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To cite this article:

Garba K. A. & Shaibu H. H. (2018). Towards an Integrated and Functional National Communication Architecture for Nigeria in Media Reflections on Governance and Development in Nigeria, ACSPN Book Series 3, pp. 5—17 Retrieved from http://www.acspn.com.ng

(Institutional or Subscribed access may be required)

Please note that this is an electronic, pre-print version of this article published by the Canada University Press, Concord Ontario, Canada for Association of Communication Scholars & Professionals of Nigeria (ACSPN).

The ACSPN Book Series is exclusive to the Association of Communication Scholars & Professionals of Nigeria.

ISBN: **978-1-989271-02-5**

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Layout/Design: Ashroph De Grafico

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INTRODUCTION

ommunication exerts enormous influence on the fabric of society. It enables people to share meaning using symbols, gather and gain information, form and maintain relationships as well as manage and coordinate tasks. Without it, it would be difficult to resolve conflicts and solve socio-political and cultural issues that plague the society. Indeed, there are numerous functions that communication performs in society. Ogwezzy (2008) identifies information, socialisation, motivation, cultural promotion and entertainment as specific functions of communication. Scholars have similarly established the correlation between the communication and development needs of a nation (Anaeto and Anaeto, 2010; Akinfeleye, 2008; Sobowale, 2008). While establishing the link between flow of information and social change and development, Owens-Ibie (2016) asserts that people are not only empowered at individual levels but institutions are strengthened, fundamental objectives and directive principles of state policy are upheld and governance is demystified and enhanced in the service of inclusive growth and development.

However, for communication to contribute meaningfully to the attainment of national objectives, countries formulate plans of action to harness the benefits of the communication process. These plans are contained in the Communication policy which provides the framework for media functions. Sobowale (2008) defines communication policy as a careful, consistent and workable plan of action formulated by government or any other agency to harness the benefits of the communication process for the well-being of the people. Mogbogu (2014) sees communication policy not just as Momoh (2004) puts it 'a coherent set of principles and norms established to guide a nation's total communication system in organization, content and objectives' but as a clear mirror into the tone and colouration of the society in which it is in force. In other words, a national communication policy articulates the goals, objectives and functions of a country's communication organism. It encompasses communication in all its ramification and states government intentions on the modus operandi for the media. Importantly, communication policy helps to ensure that the public interest is well catered for in line with the

overall socio-political, economic and cultural development goals of the society.

Generally, the mission of a vibrant communication policy in the new global arena is to help strengthen democratic practice, a healthy culture, and popular participation in governance process. McBride cited in Mogbogu (2014), outlines the objective of a national communication policy to include making decisions about the general structures for communication activities, allocating public resources to communication efforts based on predefined criteria, constituting a favourable framework for the coordination of communication activities and defining communication priorities from time to time. Sobowale (2008) asserts that a policy on communication formulated by government has its foundation in the socio-political, economic and cultural exigencies of the country. He adds that such a policy is mainly influenced by the developmental objectives of the people and that the policy is essentially geared towards ensuring that all aspects of the national life are taken into account and the ramifications of the policy are well appreciated or anticipated by the formulators. Mogbogu (2014) agrees and adds that the principal purpose of a national communication policy is to provide a favourable framework within which communication systems and technologies can be developed and utilized in a coordinated, consistent and systematic manner for the benefit of society.

Until 1987, Nigeria had no communication policy guiding media operations in the country. What obtained as Nnaemeka (1989) cited by Mogbogu (2014) observed were various anti-media laws, which mainly stifled the media as opposed to guiding and regulating the media. But the seed of what was later launched as the national communication policy was sown shortly after the popular Yaounde conference on National Communication Policies in 1980. At the conference, attended by all African countries, it was observed that no African country including Nigeria had a communication policy they had designed to guide media operations in their respective countries. Therefore, after the conference, the Federal Ministry of Information and Culture convened a seminar on national communication policy. The report of the seminar was subjected to a review by a panel of experts and was later presented at the 1987 conference of the National Council on Information, which held in Bauchi. The report was subjected to so many other reviews, which later culminated in the Nigerian National Communication Policy of 1990. Suffice to add that beyond the charge which Nigeria and the other African countries got after the Yaounde conference to each formulate a proper communication policy, one other motivating factor for the formulation of the national communication policy was the realisation by the then government of President Ibrahim Babangida that properly organised, evenly distributed and easily accessible, communication and information resources could be the main engine for wholesome development of the society (Akinsiku, 2014).

