

Africa Online

**A Study on the Emulation of Chinese Practices and Policy in the Telecom sectors of
Ethiopia and Nigeria**

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Abstract

In recent years, Chinese development efforts in Africa have increased in scope making China the second largest investor on the African continent with Chinese MNCs dominating multiple markets across the continent. The author investigates whether there is empirical support for the assumption that there is a correlation between market dominance of Chinese MNCs and similarity in policy and practices to those of China, an assumption based on Eleanor Westney's study on the emulation of organizational models in late 19th century Japan. To affirm this correlation and describe where it exists, the author examines the regulation of the telecom markets in Ethiopia and Nigeria, two cases where Chinese MNCs have varying degrees of control over the telecom market. Whether or not the studied cases share similarities with the policy and practices of China is studied using the functional method of comparative law as described by Mark Van Hoecke. The study is based on data collected from Freedom House's reports on freedom on the net which scrutinizes legislation, court cases and the behaviour of government institutions in 65 countries. The author then discusses similarities and differences between the studied cases and China, concluding that the before mentioned correlation does exist to a certain extent and that further research is required.

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Introduction

20th century China can be described as a low-key actor in foreign policy. It stood up for sovereignty in the UN security council making sure that it could develop on its own terms but it didn't involve itself in many other matters and it stayed out of international organizations to a large extent.¹ Offshore investments were negligible and mainly reached communist parties throughout Africa and Latin America. This however, is no longer the case and today, China takes part in many major UN peacekeeping operations. It is a member of the World Trade Organization, The International Monetary Fund and The G20 and played a prominent role in negotiating the Paris Agreement. The Chinese economy has gone through immense growth and is only second to the United States' in terms of GDP.² Today China is also the second largest investor in Africa not only through development aid and loans but also through enormous investments in transportation infrastructure, power plants and telecom. Chinese goods and services are common and many Chinese nationals are operating throughout Africa, employing and training locals in multiple sectors which puts up serious competition with the investments and development efforts of the global north and in many states neglected by the US and Europe due to human rights offenses, China is dominating several markets. Under the leadership of president Xi Jinping, China launched the One Belt One Road (OBOR) initiative with the goals of expanding trade routes throughout Asia, Africa, the Middle East and Europe by investing enormous amounts of capital in infrastructure projects such as ports and railways.³ China is very different from western actors in many regards but especially when it comes to freedom of expression where it goes to great lengths to enforce censorship and surveillance. Are these policies and practices exported alongside Chinese investment in the telecom sectors of Africa? Possibly but whether or not Chinese multinational companies (MNCs) have the intention to do so is hard to prove due to lack of transparency and vaguely formulated policies. Are African recipients of Chinese aid and investment likely to adopt policy and practices similar to those of China? Probably, according to emulation theory which describes how developing states attempt to imitate institutions and laws of others. This study takes off in the telecom sectors of Ethiopia and Nigeria where Chinese multinationals are major players. I examine Ethiopian and Nigerian court rulings, law enforcement and institutional practices to determine if

¹ Breslin et. al, *Handbook of China's International Relations*.

² IMF, 'Report for Selected Countries and Subjects'.

³ 'Kina bestämmer spelreglerna för den nya Sidenvägen'.

they are similar to those of China and investigate whether there is a correlation between similarity of laws, institutions and practices and dominating presence of Chinese actors in the telecom sector. Ethiopia is studied because its market is dominated by Chinese actors making it likely to show similarities whereas Nigeria is studied because of its diverse telecom market and close ties to western and Chinese actors making similarities less likely to be found. Laws and institutions are examined by looking into the outcome of court cases and what authority regulating institutions are given using the functional method of comparative law as described by Mark Van Hoecke.⁴ Whether laws and institutions are similar or not is determined by categorizing what government practices are enabled and what behaviours are forbidden or punished in both cases and my findings are compared to the “Chinese model” (further described under Theory). The results of this study are related to theory on emulation of institutions and policy.

Purpose

The purpose of this study is to compare the laws, regulating bodies and law enforcement in Ethiopia, Nigeria and China in order to confirm that there is a correlation between on one hand similarities found between the cases and China and on the other hand the presence of Chinese MNCs in the respective cases. Another purpose is to describe where this correlation exists as well as where it does not.

Research Question

Are the laws, regulating institutions and law enforcement governing the telecom market and online activity in Ethiopia and Nigeria similar to their counterparts in China?

⁴ Van Hoecke, ‘Methodology of Comparative Legal Research’.

Theory

Emulation can be described as an actor's deliberate attempt to imitate institutions, policies and practices (hereafter model) of other actors that are perceived to be successful in order to achieve development.⁵ This sets emulation apart from policy diffusion and policy transfer since they "[...] May be the result of impersonal structural forces"⁶ and "[...] [M]ay stem from adherence to externally imposed conditionalities".⁷ What model is emulated is determined as mentioned by how successful it is perceived to be as well as how accessible knowledge about the model is. A good example of this is the holistic reform of Japanese society in the late 19th century. Westney describes how the Japanese government as well as the private sector sought the council of European and American entrepreneurs, scholars and policymakers among others in order to adapt businesses and institutions to match the increasing competition of the international market.⁸ The private sector largely turned to Americans for advice on how to adapt partially because at the time, multiple US businesses and missionaries willing to share their knowledge and experience were present in Japan but also because private actors, unlike the government, did not have the resources to hire knowledgeable advisors from far abroad. After choosing a model, exchange programs with universities in the model states were initiated and Japanese people got the opportunity to work alongside professionals already accustomed to the model. The models chosen for emulation were as far as possible applied in Japan, however, some institutions required for the models to function were missing. Thus, the government had to either create new institutions or make already existing institutions, some of which had no western counterpart, fill the function of the emulated model. Parts of the chosen models were discarded either because some specific aspects were deemed inefficient or because they didn't translate very well to Japanese culture.

