



AMIR 2.0 Achievement of Market-Friendly Initiatives and Results Program

Contract No. 278-C-00-02-00210-00

Communications Strategy Report

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Submitted to:
U.S. Agency for International Development/Jordan

Submitted by:
Chemonics International Inc.

May 26, 2004

This publication was made possible through support provided by the U.S. Agency for International Development, under the terms of Award No. 278-C-00-02-00210-00. The opinions expressed herein are those of the author(s) and do not necessarily reflect the views of the U.S. Agency for International Development.

Communications Strategy Report

Final Report

Contract No.:	278-C-00-02-00210-00
Contractor Name:	Chemonics International, Inc.
USAID Cognizant Technical Office:	Office of Economic Opportunities USAID/Jordan
Date of Report:	May 26, 2004
Document Title:	Communications Strategy Report Final Report
Author's Name:	Ian Larsen, Jeffrey Bernstein and Marshall Hoffman
Activity Title and Number:	Achievement of Market-Friendly Initiatives and Results Program (AMIR Program) ICTI, 423.7 Develop Communications Strategy

Funded by U.S. Agency for International Development

This report was prepared by Ian Larsen, Marshall Hoffman and Jeffrey Bernstein, in collaboration with Chemonics International Inc., prime contractor to the U.S. Agency for International Development for the AMIR Program in Jordan.

Data Page

Name of Component: ICTI

Authors: Ian Larsen, and Jeffrey Bernstein.

Practice Area: N/A

Service Offering: N/A

List of Key Words Contained in Report: telecommunications, regulation, public relations, communication, strategy, media, journalists

Abstract

This Communications Strategy Report is the result of the authors' interviews and resultant analysis of the Telecommunications Regulatory Commission's public relations capacity. Based on interviews with TRC executives and staff, Ministry of Information and Communication Technology personnel, AMIR advisors and Jordanian journalists, the authors analyze the strengths and weaknesses of the TRC's public relations capabilities and develop both short- and long-term recommendations.

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Executive Summary

This Communications Strategy Report is intended to serve as an initial tool to evaluate the public relations capacity and requirements of the Telecommunications Regulatory Commission (TRC). Building on that evaluation, the report also provides a series of recommendations designed to help the TRC achieve its goals and particularly to identify and clarify important messages during the liberalization of the telecommunications sector in Jordan.

In particular, the report outlines the history and current state of public relations at the TRC as well as the current state of the Jordanian mass media. This outline is the result of extensive interviews with TRC executives and staff, Ministry of Information and Communication Technology personnel, AMIR advisory personnel, and Jordanian journalists.

Referring to the landscape described in the evaluation, the report then moves into areas in which the TRC can take specific actions in order to strengthen and improve its public relations capacity. In terms of an overall public relations framework, the authors recommend that the TRC take a more active role as a source for unbiased information on the telecommunications sector, and build up its capacity to engage in both proactive and reactive communications. Further recommendations build upon this theme.

Among the most important recommendations presented is the development of a journalist training program to educate journalists on the basics of telecommunications technology and regulation and also provide them with a wider context in which to understand the information released by the TRC. Similarly, the paper recommends a training program for TRC staff in which public relations staff receive more technical telecommunications training, while non-public relations staff receive basic PR training. This cross-training is intended to ensure the best use of TRC staff resources in response to journalist inquiries.

The report also recommends the development of guidelines for allocating the appropriate level of public relations effort to actions and decisions taken by the TRC. The goal of the guidelines should be to match the public relations efforts of the TRC to the level of overall public impact of any given action or decision.

The authors also recommend a series of short- and long-term public relations campaigns to be undertaken by the TRC. The short-term campaigns focus on the liberalization process, specifically the issuance of a third mobile license and the impending fixed line liberalization. These campaigns are intended to communicate to the public the rationale and potential benefits of a liberalized market in order to provide Jordanians with a balanced view of the changes to the sector.

The long-term campaigns include efforts to build the TRC brand, increase awareness of the TRC's consumer protection role, develop crisis communications capacity, publicize Jordan's role as a regional leader in telecommunications technology and policy, and to redesign the TRC website to be a more effective public relations tool.

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The authors believe the information presented in the report is a significant first step in improving the TRC's public relations capacity, and thereby increasing the positive visibility and effectiveness of the TRC as a regulator and source of public policy information.

1. Introduction

The Telecommunications Regulatory Commission (TRC) is the government agency in Jordan responsible for regulation of all fixed and mobile telecommunications operators and services in the country, as well as management of radio frequency spectrum issues and postal regulation. Once governed by the Minister of Posts and Telecommunications, the TRC was recently designated an independent agency of the government. Five full-time commissioners including a chief executive, all of whom have voting power in the regulatory decisions made by the organization, now govern it.

In addition to its commissioners, the TRC has more than 120 full time staff based in Amman. The organizational structure of the TRC includes departments in the following areas: Spectrum Management, Technical, Economics, Management, Regulatory Affairs, Finance and Operations. The TRC's public and media relations sector is currently housed within the Operations Department.¹

The TRC's public relations capacities are the focus of this report. The report analyzes the current operations of the TRC's public relations section and makes recommendations for important short-term and long-term strategies that will aid the TRC in communicating its key messages to its primary audiences. These audiences include the Jordanian public, policy makers, service providers and other stakeholders in Jordan, as well as journalists, regional and global academics, industry analysts, governments and the private sector.

The report is the culmination of the authors' research into the state of the Jordanian telecommunications market, as well as individual meetings in Amman with TRC commissioners, department directors, members of the public relations staff and AMIR advisors to the TRC and the Ministry of Information and Communication Technology (MoICT). One of the authors also interviewed Jordanian journalists who cover the telecommunications sector.² The authors also interviewed the TRC chief executive in Washington, D.C. one week after an exploratory trip to Jordan.³ In addition, the authors researched international public relations best practices among telecommunications regulators through direct contact with regulatory authority officials as well as publicly available documents.

The communication strategies laid out in this document are primarily intended to increase the TRC's ability to meet its core responsibility of promoting the effective liberalization of Jordan's telecommunications sector. This also includes the TRC's role as a public advocate that ensures the existence of fair competition within the country and that all Jordanian residents reap the benefits of a competitive market, including improved

¹ An organizational restructuring has been proposed that would create a new Department of Public and External Affairs within the TRC, raising the public relations office to equal status with other departments. No specific timeframe has been identified for approval of the proposed restructuring.

² With the exception of the meeting with CEO Muna Nijem, all meetings took place at TRC headquarters between April 11 and April 15, 2004.

³ Annex A contains summaries of one author's interviews with various TRC and MoICT staff in Amman, and Annex C contains a list of all individuals interviewed for this report.

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services and lower prices. Indeed, this report argues that the public cannot fully benefit from market liberalization without a coordinated public communications effort. The public must understand the implications of the TRC's liberalization program and know its rights and responsibilities within the framework of Jordan's telecommunications policies. Only by receiving objective information about these rights and responsibilities can the public make appropriate decisions about how to choose a fixed line operator – and therefore operate as informed actors in the marketplace – when that market is liberalized in January 2005.

In the absence of a coordinated TRC communication campaign, information about the continued liberalization of the telecommunications sector likely will be communicated almost exclusively by the private service providers active in the market, many of which have large communications budgets. If the public is exposed only to messages about the liberalization from these enterprises, there will be very little chance that full, objective information will be delivered. Instead, the primary goal of these private campaigns will be to increase market share rather than to serve the public interest.

The TRC is one of the only organizations in a position to provide such information as a public service. In fact, the TRC should consider its public relations activities as its primary means of preserving the “public sphere” within Jordan's telecommunications market and ensuring a truly competitive environment. As such, effective public communication strategies must be considered a core competency of the TRC if it is to meet the goal outlined in its mission statement of “creat[ing] a regulatory environment that promotes fairness, competition and investment, thus assuring fulfillment of the Kingdom's long-term ICT needs.”

The secondary purpose of the public relations strategies outlined in this report is to better brand the TRC within Jordan. The prevailing belief within the TRC – especially among its department directors – is that much of the Jordanian public does not know that the TRC exists, much less what its responsibilities are. The public frequently confuses the organization with MoICT and even with Jordan Telecom, the public fixed line operator. The Jordanian public must understand the TRC's position in Jordan in order to take advantage of the functions of the TRC – including consumer protection – which flow from its role as implementer of public policy. Also, the TRC rightfully deserves credit for bringing better pricing and services to the Jordanian telecommunications market through competition. As the AMIR advisor to the TRC said during one author's initial interviews in Amman, “liberalization did not happen by accident.” It was the result of many years of planning on behalf of TRC professionals. Clearly, better branding of the organization is necessary within the country.

The tertiary purpose of these strategies is to position Jordan and the TRC as leaders in regulation of ICTs in the Middle East. Jordan was the first state in the region to create an independent telecommunications regulator and was among the first to open its mobile market to competition. Under the leadership of His Majesty King Abdullah II, Jordan seeks to set the standard for ICT development in the region and considers a robust and open telecommunications market key to its economic development goals. Jordan's

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advanced standing in technology policy and its regulatory framework *vis-à-vis* the rest of the region should be communicated to a broad audience not only in the Middle East, but around the world. The underlying purpose of the government's liberalized ICT policies is to attract greater investment in Jordan, but new investment will likely be limited if these messages are not communicated adequately. Significant public communication with audiences in Jordan and around the world will be crucial to the TRC's success as it continues to liberalize the Jordanian market.

