



CONSULTATION PAPER ON ZERO-RATED ACCESS TO EDUCATIONAL PLATFORMS

**Issued by the Joint NCC-Industry Committee on the
Implementation of Zero-Rated Access to Education Platforms for
Students in Nigeria**

Public Consultation Period: June 19 to July 9, 2026

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1. Introduction

The Joint Nigerian Communications Commission (NCC) and Industry Committee on the Implementation of Zero-Rated Access to Education Platforms for Students in Nigeria (the Joint Committee) hereby issues this Consultation Paper to initiate public consultation regarding the framework for zero-rated access to education platforms for students in Nigeria (the Zero-Rated Data Access Project).

This consultation responds to recent calls from critical stakeholders for the telecoms industry to leverage its unique position in the provision of digital infrastructure for national socio-economic growth to address the digital exclusion of a huge percentage of Nigerian students who are unable to afford digital access. The Project specifically responds to the call by His Excellency, President Bola Tinubu for telecommunications operators to provide “unhindered connectivity access to educational institutions and platforms of learning.”

To create an efficient, effective and holistic framework for the implementation of the Zero-Rated Data Access Project, the NCC constituted a Joint Committee of key industry players to drive the Project. The Joint Committee is to develop an implementation framework which balances the national developmental objectives of the Zero-Rated Data Access Project with the principles of fair competition, network neutrality, and the long-term sustainability of the telecommunications sector as enshrined in the Nigerian Communications Act, 2003 (NCA 2003).

Based on its initial evaluation, the Joint Committee finds compelling justification for utilizing a Zero-Rated Data Access programme to close inclusion gaps amongst Nigeria’s most critical population segment. The Joint Committee believes that national economic growth and competitiveness will be enhanced by ensuring that Nigerian students can easily access the most current digital education platforms being utilized by their peers globally, and that the easiest way to close the access gap is to eliminate the affordability barrier through a Zero-Rated Data Access programme. The Joint Committee is, however, conscious of the fact that the programme can only be successfully implemented on the foundation of comprehensive stakeholder evaluation and a workable and sustainable implementation framework based on input from interested stakeholders.

Objective of Zero-Rated Access to Education Platforms in Nigeria

1. The primary objective is education. i.e. the provision of free access to formal education and digital skills development platforms for teaching, learning, and assessment of students.
2. Other Objectives are
 - a. to expand equitable access to digital educational resources
 - b. to support national learning outcomes and digital literacy
 - c. to promote affordable broadband usage for students and educators
 - d. To establish a transparent, sustainable zero-rating regime
 - e. to ensure fair competition and compliance with net neutrality principles.

Guiding Principles

Based on the objectives stated above, the Joint Committee believes that the implementation of the Zero-Rated Programme should be guided by the following principles:

- Equity and Inclusion
- Transparency and non-discrimination
- Technological Neutrality
- Sustainability and Cost Efficiency
- Data Protection and Child Safety
- Time-Boundedness and Transition Planning
- Targeted and Purpose-Limited Access
- Proportionality and Fair Use
- Multi-Stakeholder Accountability
- Network Integrity and Abuse Prevention

It is on this premise that the Joint Committee now requests inputs and perspectives from concerned stakeholders on the implementation of the Zero Access Project. The issues for consultation have been carefully distilled below, and stakeholders are encouraged to provide practical and evidence-based inputs for the Joint Committee's consideration within the timeline stated above.

2. Issues for Consultation

2.1 Structure

The Joint Committee invites comments on the implementation structure of the Zero-Rated Access programme. The options being considered are:

- A single, mobile-friendly website/app be created to serve as a Portal to give learners live, one-click access to the most important/approved education resources. All content on the portal would be zero-rated.

Or

That Operators be required to whitelist approved, curriculum relevant education and digital skills development websites/learning resources for which zero-rated access would be provided to qualified learners.