Multiple developing states have recently been deepening their diplomatic relationships with China. Chinese development programs as well as investments in infrastructure and trade are growing in scope and the Confucius institute is reaching deep into Africa and the Americas.⁹ Previous research

⁵ Westney, *Imitation and Innovation*.

⁶ Fourie, 'China's Example for Meles' Ethiopia'.

⁷ Ibid.

⁸ Westney, *Imitation and Innovation*.

⁹ 'HanBan-Confucius Institute/ClassRoom-About Confucius Institute/ClassRoom'.

shows us that a large number of Chinese telecom professionals are operating in Nigeria and Ethiopia, employing and training locals.¹⁰¹¹ Contracts between Chinese MNCs and the government are often negotiated along with Chinese diplomats and political exchanges between China and the government are common. Given these preconditions, according to the logic of Westneys study, similarities to the Chinese telecom model is very likely, especially in states where Chinese MNCs are dominating the market. Emulation has been studied before, both in Africa and other regions. However, most studies focus on the emulation of European or Soviet models and emulation that has taken place in the past, few studies look at potential current emulation. There are studies that research the emulation of China but through my research, I have found that those studies look at ideology and attitudes among policymakers and not at how policy is put into practice.¹² Emulation is not only an outspoken strategy but also the passing of laws and reform of institutions. Thus, it is key to complement existing research with a closer look at actual policy and practices which is what this study is devoted to.

Method

To define the Chinese model and compare it with my cases, I am using the functional method of comparative law as described by Van Hoecke.¹³ The method consists of analysing court cases and scrutinizing institutions. The object of study is not the letter of the law itself but the outcome of the court case and the idea is that if the same problem has the same solution in different legal systems, the laws are essentially the same no matter how they are phrased. As for institutions, the object of study is the authorities and tasks given to institutions in different legal systems. If legal system A has an institution with the same tasks as an institution in legal system B, the institutions can be considered the same. To specify, it does not matter if government A has an institution specifically tasked with censorship while government B gives that task to the police, if both governments have institutions with the same authority and task, the institutions can be considered the same. After all, the same functions are fulfilled and the same practices are enabled or forbidden.

¹⁰ Fei, Samatar, and Liao, 'Chinese-African Encounters in High-Tech Sectors'.

¹¹ Ojo, 'Political Economy of Huawei's Market Strategies in the Nigerian Telecommunication Market'.

¹² Fourie, 'China's Example for Meles' Ethiopia'.

¹³ Van Hoecke, 'Methodology of Comparative Legal Research'.

This method is especially fruitful when studying emulation because as can be seen in earlier cases, emulating states must adapt the chosen model to local preconditions, thus the exact imitation of institutions and the letter of the law can not be expected across different cases.¹⁴

Van Hoecke argues in his article that in using the functional method, you can only make claims about outcome and not process. Even though two legal systems come to the same conclusion to the same problem, the roads towards that conclusion can be very different. Neither does the method tell us anything about socio-economic nor historical context of the law. A more holistic analysis of a legal system would surely be interesting. However previous emulation research shows us that legal processes, history and socio-economic context will diverge between cases and the expected findings of a holistic analysis of a legal system will not tell us anything about possible emulation. A developing state looking to emulate will attempt emulating models that are more advanced, more efficient and more successful than what is currently in place. It will not emulate actors that are considered equal since that cannot be expected to increase development. Thus, it is sufficient to study cases using only the functional method to establish similarities between models.

In studying court cases and institutions alone, I will not be able to establish whether emulation has taken place. To make such a claim, I would have to ascertain that the eventual similarities between one of my cases is caused by emulation and nothing else which in turn would require a study of political strategy by researching documentation or interviewing central actors. Therefore, I am complementing my findings as far as possible with interviews and statements from central actors regarding development strategy. By finding similarities to China and establishing a correlation between those similarities and the degree of presence of Chinese telecom MNCs along with an outspoken strategy to implement policy similar to that of China, I can provide strong arguments supporting the claim that Ethiopia and Nigeria are drawing on the Chinese model and nothing else.

This study draws a major part of its data from reports published by Freedom House. In their latest reports in the Freedom on the Net (FotN) series covering the period between the 1st of June 2016 and 31st of May 2017, they study 65 countries with the same systematic analytical tools and score each country based on their findings.¹⁵ Freedom House attempts to measure to what extent the studied countries live up to freedom of expression as defined in Article 19 of the Universal

¹⁴ Westney, *Imitation and Innovation*; Clapham, 'Ethiopian Development'.

¹⁵ 'Freedom on the Net Methodology'.

Declaration of Human Rights.¹⁶ The reports describe limits on online content and internet user rights by looking at whether filtering and blocking of content as well as surveillance and repercussions against users are imposed transparently and follow a legal process. The FotN reports follow a transparent methodology that treats all cases equally. However, each report has different authors with different backgrounds. The author of the report on Nigeria, 'Gbenga Sesan, is an expert on questions regarding communications technology as well as a key representative of an organization called Paradigm Initiative which is lobbying for user rights and freedoms in Nigeria.¹⁷ Given the academic background of Paradigm Initiative's board as well as Sesan's various positions in the United Nations,¹⁸ I believe it's fair to expect a high academic standard with no problematic bias from the author. The Authors of the reports on Ethiopia and China are anonymous for security reasons. As their reports show, critics in their respective countries can expect arrest, long prison sentences and reportedly torture making their anonymity understandable. Thus, I must assume that Freedom House has held the authors on China and Ethiopia to the same standard as the other studied cases.¹⁹

The FotN reports support their claims with sources and make sure not to claim anything they can't underpin with convincing material. Scrutinizing all of the source material, a total of 372 citations across three reports, would be a time-consuming effort beyond the scope of this study. However, I have looked closer at a random sample 10% of the citations to test the reliability of the reports and found that what was not first-hand sources could be triangulated. This strengthens the reliability of the reports and although I don't use all of the material found through triangulation, I am convinced that the reports make reliable claims.