The underlying message that the reader should take from this report and its recommendations is that the public relations arm of the TRC must not be relegated to an administrative role that operates only reactively. Public relations professionals, when well-trained, can do much to make the TRC more effective, but they can only do so if they are viewed by other management areas as key players with specialized expertise in the same way that the legal department, for example, is consulted for its expertise. As the TRC continues to liberalize the Jordanian telecommunications market, public communication will be an essential part of public policy and preserving the public sphere in a competitive market, not simply a means to make technical announcements about regulatory issues.

2. Communication and Media Evaluation

2.1. History of Public Relations in the TRC

Unlike in numerous other countries where public relations is a well-defined field considered key to an organization's success, the field remains immature and under-developed in Jordan.

According to members of the public relations staff, the section began as an office that was primarily responsible for communication-related administrative duties within the TRC. The Public Relations Section was housed under the Operations Department. Most of its functions were logistical, including responsibility for follow-up on meeting arrangements and maintaining communication with similar organizations in other countries. Only from time to time did the section write press releases and communicate with the Jordanian media.

The prevailing attitude within the TRC, the communication staff says, was that the Commission was a regulatory body whose primary responsibility was to set regulations. While communicating those regulations technically fell under the TRC's purview, this responsibility was secondary at best. Furthermore, the public communications that did take place were very technical in nature and were not prepared in a way that would help the Jordanian public make sense of their role in the process or how the TRC could help them. Furthermore, the PR staff did not have adequate technical knowledge of telecommunications or its effects on economic development to accurately respond to journalist requests. Only top TRC executives currently have sufficient background to speak to these issues in any substantive way.

During this initial phase of its existence, the PR section was advocating for itself and trying to help management understand the improved role that it could play. It proposed engaging in more image management for the organization, but few of the technical professionals within the TRC understood the importance of such services, and little action was taken.

Under the leadership of CEO Muna Nijem, the role of the public relations section has changed to allow a greater focus on mass media communication. Chairman Nijem has taken a strong interest in the PR functions of her agency and has been closely involved in its functioning. The section is now somewhat more independent, yet continues to be closely linked to top management. The section generally takes its orders directly from management and only occasionally functions in a more consultative process in which the PR section recommends unique communication strategies based on management's needs at any particular time.

Currently, the section sees itself as "working in the right direction," according to section chief Raw'a Mirza. The section continues to define itself largely as a facilitator, however, handling event management, relationship building and press relations. Its staff continues to have limited knowledge of telecommunications policy and regulatory issues,

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and accordingly continues to rely directly on Chairman Nijem to communicate these messages to the press. This results in TRC management usually defining the details of press campaigns and messaging and the PR section handling the logistics of press kits, press conference settings, and catering. The PR section drafts the actual press releases, talking points and speeches, based on messages identified by the chairman. The section even handles the chairman's travel, a service not normally considered part of public relations. The section is also largely responsible for coordinating the publication of the TRC's annual report.

The PR section believes that it continues to lack the institutionalized structure and decision-making processes to function adequately. The office continues to operate in an *ad hoc* fashion, with many press releases about significant regulatory announcements prepared on short notice, with little strategic planning for how the PR section can help to brand the TRC as an organization that is working to improve access to ICTs for the Jordanian public, for example.

One particular strength of the section is its relationships with the Jordanian media. Section staff appear to be tightly tied to the individual journalists covering the telecommunications field and can call on them when necessary. Such relationships are an important component of an effective PR department and should be encouraged and continued.

The section is also beginning to expand its services into advertising. At this writing, it is working with a Jordanian public relations firm to develop advertising in support of the TRC's new national numbering program, in which Jordanian phone numbers are changing slightly to allow for a greater capacity of phone numbers as both the population and the number of phones being used in the country grows.

A restructuring of the PR section and other sections within the Operations Department was recently proposed. According to PR section director Raw'a Mirza, the proposed restructuring will raise the PR function to the level of a department, giving the PR director more latitude to operate on an equal level with other department directors. The new department will house both the current PR operation and the international affairs section, also currently located within the Operations Department. As part of the proposed restructuring, the PR staff will likely double from its current three professional staff working under the section chief to six professional staff. This change alone will help the PR staff overcome some of their difficulties in implementing larger communications strategies simply because more staff will be available to handle day-to-day communications needs while others can be given an increased strategic planning focus.

2.2. Jordanian Mass Media

The mass media presence in Jordan is relatively small, with three national daily newspapers, a national television network, a national radio network, an official news agency and several weekly newspapers. Major international media maintain bureaus or

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stringers⁴ in Jordan, although the TRC does not usually engage in much outreach to international media outlets.

Most of the newspapers have a single journalist who covers the telecommunications sector, although telecommunications is only one of several issues covered by many of these journalists. In some cases the journalists work with editors who are knowledgeable in the field, and in other cases they do not. The television network and the radio network do not have journalists dedicated to covering the telecommunications sector. In general, they simply assign journalists to the issue whenever needed.

The small nature of the media structure in Jordan is significant because it allows the TRC public relations staff to develop strong relationships with the few journalists who cover the issue. The PR staff appears to know each journalist well and does not seem to have generally adversarial relationships with any of them.

The PR staff believes that there is a very high level of interest in telecommunications issues in the media in Jordan and that the sector receives coverage on an ongoing basis. In addition to the TRC, telecommunications journalists routinely cover MoICT, the two mobile phone operators, Jordan Telecom and other industry players.

The main problem with press coverage as described by the PR staff and others within the TRC is that the level of journalists' understanding of telecommunications issues is quite low, even if the interest in the subject is very high. For example, several of the newspapers publish TRC press releases *verbatim* without offering input from other experts or analysis of their own. Others simply summarize the press releases and add to them with interviews from other telecommunications experts in the country, including the CEOs of the mobile operators, for example.

The PR staff suggests that this lack of analysis in the media is largely the result of poor training in telecommunications issues on behalf of the journalists themselves, and interviews with several journalists generally bear out this point. Few of the journalists interviewed for this report have any technical, policy, or regulatory background in telecommunications. While some do come from a scientific background or a background in information technology, others have no academic history in the field whatsoever. In one example, a journalist came from a background in advertising and had no formal training in journalism or telecommunications at all. The journalist came into the field due to a lack of advertising jobs in Jordan and was assigned to cover telecommunications issues as well as to edit the lifestyle page of the newspaper, two vastly different assignments.

This lack of analysis is problematic for the TRC, as well as for the Jordanian public. Without a knowledgeable press corps, there is an inability for anyone other than TRC experts to synthesize information about the issue in a manner that is digestible for the general public. The TRC deals with highly technical information that is difficult to

⁴ "Stringers" are independent, part-time journalists who file stories for news organizations on an as-needed basis.

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interpret without specialized knowledge. In a framework in which journalists do little more than reprint TRC press releases, the public loses the ability to follow and make sense of regulatory changes in the country. In such a situation, the public will find very little value in news coverage of the TRC, regardless of the quantity of coverage.

Secondarily, a poorly trained press corps has a tendency to make the TRC's job harder. Whenever the TRC releases a news item, the PR staff and senior management are required to be overly vigilant with journalists to ensure accurate reporting of technical information. This presents a burden to the senior management in particular, whose time should be freed up for other issues.

2.3. Journalists' Impressions of the TRC

A degree of frustration toward the TRC appears to exist among some journalists. According to these journalists, the TRC is too slow to respond to their questions and sometimes effectively withholds information from them. In the case of the licensing of the third mobile operator, the TRC sent a letter to local media outlets stating that they would not issue public statements about this subject at all after having received an onslaught of questions about it from journalists.

While the need to ensure an unbiased process and appropriate handling of confidential information is understandable, this step was nonetheless unusual for a public sector organization, and it caused tension between some members of the press corps and the TRC. In one extreme example, a newspaper printed in its entirety the TRC letter denying information about the licensing process, which risked creating the public impression that the TRC is a secretive body unwilling to fully embrace transparency.

Some journalists criticize the TRC for having too few individuals who can answer their questions in a substantive way. In many cases, the TRC CEO is the only person made available to them to answer questions.⁵ They say that the other key actors in the Jordan telecommunications sector, e.g., the CEOs of the mobile operators, are very quick to respond to their requests and garner comparatively more press than the TRC as a result. In one example, a journalist writing a story about the issuance of the third mobile license in Jordan had been waiting for three weeks for an interview with the TRC, while the existing mobile operators were able to grant interviews within four days of the request.

Journalists also criticize the TRC for trying to control their stories too much. In some cases, the TRC has required journalists to submit their questions in writing before granting an interview. In other cases, the TRC has asked to review the journalists' stories

⁵ The fact that the CEO is the only person usually made available to answer questions may factor into the TRC's slow response time, as Chairman Nijem's availability is very limited, and she may not be able to respond to journalists in a timely fashion.