2.2 Eligibility for Zero-rated Access

The Joint Committee seeks inputs from stakeholders on the category of students that should be eligible for zero-rated access to education platforms in Nigeria. This enquiry is premised on the fact that given the volume of data that will potentially be consumed by users and the cost to the industry, sustainability cannot be guaranteed on an all-comers basis. The options being considered are:

- Restricting zero access to only students of senior secondary and tertiary institutions (first degree only).

Or

- Restricting zero access to students of only public senior secondary and tertiary institutions (first degree only).

Or

- Opening up zero access to all students and teachers of primary, secondary, and tertiary institutions at all levels, and regardless of whether they are in private or public institutions.

Or

- A progressive model which starts with students and teachers in public schools and is gradually opened to private schools in future, based on clearly defined participation criteria.

Or

- Opening to all users who seek to interact with whitelisted educational and digital skills development websites/learning platforms, without the need for prior segmentation based on student, institutional, or demographic classification.

The Joint Committee is mindful that each of these options has cost and sustainability implications and encourages stakeholders to include financing options in the comments to guide the Committee in designing a sustainable model. Stakeholders are also encouraged to propose other options not mentioned above.

The Joint Committee also notes that all options would require some form of registration which enables access providers to control access and prevent abuse.

2.3 Definition of "Educational Content"

In the context of zero-rated access, the Joint Committee views education content as structured digital materials, services, or resources designed primarily to support teaching, learning, skills development, or academic assessment. Such content must also align with approved curricula or accredited learning.

Based on this consideration, the Joint Committee is considering whitelisting education content on the following categories of education/skills development resources websites/learning platforms for zero rated access:

- a. National curriculum-aligned materials (Basic, Secondary, Tertiary)
- b. Accredited e-learning platforms/resources by FME or recognized body (WAEC, NECO, NBTE, NUC)
- c. Digital libraries, journals, and research repositories
- d. Public-interest resources (e.g., e-library, literacy tools)
- e. Teacher training platforms
- f. Public examination resources
- g. Option A: limit access to only **.edu** domains and websites maintained by government-approved formal education institutions.
- h. Option B: developing specific curated lists (e.g., Google Classroom, Coursera, Nigerian Virtual Library, Nigeria Learning Passport).

- i. Option C: A broad category of sites including creative industry hubs.

Stakeholders are requested to make recommendations to enable the Joint Committee to determine appropriate content to be included.

Content Exclusion

Conversely, the Joint Committee proposes to exclude the following content from zero-rated access:

- General internet browsing platforms
- Social media platforms
- Entertainment or streaming services
- Ad-heavy or data-harvesting applications
- Unmoderated user-generated platforms
- Applications bundling educational and non-educational content without separation

Stakeholder comments are also requested in this regard.

2.4 Definition of “Educational Platform”

The Joint Committee is cognizant of the fact that permitting the zero-rating of all portals and websites which provide “education” content is practically impossible. This is due to the fact that loosely defined, “education” can be accessed through practically any instructional platform, and the cost, quality and other considerations of such access will make it impractical to do that. A formal definition of “education platform” is therefore required.

2.5 Funding and Sustainability Considerations

The Commission and the Industry appreciate that sustainability is one of the most important considerations for this project. It is also important that all applicable costs be spread evenly amongst participants in a way that enables the implementation of this legacy project without unnecessarily burdening any particular set of stakeholders. This consideration is germane, considering that all participants already meet their fiscal obligations to all tiers of government.

Regarding sustained operation of the programme therefore, the Joint Committee proposes the following options:

- a. A ***resource-based participatory partnership model*** which allows for shared responsibility. It envisages that costs be spread across all levels of the ecosystem without overburdening any set of players. All major players in the communications and education value chain will be invited to participate on a “*bring what you sell*” basis.
- b. Subsidization of access by the Universal Service Provision Fund (USPF), to compensate operators for data consumed via zero-rated educational access.
- c. Government subsidies – for Education and digital inclusion programs
- d. Development partners (World Bank, UNICEF, GSMA Digital Inclusion Fund, etc.)
- e. Public-Private Partnerships (PPP)
- f. Time-Bound Access and Transition Model

The Joint Committee proposes that the Zero-Rated Programme shall operate on a time-bound basis, under which access to approved educational and digital skills development platforms shall be provided without data charges and subject to a defined complimentary daily data allowance for an initial period of twelve (12) months. Within this period, the Commission shall conduct bi-annual reviews (every six months) to assess usage patterns, network impact, effectiveness in improving access, and overall sustainability. This initial zero-rated phase is intended to drive adoption, enhance awareness, and reduce immediate affordability constraints, particularly for underserved and vulnerable users, while maintaining alignment with broader policy objectives.