Operationalization

In order to compare my cases to China, I provide a definition of the Chinese model that consists of a list of behaviours that are forbidden as well as a list of functions fulfilled by Chinese regulating authorities. What behaviour is forbidden and what functions institutions fulfil is determined by

¹⁶ 'Universal Declaration of Human Rights'.

¹⁷ 'Board'.

¹⁸ 'Gbenga Sesan'.

¹⁹ 'Acknowledgements Internet Freedom 2017'.

using the functional method of comparative law. Lists of forbidden behaviours and functions of regulating authorities are provided for Nigeria and Ethiopia as well. The cases are then compared to the Chinese model to identify similarities and differences. To be considered similar to China in regard to a certain behaviour, a case must forbid the same behaviour and apply comparable penal measures as China. Thus, if one behaviour is punished in China and not in for instance Nigeria, the two are not considered similar regarding the behaviour in question. To make claims about degree of similarity to the Chinese model, the number of similarities are compared between the cases. The cases are chosen based partially on prominence of Chinese telecom MNCs. In Ethiopia, Chinese actors are dominating the market whereas in Nigeria, multiple roughly equal actors are in competition (-more on the reasoning of my selection of cases in the following chapter). If Ethiopia proves to be more similar to China than Nigeria, I can safely claim that there is a correlation between that similarity and dominance of Chinese MNCs in the telecom markets of my cases. If the opposite is found to be true, the assumption of a correlation is weakened along with emulation theory. It would be interesting to see if a case with absence of Chinese MNCs is more different from the Chinese model than cases with Chinese MNC presence since that would strengthen the claims of this study, should it prove successful. However, I am restricted in time and resources and will leave the study of such a case for future research.

Selection of Cases

According to emulation theory there should be a correlation between market dominance and similarity to a model. Thus, if Chinese telecom MNCs dominate the market in a developing country, that country's institutions and application of laws should be similar to the Chinese telecom model. If this is true, less similarities should be found in developing countries where Chinese MNCs are competing with and are on equal footing to actors with other national backgrounds. To study whether these assumptions find empirical support, at least two cases need to be studied: one where Chinese MNCs are dominating the telecom market and one where they are in fair competition with others. By doing this, I expect to describe where an eventual correlation exists and where it does not. Studying a case where Chinese MNCs are absent would tell us nothing about whether the presence of Chinese actors have an impact on politics or not which defeats the purpose of this

study. Therefore, Chinese MNC presence is a requirement to qualify as a case. By selecting cases according to these criteria, I hope to generalize my findings to a wider population of developing countries with preconditions similar to my cases.

Ethiopia is studied due to Chinese market dominance. It was never colonized by European countries except for a brief period during the Second World War when it was occupied by Italy.²⁰ Thus, Ethiopia has enjoyed a low degree of exposure to European governance and institutions which sets it apart from the rest of Africa. While Ethiopia has drawn on European models to develop institutions, the main models aspired to were those of 19th century Japan and the Soviet Union. Ethiopia has shied away from development aid with conditionalities and attempted to achieve development on its own terms, further distancing itself from western institutions and influence.²¹ The Ethiopian internet service industry is owned by Ethio Telecom (ET), a government owned company with no competing actors. In 2006, ET found an urgent need to modernize its technology and turned to Chinese ZTE and later also Huawei. The two Chinese MNCs have rapidly updated and expanded the Ethiopian telecom networks without serious competition from other actors, an undertaking financed by loans granted from a Chinese government owned development bank, loans with low rent and no conditionalities.

Nigeria is chosen because of its telecom market competition. It is a former British colony and as such, it has inherited some British institutions, notably the common-law legal system found in many other previous colonies.²² Nigeria used to have a state-owned monopoly in the telecom market until the early 1990's. After an economic crisis, the government was heavily indebted and decided to privatize and liberalize large parts of the public sector, including telecom, in line with the structural adjustment programs of the International Monetary Fund (IMF) and the World Bank, two western organizations that Nigeria relied on for development funding.²³ MNC's from around the world were buying into the previously government owned monopoly holder Nigerian Telecommunications Limited (NITEL) and in 2017, actors such as French Alcatel Lucent and Swedish Ericsson among others are competing with Chinese Huawei, ZTE and Alcatel-Lucent Shanghai Bell for infrastructure contracts. This diverse foreign investment has created jobs in both

²⁰ Clapham, 'Ethiopian Development'.

²¹ Workneh, 'Chinese Multinationals in the Ethiopian Telecommunications Sector'.

²² Adebola, 'Common Law, Judicial Precedents and the Nigerian Receivership Procedure'.

²³ Ojo, 'Political Economy of Huawei's Market Strategies in the Nigerian Telecommunication Market'.

Chinese and western companies which exposed the Nigerian people as well as the government to actors representing multiple models of telecom development. Chinese MNCs benefit from tax cuts from the Chinese government for investing abroad which makes their products cheaper and Nigeria can take large development loans at beneficial rates without conditionalities from Chinese government owned banks to fund their investments in Chinese technology and services which gives the Chinese MNCs in Nigeria an advantage against their western competitors. Never the less, despite their advantage, Chinese MNCs remain in competition with western actors that provide attractive offers making a vibrant market with no clear dominance.