No meaningful national development occurs without effective communication architecture. Also, there may be no sustainable development in a nation without an articulated and comprehensive communication plan. Indeed, the transactional nature of communication information sharing through participation possible and a tool for mobilisation across rural and urban areas. Presently, Nigeria's communication architecture is concentrated in urban areas and elitist in nature. This policy framework has made the desirable growth in national development elusive. It has also made it difficult to map out boundaries of operation and spell out duties and responsibilities of the various media of communication in the country. The implication of this weakness is evident in the inability of various channels in the country to align their operations with national interest and national development plans.

It is against this backdrop that this chapter examines Nigeria's National Communication policy and strategy from conception to date. Using the historical research approach, which according to

Tejumaiye (2003), Osoula (2005) and Littlejohn and Foss (2008), is useful to gain a clearer perspective of the present and to arrive at an accurate account of the past as it relies on reading books, documents, articles, records (audio, audio-visual) and other materials that can be used to gain information, this paper undertakes a gap analysis of the policy with a view to identifying some structural deficiencies in the policy. The chapter highlights the various efforts and stages of review and implementation of the National Communication policy. It makes recommendations and proffers implementation strategies on how a well-structured, viable and coherent communication policy can help make the mass media play a veritable role in the establishment and furtherance of a new national communication order albeit within the framework of existing international normative standards and as reflected in Nigeria's constitution and other statutory provisions.

Communication Policies, the Media and Society

A number of frameworks have been offered to interpret the relationship between media and society. For instance, in *Four Theories of the Press* by Fred Siebert, Theodore Peterson and Wilbur Schramm argues that the press takes on the form and coloration of the social and political structures within which it operates (Akinfeleye, 2008). Siebert et al offered four models that clarified this predisposition. These are Authoritarianism, Soviet Communism, Libertarianism/ Free Press, and Social Responsibility. However, Denis McQuail later added two more models Development and Democratic-Participant models - and they are all grouped as normative theory of the media (McQuail, 2010).

The democratic- participant media theory by McQuail, for instance, provides a basis for appreciating the role of a communication policy in harnessing the benefits of the process of communication for the well-being of all Nigerians. The theory came into existence as a response to the elitist nature of the press. The theory insists that the existing bureaucracy as well as commercial and hegemony in media system should be broken down so as to guarantee media access for all potential users and consumers whether they are in rural or urban areas. In other words, media access and ownership of media by groups, organization and local communities, which the tenet of the Democratic-Participant media theory emphasizes, is imperative for engendering national development.

But the need for a more theoretical and practical treatment of media and society in general and journalism and democracy in particular gave birth to three more models Polarized Pluralist, Democratic Corporatist and Liberal. Propounded by two communication scholars and authors of the book *Comparing Media Systems: Three Models of Media and Politics* - Daniel C. Hallin and Paolo Mancini, the model evolved from four frameworks namely: development of media markets, political parallelism, journalistic professionalism, as well as the degree, level and nature of state intervention. While the contribution of Hallin and Mancini to understanding how journalistic practice and institutions interact with political system continues to provoke critical engagement in the field of communication, another scholar, Fredrick Hubert Faraday developed the African Media Barometer with emphasis on four key models: Constitutional guarantee for freedom of expression, diversity in the media landscape with focus on issues of independence and sustainability, deregulation of broadcast media, and professionalization of journalism practice.

From the foregoing, it is evident that the frameworks propounded by Hallin and Mancini as well as that of the African Media Barometer captured the trajectory of the relationship between the media and political systems. However, there is presently an increasing need to articulate the roles and tasks of the mass media in society in the light of changes in the global political landscape

coupled with changes in information technology and the clamour for openness, transparency and accountability in the art of governance.

Largely, and in the case of Nigeria, the character and shape of communication system has been captured in policies adopted by government. And since communication policies are products of governments, it follows that different political and economic contexts would produce different communication policies. For instance, in advanced democracies where the instruments of mass communication are largely held by commercial interests, and where policy makers are drawn from varied backgrounds and given substantial elbowroom to make policy recommendations, the final document as well as its tilt and biases often reflect the ideological preferences of the political actors. This reflection, according to Opubor, Akingbulu, and Ojebode, (2010), becomes more obvious in dictatorial regimes where policy makers are drawn from a narrow pool of government loyalists and where certain subjects are marked as "forbidden" even when such subjects require urgent policy attention.

National Communication System Development

The dimensions of the cultural, social, historical and economic state of affairs of a nation should influence the communication system. Indeed the national communication policy ought to be developed within the framework of the national philosophy and objectives and like MacBride as cited by Mogbogu (2014) pointed out that it must specify the kind of development a country is interested in achieving and must outline the parameters by which it will measure effectiveness. Nigeria and its communication systems have largely been influenced by its political orientation. Unlike countries like Ghana and Canada, two countries whose communication policies were developed within the framework of their national philosophy and objectives to meet the various information needs of its citizens, the various stages of Nigeria's political development seem to have blurred the policy direction of the Nigerian communication architecture. For instance, Nigeria has undergone three political orientations: colonial, military and civilian.

