Zero Rating compliance
perspective from large application providers

SELFIE
NETWORKS

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Background

- **We help application providers participate in zero-rating programs**
- Talked to > 50 telcos & app providers worldwide over last two years, consulted FCC and BEREC
- Representative customers :
    - **Tinder** (Social network) 192 countries, 48 languages, top non-game grossing mobile app
    - **Audiomack** (Music) 6 million active users (2+M in EU), ~30 employees

Main Points

1. Barrier to entry in existing EU zero-rating programs is very high.
2. Many eligible apps left out of existing zero-rating programs → **user choice and competition are affected**
3. **Case-by-case doesn't work.** We need clear and transparent participation rules.

How can an app participate in a (music) zero rating program?
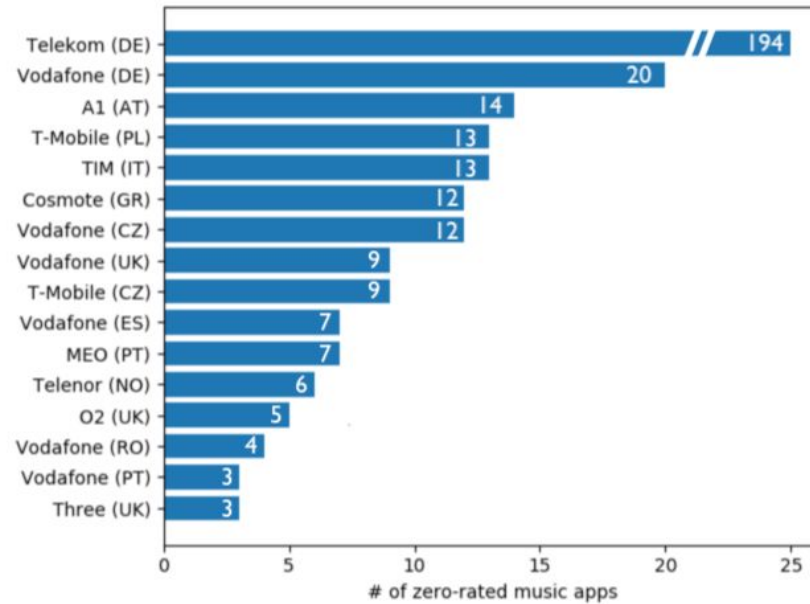
How can an app participate in a (music) zero rating program?

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Barrier to entry is high - 1/16 after 6 months …

Impact on user choice and competition

- Mobile data usage is one of the top user concerns (85% of songs played at Audiomack are pre-downloaded and played "offline")
- Audiomack participates in 1/16 zero-rating programs
- Apple Music participates in 16/16, Spotify participates in 12/16
- **User choice is biased and non-zero rated apps are in disadvantage**

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- Case-by-case doesn't work
    1. Impossible to get meaningful market data
    2. Numbers trumped by handful tech giants
    3. NRAs lack means and resources to audit and monitor

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- **Three simple rules for inclusive zero-rating programs:**
  1. Online workflow for app providers to apply
  2. Common, reasonable technical terms for everyone
  3. Time-bounded: should launch or reject within 1 month

100% feasible technically and business-wise

Summary

1. Barrier to entry in existing EU zero-rating programs is very high.
2. When an app does not participate in a zero rating program and their competitors do, **user choice, innovation and competition are greatly affected**
3. **Case-by-case doesn't work.** We need clear and transparent participation rules, and this is 100% feasible both technically and business-wise.

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Questions or comments?

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It goes way beyond zero-rating...