China

Under Deng Xiaoping's rule, China underwent economic liberalization and attempted to cast away the isolationism of Maoist ideology which softened relations with western actors. This changed dramatically in 1989 after the massacre at Tiananmen Square. Sanctions were imposed and a tougher political stance was taken by the west towards China. However, most African governments reacted with silence. Some reacted positively to the incident going as far as congratulating China for successfully and efficiently stopping protests.²⁴ China found tolerance towards its behaviour and likeminded statesmen in large parts of Africa and although serious foreign policy efforts and investments in the continent came much later, Sino African political bonds started to grow strong post Tiananmen. The Chinese Communist Party (CCP) was a rather new actor in foreign policy at this point and barely had any functioning embassies in Africa at the time but this came to change in the following decade.

The foundation of Chinese development is economic growth under government control and maintaining growth is what gives legitimacy to the CCP. An economy can only grow so much within the borders of one state however, Chinese actors need to seek new markets and more natural resources are needed to fuel the economy.²⁵ This is where Africa fits in to Chinese foreign policy. The continent is resource rich and full of potential consumers of Chinese products and services. In the year 2000, the first Forum on China-Africa Relations (FOCAC), a political forum with the

²⁴ Breslin, *Handbook of China's International Relations*.

²⁵ Breslin.

purpose to promote development was hosted by the Chinese government in Beijing. 80 ministers from 40 African governments attended in an effort to find an alternative to what the west had to offer in terms of development. Chinese officials considered the global order at the time to be unfair towards the developing world and aimed to change this, claiming that development aid under conditionalities on human rights and liberalization should be “vigorously opposed”.²⁶ The message from China was that sovereign states with different historical and cultural background should be able to decide what human rights they abide to and what path of development they choose to follow on their own without outside intervention. The forum ended in a plan to double Chinese development aid to African governments and instate a development fund to promote Chinese offshore investment in Africa. Further, it was decided that the debt of 31 African states was to be cancelled and tariffs on hundreds of African products were removed to encourage Chinese import from Africa. The plan also included increased academic exchanges and professional training programmes. Today, a total of 6 FOCAC ministerial summits have been held to expand Sino African development projects.²⁷ Chinas Africa policy involves business relations, political counselling and education which makes good conditions for emulation, especially in African states neglected by western actors.

The Chinese government is keeping tight control over the national telecom market. Although private Internet service providers (ISP), domestic social media and other telecom companies are allowed, they are required to comply with government strategies and apply censorship and filtering of content and websites such as private messages, pictures and blogs containing satire and discussion on controversial matters as well as foreign news outlets considered inappropriate by the government.²⁸ Internet access has previously been denied regionally in connection to controversial events such as protests and natural disasters in order to prevent the spread of sensitive news and criticism.²⁹

Censorship of international content is performed automatically by the infamous Great Firewall of China which blocks entire websites as well as specific content based on keywords and IP address.³⁰

²⁶ Ibid

²⁷ ‘Johannesburg Summit & The 6th Ministerial Conference’.

²⁸ ‘FOTN 2017_China.Pdf’.

²⁹ Ibid, 4.

³⁰ Ibid, 9.

Content that is not filtered by the Great Firewall is under human surveillance.³¹ Connection to the global Internet is under government control which allows the government to deny access to ISPs, should they not comply with government rulings.³² Citizens have tried to bypass the Chinese online surveillance apparatus using VPN, however this has recently become increasingly difficult since the government has started to intercept and block international VPN providers.³³ VPN is not entirely forbidden though and it is in fact a tool used by the government to maintain presence on international social media among other things which makes VPN necessary. Therefore, Chinese actors can provide VPN services given that they apply for a license from the government which enables the government to crack down on domestic VPN should it be abused.

International social media is blocked in China and replaced by domestic alternatives to meet market demands. Domestic social media however is heavily restricted. User data must be stored within China, users are required to register to services using their full name and other data that prevents anonymity and all user data must be stored within China and shared with government agencies at their will, without judiciary oversight or transparency.³⁴ User accounts in social media are frequently shut down upon government request.³⁵ Further, government agencies have the authority to intercept and censor instant messaging in apps and SMS in real time.³⁶ This has serious implications on user freedom since the government can find out if users attend controversial events or discuss controversial topics through private messaging even if they are not suspected criminals. International online service providers are also required to store user data within China which allows the government to monitor virtually all online behaviour.³⁷ The State Administration of Press, Publications, Radio, Film, and Television which supervises traditional media is also tasked with monitoring live streams and online videos.³⁸ User transgression of government regulations is usually punished with deletion of user accounts and police arrest without court order.³⁹ Some users

³¹ Ibid, 8.

³² Ibid, 4.

³³ Ibid, 8.

³⁴ Ibid, 18, 22, 24.

³⁵ Ibid, 10.

³⁶ Ibid.

³⁷ Ibid, 2.

³⁸ Ibid, 7.

³⁹ Ibid, 17-22.

are sentenced to heavier punishment such as fines or prison time, however judges are not allowed to interpret the law independently and must abide guidelines from government agencies.⁴⁰ Thus,

Forbidden Activity	Punishment
ISPs, social media and other online companies failing to implement adequate measures against the spread of forbidden content.*	Punishments ranging from short detentions and fines to long prison sentences.
Providing VPN services without license.	Blocking of service.
Promoting religious interests online.**	Blocking of website.
Discussing ideologies optional to that of the CCP.***	Blocking of website, closing of social media accounts.
Producing news content without government approval.****	Closing of website or social media account.
News outlets publishing content from social media without authenticating sources.	Deletion of content.
Publishing criticism of the CCP in foreign online media.	11 years in prison.
Publishing criticism on the detention of political activists .	10,5 years in prison.
Publishing documentation on incidents related to protests.	4 years in prison.
Commenting Tiananmen massacre in private chat.	1 year in prison.
Posting satirical pictures of Xi Jinping.	10 days of detention.
Speaking ill of Xi Jinping in private online chat.	7 days of detention.
Posting news content on controversial topics.	10 days of detention.
Sharing discontent with local government programs in social media.	10 days of detention.
Using VPN to access censored content.	15 days of detention.

