



Framework for the Implementation of Zero-Rated Access to Educational Platforms and Content in Nigeria

September 2026

Executive Summary

Background

The Framework for the Implementation of Zero-Rated Access to Educational Platforms and Content in Nigeria establishes the regulatory, technical and institutional arrangements for providing zero-rated access to approved digital educational resources for learners in Nigeria. The Initiative is designed to reduce the data-cost barriers that limit access to online learning and to promote digital inclusion, while safeguarding competition, consumer interests, data protection, cybersecurity and network integrity.

The Framework was developed by the Joint Industry Committee on Zero-Rated Access to Educational Platforms and Content comprising of representatives of the Nigerian Communications Commission (NCC) and the Association of Licensed Telecommunications Operators of Nigeria (ALTON) with the active participation of representatives of the Federal Ministry of Communications, Innovation and Digital Economy (FMCIDE), the Federal Ministry of Education (FME), participating Mobile Network Operators (MNOs) and stakeholders across the Nigerian telecommunications and education ecosystem. It consolidates the outcomes of extensive desk research and global benchmarking, stakeholder consultations, learning sessions, technical engagements, a Simulation Exercise, Committee deliberations and reviews undertaken during the framework-development process.

Under the Framework, zero-rated access will apply only to educational platforms and content that have undergone a formal accreditation and approval process jointly administered by the FME and the NCC. Accreditation will be based on clearly defined educational, institutional, technical and regulatory requirements detailed in this Framework.

Eligible Platforms

An **Approved Educational Platforms Register (AEPR)** will be developed to serve as the authoritative list of platforms eligible for zero-rated access. Participation will remain open to all platforms that satisfy the applicable requirements, and no operator-specific commercial arrangement will determine eligibility. Approved platforms will be subjected to periodic compliance reviews, technical audits and performance assessments, and may be suspended or removed where the prescribed standards are no longer met.

The Framework requires Network Operators and platform providers to maintain appropriate technical, quality-of-service, cybersecurity, reporting and abuse-prevention controls to preserve the integrity of the Initiative.

Operational Model

The Initiative will initially be implemented through an **Operator-Sponsored Model**, under which participating MNOs will bear the cost of providing zero-rated access to AEPR content. The overall funding and operational structure will undergo periodic joint reviews to ensure the

Initiative remains operationally efficient, commercially viable, network-safe, and financially sustainable.

Implementation will be subject to regulatory approval and compliance with applicable Nigerian telecommunications, consumer-protection, cybersecurity and data-protection requirements. Relevant safeguards include non-exclusive platform participation, non-discriminatory treatment, prohibition of unlawful blocking or degradation of other internet traffic, protection against unauthorised use of personal data, child-online-protection measures, transparent consumer information and accessible complaint and redress mechanisms.

Fair Usage Criteria

In furtherance of the above and to support responsible usage whilst managing programme costs, a daily zero-rated data allowance of **100 MB per learner** will apply. The allowance will be separate from the learner's regular and/or bonus data balances and will apply only to AEPR content.

Initial Rollout

The Initial Rollout will commence with a curated AEPR comprising platforms that demonstrate educational relevance, regulatory compliance, content quality, conformance with security standards, data privacy compliance, operational maturity, and technical readiness. During the Initial Rollout period, access will be open to all subscribers on participating networks. Data from the Initial Rollout will be applied to evaluate resource and other requirements for scaling up the programme to primarily accommodate a target audience of learners from Government/Public Senior Secondary and Government/Public Tertiary Institutions in the long run.

Learner Accreditation/User Authentication

The Framework provides a simple accreditation process leveraging whitelisted websites accredited by the FME for commencement of the initiative. To access these websites, users are required to sign up and create user profiles on the respective platforms. The Framework also supports the use of alternative User Authentication Pathways for all students and teachers. The list of Alternative User Authentication Pathways and their main identity credential shall be published and updated from time to time as experience with the Zero-Rated Initiative evolves. Eventually, the framework aims for the establishment of a Central Education Database for the management of user authentication systems.

