rated South African job portals.	No Other relevant initiatives: Vodacom provided additional data allowances to small and medium enterprises. Work-from-home services have been extended to all Vodacom enterprise customers in the region ³⁴⁸ .	No

³⁴⁴ <https://smart.com.ph/About/newsroom/full-news/2021/08/05/smart-unveils-unli-giga-with-unlimited-access-to-social-media-video-apps-for-only-p149>

³⁴⁵ <https://smart.com.ph/About/newsroom/full-news/2021/08/05/smart-unveils-unli-giga-with-unlimited-access-to-social-media-video-apps-for-only-p149>

³⁴⁶ <https://www.globe.com.ph/about-us/newsroom/sustainability/globe-services-assistance-package-COVID-19.html#gref>

³⁴⁷ <https://www.globe.com.ph/about-us/newsroom/sustainability/globe-services-assistance-package-COVID-19.html#gref>

³⁴⁸ <https://www.vodafone.com/news/digital-society/vodacom-helps-to-flatten-COVID-19-curve-through-technological-innovation>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Spain	Yes E.g. Vodafone Pass offered zero-rated access to social media services ³⁴⁹	Yes E.g. Vodafone Pass offered zero-rated access to music and video streaming services ³⁵⁰ . Other relevant initiatives: Telefónica, Vodafone and Orange offered ³⁵¹ for up to two months (from March 2020) free additional TV content (mostly for children but also sports in the case of Telefónica) to their existing IPTV subscribers.	No	No However, Vodafone offered free unlimited data to mobile contract clients who were self-employed or small and medium businesses.	No The four largest operators (Telefónica, Vodafone, Orange and MasMovil/Yoigo), amongst other, signed a connectivity deal ³⁵² in March 2020 including a commitment to offer “additional services to mobile connectivity contracts” free of charge, subject to fair use, and provide additional audiovisual content to existing audiovisual offers free of charge during the lockdown due to the COVID-19 pandemic.

³⁴⁹ <https://ayudacliente.vodafone.es/particulares/movil/vodafone-pass/>. Specific offer not promoted to new customers as of October 2022. In June 2022 the Body of European Regulators for Electronic Communications revised net neutrality guidelines to reflect a court ruling by the Court of Justice of the EU that previously considered zero rating practices incompatible with EU law. However, the guidelines did not set any European-wide timeline for operators to cease zero rating offers.

³⁵⁰ <https://ayudacliente.vodafone.es/particulares/movil/vodafone-pass/>. For a fee worth from €3 to €8 per month, consumers could choose the type of content to be zero-rated (social media, music, video, etc.). Specific offer not promoted to new customers as of October 2022. In June 2022 the Body of European Regulators for Electronic Communications revised net neutrality guidelines to reflect a court ruling by the Court of Justice of the EU that previously considered zero rating practices incompatible with EU law. However, the guidelines did not set any European-wide timeline for operators to cease zero rating offers.

³⁵¹ https://www.movilonia.com/reportajes/ofertas-movistar-vodafone-orange-pepephone-o2-masmovil-jazztel-amena-coronavirus/#Movistar_50GB_al_mes_y_contenidos_infantiles_y_deportivos_gratuitos

³⁵² https://www.mineco.gob.es/stfls/mineco/prensa/ficheros/noticias/2020/200320_np_Pacto_por_la_conectividad_COVID-19.pdf

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
Thailand	<p>Yes</p> <p>Jan. 2021: Immigrant package launched – includes zero-rated access to LINE, Facebook and Viber (amongst other applications) to communicate with friends and relatives in other countries more easily³⁵³.</p> <p>April 2020: Happy@Home package for new postpaid subscribers including zero-rated access to Office 365, Zoom, YouTube, FreeFire, Line, Facebook, Twitter³⁵⁴</p>	<p>Yes</p> <p>April 2020: Happy@Home package for new postpaid subscribers including zero-rated access to Office 365, Zoom, YouTube, FreeFire, Line, Facebook, Twitter³⁵⁵</p>	<p>Yes</p> <p>June 2021: Happy work and Learn – package including zero-rated access to Microsoft 365, Zoom, WebEx, Shopee applications, amongst others³⁵⁶</p> <p>May 2020: GOMO – package including 50 GB of data and zero-rated access to Office 365 and Zoom³⁵⁷</p> <p>May 2020: Initiatives to mitigate COVID-19 effects – amongst other zero rating of productivity apps such as Zoom, LINE, and Microsoft Office³⁵⁸</p> <p>April 2020: Happy@Home package for new postpaid subscribers including zero-rated access to Office 365, Zoom, YouTube, FreeFire, Line, Facebook, Twitter³⁵⁹</p> <p>March 2020: Work Anywhere service, top-up service granting zero-rated access to Office 365 and Zoom³⁶⁰</p> <p>Other relevant initiatives:</p> <p>April 2020: 10 Gb of free mobile data (all operators)³⁶¹</p>	<p>Yes</p> <p>June 2021: Happy work and Learn – package including zero-rated access to Microsoft 365, Zoom, WebEx, Shopee applications, amongst other applications³⁶².</p> <p>May 2020: Initiatives to mitigate COVID-19 effects – zero rating of productivity apps such as Zoom, LINE, and Microsoft Office³⁶³</p>	No

³⁵³ <https://dtacblog.co/en/dtac-assists-migrant-communities-affected-by-COVID-19/>

³⁵⁴ <https://dtacblog.co/en/dtac-never-stops-taking-care-of-customers-by-delivering-simpler-happier-and-worry-free-lifestyle-at-home/>

³⁵⁵ <https://dtacblog.co/en/dtac-never-stops-taking-care-of-customers-by-delivering-simpler-happier-and-worry-free-lifestyle-at-home/>

³⁵⁶ <https://dtacblog.co/en/dtac-happy-work-learn-package-keeps-everyone-connected/>

³⁵⁷ https://investor.ais.co.th/news.html/id/780985/group/newsroom_press

³⁵⁸ <https://dtacblog.co/en/connecting-society-to-what-matters-most/>

³⁵⁹ <https://dtacblog.co/en/dtac-never-stops-taking-care-of-customers-by-delivering-simpler-happier-and-worry-free-lifestyle-at-home/>

³⁶⁰ https://investor.ais.co.th/news.html/id/768641/group/newsroom_press

³⁶² <https://dtacblog.co/en/dtac-happy-work-learn-package-keeps-everyone-connected/>

³⁶³ <https://dtacblog.co/en/connecting-society-to-what-matters-most/>

Country	Social networks and communications tools	Entertainment content	Remote working services	Resources for small and medium businesses	Other
United Kingdom	Yes Several zero rating offers available for many years. Example: Virgin Mobile granted zero-rated access to WhatsApp and Messenger ³⁶⁴ .	Yes Several zero rating offers available for many years. Examples ³⁶⁵ : O2, Three and EE offered zero-rated access to music streaming services. Sky and EE offered zero-rated access to video streaming services.	No	No	No

³⁶³ <https://dtacblog.co/en/connecting-society-to-what-matters-most/>

³⁶⁴ https://www.ofcom.org.uk/__data/assets/pdf_file/0014/148100/ofcom-approach-net-neutrality.pdf, p. 11.

³⁶⁵ https://www.ofcom.org.uk/__data/assets/pdf_file/0014/148100/ofcom-approach-net-neutrality.pdf, p. 11–12, and https://www.ofcom.org.uk/__data/assets/pdf_file/0033/197709/net-neutrality-report-2020.pdf, paragraphs 3.9 and 3.14.

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