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before publication as a condition of granting an interview.⁶ Both of these actions are unusual policies by Western journalistic standards.

Some journalists also have expressed frustration that the TRC gives exclusive interviews on important issues to individual news outlets without allowing others to have access to the story. While it is not unheard-of for organizations with well-developed press operations to offer exclusive interviews to journalists, these interviews are almost never offered for the purpose of making an announcement about a technical matter or regulatory change. Instead, they are offered as an opportunity for a single journalist to gather more information on macro-level ideas and attitudes from an organization's executives.

One journalist from the *Jordan Times*, the country's only English language daily newspaper, also expresses frustration that the TRC does not prepare press materials equally in English and Arabic. The journalist is an Arabic speaker but characterizes her Arabic reading comprehension as relatively weak. According to this journalist, the majority of TRC press materials are prepared exclusively in Arabic, making it difficult to adequately cover the story. While this journalist may be the only one with such a problem, it is nonetheless significant, as observers and interested parties outside the Arabic-speaking world following Jordanian telecommunications issues would likely turn to the *Jordan Times* as a primary source of information about the country's progress toward liberalization of its telecommunications markets.

Cumulatively, these TRC policies, whether formal or *de facto* have led some journalists to believe that the TRC does not fully implement its policy of transparency. They argue that the TRC must conduct itself in line with international best practices of transparency and open communication. "Jordan must be modern in its approach," says one. "We can't say, 'we're Arab, we do it differently.'"

2.4. Current Public Relations Initiatives

During the last year, the PR section of the TRC has worked with an outside public relations firm for the first time. The firm, Action PR, is one of only a handful of such companies operating in Jordan today. According to interviews with TRC PR director Raw'a Mirza and a representative from Action PR, the purpose of Action PR's involvement with the TRC was essentially twofold: First, it added much-needed staff to the already overworked PR section. Second, it devised a strategy to better communicate with TRC stakeholders and better brand the TRC with the Jordanian public.

Action PR was very active in the TRC's work at last year's World Summit on the Information Society in Geneva. The company wrote talking points and speeches for TRC executives to use at the event. They also prepared press kits and other similar materials.

⁶ Chairman Nijem explains that this policy is sometimes necessary to ensure correct reporting of technical material. She says she would prefer not to engage in this practice and that having a better-trained press corps could eliminate the need for her to review articles before publication.

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The company was also very active during the period when the third mobile license tender was announced in late 2003. It prepared press releases, coordinated press conferences and fielded general media inquiries about the new license, for example.⁷

Action PR's strengths, according to the PR department, included its ability to work reliably in English as well as its ability to backstop the full-time PR staff during times of intense activity. However, the two organizations experienced some difficulty implementing Action PR's larger branding strategy.

The initial contract between the TRC and Action PR expired after three months. It was extended for one month after its end date, but at this writing it has not been renewed. However, Action PR does continue to work with the TRC on at least a short-term basis while the two organizations collaborate on a television public service campaign informing the public of the changes that are taking place as part of the national numbering plan.

In a separate effort from Action PR, the TRC last year initiated a regular newsletter called the TRC *Communicator* that was distributed to various stakeholders in Jordan and around the world. The publication was well received but became too labor-intensive to maintain and was ultimately discontinued.

⁷ As part of its strategic plan, Action PR developed what the authors consider to be several very good ideas for branding of the TRC in Jordan that should be carried out as part of a larger campaign. These strategies will be highlighted in Section 3.4 (Communication Strategies Outlined).

3. Recommendations

3.1. Proposing a Macro-Level Public Relations Framework

In order to create a public relations framework in which the TRC should operate and identify communications strategies, it is helpful to examine the different ways in which the TRC and the Jordanian mobile service providers have approached communication strategies in advance of and during the tendering of the third mobile license in the country.

As noted in the introduction of this report, the authors believe strongly that as the exclusive regulator of the telecommunications industry in Jordan, the TRC is one of the only organizations that has the legitimacy to communicate with the Jordanian public about why liberalization of the market is being pursued, what the short- and long-term benefits will be and what rights and responsibilities consumers will have under the new scheme.

The authors contend that the citizens' right to objective information about telecommunications policies is a fundamental matter of preserving the public sphere in a liberalized ICT environment.⁸ In order for Jordanian consumers and businesses to make educated choices about their telecommunications services, they need to have access to as much unbiased information as possible. For example, the existing mobile operators are currently making their positions on a third mobile license known through public relations efforts, but they have a vested interest in presenting a certain point of view – one that encourages limiting competition in the market.

However, it is in the public interest for Jordanians to be exposed to a variety of different viewpoints in order to be able to fully comprehend the issues in question. In its role as the executor of Jordanian telecommunications policy, the TRC should be serving as the primary supplier of unbiased information so that the public can make well-reasoned decisions based on complete information.

The dissemination of objective information is particularly important as Jordan prepares to liberalize fixed-line telecommunications. In short, unless the TRC plays an active role in objectively communicating the reasons why Jordan is pursuing a liberalized fixed-line telecommunications environment and what Jordanians can expect from liberalization, the public will be left in an information vacuum in which they will nonetheless be expected to make adequate decisions about how to interact with service providers and the regulator within the liberalized environment.

Without such a policy in place, one can expect the private carriers to fill this vacuum with partial information aimed only at increasing their own market share rather than delivering valuable information to consumers that will allow them to make complete and rational

⁸ Further theoretical background for the concept of the public sphere is presented in Annex B.

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choices as they consider which carriers to choose to provide various telecommunications services.

However, the current *de facto* policy of the TRC when approaching public communication is to release technical information about regulatory changes and proposed regulatory changes to the national media without focusing directly enough on why the changes are significant to the public or what the underlying objectives of government policy are. Furthermore, the TRC currently does little to promote public rights by informing Jordanians of their ability to file complaints against service providers and to have those complaints satisfactorily resolved by the TRC.

Let us look at a broad example from the mobile market in order to better explain why it is essential for the TRC to adequately fill the information vacuum on telecommunications liberalization. As many TRC staff and executives informed the authors during the discovery phase of this project, the two existing mobile service providers in Jordan have made it clear in the Jordanian press and elsewhere that they do not support further liberalization of that market. The TRC and MoICT experts have observed that the service providers appear to have launched major information campaigns in Jordan to support their point of view that adding a third mobile company to the milieu would constitute an oversaturation of the market and would not result in further decreases in prices or spark further innovation. One service provider collaborated with one of Jordan's best-known economists to make this argument in the press, potentially adding credibility to their argument in the public eye.

The service providers have apparently engaged in this campaign despite the fact that there is an overwhelming body of economic research suggesting exactly the opposite – that increased competition will only improve service, encourage innovation and further reduce prices in the marketplace, albeit to a lesser degree than took place when the country moved from a mobile monopoly scheme to a duopoly scheme.

While the mobile service providers have been fostering their limited point of view in the Jordanian media and among the country's policy makers, the TRC has done little to refute their claims. Instead, the TRC has continued to simply make staid announcements about changes in regulations or the offering of new tenders without directly challenging the service providers' assertions. As one TRC employee stated, "TRC is mandated to introduce more competition. The internal feeling is that it is not our responsibility to communicate why."

The service providers are disseminating partial information in support of their point of view, and the primary government agency that would be able to clarify the situation and give a fuller picture for the benefit of public debate is offering little information in return – effectively a distortion of the information required by the public to make adequate choices.⁹ The need to limit distortion of ideas in the public sphere, therefore, will become the overarching goal of the public communication strategies outlined below.

⁹ See Kant's thoughts on the dangers of distorted information in a free society in Annex B.

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The TRC is at a critical period in its history. It is on the verge of formally announcing the upcoming liberalization of the fixed line telecommunications market in the country, which will significantly change the ICT landscape. These strategies must be implemented quickly, as the fixed line liberalization is set to begin in January 2005.

The authors are sensitive to the fact that the TRC likely will not be able to match the communications budgets of private service providers operating in Jordan, but the recommendations presented in the Sections 3.2 through 3.4 could considerably offset this imbalance.

Recommendation: The TRC should take a more active role as a source for unbiased information designed to provide Jordanian and international audiences with a complete picture of the telecommunications sector. The TRC should enhance its capability to react to misinformation or lack of information, and also to proactively provide information on sector goals.

The following sections provide more detailed actions that the TRC can take in response to this recommendation.

3.2. Intermediate Steps – The Need for Training

During one author's initial trip to Amman, several TRC staff members referenced the need for training sessions for various groups as part of the communications process, and the authors strongly agree with this need. Indeed, offering technical training and training in the importance of strategic communication must be a foundation of the TRC's new, more comprehensive media strategy. Specific trainings are outlined below.

3.2.1. Journalist Training

As noted in Section 2.2 (Jordanian Mass Media), few Jordanian journalists or their editors who cover the telecommunications sector have technical training in telecommunications issues. This phenomenon has led to some frustration within the TRC because executives do not believe that journalists have adequate knowledge to report TRC decisions accurately, thereby creating the potential for dissemination of misinformation to the public. As a result, TRC executives have adopted an informal policy of requesting copies of articles before they are published.