These periods, especially the colonial period was significant in the history of communication in Nigeria for a number of reasons. It was during that period that broadcasting began in Nigeria (in 1932) with a radio repeater station established in Lagos as an outlet of the British Broadcasting Corporation. It was also during that period that television broadcasting began in Nigeria with the establishment of the Western Nigeria Television in Ibadan in 1959. One century earlier, 1859 precisely, the newspaper business had begun mainly as a private business entity. It was also during the colonial period that most political decisions including the decisions that impacted on the communication system were made entirely by Britain with the participation of Nigerian politicians rising gradually as the country approached independence. Since independence, political decisions that border on the country's communication architecture have moved between civil and military rule. Ghana has a similar experience. Like Nigeria, Ghana has been governed by a series of military and democratic administration since the country gained independence in 1957. Akinsiku (2014:47) observes that like Nigeria, changes in government have affected the communication architecture development and have subjected it to 'alienating policies of libertarian policies of tolerance and authoritarian control'. But the situation in Canada is different. Canada has consistently enjoyed democratic rule, a situation which as Mogbogu (2014) notes, makes the Canadian communication policy sit in tandem with some of the postulations of MacBride, one of which is that development is only achieved in an environment that is characterised by participatory democracy. The other key postulations by MacBride which the Canadian policy reflects but which are not reflected in the Nigerian policy, is the issue of risk and crisis communication and the fact that the Nigerian policy did not make any reference to an official language and so lost the opportunity to entrench local languages as core element of cultural communication (Magbogu, 2014). In other to properly appreciate the inadequacies or otherwise of the Nigerian national communication policy, a brief examination of the various stages of the political orientation of the National Communication policy especially since independence will suffice.

Political Orientation of the National Communication Policy: 1960-1999

The Nigerian media is a hundred years older than Nigeria as an independent country. The first newspaper in Nigeria, Iwe Irohin, was published in Abeokuta in 1859, and Nigeria achieved political independence in 1960. The constitutional base of the media and communication generally should, therefore, be traced from the Constitution of 1960, which provided for freedom of expression under section 24. This section became section 25 in the 1963 Constitution when Nigeria became a republic. The section was retained in the 1979 Constitution, but two things emerged the media as reflected in section 21 now had a responsibility to monitor governance. Also that section specifically section 39:2 of the constitution placed emphasis on ownership. However, the 1989 Constitution, which did not come into effect fully before the toppling of the Interim Government of Chief Ernest Sonekan in November, 1993, was not markedly different from the provision of the 1979 as it relates to the media. The 1995 Draft Constitution which was handed over to General Sani Abacha, the then Head of State on June 27, 1995, was not promulgated before he died in June 1998. But it had been argued that, in addition to retaining the obligation of the mass media in section 21 of the 1979 section (as section 23), the 1995 Draft Constitution reproduced the same section as a right under Chapter IV, which deals with Fundamental Rights. Even more far-reaching was the right granted to everyone under section 35, which charged the media, among other things, to ensure the eradication of corrupt practices and abuse of power and protect and preserve public property.

Momoh (2004) argued that section 40 of the Draft Constitution entitled: "Right to Freedom of Expression and the Press" served as a precursor to Freedom of Information Act enacted in 2011. In its subsection 4, it was stipulated that "Every citizen of Nigeria shall be entitled to know and be informed of the activities of the state and any of its organs and agencies."

But a critical area of tension, according to Momoh (2004), was the presence in the Constitution of a Federal Executive Body under section 154 (Q) of the Draft Constitution. It was known as the National Mass Media Commission whose composition and functions were spelt out in section 46 of Part 1 of the Third Schedule to the Constitution.

Although, the composition of its membership cut across professional groups, government agencies and general public such as newspaper proprietors, radio and TV proprietors, Guild of Editors, Nigeria Union of Journalists (NUJ), Ministry of Communications, two members each to represent general public and special interests, the functions of the Commission appeared to be highly repressive and antithetical to communication policy that could foster access to the media by all social groups constituting the society, a system that encourages and permits plural and diverse ownership and control of media institutions (Oso, 2012).