⁴⁰ Ibid, 17.

Accessing and sharing spiritual and religious content.*****	Punishment ranging from detentions to lifetime in prison depending on what gravity the crime has according to government agencies.
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users can't expect a fair trial if they're treated unjustly by the government.

*Kuaibo, a website hosting peer-to-peer video streaming was fined heavily and executives were sentenced to prison due to pornography being streamed on the website. This makes executives responsible for what content is shared between users. Failure to censor social media comments of lower gravity have led to shorter detentions.

**A Muslim website discussing the need for better halal labelling in China was taken down in December 2016 upon request from authorities. The content was considered extremist.

***A liberal website attempting to unite different ideological schools of thought in questions of democracy was taken down in October 2016. A feminist account on Chinese social media platform Weibo was closed in February 2017.

****Only traditional news outlets and government organizations are can obtain a license to produce news content online according to regulations as of may 2017.

*****Religious groups such as Falun Gong practitioners, Tibetan monks and Muslims are especially targeted by government agencies and given harsher punishment.

Table 2: Power of Chinese Regulatory Bodies and Government Institutions
Control of gateway to global internet.
Authority to shut down internet access at will.
Authority to censor online streaming and video content in real time.
Authority to demand deletion of news, blogs and other text.
Automated blocking of webpages and search terms based on keywords and IP address.*
Authority to impose limits on what software and services cybercafés can provide
Human monitoring of online content.
Blocking and interception of VPN services.
Deleting user accounts on social media.
Censorship of words and pictures in SMS and instant messaging apps through real time interception.
Monitoring of users and manipulation of discussions and content through social media accounts.**
Law enforcement has authority to demand help from private companies to decrypt data.
Encryption software can only be used after approval of government agencies.
Authority to instruct the judiciary regarding rulings of freedom of expression.
Authority to demand real name registration to online services.
Authority to extract user data at will.
Authority to detain citizens for online activity without criminal charges.

Authority to impose further restrictions on groups considered to threaten the regime.***

*Content containing certain seemingly harmless words are filtered since they're commonly used in a satirical context.

**Government agencies run social media accounts that appear to be private, manipulating discussions and averting attention from controversial events by posting pro-government comments. These accounts are also tasked with reporting offensive comments and criticism towards the government from social media users.

***The local government in Xinjiang imposed regulations in 2015, requiring real-name registration of Uyghur minority population upon purchase of electronic devices that could be used for recording, broadcasting and storage of data. The devices had preinstalled spyware allowing police to track users in real time.

Online journalism is heavily restricted in China. Using sources that are not officially acknowledged by the government is a punishable offense that can lead to detention on various criminal charges and creating news content is illegal unless you are registered as a news outlet.⁴¹ Several unofficial news outlets have reportedly been shut down by authorities. Spreading false information is punishable with up to 3 years in prison if the information is shared more than 500 times or viewed more than 5000 times.⁴² What is to be considered false information and legitimate sources is ultimately up to government agencies which severely limits freedom of expression and disables the use of anonymous sources in news reporting. ISPs and social media companies can be punished for failing to implement adequate measures to prevent the spread of false information and content labelled as extremist or terrorist.⁴³ This essentially forces internet companies to apply their own censorship and surveillance apparatus or face criminal charges. With the authority to define what's true and false, government agencies can put an abrupt end to all political discussion, satire, criticism, negative reporting and otherwise controversial activity on the net.

Table 1 and 2 consists of what behaviours are prohibited in China and what tasks and capabilities Chinese authorities have respectively, making up the Chinese telecom model.

⁴¹ Ibid, 13-14.

⁴² Ibid, 18.

⁴³ Ibid, 5.

Ethiopia

All connection to the internet goes through government owned ISP Ethio Telecom (ET) which holds a monopoly on the internet service market.⁴⁴ This enables the Ethiopian government to shut down internet access regionally and nationally which it has done on several occasions in association to mass protest.⁴⁵ Even when internet access is available, access to social media has been blocked for extensive periods. Social media users and bloggers posting content disliked by the government are frequently visited by security personnel demanding the content to be taken down suggesting monitoring of social media.⁴⁶ Ethiopia does not have its own domestic social media platforms like China. Thus, the Ethiopian government is unable to exercise the same kind of control over social media platforms. Whether the personal visits are due to a lack of technology to delete posts directly, inability to control international social media or simply employed as a tactic to scare citizens from expressing criticism towards the government online remains an open question. Recently passed anti-terror laws and defamation laws include online activity but are vaguely formulated which enables government crackdown on most online activity considered threatening.

The government imposes thorough control of communications hardware. Citizens leaving the country are required to register their hardware before departure and unregistered devices brought into the country are confiscated by customs in an effort to prevent the spread of forbidden technology and software.⁴⁷ Subscription to telecom services is also controlled with requirements to register full name, ID number and passport photo for purchasing a sim-card.⁴⁸ Further, home address must be registered for subscription to internet services. This information is shared with law enforcement and regulating institutions which makes anonymity online near impossible. ZTE, a Chinese telecom MNC employed to upgrade the Ethiopian telecom network has previously assisted in installing surveillance technology allowing the government to extract information on current location as well as the ability to intercept SMS, email and phone calls, records of which are frequently used in interrogations and court.⁴⁹ Even though European actors such as Swedish

⁴⁴ 'FOTN 2017_Ethiopia_0.Pdf'.