The authors agree that the current level of knowledge of telecommunications issues among Jordanian journalists is preventing them from providing a presentation of telecommunications that would enable the public to make sense of regulatory goals and the reasons for increasing competition in the market.

The authors submit that journalists and their editors in Jordan must be perceived as essential actors in preserving a forum for public discourse. A poorly informed press corps cannot advocate for access to complete information because they themselves do not have the necessary expertise to determine when any other actor may be manipulating

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information being released. For example, without adequate knowledge, a journalist might have difficulty determining whether a document released by a mobile service provider is truly providing objective information about deregulation or is simply intended to provide partial information in an effort to increase the company's market share.

The handful of journalists as well as their editors who cover these issues in Jordan should be offered extensive training in telecommunications technology, policy and regulation as soon as possible.

Such training, however, cannot be limited to telecommunications jargon and "the wonders of new technology," although these items should be addressed in the training sessions. Instead, such training must be much more holistic in nature. It should address the economic theory behind liberalization as well as potential social development that could come about through expanded access to ICTs in developing and middle-income countries.

By understanding the technical, economic and social importance of ICTs, journalists will essentially be developing the critical tools necessary to better synthesize the importance of the TRC's policies for the Jordanian public. Journalists will be able to use these same tools to deconstruct arguments against liberalization that are being promoted by private actors seeking to maximize their own market share.

The authors cannot sufficiently underscore the incredible importance of comprehensive journalist training, in both the short- and the long-term. If the TRC engages in such training, it will likely create advocates for the idea that increased liberalization is the best means to spur development, lower prices and encourage innovation. A press corps with these new critical tools will be able to marginalize the vast communication budgets of the companies fighting greater liberalization simply by virtue of having an increased ability to analyze the arguments of those organizations. The result will be a significant return on investment for the TRC and improved access to complete information for the Jordanian public.

An equally important benefit for the TRC will be that improved journalist knowledge of the industry and technical issues will provide the TRC with more confidence in the press corps to "get it right" the first time. This confidence will reduce the TRC time and energy currently channeled into reviewing articles before publication.

It has been suggested by some within the TRC that there may be instances in which relatively low-paid journalists are receiving secondary income as consultants from private sector companies in the Jordanian telecommunications market, therefore creating a conflict of interest.¹⁰ By offering training to these journalists in particular, the TRC would essentially maintain a high ethical standard while applying pressure on them to

¹⁰ Such a situation was asserted as a "fact" by one executive interviewed for this report. The authors do not claim to have substantiated this assertion, yet they believe it is important to address the issue, as it presents a serious conflict of interest and has the potential to dangerously sway the objectivity of news coverage of the telecommunications sector.

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begin reporting on issues fairly. The authors believe that confronting these journalists with complete information about telecommunications regulation and the MoICT policies supported by such regulation is the best practice for offsetting the unethical procedures of other actors in the market.

The press corps' improved ability to report more analytical stories about the complete telecommunications sector will directly benefit the Jordanian public, not only in their ability to participate in a complete "public choice" scenario, but also to understand how much potential for social benefit there is in increasing access to technology.

A more active press corps can articulate to the public that as mobile pricing comes down through increased competition, access to these services – and access to crop data, weather, news, educational materials, etc. – will become easier. Increasing access to such development-related information may resonate in the minds of otherwise disenfranchised communities in Jordan, providing motivation to become more involved in demanding access to such information.¹¹

When contemplating the structuring of such journalist training, the TRC should seriously consider the need for balanced and objective information about telecommunications regulatory issues. While it is true that when queried most journalists said they did not believe that accepting training from the TRC would represent a conflict of interest or that such training would be considered biased, it is nonetheless important to ensure that a training program truly is objective.

One good way to achieve this goal is to incorporate the participation of outside organizations in the training. TRC technical experts should absolutely play an important role in the training (and particularly in accurately describing the Jordanian telecommunications landscape). However, the TRC could also consider inviting a handful of expert telecommunications journalists from major media outlets in developed countries with liberalized telecommunications markets to give Jordanian journalists a better sense of the global picture as well as best practices in other regions. The TRC might also consider involving experts from a major intergovernmental institution, such as the International Telecommunication Union, or influential academics or consultants involved in the field. By doing so, the TRC will provide a more well-rounded training and will be able to defend itself against criticism that the training sessions are biased in any way.

Recommendation: The TRC should engage public relations and telecommunications consultants to collaborate with TRC management and staff to design a holistic journalist training program. The training program should cover telecommunications technology and regulatory basics, presented in a context of economic development and benefits to Jordanians. The training programs should expose journalists covering the Jordanian

¹¹ For a more detailed treatment of information for development themes, see J.P. Singh's *Leapfrogging Development?*, 1999, State University of New York Press, and Robin Mansell and Uta Wehn's *Knowledge Societies: Information Technology for Sustainable Development*, 1998, Oxford University Press.

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telecommunications sector to positive examples of telecommunications sector press coverage from around the world. In addition, the TRC should consider how to attract journalists to such training while adhering to appropriate ethical guidelines.

3.2.2. TRC Technical and Communication Staff Training

The need for better training of TRC staff is just as important as the need for better education of journalists. At present, few technical staff members within the TRC fully understand the importance of public communication or strategies for dealing with the press. However, the public relations staff has great expertise in this field and, if given the time, could articulate the lessons they have learned to more technical staff, thus creating advocates for increased public communication as a core competency of the TRC.

Similarly, the public relations staff, who are experts in communication theory as applied within the Jordanian cultural setting, do not necessarily have the appropriate level of technical knowledge to be as helpful as possible to Jordanian journalists. This report earlier described the current situation, in which journalists sometimes wait for days or weeks to receive answers to technical questions. That problem could be significantly mitigated if the public relations staff received technical training that essentially made them communications experts with an important spike of knowledge in telecommunications technology and regulations. In addition, while MoICT determines and directs telecommunications policy, the TRC's public relations staff should at least have a basic understanding of MoICT's policies in order to better understand how TRC regulations reflect and implement such policies.

By empowering the public relations staff and the technical and issue-oriented staff of the TRC with the training described above, the organization can almost immediately become more efficient when dealing with the media. After such training, the TRC will be composed of technical experts with an appreciation for the importance of communication and communications experts with a substantive knowledge of technology and policy. Journalists will be able to access information much more readily because public relations staff can reliably answer basic regulatory questions, and more technical questions can be answered directly by mid-level technical staff without the need to involve top TRC management at every level of communication. As part of these trainings, the TRC should strongly consider creating a formalized internal communication process that identifies potential liaisons within each technical department that can answer general inquiries.

In the near term, these liaisons could serve a strictly internal TRC function. Given the TRC's need to significantly ramp up its public communications capacity and activities in anticipation of the fixed-line liberalization, the PR department should serve as the key interface to the media and the Jordanian public in order to ensure uniform messaging. However, when fully trained and after careful PR training and cooperation with the public relations staff, these liaisons can be a very valuable external relations asset as well. In the longer term, the PR department may wish to work with the technical department liaisons to determine their potential for direct communication with journalists. The benefit of training the liaisons to interact directly with media outlets would be the further

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development of relationships with journalists who would appreciate periodic dissemination of information directly from appropriate TRC technical or issue-oriented staff rather than the PR department, who may sometimes be viewed as a “middleman” attempting to filter information. However, even if the liaisons engage in more external communications, the PR department should maintain proper oversight of these liaisons and may wish to participate in actual interviews between department liaisons and journalists. In very sensitive cases, the PR department may still wish to seek technical guidance from the department liaisons and then answer journalists questions themselves. In addition, all TRC management and staff personnel who are anticipated to have contact with the media should receive media training in order to learn how to best present the TRC’s messages. Various firms in the region could provide such training services.

The type of staff training described here can be developed by the in-house PR staff with the assistance of external communications consultants familiar with the process.

Recommendation: TRC public relations and technical staff should be cross-trained in each others’ areas of expertise on a general level in order to provide each group with an understanding and appreciation of the abilities and knowledge of the other. Such training should also select and train non-senior technical staff representatives to serve as departmental liaisons to the public relations staff, and possibly to the press at a later date and after appropriate training.

Identification of departmental liaisons will reduce the burden on TRC management of responding to routine press inquiries. Internal TRC training should also include appropriate media training for those management and staff personnel expected to interact with media outlets.

3.3. Transparency

As indicated by the AMIR advisor to the TRC, the Commission currently has no guidelines or criteria for deciding what TRC actions or decisions should be communicated to the public or to stakeholders through a public relations effort. The TRC issues press releases for few of its decisions and generally does not make any information on such decisions available to the public, except in the most high profile actions. The development and implementation of such guidelines or criteria would help the TRC improve the flow of relevant information to the Jordanian public while providing the public relations staff with a framework for efficiently allocating their time and resources to appropriate public communications efforts.

The success of any media campaign relies on significant planning and execution. While unique, newsworthy messages are important, the organization launching the campaign should focus equally on their organizational skills and the use of well-tested techniques to ensure that the campaign receives the maximum results for the given effort. The first step in such campaigns, however, must be to determine the amount of publicity desired for TRC messages.