Monitoring, Quality Assurance and Review

Implementation will be monitored through indicators covering service availability, platform usage, active subscriber lines, data consumption, consumer complaints, network performance and regulatory compliance. Relevant data will be gathered from the date of rollout, and a structured Impact Assessment will be carried out within one year of rollout to evaluate the Initiative's educational, technical, financial, consumer-protection and regulatory outcomes. The findings will inform any adjustment to the eligibility requirements, technical architecture,

data allowance, funding arrangements, monitoring indicators and implementation safeguards. Expansion and Scaling-Up will proceed progressively. Relevant considerations will include technical feasibility, regulatory compliance, measurable public benefit and sustainable long-term funding.

The Framework therefore provides a coordinated national approach to improving affordable and equitable access to digital education in Nigeria.

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Introduction

1.1. Background

Affordable internet access has become a prerequisite for meaningful participation in modern education. Although digital learning platforms continue to expand across Nigeria, access by learners to digital education content remains a critical barrier for many learners, particularly those in underserved and unserved communities.

To address this challenge, the Nigerian Communications Commission (NCC) constituted the Industry Committee on Zero-Rated Access to Educational Platforms and Content to establish a structured, sustainable implementation strategy jointly with the Association of Licensed Telecommunications Operators of Nigeria (ALTON). This Framework is the result of intensive stakeholder collaboration and defines the regulatory, technical, and governance mechanisms for the delivery of zero-rated access to accredited learners while preserving fair competition, consumer protection, and the principles of net neutrality.

1.2. Purpose of the Framework

This Framework is designed to provide a comprehensive blueprint for the implementation of conditional zero-rated access to educational platforms and content in Nigeria. It defines institutional responsibilities, technical implementation requirements, eligibility criteria, regulatory safeguards and implementation arrangements for roll-out and deployment.

1.3. Scope

The Framework covers governance, eligibility, accreditation, technical implementation, funding model, delivery model, regulatory approval, roll-out implementation, monitoring, impact assessment and national expansion of the initiative for Zero-Rated Access to Educational Platforms and Content (the Initiative).

1.4. Methodology

This Framework consolidates stakeholder contributions made during public consultations, technical sessions, and individual/group submissions into a single implementation framework. It was therefore developed with valuable insights from a wide spectrum of stakeholders across the telecommunications and education ecosystem, including the Federal Ministry of Communications, Innovation and Digital Economy (FMCIDE), the Federal Ministry of Education (FME), participating Mobile Network Operators (MNOs), Education Technology (Edutech) practitioners and various Stakeholders across the country. The Committee was supported by specialized Sub-Committees covering Technical, Policy, Regulation and Competition, Educational Content, Sustainability and Roll-Out/Launch. Extensive benchmarking exercises were also carried out to incorporate learnings from other jurisdictions who have successfully implemented similar initiatives.

2.1. Objectives

The Framework serves six principal objectives:

1. Ensure that eligible learners in Nigeria have access to critical platforms for advancing their academic and socio-economic growth in the overall national interest.
2. Ensure that this initiative remains focused on educational outcomes.
3. Promote transparency and consistency in the selection of participating platforms.
4. Safeguard the initiative against misuse, commercial distortion and abuse.
5. Maintain compliance with applicable regulatory and policy instruments.
6. Preserve public confidence through a fair, evidence-based accreditation process.

3.0. Programme Design

The effectiveness, credibility and long-term sustainability of the Initiative depend fundamentally on the establishment of a robust programme design framework which ensures that zero-rated access remains a carefully governed public-interest intervention rather than an unrestricted commercial offering. Participation is therefore based on transparent eligibility requirements, objective accreditation standards and clearly defined governance processes that preserve programme integrity, protect consumers and maintain consistency across participating Operators.

This Framework adopts the principle that educational value, not commercial affiliation or market influence, should determine eligibility for participation. Consequently, all qualifying educational platforms are afforded equal opportunity to participate under a uniform regulatory framework administered jointly by the Nigerian Communications Commission (the Commission) and the Federal Ministry of Education.