⁴⁵ Ibid, 4.

⁴⁶ Ibid, 8.

⁴⁷ Ibid, 11.

⁴⁸ Ibid, 14.

⁴⁹ Ibid, 13.

Ericsson is working on repairs of Ethiopian telecom infrastructure, ZTE is the largest investor and other Chinese actors hold significant contracts with the government making Chinese actors dominant.

The government issued a state of emergency in October of 2016 in connection to a mass protest. During the state of emergency, select online activity including online mobilization, posting protest related content in social media and contacting controversial dissidents was prohibited and offenders were arrested, sometimes sentenced to prison.⁵⁰ Multiple sources report that Ethiopian prisons exercise torture on detainees as well as prisoners in order to force confessions and extract information.⁵¹ This is denied by the government.

Privately importing communications technology.	Confiscation of unregistered hardware.
Accessing, posting and “liking” protest related content.*	Punishment varies from detention to 5 years in prison depending on gravity of crime.
Posting gestures or symbols related to opposition to the government.*	Punishment varies from detention to 5 years in prison depending on gravity of crime.
Contacting controversial diaspora population*	Punishment varies from detention to 5 years in prison depending on gravity of crime.
Criticising Ethiopian anti-terrorism laws	18 years in prison.
Posting critique in social media on how government handled protests.	6,5 years in prison.
Teaching internet security	5 years in prison
Publishing articles on controversial topics in foreign media	3 months in prison.**
Publishing anti-government music videos***	6 months of detention.***

*These activities were illegalized during the government-imposed state of emergency

**In October of 2016, an academic reportedly got tortured during jail time

***A group of 7 artists were arrested without criminal charges and held in a prison known to torture inmates for publishing music videos criticising the government. In June 2017, the group were charged with terrorism and are still held.

⁵⁰ Ibid, 2, 4, 9, 11-12.

⁵¹ Ibid, 12-15.

Table 4: Power of Ethiopian Regulatory Bodies and Government Institutions
Control of gateway to global internet.
Authority to shut down internet access at will.
Authority to detain citizens for online activity without criminal charges.
Authority to demand deletion of online news, blogs and social media posts.
Blocking and interception of VPN services.
Automated blocking of webpages and search terms based on keywords and IP address.*
Monitoring of users and manipulation of discussions and content through social media accounts.**
Impose limits on what software and services cybercafés can provide
Ability to terminate sim-cards and forbid individuals from acquiring new ones.
Authority to intercept and monitor communications in real time.
Authority to access user information at will.
Authority to monitor citizens through webcams and keyloggers using spyware.
Authority to demand registration of real name, passport photo and ID number upon purchase of sim cards and subscription to internet services.

Ethiopian laws are vaguely formulated allowing government agencies to define what is criminal and what is not.⁵² Whether the judiciary is independent or rules in line with government instructions is unclear, however no cases where the court ruled in favour of the defendant were reported by Freedom House. The number of court cases to study in Ethiopia is rather low compared to other states. The most remarkable instances occurred during the 2016 state of emergency when people were arrested by the thousands and even then, only a handful of cases were taken to court.

*News outlets covering controversial topics and criticising the government, human rights organizations, LGBTI groups and circumvention tools as well as digital security software and information thereof.

**Social media accounts run by government agencies appearing to be private are spreading propaganda and post pro government content to manipulate online discussion.

⁵² Ibid, 11.

An academic study based on interviews with Ethiopian policymakers and key government officials show that Ethiopia is using China as an inspiration in its development strategy.⁵³ Senior staff from the Development Bank of Ethiopia even went as far as claiming that Ethiopia “need[s] a cultural revolution like China had”.⁵⁴ Ethiopian ministers frequently visit China for sharing experiences and lesson learning on development and since the inception of FOCAC, the number has drastically increased on a yearly basis. Official documents state that the goals of Ethiopia’s development trajectory should be inspired by quickly developing east Asian states in general but in reality, the strategies adopted are more similar to the Chinese model than any other and statements from officials confirm that China is the major inspiration for Ethiopian development policy in general terms as well as in infrastructure, political stability, industry and so forth. The financial policy of Ethiopia has shifted from focusing on redistribution of resources to achieving double digit annual growth and increased GDP as a primary goal. Western influences were hardly mentioned by central actors and one senior advisor to the prime minister claimed that Ethiopia was aiming towards becoming like the Asian states that had developed in the last few decades since they were closer to where Ethiopia is now than the European states that have developed for centuries.

The study did not include interviews with officials in the telecom sector. Thus, I cannot prove that similarities between Ethiopia and China found in this study are the result of emulation. However, senior party officials stated that the Chinese population sacrificed some of their rights to enable the development of their country. Sacrificing rights is not a problem given that the state is under good governance, as long as it’s a developing state, such a sacrifice is justified for China as well as Ethiopia. This rhetoric and its widespread support among key Ethiopian political actors strengthens the assumption that the strict Ethiopian control of the telecom sector is imposed to strengthen the stability of the one-party state in order to implement a development trajectory similar to that of China.

⁵³ Fourie, ‘China’s Example for Meles’ Ethiopia’.

⁵⁴ Ibid.