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3.3.1. International Best Practices

The authors conducted a survey of best practices among telecommunications regulators who have developed, or are developing, official guidelines for categorizing the decisions made by the regulatory body, or who have unofficial guidelines in place. The decisions are categorized in order to determine their importance to the sector and the corresponding level of public relations effort necessary to communicate decisions in each category. In the broadest sense, the regulators surveyed have a common rule that governs such categorizations: decisions that affect consumers, businesses and/or the functioning of the telecommunications sector should be widely disseminated, while decisions that only affect internal organizational processes require only a minimal public relations effort.

For example, the Irish telecommunications regulator (ComReg) has internal decision-making procedures that do not result in press releases or other notices to the public. Examples of such decisions include compensation policies or changes, as well as human resources issues. However, ComReg is subject to Irish Freedom of Information legislation, which allows the public to request documents that are not currently in the public domain, with the exception of certain restrictions with respect to confidential or commercially sensitive information. Therefore, ComReg keeps clear records of all decisions made, even those not initially intended for release to the public.

Similarly, the Italian telecommunications regulator is currently in the process of establishing official guidelines for the release of its decisions and consultations. While the guidelines have not yet been finalized, one of the central themes of the work in progress is to make public any actions that affect or interest the majority of Italian citizens.

The Danish regulator also does not have specific rules or guidelines in place, but has indicated that there are unofficial guidelines in effect for determining the public relations effort necessary for regulatory actions. All legal actions that affect the structure or operation of the telecommunications sector are made public, while actions that have a limited scope are not made public.

In order to improve the TRC's communications with the Jordanian and international public, it should establish a means by which to identify those decisions which require a significant public relations effort and those which may be made public in the interest of transparency, but which do not require wide dissemination.

3.3.2. GATS

As discussed in Section 3.3.1, various countries have implemented their own unique means of determining the appropriate amount of public access to information on regulatory decisions, based in part on the country's transparency laws. Because there does not appear to be a single best practice available to use as a framework upon which the TRC can build its transparency policy, the authors recommend using Article III of the

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Global Agreement on Trade in Services (GATS) as a baseline to determine what TRC regulatory information should be made public.¹²

The GATS Annex on Telecommunications reads in part:

In the application of Article III of the Agreement, each Member shall ensure that relevant information on conditions affecting access to and use of public telecommunications transport networks and services is publicly available, including: tariffs and other terms and conditions of service; specifications of technical interfaces with such networks and services; information on bodies responsible for the preparation and adoption of standards affecting such access and use; conditions applying to attachment of terminal or other equipment; and notifications, registration or licensing requirements, if any.

It should be noted, however, that GATS Article III itself also makes accommodations for the non-disclosure of some information. The agreement specifically states:

Nothing in this Agreement shall require any Member to provide confidential information, the disclosure of which would impede law enforcement, or otherwise be contrary to the public interest, or which would prejudice legitimate commercial interests of particular enterprises, public or private.

This GATS language can help to establish a minimum floor and ceiling for the public release of information on TRC rulings and other documents. Essentially, *all* information created by the TRC should be made *available* to the public with the *exception* of any information deemed confidential by the TRC.

Recommendation: The TRC's public relations staff, in consultation with TRC management and department leaders, should develop guidelines for determining the appropriate public relations effort for releasing TRC decisions. The foundation for these guidelines should be increased publicity for decisions that have a material impact on the structure of the telecommunications sector or on Jordanian consumers or businesses. Decisions that primarily affect internal TRC operating procedures need not be released at all, except in response to a request from the public. The guidelines should evolve over time as the Jordanian telecommunications sector evolves.

In Annex D, the authors provide a more detailed toolkit for the public release of TRC decisions.

3.4. Communication Strategies Outlined

This report has attempted to explain the current public communication paradigm within the TRC and to lay out an important theoretical grounding that justifies adopting a new, much more articulated communication policy that promotes the preservation of the public sphere within Jordan as the telecommunications markets liberalize, while simultaneously increasing the TRC's positive visibility in the public eye.

¹² The complete GATS text, including Article III, can be found at:
http://www.wto.org/english/res_e/booksp_e/analytic_index_e/gats_01_e.htm

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Under the new proposed communication framework, the TRC would increasingly position itself as an organization that advocates for a modernized telecommunications regulatory framework as a means to improve economic and social development rather than simply a body that implements policy with little focus on the longer-term effects of those policies. In practice, this policy will begin to brand the TRC as an important public advocate and a leader in His Majesty King Abdullah II's efforts to attract greater investment in Jordan through increasing the country's access to ICTs.

This proposed communication policy, of course, must be applied at the micro level in order to be effective. This section explains the types of communications campaigns that the TRC might wish to implement as part of its upcoming regulatory changes. The recommendations made here are intended to serve as a strategic plan. However, truly detailed action plans to implement these recommendations can only be developed in close strategy planning meetings with the TRC.

Some elements of these strategies will need to be instituted as soon as possible, since the regulatory changes to which they relate are already underway, while other strategies should be undertaken in the longer term.

In general, these strategies can be outlined in much more detail after the authors receive the TRC's detailed reactions to this report.

3.4.1. Short-Term Campaigns

3.4.1.1. Third Mobile License Campaign

The primary goal of this campaign should be to minimize the effects of the existing mobile operators' effort to frame expanded competition in the market as a waste of government resources. To that end, the TRC has data on its side and can engage in a short but intensive campaign that will help to reframe the importance of competition in the Jordanian public's eye.

A series of public education campaigns can be undertaken that can educate the public about the importance of *broad* competition in the mobile market and that a simple duopoly is insufficient to bring the best services and prices to the Jordanian people. A data-driven press campaign that highlights examples from other countries of similar levels of development would be beneficial. The core of the campaign should be demonstrating to journalists and the Jordanian public that overwhelming statistical evidence supports the TRC's assertion that the Jordanian people and the Jordanian economy will benefit from increased competition.

A detailed press release prepared in conjunction with the technical and economics departments of the TRC can be introduced to the press first as a formal launch to the

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campaign.¹³ Chairman Nijem, along with the directors of the departments involved, should be made available for interviews on the subject.¹⁴

The public relations department should simultaneously work with TRC technical experts to draft an editorial article for a leading Arabic-language newspaper or magazine in the country that summarizes the arguments made in the press release. The PR department should begin work early to identify the best newspaper for this purpose and meet with its editorial staff to ensure that the finished article will be guaranteed placement in the paper.

Similarly, the PR office should begin identifying important public affairs programs on Jordan Television and Jordan Radio and offer Chairman Nijem as a potential guest on the programs. Chairman Nijem can take advantage of these appearances as an opportunity to make compelling arguments in favor of increased competition in the mobile market and simultaneously increase public understanding of the TRC's role in their lives.

Recommendation: In conjunction with international and Jordanian PR consultants, devise a public education campaign stressing the importance and benefits of a third mobile operator in the Jordanian market. The campaign should include statistical support and should be proactively targeted to a variety of media outlets, including prominent placement in a leading Arabic-language publication.

3.4.1.2. Fixed Line Liberalization Campaign

The same strategies outlined in the section above can serve as a starting point for a major communication campaign relating to the fixed line liberalization initiative that is set to begin in the second half of 2004. The fixed line campaign, however, will need to be more extensive, as its overall focus must be on educating the public in terms of what to expect from liberalization.

The TRC should produce a second statistics-based press release for release during the summer of 2004 that suggests expected pricing decreases as competition increases over the next several years, for example. These data have already been prepared by the TRC's economics department and MoICT consultants, and can relatively easily be prepared for distribution to the press. The press release can also highlight possible improvements in service and innovative technology examples that were adapted in other countries as a result of fixed line liberalization. The effort to convince the public about the importance of competition should be continued well into 2005 as the liberalization plan continues.

¹³ Examples of similar, highly successful press campaigns that rely on statistics to tell a story can be obtained from the authors upon request.

¹⁴ While a press conference may be the standard procedure for releasing such information within the TRC, the authors advocate for a series of individual interviews with leading journalists in lieu of, or in addition to, a press conference. In the authors' extensive experience in international media consulting, individual interviews generate more substantive stories that are less critical of the organization that has launched the campaign.

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The PR office should simultaneously work with various technical offices to prepare a series of documents that address the public's rights and responsibilities in a liberalized fixed line market. These documents could be framed as a "Consumer Bill of Rights." Such materials, as well as a "Frequently Asked Questions" section can be incorporated into the TRC website as well as the MoICT and other government websites. They can also be prepared as printed documents that can be distributed by the TRC either through direct mail to the Jordanian public or through regional government outlets or civic groups throughout the country.

After the initial press campaign and preparation of website materials, the TRC might also consider preparing a longer-format document that lays out a more detailed rationale for the introduction of competition in the market. The document should be geared toward Jordanians of average education levels and can be kept on hand as a standard briefing document for individuals who request more information in the long run.

During the course of the liberalization process, it is expected that the TRC will need to make technical announcements about the status of the plan. The PR staff should ensure that standard language is inserted into each of these announcements that reminds journalists and others reading the materials why introducing competition is so important.

