

Zero-rating Frequently Asked Questions

Version 1.1, 2020-04-22

Q: What do the regulations say?

A: The Electronic Communications, Postal and Broadcasting Directions published on 2020-03-26 (as amended) include the following regulations:

- *9.1. Electronic Communications Service Licensees must provide zero-rated access to local educational content websites.*
- *10.2. Electronic Communications Service Licensees must zero-rate all COVID-19 sites as identified by the Department of Health and must zero-rate all calls to the national number for COVID-19 as published by the Department of Health.*

This list of Frequently Asked Questions deals with the requirement to zero-rate websites. (It does not cover zero-rated calls to the national COVID-19 number.)

Q: What does it mean to zero-rate a website?

A: Although the regulations do not define “zero-rating”, it is generally taken to mean that a user accessing a zero-rated website will not be charged for traffic to that website, and will be able to access that website even if they have no data remaining. For access services that have a cap, zero-rated sites will be accessible to users even if they have exceeded that cap.

Q: What can be zero-rated?

A: The regulations cover “local educational content websites” and “COVID-19 sites as identified by the Department of Health”. In general, a website can be zero-rated if it has a known, fixed IP address. Educational content that is located in cloud storage systems cannot be distinguished from other cloud content, and generally cannot be zero-rated.

Q: What are the limitations of zero-rating?

A: Zero-rating of local websites is only one tool to promote improved access to education. By itself, zero-rating only assists citizens who need to access specific zero-rated sites. It has some limitations even then. Generally, embedded content on a website (such as videos, or external images) will not be covered by zero-rating, as it is not hosted on the zero-rated server but on a third-party server which is not zero-rated.

Zero-rating local websites also does not solve more general problems of affordable access to video conferencing platforms such as Zoom or Microsoft Teams, or access to non-local content such as specific YouTube videos, or particular Google Drive documents useful to learners. Operators cannot distinguish educational use of services and platforms from commercial or entertainment use, and are thus unable to zero-rate educational use of the Internet in general.

Q: How do operators implement zero-rating?

A: The ability of an operator to implement zero-rating depends significantly on the technical limitations of their underlying network architecture. This means that each operator's approach may be different.

Some fixed line operators implement zero-rating by listing the IP address of the sites in a proxy server or by accounting for traffic to those IP addresses differently. In some cases, this is a relatively simple process, and can be done based just on the domain name and IP address.

Some mobile operators implement zero-rating using deep packet inspection. This allows for more nuanced zero-rating of content within a website, but poses challenges for secure sites, and the process for adding each new site to the zero-rated list is more time consuming. It also requires website operators to provide more technical information, and even changes to their website configurations.

Some operators cannot implement zero-rating at all. They have no technical mechanism for differentiating traffic to a particular local website from any other website. These operators have generally dealt with zero-rating simply by removing all caps on those services for the duration of the crisis.

Q: Where should I send my zero-rating request?

A: If you have a COVID-19 or local education content website that you would like to apply to have zero-rated, please complete this [application form](#) and then submit it to one of the following three Departments:

Department of Basic Education (DBE)

- Mr. Shiloh Naiken (Naiken.S@dbe.gov.za)
- Mr. Seliki Tlhabane (Tlhabane.S@dbe.gov.za)
- Ms. Elspeth Khembo (Khembo.E@dbe.gov.za)
- Mr Henry Kavuma (Kavuma.H@dbe.gov.za)

Department of Higher Education and Training (DHET)

- Ms. Trudi Van Wyk (VanWyk.T@dhet.gov.za)
- Mr. Wean Minnie (Minnie.W@dhet.gov.za)
- Mr. Randall Faulmann (Faulmann.R@dhet.gov.za)
- Mr. Bheki Mahlobo (Mahlobo.B@dhet.gov.za)
- Ms. Dorothy Masipa (Masipa.D@dhet.gov.za)

Department of Health (DoH)

- Mr. Mbulelo Cabuko (Mbulelo.Cabuko@health.gov.za)
- Mr Yogan Pillay (yogan.pillay@health.gov.za)

In addition, please copy your application to:

Department of Communications and Digital Technologies (DCDT)

- Mariam Paul (mpaul@dtps.gov.za)
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Q: Why does the application form require so much technical information?

A: Some operators require additional information (ports and SNI) to be able to successfully implement zero-rating for a website. Asking for all of the required technical information up front means that all operators can swiftly implement zero-rating once the application is approved.

Q: What is the process after I submit my request?

A: Once your application is approved by the relevant Department, the details you provided on your application form are added to the list of zero-rated sites, and operators are notified of the addition. This is usually done within 24 hours of approval. Once listed, It takes several days for zero-rating of a site to be implemented across all networks.

Q: Does the site need to be hosted in South Africa?

A: Operators are required to zero-rate local websites. 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 operators have voluntarily zero-rated sites which fall outside of these limitations, but they are not required to do so.

Q: Do commercial educational sites qualify for zero-rating?

A: The regulations do not specify that a “local educational content website” must be operated on a non-profit basis, and some educational sites operated on a commercial basis have been included on the list. However, not all operators have agreed to zero-rate these sites.

Q: Where can I find a list of zero-rated sites?

A: The current list of zero-rated sites is available here: tinyurl.com/zero-rated. Please note that there will be a delay between an approved site appearing on the list and implementation of zero-rating across all networks.