3.1. Platform Eligibility Framework

3.1.1. Purpose

The Eligibility Framework establishes the criteria for determining which digital platforms and educational content qualify for inclusion in the national zero-rated access programme. It provides a transparent and objective basis for assessing applications while ensuring that only platforms whose primary purpose is educational are granted zero-rated status.

3.1.2. Guiding Principles

Educational Purpose

Educational content must constitute the principal function of the platform rather than an incidental feature of a broader commercial service.

Public Interest

Participation should advance national educational objectives and improve affordable access to learning.

Transparency

Eligibility requirements should be published, consistently applied and periodically reviewed.

Non-Discrimination

Assessment should be technology-neutral and platform-neutral.

Sustainability

Participating platforms should demonstrate sufficient technical and operational capability to support long-term implementation.

3.2. Definition of an Educational Platform

For the purposes of this Framework, an educational platform is defined as a **digital platform, application, website, repository or online service whose primary purpose is the creation, delivery or facilitation of structured learning experiences intended to achieve measurable educational outcomes.**

3.3. Eligibility Criteria for Education Platforms

To qualify for participation in the Zero-Rated Access Initiative, a prospective platform shall satisfy the educational, institutional, technical and regulatory requirements established under this Framework. In this regard, curriculum alignment means alignment to a curriculum approved by the Federal Ministry of Education and other relevant Agencies under its purview.

Educational Requirements

The following curriculum-aligned instructional materials will be included

- a) Structured learning programmes
- b) Academic research resources
- c) Examination preparation materials
- d) Certification programmes
- e) Technical and vocational learning resources

Institutional Recognition

Prospective platforms should demonstrate educational credibility through accreditation, recognized institutional partnerships, government recognition, or established educational use.

Technical Eligibility

Prospective platforms must satisfy the following requirements:

- Clearly identifiable domains
- Static IP address allocation
- Support for Operator whitelisting
- Secure hosting infrastructure
- Compatibility with Operator policy and charging systems

Regulatory Compliance

Participating platforms shall demonstrate ongoing compliance with applicable telecommunications, education, cybersecurity, consumer protection and data protection laws, including but not limited to the Nigeria Data Protection Act (NDPA) 2023, the Cybercrime (Prohibition, Prevention, etc.) Act (as amended), and relevant provisions of the Internet Code of Practice 2026.

3.4. Exclusion Criteria

To preserve the integrity of the Initiative and ensure that public-interest resources are directed exclusively towards educational objectives, certain categories of platforms and services shall not be eligible irrespective of popularity or market penetration. This is to prevent misuse of the programme, limit opportunities for traffic leakage and ensure that zero-rated access remains consistent with its educational mandate. Based on this criterion, the following are excluded from the Initiative:

- a) Entertainment-focused streaming, gaming and non-educational media platforms.
- b) General social media platforms not specifically designed for structured educational delivery.
- c) General web search engines and unrestricted internet browsing services.
- d) General-purpose video platforms without defined educational scope.
- e) Platforms with unverifiable, non-credible, or non-accredited educational content.
- f) Mixed-content platforms where educational material is incidental rather than primary.
- g) VPNs, proxy services, and similar technologies capable of circumventing programme controls.

3.5. Platform Accreditation Process

Prospective participating platforms shall be subject to a formal accreditation process jointly administered by the Federal Ministry of Education and the Nigerian Communications Commission. Accreditation is intended to establish a transparent, nationally consistent mechanism for determining which platforms qualify for inclusion. Operator-specific commercial arrangements shall not determine eligibility.

3.5.1. Governance Arrangement

The accreditation framework adopts a multi-stakeholder governance model that combines educational oversight with regulatory supervision. Under this arrangement, the Federal Ministry of Education provides policy direction and alignment with national education priorities, while the Commission establishes implementation requirements, compliance obligations and ongoing monitoring arrangements.