Nigeria

In Nigeria, the telecom market is very diverse with 82 ISPs as of 2017.⁵⁵ Multiple mobile companies also provide internet services. Access to the global internet is not controlled by the government which severely limits its ability to exercise power over internet companies should it want to.⁵⁶ Regional limitations to internet connectivity has been enforced although as a means to combat the armed extremist guerilla Boko Haram and not to control the civilian population.⁵⁷ Cybercafés are required to apply for a license by law although the widespread presence of unlicensed establishments suggest that the law is not enforced.⁵⁸ There are no notable government enforced limits to or censorship of online media in Nigeria which paves way for a healthy environment for bloggers and social media users.⁵⁹ However, the Cybercrime Act which was signed into law in 2015 has through vague formulations enabled the government to arrest bloggers and seize their equipment on seemingly arbitrary basis for expressing critical thought online.⁶⁰ Criticism against the government is further hindered by the Nigerian Defamation laws which covers online activity and puts the burden of proof on the accused. Although sentences are rare, the government frequently accuses bloggers and media outlets scrutinizing and criticizing government agencies and politicians which has led to an increasing number of arrests since 2015.

A recent legislative proposal from the regulating body, Nigerian Communications Committee (NCC) suggest a political will to change towards stricter control of internet users and further limits on freedom of expression.⁶¹ The proposed law would allow real time interception of communication and require ISPs to assist government agencies in decrypting user data without judicial oversight. This proposal is currently being negotiated. In contrast, a bill that protects freedom of expression and user data online passed through both the house of representatives and the senate in late 2017, putting the future of the legislation in the president's hands.⁶² This paints

⁵⁵ 'FOTN 2017_Nigeria.Pdf'.

⁵⁶ Ibid.

⁵⁷ Ibid.

⁵⁸ Ibid.

⁵⁹ Ibid, 5.

⁶⁰ Ibid, 2, 5-8, 11.

⁶¹ Ibid, 9.

⁶² 'Nigerian Senate Passes Digital Rights and Freedom Bill | GIP Digital Watch'.

the picture of a politically inconsistent Nigeria with regulating bodies moving towards a more restrictive and controlling direction whereas politicians promote user rights.

The government as well as private ISPs has acquired surveillance technology used to monitor citizens by other states such as Ethiopia and the budgeting for new surveillance technology has increased drastically.⁶³ The Nigerian government motivates this by pointing at the struggle against Boko Haram. It is not known whether the Nigerian government uses its surveillance technology against civilians or not but in light of the crackdown on online critics and the strict legal proposition from the NCC, some observers fear that online freedom of expression and user rights are at risk.

Table 5: Online Activity Illegal in Nigeria	
Criticizing government agencies and local politicians.	Up to 2 days of detention.

Table 6: Power of Nigerian Regulatory Bodies and Government Institutions
Authority to detain citizens for online activity, criminal charges required.
Authority to order denial of internet access regionally*
Regulatory body exercises public authority independently from the government.**
Judiciary is independent from government influence***
Authority to perform online surveillance of citizens****
Access to user personal data upon request under judicial oversight.
Access to data on communication and online activity of users under criminal investigation.*****

*This authority has up to date only been used during a state of emergency in the fight against Boko Haram.

**Leadership of the Nigerian Communications Commission is appointed by the government but their work is not under direct government control.

***The government can't provide guidelines for court cases. There are cases where the judge has ruled against the government regarding freedom of expression online.

****Nigerian law allows surveillance online, however there is no proof of government agencies using this.

*****With vaguely formulated laws on cybercrime, this law allows surveillance of messages and other communication between government critics.

Senator Shehu Sani, chairman of the Senate Committee on Foreign and Domestic Debts and vice chairman of the Senate Committee on Foreign Affairs spoke out during a celebration of the CCP's 95th anniversary claiming that China is a role model for Nigeria regarding economic and socio-

⁶³ 'FOTN 2017_Nigeria.Pdf'.

political development.⁶⁴ He also applauded the CCP for being anchored in ideology and principles, something that many parties according to him are lacking throughout Africa. With China being the second largest investor in Nigeria, such friendly rhetoric is no surprise, Sani's speech is by no means an official declaration of Nigerian development policy. An explicit, outspoken, widely approved strategy to emulate China is yet to be found.

Analysis

When comparing the laws of Ethiopia and China, there are similarities at a first glance. Laws are formulated vaguely which enables prosecution of internet users on arbitrary basis. Citizens are punished with long prison sentences for criticising the government in foreign media, they are imprisoned for questioning legislation on social media and they are detained without criminal charge for creating and spreading oppositional content and discussing topics controversial to the government. When looking closer at court rulings and extrajudicial punishments however, the similarities become fewer. The criminalized activity reported in the FotN reports on China and Ethiopia are very different from each other as demonstrated in table 1 and 3. Some activities punished in China reportedly did not occur at all in Ethiopia and vice versa which leaves us asking whether those activities would have been criminalized should they have occurred. The list of criminal activity in China is far more extensive than that of Ethiopia which could be explained by multiple factors. With these differences at hand, it is easy to assume that the similarities in the application of the law are too few to suggest that market dominance of Chinese MNCs have an impact on Ethiopian laws. However, the court cases reported took place during a one-year period and does not represent an exhaustive description of the outcomes of court cases in the two countries. It is possible that more similarities can be found in a study of a longer period of time. Both countries have passed laws enabling the prosecution of the oppositional and critics but the data presented here is not sufficient to determine if the laws can be considered the same using the functional method which is a shortcoming of this study.

⁶⁴ 'China's Communist Party a Model for Nigeria – Shehu Sani'.