The TRC can also dispatch a number of mid-level technical experts to speak about the liberalization to interested groups around the country. Chairman Nijem can focus again on written editorials as well as broadcast media appearances while department heads, for example, could focus on occasional speeches to citizens groups, schools and universities and others over the course of the next year.

Recommendation: Beginning in mid-2004 and continuing well into 2005, in conjunction with international and Jordanian PR consultants, devise a public education campaign describing the impending (and continuing) changes to the fixed-line communications market. The campaign should describe the changes in the context of benefits to Jordan and to consumers. The campaign should include statistical support and consumer-oriented materials to explain the changes in a detailed fashion, and should make TRC spokespeople available to media outlets, educational facilities, and civic groups to answer questions.

3.4.2. Long-Term Campaigns

3.4.2.1. Branding the TRC

The strategies laid out above can be continued in the long run as a means to help the public understand the TRC's role in their lives. For example, the TRC may wish to fashion two major, statistically based press campaigns each year that will remind Jordanians of the important economic contribution the competitive market is bringing to Jordan or other important themes. Chairman Nijem should also plan for the publication of three or four editorial articles about pressing issues in print media every year. Similar

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personal appearances and interviews on news and public affairs programs should also be maintained in the long run. While the authors are aware that Chairman Nijem frequently takes the “message” of the TRC to various technical meetings in Jordan, throughout the Middle East and around the world, an increased and sustained focus must be put on national and regional meetings and media that reach the public directly. Otherwise, the messages will not filter down appropriately and the TRC will continue to be misunderstood.

On a less technical level, several of the specific campaign ideas developed by Action PR would be valuable as sustained branding efforts for the TRC. For example, Action PR had proposed preparing TRC-branded signs to be posted in mosques that remind people to turn off their mobile phones. They also proposed similar signs reminding people not to use their cell phones while driving. Such campaigns are relatively simple to create and maintain over the long run and the authors fully endorse them. The authors recommend creating direct advertising campaigns for implementation at airports and other ports of entry into Jordan that alert people that they need to understand TRC regulations for use of ICTs in Jordan. Such a print advertising campaign can refer individuals to the TRC website to learn more.

Recommendation: Develop two statistically supported press campaigns each year designed to demonstrate the benefits of specific telecommunications sector developments to Jordanians while increasing awareness of the TRC. Consider other means to increase brand awareness, such as telecommunications-themed advertisements or public service announcements.

3.4.2.2. Consumer Protection Service

Several TRC executives were very interested in promoting the TRC’s consumer protection branch, which they believe is not currently operating adequately, in part because few consumers know that the service is available to them.

Jordanian telecommunications consumers currently have the right to contact the TRC if they have been unable to come to a satisfactory resolution to a service problem they are experiencing with a service provider. Once the TRC receives such a complaint, it will pursue the issue with the provider and help expedite a favorable resolution whenever possible.

The TRC could post more information about this service on its website and prepare the same information as leaflets that can be distributed in public spaces throughout the country. The campaign could easily be adjusted to serve as a print and broadcast advertising campaign that bears the TRC brand.

The TRC could also mandate that telecommunications service providers enclose TRC-branded flyers describing the service once or twice a year in their bills to customers. The costs of such a mandate should be covered by the TRC, but it would be an effective way

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to reach customers directly at a time when they are thinking about their telecommunications service.

Recommendation: Develop and distribute consumer-oriented materials to increase awareness of the TRC's consumer protection role.

3.4.2.3. Crisis Communication

The TRC and the PR staff should work to develop a uniform policy for responding to communications crises. For example, it is possible that civic groups could organize demonstrations against the TRC, wrongly accusing it of not doing enough to decrease telecommunications pricing in the country. In such a situation, the TRC will need to have pre-prepared materials and briefing books ready to explain the realities of competition and that prices tend to move slowly. Similarly, the TRC must be prepared to respond to misinformation or incomplete information presented by telecommunications industry stakeholders. The TRC must be prepared to reframe issues in the public mind almost instantaneously.

PR staff should hold periodic brainstorming meetings with all technical departments to anticipate potential problems that could arise and prepare materials that will refute faulty arguments and communicate emergency information if necessary. If prepared in advance, these materials can be distributed to journalists quickly and therefore limit damage in the press.

Recommendation: Conduct regularly scheduled exercises to anticipate potential public relations problems that could require an immediate TRC response. Develop core materials that can be easily polished and distributed to minimize the impact of misinformation or misunderstanding.

3.4.2.4. Jordan as Regional Leader in ICT

As outlined in the Jordanian Statement of Government Policy, expanding access to ICTs and developing a world-class telecommunications infrastructure is a key element of Jordan's economic development strategy. The country's theory is that by leading the region in access to technology, it will attract increased investment. However, this theory can only become reality through adequate communication of Jordanian advancements in technology in mass media outlets, international meetings and other events outside of Jordan and even outside of the Middle East.

The TRC can create an international publicity campaign that could greatly increase the degree to which it is communicating Jordanian policy, regulatory and technology advances to the world. Once or twice a year, the TRC can prepare communication campaigns geared specifically toward international media outlets that cover telecommunications issues. At other times of year, the PR department can also pitch interviews with Chairman Nijem to regional and international telecommunications industry publications, providing her with an opportunity to highlight Jordan's successes

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and its proposed path forward. In addition, statistically based press campaigns developed for domestic TRC branding efforts could also be adapted to provide ready-made story ideas for international journalists.

In this case, the annual or semi-annual proactive campaigns would need to highlight major advances, such as Jordan reaching an important benchmark in technology development or a report that ties a significant amount of economic growth in the country to technology development or the King's development strategies generally.

The TRC may also wish to sponsor an international press junket to the country on an annual basis. Such trips would give international journalists an opportunity to learn more about the country's advances and report on them in their media outlets. This strategy can be an excellent way to generate extensive feature stories in major international publications. However, in order to do so, a unique angle must be developed that will pique journalists' interest. For example, if the TRC can frame Jordan as the leader in ICT policy in the Middle East because it has adopted a regulatory framework that would be unexpected of a country its size, journalists may be interested in learning more.

Relaunching the TRC's *Communicator* publication or creating a simpler version of it that would be less labor intensive and could be e-mailed rather than printed would be another good way to maintain adequate communication with international journalists around the world.

Recommendation: In conjunction with Jordanian, regional, and international PR consultants, design comprehensive campaigns to increase regional and global awareness of Jordan's status as a telecommunications leader. The campaigns should focus on particular Jordanian achievements that can be used to create a story that regional and international journalists can tell to their home audiences.

3.4.2.5. Improved Website

The TRC's website should become a major backbone of its public communication efforts. In the short-term, the TRC should aim to provide regular website updates. The current update schedule is sporadic and does not adequately convey the fact that the TRC is engaged in a significant effort to reshape the Jordanian telecommunications sector.

In the longer term, the TRC should reconsider the structure of the website. The site is currently geared toward a technical audience rather than the general public. The site could be reorganized to place important technical announcements in one section but also have a journalist-oriented section that contains briefing materials, questions and answers, a database of past press releases, references to MoICT policy objectives and other reference materials. A similar section could include important information for consumers and/or resources for educational programs that include a telecommunications component.

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Ultimately, the website should be a clearinghouse of information in both Arabic and English. As long as the site is prepared primarily in Arabic with only some materials translated to English, international traffic, including potential investors and service providers in Jordan, will be limited.

The mechanism for posting materials to the website should be altered as well. Currently, technical staff and the Information Services section decide what materials to post and when to post them. However, since the website is the primary location for journalists to find information about the TRC, the PR section must play a role in determining what materials should be posted on the site. The PR section's ability to do its job efficiently is limited if a journalist calls to inquire about a document she found on the site only to find out that the PR department did not know about its existence.

Recommendation: Responsibility for the TRC website should be shared among the PR staff and other departments. The PR staff should be tasked with redesigning the site to better publicize the role, responsibilities, and actions of the TRC to a multiple audiences. Materials should be presented in Arabic and English, and new material should be added regularly.

4. Conclusion

The evaluation of the TRC's communications capacity and the communication strategies laid out in this document are intended to serve multiple purposes. First, they serve as a tool to increase the TRC's ability to promoting the effective liberalization of Jordan's telecommunications sector. This is arguably the TRC's most important role in the short term. The public must be made aware of the implications of the liberalization program in order to be able to make informed decisions in a liberalized market. The secondary purpose of the public relations strategies outlined in this report is to better brand the TRC within Jordan in order to clarify its role as the chief executor of public policy in the telecommunications sector. This paper and the strategies presented also intend to assist the TRC in positioning Jordan and the TRC as leaders in ICT regulation in the Middle East.

A key message flowing through this report is that in order for the TRC to engage in effective public relations, the Commission's PR capacity must be understood and appreciated by the other TRC offices. Well-trained public relations staff must be viewed as equally integral to the TRC's goals as the technical or issue-oriented staff. The importance of the TRC's public relations capacity extends beyond dissemination of TRC information and goals, but toward a broader goal of preserving the public sphere and ensuring that the Jordanian public, as well as regional and international observers, understand the government's public policy goals and the state of the Jordanian telecommunications market.