Upon the expiration of the twelve-month period, the framework shall transition to a paid access model, supported through the introduction of dedicated low-cost or discounted educational data bundles made available by service providers on fair, transparent, and non-discriminatory terms. Where necessary, targeted funding interventions, including support from the Universal Service Provision Fund (USPF) and other public or development financing mechanisms per (b) – (e) above, may be applied to sustain affordability for priority user segments. This transition mechanism will ensure that the framework remains time-bound, sustainable, and commercially viable, while avoiding the creation of perpetual access obligations and preserving incentives for continued investment in network infrastructure.

Stakeholders are invited to comment on these options and/or recommend other options which ensure the sustainability objectives set out above.

2.6 Regulatory and Governance: Net Neutrality vs. Developmental Access

Zero-rating entails the exempted defined content from usage charges. This has the potential of violating technical net neutrality principles as it can disproportionately benefit certain content providers. Whilst it is noted that the NCC's recently issued Code of Internet Practice gives the Commission the power to allow zero-rating in justified cases, stakeholders are invited to comment on whether Nigeria should adopt an exception to net neutrality rules specifically for government-accredited educational platforms (e.g., universities, NITDA digital skills portals)?

2.7 Regulatory and Governance: Fair Competition and Market Distortion

The Joint Committee acknowledges that there is a risk that network operators with significant market power may be incentivized to zero-rate their own educational content or use free data allowances to drive market share, thereby crowding out smaller educational tech startups and negatively affecting market opportunities for competing operators.

The Joint Committee is keen to develop an implementation model which does not negatively impact fair market competition. Stakeholder comments are therefore requested on the safeguards which can be implemented to ensure that zero-rated access does not create an anti-competitive environment.

2.8 Localization and Inclusivity

The Joint Committee proposes that the platform should be localized to an extent that reduces implementation and ongoing service provision costs. Materials should, as much as possible, be easily accessible, preferably in low-bandwidth optimization formats; disability-friendly, offline-first design (downloadable lessons). Platform design should also allow for periodic review/monitoring mechanism such that the regulator is able to monitor key metrics such as;

- Number of active users (students/teachers)

- Data consumption patterns
- Learning outcomes (where measurable)
- Geographic reach (urban vs rural)
- Platform diversity
- Gender inclusivity metrics
- Usage growth patterns
- Improvement in exam performance (WAEC/NECO data correlation)
- Teacher adoption rate
- Indicators of misuse/abuse (such as tunnelling and streaming of non-educational content)
- Market distortion
- Complaint/redress mechanism
- Multilingual content (local and official languages)
- Accessibility (audio, low-bandwidth optimization or formats, disability-friendly)
- Offline-first design (downloadable lessons)
- Device compatibility (desktops, laptops, feature phones, low-end smartphones)

Stakeholders are requested to make recommendations for achieving these objectives. Stakeholders may also make additional recommendations that will enhance the localization of data and the participation of a wider ecosystem of service and infrastructure providers.

2.9 Other Aspects

The Joint Committee invites interested stakeholders to make other comments and/or suggestions they consider useful in the design and implementation of Zero-rated access to education platforms in Nigeria. Stakeholders are also encouraged to share best practice from Nigeria and/or other jurisdictions which would assist the Joint Committee to achieve its mandate in the overall national interest. Recommendations will be carefully considered in the development of the programme.

3 Procedure for Submissions

Submission should be submitted in electronic format (preferably in .PDF) and submitted by email to:

- zeroratedconsultation@ncc.gov.ng
- Deadline for Submissions: **July 9, 2026**

Thank you.

Dated: 19 June 2026