3.5.2. Application and Assessment

Accreditation shall follow a structured two-stage process comprising initial validation and continuous performance assessment. Initial validation evaluates educational purpose, accreditation status, technical readiness and regulatory compliance. Once admitted, participating platforms remain subject to periodic reviews that assess continued compliance, educational relevance, utilization and programme impact. Accreditation is therefore an ongoing regulatory status rather than a one-time approval.

Supporting governance measures include:

- a) A centralized accreditation and validation registry called the Approved Educational Platforms Register (AEPR).
- b) Periodic compliance reviews and technical audits.
- c) Dynamic inclusion or removal of platforms based on performance and compliance.
- d) A technology-neutral framework capable of accommodating future educational technologies.
- e) A transparent appeals mechanism enabling platforms to seek review of accreditation, conditional-accreditation or removal decisions.

The principal output of the accreditation process shall be the Approved Educational Platforms Register (AEPR). This register forms the authoritative basis for the Commission's approved-platforms list used by participating Operators when configuring zero-rated access.

4.0. Technical Design and Network Integration

The technical design establishes the common implementation baseline for all participating Operators, ensuring that zero-rated educational traffic can be accurately identified, efficiently delivered, and effectively monitored without compromising network integrity, consumer protection, or regulatory compliance.

The technical architecture has been developed to ensure implementation simplicity while preserving operational integrity. Rather than requiring extensive changes to existing network infrastructure, the Framework leverages existing charging, policy management and traffic management capabilities already deployed within participating mobile networks. This minimizes implementation costs, accelerates deployment and promotes uniform implementation across Operators while maintaining sufficient flexibility for future technological evolution.

4.1. Traffic Identification Mechanism

IP-based identification shall be the common technical standard for identifying zero-rated educational traffic throughout the roll-out phase. In comparison with other approaches considered (i.e. DNS-based identification and Deep Packet Inspection) IP-based identification provides the appropriate balance between implementation efficiency, precision and regulatory compliance. It also avoids susceptibility to tunnelling and domain manipulation associated with DNS-based identification. Furthermore, it avoids the privacy and implementation concerns associated with Deep Packet Inspection.

Under this approach, accredited educational platforms shall maintain dedicated and verified IP addresses for all educational services intended to receive zero-rated treatment. Platform providers shall supply verified mappings between approved domains, URLs and corresponding IP ranges to participating Operators. These verified mappings will form the basis upon which Operator charging and policy systems distinguish zero-rated educational traffic from ordinary internet traffic. Accredited platforms shall notify the Commission and participating Operators of any change to their approved IP ranges not less than five (5) working days before the change takes effect, or immediately the change is effected where the change is unplanned and/or unavoidable.

4.2. Network Architecture

Participating Operators shall implement zero-rating by configuring existing policy control and charging systems to exempt traffic destined for approved IP ranges from accredited learners' commercial data allowances. The AEPR shall constitute the definitive reference for all technical configurations, ensuring that only verified educational platforms receive zero-rated treatment. The Commission shall publish all additions to, and removals from, the Register on its website, and participating Operators shall implement the corresponding configuration changes within 48 hours of publication. Removal of a platform from the Register shall take

effect immediately upon publication, and zero-rated treatment for that platform shall cease accordingly.

Each participating Operator shall maintain synchronized configuration of its charging and policy systems, periodically refresh approved IP ranges where platforms utilize Content Delivery Networks, implement mechanisms for detecting abuse or traffic leakage, and submit monthly implementation reports to the Commission. Any discrepancy between a deployed configuration and the Commission's Approved Educational Platforms Register shall be corrected and reported to the Commission within 48 hours of detection.

In addition to Operator whitelisting, the Commission shall provide a discovery portal enabling beneficiaries to identify and reach approved educational platforms and shall integrate that portal with national education platforms.