Annex
TRC and MoICT Interviews
Perceptions of Public Relations Needs

A:

As mentioned in the introduction, the authors interviewed various department directors and staff, commissioners and Chairman Nijem as part of their discovery process for this report. The purpose of these interviews was to gain a fuller understanding of the TRC's organizational structure and to learn about specific public relations potential that could be found within each department, e.g., internal papers that could be used as part of a promotional campaign.

These interviews provided an additional benefit in that the authors gained valuable insight into the executives' attitudes toward public relations within the TRC and the issues that they perceived as requiring greater PR support.

Specific communications needs and suggestions, as well as potential PR materials identified by each department during these interviews, are outlined briefly in the paragraphs below. As the reader will see, the overwhelming consensus among all executives interviewed is that the TRC should undertake greater public communication efforts. In particular, nearly every interviewee stated that a major branding campaign would help the public understand the TRC's role.

Spectrum Management Department and Technical Department

Mohamed Dabbas of the Spectrum Management Department and Ansari Mashaqbah of the Technical Department were interviewed for this report.

These departments believe that the TRC needs to create awareness for the public on the use of wireless equipment. For example, electronic items that may cause interference with wireless networks are regulated by the TRC. There are currently some brochures on these issues, but there needs to be a more comprehensive communication approach and better distribution. There is also a need to communicate with people coming from outside Jordan that equipment that is approved for use in their home country may not necessarily be approved for use in Jordan. It is also important for potential investors to know all of the technical requirements that affect participants in the Jordanian telecommunications sector.

Currently, some guidelines are available on the TRC website, but the spectrum management and technical departments believe that they need to develop a better website that disseminates this information more effectively so that they do not have to field calls. Specifically, they would like to see a location on the website where both Jordanians and potential investors or visitors can review frequently asked questions and ask specific questions.

The technical department believes that the TRC would benefit by training spokespeople within each department who have very technical knowledge and can field relevant

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questions. By designating a junior staff member in each department to act as liaison to the PR staff, more press inquiries could be fielded by the PR staff in conjunction with the appropriate department liaisons. Under such an arrangement, there would be far fewer demands on Chairman Nijem's time and the entire public communication process would be streamlined.

Economics Department

Yousef Hunaiti of the Economics Department was interviewed. He believes that the TRC needs to develop publications that help people understand what the TRC is and what it does. Jordanians also need to know how the TRC can deal with consumer complaints. He hears informally from many people who complain about operators, for example. They do not know that they have the right to file a formal complaint.

The director also believes that the TRC needs to offer more publications about telecommunications and economic development. The Jordanian education system is lacking in its programs for telecommunications policy, for example. They need to work with universities and research institutions to promote the training of more technical consultants who have an academic knowledge of telecommunications in the region and its relationship to economic development. The director has not seen more than 3-4 researchers on this subject during the last seven years at the TRC. He would like to see Jordanian students as well as U.S. and European students working at the TRC. The focus would need to be on economics, accounting and business students who have a telecommunications element in their programs. If the TRC creates more technical publications geared toward these organizations, knowledge of the Jordanian telecommunications sector would be enhanced and more independent research on the subject would be spurred.

The department is highly involved in collecting data for use in quarterly and yearly reports. This includes main indicators of the telecommunications market. There is some potential to use these statistics for the basis of major media campaigns highlighting the importance of the TRC's work in terms of increased access to telecommunications services in Jordan. The department has also compiled projections for the next ten years on expected changes in telecommunications pricing and penetration as the market is liberalized. This information would be extraordinarily valuable as the basis for a major press campaign that would refute the anti-liberalization information being promoted by the private mobile operators in Jordan, for example.

In addition to the TRC's statistical research, multilateral organizations such as the International Telecommunication Union and the World Bank collect relevant statistics that could be used for such media campaigns. Similarly, there are also private research organizations that publish technical statistics about telecommunications indicators in the Middle East, including *Tarifca*, *Telegen*, and *Totality*.

The department director believes that Jordan is already a regional leader in telecommunications deregulation. It is providing a leading model for how to handle

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deregulation among countries with similar levels of development. This message should be communicated internationally, he says. Even developed countries could learn from the Jordanian example.

Management Department

Department Director Muna Hakooz was interviewed for this report. When questioned about specific communications needs, she expressed the need to build an internal TRC database of all external communications in terms of press releases, presentations, material and documents. Such a database is needed because there is a periodic problem of duplicating earlier work because individual departments are unaware that other departments have already completed similar projects. In extreme cases, entire reports are sometimes duplicated because one team does not know that the other team has already written a report on the same subject.

The director also expressed a need for a unified image for the TRC and a unified format in which it communicates. A series of templates for communication documents, for example, would be helpful.

This theme carried through the entirety of the discussion with the Management Director. She had a strong interest in institutionalizing the communication process and creating uniformities throughout the organization. Such systems are crucial, she said because they outline how to convey TRC decisions when communicating with stakeholders. These systems will be important to ensuring transparency and establishing the proper channels of communication.

The management director was also interested in building the TRC image within the organization in order to build corporate pride and create ‘ambassadors’ among the staff.

Regulatory Affairs

Abdel Kadder Batayneh of this department was interviewed. At the time of his interview, the Directory of Regulatory Affairs was traveling, and Mr. Batayneh, the head of the IT section, was serving as acting Regulatory Affairs director.

The Regulatory Affairs Department is leading the fixed line liberalization team within the TRC. Mr. Batayneh points out that a communications plan was outlined in the TRC’s statement of government policy but that in reality they have no proactive approach to implement this policy. At every benchmark, the TRC decides on an *ad hoc* basis what public communications steps should be taken, if any. Mr. Batayneh is somewhat concerned that they are too arbitrary in their approach to this matter. Instead, he suggests, they should have a plan in place to anticipate significant communications needs as the liberalization process proceeds.

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Mr. Batayneh is also concerned about customer service. He believes that telecommunications customers do not really know about the TRC and that it can help them. He supports creating a communication plan to publicize this idea.

Mr. Batayneh states that there are plans for a call center at the TRC for consumers to file complaints about service providers. Currently, consumer affairs receives complaints from customers and follows up by sending written inquiries to the service provider and requires a response within three days. If the service provider's response is not satisfactory to the TRC, they demand further information. However, customers generally do not know about this service. The entire issue needs to be communicated more effectively.

Mr. Batayneh states that public relations is a new field in Jordan. It is difficult to convince technical staff that PR is necessary, he believes, because technical people are accustomed to handling basic communications needs themselves. By simply calling journalists to let them know of new developments, many technical staff believe that they are doing all that is necessary.

Finance Department

Abdel Razzaq Arabiat, director of the Finance Department was interviewed. He generally believes that all departments within the TRC are supportive of increased public relations efforts. Most directors understand the need to better brand the organization and communicate with the public effectively as the TRC continues to liberalize the Jordanian telecommunications market.

In 2004, the TRC has allocated 400,000 Jordanian dinars to the PR section. It is the largest PR budget ever for the TRC. The director states that these monies must be spent in their entirety, because budgets for 2005 are expected to be 20 percent lower. However, he is also confident that increasing PR budgets for specific programs having to do with fixed line liberalization, for example should not be a problem because they can be allocated from the capital budget for the liberalization in 2004 alone. He points out also that there is already funding in place to increase staff within the PR section in anticipation of the approval of the proposed department restructuring.

Engineering Commissioner (Mohamed Khasawneh)

While the commissioner admits that he is not naturally an effective communicator, he recognizes that if the TRC does not increase its communication efforts during the liberalization process that they will suffer. In fact, he believes that the TRC is already suffering from misperceptions about liberalization being circulated by the current mobile operators. He is concerned, however, that there is a shortage of resources, particularly given the schedule for liberalizing the market. He strongly believes that the TRC needs a concrete communication campaign that can be implemented quickly.

Legal Commissioner (Masson Shocair)

The legal commissioner, like other executives, is concerned that the Jordanian public does not know what the TRC does. She says that the public frequently confuses the TRC with MoICT and Jordan Telecom. She also believes that the public should be better educated about why liberalization is so important (although she believes that this task is secondary to basic education about the TRC's role).

The commissioner is also concerned that the mass media coverage of the TRC is too formal. The news stories rarely synthesize information about TRC policies enough to make them matter to average Jordanians. Journalists should be better educated to help them file stories in a more holistic way, she believes.

The commissioner also believes that the TRC should focus on communicating that it has a productive relationship with the operators, even though there is sometimes some strife. She is concerned that the newspapers frequently highlight that the regulator and the operators are not working well together. The regulatory body is a new entity in the Jordanian mentality, she says, and the public has no expectations for it. The public does not sufficiently understand the relationship between the TRC and the operators, so the impression is simply that the two sides are arguing and not doing their jobs. This issue must be reframed in the public eye. What at first appears to be fighting between the two sides is actually a process that is intended to protect consumers.

Consumer protections notwithstanding, the TRC must also make clear that part of their job is to protect operators as well. The overall task of the TRC communications department should be to create a mature concept of the TRC and give the public a chance to believe in their credibility.