Chinese authorities are able to control streaming services, video content and social media to a further extent than Ethiopia. This can be explained in part by the unique Chinese online environment. As the Freedom House reports show, foreign websites where users are able to share anti-government or satire and take part of foreign news media are systematically blocked. The Chinese government has no jurisdiction over large online services such as YouTube and Facebook since they are operating from outside of Chinese borders. Thus, to remain in control of online content, foreign services are banned and in their place, you find domestic services such as WeChat, Youku and Sina Weibo, actors whose servers and user data are required to be stored within Chinese borders which enables more extensive authority over online media. In Ethiopia, this is not the case. While automatic filtering of foreign websites akin to the Great Firewall does exist in Ethiopia, foreign social media is allowed although blocked periodically and domestic options to multinational online media is yet to be developed. The reason why is not for this study to decide but my best guess is that internet penetration plays a big role. China has an internet penetration of 53,2% totalling 750 million Internet users which makes the largest online population on earth whereas Ethiopia sits at an Internet penetration of 15,4% and 16 million users. Developing online media is costly but with a market consisting of the world's largest online population in the world's second largest economy, without having to compete with established western actors, Chinese developers are looking at good preconditions for success. The number of potential consumers in Ethiopia is much lower in comparison and even with access to the Internet, Ethiopian users have an average connection speed of 3,1 mbps compared to the global average of 7 mbps which severely limits the usability of media such as streaming services. The preconditions for developing a social media environment alike that of China simply are not there yet in Ethiopia.

While Ethiopian authorities lack the ability to delete online media user accounts and controversial posts in social media and blogs, they can terminate sim-cards and internet subscriptions of users at will, allowing the government to impose limits on user activity despite not controlling the online media itself. Further, government agencies visit citizens posting controversial content in person and demand the deletion of the content under threat of detention. These practices seem to serve the same purpose as those of the Chinese government, namely to remove discussion on unwanted topics and isolate unruly users from online media. It is difficult to claim that the two countries are the same regarding these practices, after all they are using different methods to tackle the same

problem. Never the less the outcome is similar and the possibility of this being an example of emulation with adaptation to local preconditions cannot be ruled out.

In the FotN reports, Ethiopian surveillance is politically motivated and there is no report of ethnical discrimination. The Chinese government however is targeting Uyghurs and Tibetans with extreme measures bot regarding surveillance and indictments making discriminatory ethnically motivated surveillance a factor in the Chinese model without comparable counterpart in regard to the authority of regulatory bodies.

Apart from the above discussed differences between Ethiopia and China, the countries are strikingly similar. Both governments maintain control of access to the global internet and deny access for similar reasons. Both law enforcements detain online critics without criminal charge. Automatic filtering is employed in both countries as a strategy to censor domestic sources of information, both governments employ measures to prevent anonymity and both governments can extract user data without restrictions and oversight. This confirms the correlation between dominance of Chinese MNCs and similarity to the Chinese telecom model at least in terms of government institutions. If the causal mechanism behind this similarity is emulation or something else remains unanswered but interviews with key government officials regarding Ethiopian development strategy suggests that it is a likely possibility. The interviews referred to concerns Ethiopian development strategy in wider terms and not specifically regarding telecom legislation which leaves us without explicit proof of emulation. Besides, it is possible that Ethiopia's development strategy is inspired by another actor entirely and that credit is given to China as an ex post facto construction to strengthen political ties between the countries or for another reason entirely. To establish the causal mechanisms behind the correlation between the similarities to the Chinese model and market dominance of Chinese MNCs found in this study, a study examining similarities between Ethiopia and China before and after Chinese MNC dominance on the Ethiopian telecom market is required. However, the empirical proof presented here shows that the correlation exists and within what context it exists which is enough as far as this study is concerned.

One might argue that China and Ethiopia are two authoritarian states and that there is little surprise that authoritarian states adopt similar policies and institutions to each other. It is after all in the interest of many authoritarian governments to control their populations and the flow of information. However, I would argue that it's naïve to think that authoritarian states come up with policy so

similar to each other on their own just by merit of being authoritarian and that the similarities seen in fact are correlated with market presence since it enables lesson learning and emulation.

As for Nigerian law, the only similarity to China found is the detention of government critics but that's where the similarities end. The detentions are generally shorter than those in China and no prison sentences at all were reported. Before the Nigerian cybercrime law of 2015, not even detentions of that kind were enforced. With no further sign of similarities between the two countries and political efforts from elected officials to strengthen the protection of user data and online rights through a democratic process, I must assume that merely the presence of Chinese MNCs has little to no impact on law-making.

The power to detain citizens for online activity and access user data and records of online communication all require either criminal charges or oversight from the judiciary which widely differentiates Nigeria from China since the Nigerian judiciary is independent and can deny access to personal data if it considers the case to be groundless. The power to deny access to the internet regionally has been exercised both in Nigeria and China but where China uses it to control the flow of information online during civilian protest, Nigeria motivates it with the fight against the armed, ISIS related guerrilla Boko Haram. Nigerian authorities have far from the same powers as their Chinese counterparts and the power they have is exercised under either extreme conditions or oversight which suggests that the correlation seen in Ethiopia lies between similarities and market dominance which yet again affirms that Chinese presence alone does not correlate with similarity between institutions.

Conclusions

This study finds that there is a similarity between the tasks performed by regulating authorities and law enforcement in the telecom sector in Ethiopia and their counterparts in China. It further finds that this similarity is correlated to the market dominance of Chinese MNCs on the Ethiopian telecom market as suggested by emulation theory. The assumption that Ethiopian institutions are drawn on the model of Chinese counterparts is strengthened by interview statements from key actors in Ethiopian development. These similarities are not found in Nigeria which suggests that

market dominance, not merely presence, is a prerequisite for the correlation to be found although further research is required to confirm this. Although Ethiopia is not a representative case for Africa in large or developing countries in general, these findings speak to a population of developing countries with preconditions similar to those of Ethiopia. With China expanding trade routes throughout Central Asia, Africa and the Middle East as part of the OBOR initiative, I believe that more cases like Ethiopia could be found if Chinese actors assert market dominance.

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