4.3. Quality of Service

The effectiveness of the Initiative depends not only on making approved educational content available without data charges, but also on ensuring that beneficiaries receive a level of service equivalent to that experienced by subscribers accessing paid services. Zero-rated access should therefore not result in a diminished user experience or create a two-tier internet in which educational traffic is technically disadvantaged.

Accordingly, participating Operators shall ensure that zero-rated educational traffic is neither throttled, degraded nor deprioritized relative to equivalent paid traffic carried over the same network. This requirement reinforces the Commission's commitment to an open internet while ensuring that the Initiative's educational objectives are achieved without compromising service quality.

Quality of Service obligations shall be measured against the applicable Nigerian Communications (Quality of Service) Regulations 2024 and the Quality-of-Service Business Rules 2024. Operators shall remain responsible for maintaining compliance with these instruments throughout the roll-out and any subsequent national deployment.

Monthly technical reports submitted to the Commission shall enable continuous assessment of network performance, user experience and operational effectiveness while supporting timely corrective actions where service quality falls below acceptable thresholds.

4.4. Cybersecurity Baseline

Cybersecurity safeguards are fundamental to protecting the integrity of the Initiative and ensuring that zero-rated access cannot be exploited for malicious purposes. The Cyber Resilience Framework for the Nigerian Communications Sector (CRF-NCS) shall serve as the baseline cybersecurity framework for participating Operators and accredited educational platforms.

For the initial roll-out phase, full CRF-NCS certification shall not constitute a mandatory precondition for participation. However, Operators shall demonstrate their current level of implementation and provide an implementation roadmap where certification remains outstanding.

Participating Operators shall implement the following minimum cybersecurity controls:

1. Detection of tunnelling, anomalous traffic and attempts to circumvent zero-rating controls.
2. Timely reporting of significant cybersecurity incidents to the Commission's CSIRT.
3. Appropriate identity, access management and data-security controls for zero-rated sessions.

Accredited educational platforms shall likewise implement proportionate cybersecurity measures, including compliance with the Nigeria Data Protection Act 2023, and the Cybercrime (Prohibition, Prevention, etc.) Act (as amended). They shall also implement secure hosting arrangements, acceptable use policies and minimum incident response procedures. These measures collectively preserve trust, protect learners and maintain the integrity of the approved-platforms ecosystem.

4.5. Per-Line Daily Data Allowance

A daily fair-usage threshold shall apply to zero-rated traffic on each eligible learner's line. The purpose of the threshold is to balance two legitimate objectives: providing beneficiaries with a meaningful volume of educational access and protecting participating networks from excessive or uncontrolled traffic exposure. The allowance shall be distinct from the learner's regular data or bonus balance and shall apply uniformly across participating Operators. The proposed daily allowance for the rollout phase is 100 MB per line, per day.

4.5.1. Application of the Threshold

The zero-rated allowance shall be applied through the participating Operator's Online Charging System (OCS). During an active session, the OCS shall monitor cumulative usage against the approved threshold. When the threshold is reached, the applicable policy and charging controls shall immediately terminate the zero-rated treatment for the session, thereby preventing leakage into unapproved or unpaid traffic. In this regard,

- a) The allowance shall be measured per learner line and reset at the agreed daily renewal time.
- b) The allowance shall apply only to traffic associated with platforms and IP ranges contained in the AEPR.
- c) Consumption of the zero-rated allowance shall not reduce the subscriber's regular data or bonus balance).

- d) Once the zero-rated threshold is exhausted, continued access shall be subject to the learner's existing data plan, switch to text-only mode or other applicable charging arrangements.
- e) Operators shall maintain auditable usage records sufficient to support monitoring, reconciliation and regulatory review.

5.0. Learner Eligibility and Accreditation

A simple accreditation process leveraging whitelisted websites accredited by the FME and the NCC will be adopted. To access these services, users are required to sign up and create user profiles on the respective platforms. The Framework will support the use of alternative User Authentication Pathways for all students and teachers. The list of Alternative User Authentication Pathways and their main identity credentials shall be published and updated from time to time as experience with the Zero-Rated Initiative evolves. Eventually, the Framework aims for the establishment of a Central Education Database for the management of user authentication systems.