The commissioner points out that there are no laws in Jordan outlining what information should be given to the public and what should not be. Most communications decisions are discretionary, but more formal rules can be written into the bylaws of the organization, thereby requiring the TRC to follow them.

Ministry of ICT

Ministry advisors Roger Guichard and Khaled Hudhud were interviewed for this report.

At the suggestion of the AMIR advisor to the TRC, the authors also interviewed staff at MoICT to learn about their attitudes toward public communication of telecommunications policy in Jordan. Much like the attitude common within the TRC, the Ministry is focusing on promoting the benefits of liberalization as the best way to reduce prices and expand quality of telecommunications services in Jordan. The Ministry also believes that communications campaigns should highlight the fact that Jordan has been moving toward liberalization for ten years. The government has actively advocated this path.

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Ministry advisors are also sensitive to the fact that the mobile operators are distributing misleading information about liberalization in an effort to stop the issuance of the third mobile license. They point out that the providers have large communication and advertising budgets and are using them to convince Jordanians that further liberalization is a waste of time.

It is significant to note that the operators are distributing very limited information about liberalization and that the overwhelming body of research indicates that broader competition in the market will indeed continue to reduce prices and improve services. For example, the Ministry points out that there will be a significant economic multiplier effect when the third mobile licensee enters the market. At that point, every dollar spent on mobile services in the economy will produce \$1.40 worth of benefit to the economy. They also point out that it is currently ten times more expensive to provide Internet service in Jordan than in most countries. However, that pricing will go down significantly when the fixed line market is opened. These are significant messages that are being missed in the public debate on the issue.

However, the mobile service providers are not wasting time in communicating their view that further liberalization is not necessary. For example, they enlisted the top economist in the country to assert in a newspaper article that the government is wasting tax dollars by offering a third mobile license. The article argued that the money would be better used in other areas of the economy. Neither the TRC nor the Ministry has adequately refuted this claim.

The main thrust of the Ministry communication plan is that government makes a difference. Liberalization did not happen by accident. It is sensitive to the need to promote realistic expectations of liberalization. They point out that while the benefits will be significant, they will also come quite slowly.

The Ministry advisors also suggest that the TRC and the Ministry work in collaboration as the fixed line liberalization proceeds. For example, when the TRC publishes the licensing guidelines at the end of June, the two could organizations work together to promote a clear understanding of what Jordanians should expect when the market opens.

Annex **Theoretical Public Sphere Reference**

B:

The idea of the “public sphere” is most commonly associated with Jürgen Habermas’ *The Structural Transformation of the Public Sphere* and Immanuel Kant’s *On the Relationship of Theory to Practice in Political Right*. The concept is defined as “the intermediate sphere that formed between civil society and the State during the Age of Enlightenment. It is an area that is accessible to all citizens and where the public gathers to formulate an opinion. A public opinion emerges from exchanges of discourse on reasonable positions concerning issues of general interest.”¹⁵

The significance of the public sphere as it applies to public choice in telecommunications deregulation in Jordan is that public access to information about the liberalization is being mediated through the domestic media outlets and may be manipulated through the use of sophisticated communication techniques by certain actors in the market. These actors are presenting a limited point of view about liberalization that is likely to negatively affect public opinion about the topic. The TRC, in turn, is doing little to work with journalists to offset this manipulation and therefore is allowing the public sphere in which Jordanians make their decisions about the importance of deregulation to be distorted.

The reader must consider that the Jordanian mass media are the primary outlets through which the public will receive information about the liberalization, including the merit of the plan and what information consumers should use in choosing a fixed or mobile carrier. If the media are unduly manipulated by any actors in the market, the ability of the public to make choices will be fundamentally limited.

One of the hallmarks of a fully functioning public sphere is the concept of transparency. Paraphrasing Kant, Venturelli (1998)¹⁶ says

... the Kantian defence rests on the level of transparency and degree of non-distortion in the structures of public space for sustaining knowledge and debate, which permits lines of common interest to emerge...

Venturelli goes on to say:

The central idea is that citizens should be ‘convinced by reason’ and deliberation in the public realm – not by appeals to desire and entertainment or by false debate, distortion and inadequacy of information – that the institutions and norms of their political community are in the general interest. Conversely, the social order of a political community, including its institutions, policies, and norms, is not in the public interest when citizens cannot be convinced by reason in the public realm, or else when they encounter barriers to widespread inclusion within information structures for deliberating on matters of common concern and government policy.

¹⁵ See http://www.wolton.cnrs.fr/glossaire/gb_espace_pub.htm.

¹⁶ Venturelli, S. (1998), *Liberalizing the European Media: Politics, Regulation and the Public Sphere*, New York, Oxford University Press

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It is this Kantian/Habermasian perception of the public sphere upon which this report builds its theoretical argument for greater activism through public communication on the part of the TRC. The authors maintain that as the primary public agency involved in telecommunication regulation in Jordan, it is incumbent upon TRC to maintain a fully functioning public sphere in which Jordanians can adequately formulate an opinion on the future of the telecommunications sector in Jordan. It must be the responsibility of the TRC to offset the distortion of public information being fostered by other actors in the market.

The authors further contend that the public represents an essential actor in the Jordanian telecommunications market and that a liberalized market cannot operate efficiently without the preservation of the public sphere. Partial information promoted by a single carrier, for example, could cause a distortion of the market and limit competition. Such a situation would be in direct conflict with the TRC's mission statement of "creat[ing] a regulatory environment that promotes fairness, competition and investment, thus assuring fulfillment of the Kingdom's long-term ICT needs."

Annex
Individuals Interviewed for Report

C:

The following individuals were interviewed in Amman, Jordan during the discovery stage of this project, April 11-15, 2004. Chairman Muna Nijem was interviewed in Washington, D.C. on April 23, 2004.

TRC:

Chairman and CEO Muna Nijem
Commissioner Mohamed Khasawneh
Commissioner Masson Shocair

PR Section – Raw’a Mirza, Bashir Al-Zo’ubi
AMIR Consultant – Bob McDonald
Technical Department – Ansari Mashaqbah
Spectrum Department – Mohamed Dabbas
Economics Department – Yousef Hunaiti
Management Department – Muna Hakooz
Regulatory Affairs Department – Abdel Kadder Batayneh
Finance Department – Abdel Razzaq Arabiat

Journalists:

Addostour Newspaper – Lama Absa
Alrai Newspaper – Mohamed Hawamdeh
Jordan Times – Jumana Bissiso
Al-Arab Alyawm Newspaper – Faeq Hijazin

Other:

Action PR – Qais Al Rousan
MoICT – Roger Guichard, Khaled H. Hudhud

Annex **Toolkit for the Release of TRC Decisions**

D:

As highlighted in Section 3.3, the authors recommend that the TRC develop guidelines for determining the level of effort to be employed in the public release of TRC decisions. In particular, the parameters for such guidelines should include a distinction between decisions that primarily affect internal TRC procedures and decisions that affect the telecommunications sector and/or consumers. In Section 3.3.2, the authors recommend making all TRC decisions available to the public, with the exception of confidential information.

The key to this policy relates the word “*available.*” Clearly, there is a continuum of options that can be used as a toolkit in determining the amount of publicity that any single decision or announcement will receive while still meeting the basic requirements laid out in GATS. To use such a toolkit would give TRC some level of control over information dissemination and prevent an overload of work on the part of the PR department.

The authors break this continuum toolkit into three levels:

1. *TRC documents that are perceived likely to be of little interest to the public or other actors in the Jordan telecommunications market but are not deemed confidential could be made available upon request only.* Minor staffing decisions, for example, would fit into this category. TRC may consider placing a link on its website announcing that some information is available through such a “by request only” service. The PR department would be responsible for responding to these requests.
2. *More formal policy decisions would warrant being posted proactively on the TRC’s website.* The authors recommend that all significant policy decisions that are not specifically deemed confidential should be posted on the TRC’s website. In some cases, a press release announcing the new decision could be posted on the website, and the text of the decision itself could be made available by request only.
3. *Still more decisions – those that the TRC considers to be key to its branding campaign or to demonstrating the advanced standing of Jordan’s ICT policies – could be framed as major proactive media campaigns like the ones recommended in this report.*

The various elements of a successful media campaign can best be determined with the assistance of domestic or international public relations consultants. However, all of these campaigns would have at a minimum a well-written press release that clearly states the news value of the story. Depending on the campaign, the TRC may also wish to consider the use of supporting documents. Such support materials could include talking papers, questions and answers (Q&As), graphic materials, photos and video.

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In some cases, a major media campaign would warrant an editorial signed by the TRC chairman for placement in a Jordanian newspaper or magazine. Similarly, the chairman may wish to consider appearances on television and radio public affairs programming to promote key messages.

The TRC should also consider the use of press conferences or a series of individual press interviews for every major media campaign. In the authors' experience, the latter option is much more valuable because it provides an opportunity for more accurate communication of messages and builds rapport between journalists and TRC executives.

TRC should also consider compiling lists of regional and international journalists located in Jordan and throughout the Middle East. Having this list on hand will be very helpful in preparation for a major international press campaign like the one outlined in this report.