5.1 Support and Appeals

- Learners who encounter verification issues can contact a **dedicated helpdesk** via toll-free number or email.
- Appeals will be reviewed jointly by NCC and FME to resolve discrepancies.

This process is designed to ensure transparency, data integrity, and equitable access while leveraging existing national education databases and significantly reducing implementation costs to assure sustainability.

6.0. Funding Model

The Initiative will commence with the **Operator-Sponsored Model**, under which participating Mobile Network Operators (MNOs) sponsor the provision of zero-rated access to approved educational platforms for eligible learners.

The operational and commercial performance of this funding structure will undergo periodic joint reviews to safeguard network integrity and ensure the Initiative remains sustainable.

7.0. Regulatory Approval

Implementation of the Initiative shall proceed based on this Framework. This is to ensure that the Initiative advances legitimate public-interest objectives while remaining consistent with the

Internet Code of Practice 2026, competition principles, data regulation and consumer-protection obligations.

7.1. Public Interest Exception and Net Neutrality

Zero-rated educational access shall operate under the Public Interest Exception provided by the Internet Code of Practice 2026. The Initiative remains content-neutral within the educational category and shall not permit exclusive commercial arrangements, discriminatory treatment or preferential network performance for participating platforms. In this regard, there shall be

- a) No blocking of lawful non-zero-rated content.
- b) No throttling or degradation of equivalent traffic.
- c) No prioritization of zero-rated traffic over paid traffic.
- d) Transparent and non-exclusive platform accreditation.
- e) Traffic-management measures only where expressly permitted by applicable regulation.

7.2. Fair Usage Requirements

A daily allowance of 100 MB per line per day per approved learner shall apply uniformly across all participating Operators. The allowance supports transparency, predictable implementation and effective regulatory oversight while ensuring equitable treatment of beneficiaries irrespective of network provider.

7.3. Consumer Protection

Consumer-protection responsibilities are allocated according to institutional competence. The Federal Ministry of Education and the Commission shall oversee platform approval, Operators shall remain responsible for network-related implementation issues, while the Commission shall coordinate complaint resolution and overall regulatory supervision.

Because the Initiative caters to learners at secondary school level, participating Operators and accredited platforms shall implement child online protection measures consistent with the Internet Code of Practice 2026.

These measures include age-appropriate terms and parental-control information; URL-level blocking of Child Sexual Abuse Material (CSAM) within the zero-rated service environment; and child-safety and age-appropriate content controls maintained by each accredited platform. Failure to maintain these controls may constitute grounds for suspension or removal from the approved-platforms list.

7.4. Competition Safeguards

The Initiative shall preserve a fair, transparent and non-discriminatory competitive environment. Eligibility for participation shall remain open to all platforms that satisfy the approved accreditation criteria, and which are listed on the AEPR, while Operators shall apply consistent on-boarding procedures and technical implementation standards. This shall ensure that there is

- a) No exclusive zero-rating arrangements.
- b) Uniform accreditation and on-boarding requirements.
- c) Technology-neutral implementation.
- d) Consistent application of fair-usage controls.
- e) Regulatory monitoring of market impacts.

7.5. Transparency and Public Awareness

Effective implementation depends upon clear communication with beneficiaries and stakeholders. Participating Operators, the Commission, and the Federal Ministry of Education are expected to publish the AEPR, explain eligibility conditions, describe complaint mechanisms and periodically update stakeholders on programme performance. Public awareness measures in this regard will include:

- a) Publication of approved educational platforms.
- b) Frequently asked questions and user guidance.
- c) Periodic public awareness campaigns.
- d) Accessible complaint and redress channels.
- e) Regular review of published information.

Following regulatory approval, implementation will proceed only after participating Operators demonstrate technical readiness, reporting capability and compliance with all conditions attached to approval.

8.0. Initial Roll-Out Phase

Pending the implementation of alternative authentication pathways referred to in Paragraph 5 above, the Initial Rollout phase will be open to subscribers on participating networks granting learner access to accredited whitelisted educational websites and platforms approved by FME and the Commission. Data from the Initial Rollout will be applied to evaluate process, technical, resource and other requirements for scaling up the programme to primarily facilitate

access for a target audience of learners from Government/Public Senior Secondary and Government/Public Tertiary Institutions in the long run.

8.1. Initial Roll-Out Platform Selection

Initial Roll-out platforms will be those that satisfy every mandatory eligibility requirement listed in 3.1 above, while also demonstrating sufficient demand, operational maturity and technical readiness. These would include

- a) Government education portals.
- b) Learning Management Systems of selected tertiary institutions.
- c) Digital libraries and repositories.
- d) National examination preparation platforms.
- e) Teacher professional development platforms.

9.0. Kick-Off

The Initiative will officially kick off in accordance with the regulatory approvals, platform accreditation, funding confirmation, and Operator readiness criteria detailed in this Framework. A coordinated national kick-off/launch will ensure consistency of implementation across participating Operators while reinforcing the Initiative's public-interest principle and character.

9.1. Network Activation Sequence

- a) Complete accreditation and onboarding of approved educational platforms.
- b) Configure charging, policy and zero-rating rules using the approved platforms list.
- c) Implement fair-usage thresholds, quality-of-service parameters, and security controls.
- d) Simultaneously activate zero-rated access across participating Operators.

9.2. Programme Identity and Public Awareness

A single programme identity will be adopted to reinforce that the Initiative is a national education programme rather than a commercial product. Public awareness activities should explain the approved platforms, eligibility conditions, fair-usage limits and complaint channels through coordinated communication by the Commission, the Federal Ministry of Education and participating Operators.

9.3. Stakeholder Engagement

Continuous engagement with educational institutions, state authorities, Operators and beneficiaries will accompany launch activities to promote adoption, improve awareness and ensure effective implementation across all participating locations.

10.0. Performance Monitoring

Monitoring shall provide evidence of implementation effectiveness and reporting should focus on network performance, utilization, educational reach and regulatory compliance. Key metrics to be monitored include

- a) Zero-rated traffic volume
- b) Active subscriber lines accessing approved platforms
- c) Platform utilization and request success rates
- d) Institutional and geographic reach
- e) Network performance, uptime and whitelist integrity

11.0. Impact Assessment and Refinement

During the Rollout Phase, periodic structured evaluations will be conducted to determine whether the Initiative is achieving its educational, technical, financial and regulatory objectives. Lessons learned should inform revisions for continuous rollout for sustainability of the initiative. Metrics to be monitored and reported upon in this regard include

- a) Improved educational access
- b) Digital inclusion outcomes
- c) Participation in underserved communities
- d) Estimated savings to beneficiaries
- e) Operator sustainability and funding adequacy

Evaluation findings will be used to refine accreditation standards, technical architecture, governance arrangements, monitoring indicators and abuse-prevention mechanisms before the full rollout.

12.0. Scale-Up/Expansion

The Initiative will be expanded on such terms as to ensure that its implementation remains technically feasible, financially sustainable and operationally effective. Additional categories of learners, educational platforms and educational institutions may be considered during the expansion period, while maintaining transparency, technology neutrality and regulatory

consistency. Additional Operators and network service providers who wish to support the Initiative may join during the Initial Roll-Out period.

12.1. Readiness Conditions

Readiness for expansion will be measured by successful completion of the roll-out against agreed success criteria. Such criteria include

- a) Demonstrated integrity of the approved-platforms list and security controls.
- b) Compliance with quality-of-service obligations.
- c) Availability of a sustainable long-term funding arrangement.
- d) Effective implementation of data-protection and child-online-protection safeguards.
- e) Operational governance, monitoring and complaint-resolution mechanisms.

Expansion should be undertaken progressively, with readiness assessed to ensure that the quality and sustainability of the Initiative are preserved.