The current civilian dispensation: 1999 till date

Nigeria returned to democratic rule again in 1999 and witnessed the first civilian-to-civilian transfer of power in 2007. A number of communication policies and initiatives were introduced and they include the adoption of the Global System for Mobile Telecommunication in 2001 which did not only revolutionize the telecom sector, upscale internet usage, but also propelled the rapid spread of online media. There was also the *review of the Mass Communication Policy of*

1990, which government undertook in 2004; licensing of Campus Radio broadcasting in 2002 which was meant to further liberalize the broadcasting sector (the first campus radio license was released to the Department of Mass Communication, University of Lagos, thus giving birth to UNILAG radio 103.1FM radio station) and the inauguration of a committee on Community Radio Policy in 2006. Others are the inauguration of the Committee on Digitization of Broadcasting and much later a Presidential Advisory Committee (PAC) to design a road-map for the digitization programme in 2008; the enactment of the Freedom of Information Act in 2011, and the formal release of community radio license in 2015 to a total of 17 community radio stations distributed across the six geo-political zones of the country.

So far, a conclusion can be reached to the effect that there was an upswing of government intention to make communication serve national and public interests. Given the theoretical formulations in mass communication, it is to be expected that authoritarian regimes in Nigeria (colonial and military) made policies that restricted the media and controlled them. It is logical to imagine that civilian regimes, on the other hand, made policies that developed and expanded the media. These have been the popular submissions. But these submissions require a more nuanced examination given some notable events that challenged these seemingly logical submissions. For instance, it was during the military governments that broadcasting in Nigeria grew from a one-tier to a two-tier regime in 1992. Not only this, the military also proliferated broadcast stations. But it must be stated that, different political and economic contexts influencing different communication policies notwithstanding, there is uniformity in the set of elements that should define the communication policy. Citing McQuail, Opubor et al (2010) listed this set of elements as goals and objectives, values or criteria by which the goals are recognised and defined, content and communication services to which the policy applies, the different distribution services, and policy measures or means of implementation, with the major objective to promote or defend "the overall public interest."

The Nigeria National Communication Policy: An Appraisal

The birth of the Nigerian communication policy can be traced to February 7, 1987 at the seminar on National Communication Policy organised by the Federal Ministry of Information and Culture in collaboration with an interdisciplinary group of university lecturers and researchers appointed by the ministry and assisted by the Nigerian Institute of Journalism (NIJ) and eminent mass communicators in Nigeria (NCP, 1990). The seminar, which was held at the Administrative Staff College of Nigeria (ASCON), attracted 250 participants from mass communication and related fields. During the six-day event, 12 seminar sessions were conducted and 52 papers were commissioned in addition to another 24 papers at the panel of expert committee. To facilitate effective communication in Nigeria the 1990 national communication policy document enunciated 10 cardinal objectives which are-

- 1. To identify critical or central organs, media mechanism or institutions of the Nigerian society that are involved in the development of the Nigerian communication system, both internally and externally.
- 2. To provide guidelines for the mobilisation and development of those institutionalized mechanism in (1) above to achieve national objective and aspirations.
- 3. To mobilise all structures in society in a chain system relationship for the propagation of the national goals and objectives.
- 4. To evolve a rational and systemic packing of all communication media and resources for national goals.
- 5. To establish operational boundaries for the media industry.

- 6. To promote and consolidate national interest.
- 7. To ensure better management of communication resources to facilitate development and nation building.
- 8. To harness Nigeria's immeasurable cultural wealth to develop an authentic Nigerian culture, to cultivate a deep sense of patriotism in the Nigerian people and propagate worldwide distinctive national identity.
- 9. To further at home and abroad those cardinal principles upon which our nation and constitution are founded and which protect and enhance Nigeria's national interest and security in the international system.
- 10. To encourage creativity and promote indigenously rooted innovations for the collective good rather than for individual expression.

Instructively, these objectives were guided by the goals, objectives, hopes and aspirations enshrined in Chapter II of the 1979 Constitution under the Fundamental Objectives and Directive Principles of State Policy. The argument was that Chapter II provided enough foundation upon which the national communication policy could be built.

In line with the objectives listed above, boundaries of operation were allotted to the various media of communication then in existence in the country. These media are: the print media, which include newspaper, magazine, books, posters, bill boards and hand bills; and the broadcast media, which include radio and television. Both occupied chapters three and four of the policy document. Other chapters are: political institutional development (chapter 5); integration of traditional and modern communication media (chapter 6); culture and cultural institutions (chapter 7); film industry (chapter 8); external communication structures (chapter 9); communication technology (chapter 10); communication training and research (chapter 11); and communication laws and regulatory agencies (chapter 12).

The fallout of the 1990 policy document manifested in the creation of the National Broadcasting Commission (NBC) through Decree No 38 of 1992. The law provided for the private involvement in broadcasting which under the constitution had been a monopoly of government. There was also the Nigerian Press Council Decree No.85 of 1992 which repealed the Media Council Decree 59 of 1989. Media Council was mentioned twice in the 1990 Mass Communication Policy: first in section 5.4 (b) as an agency to "ensure that political communication, political party manifestoes and other propaganda materials are designed to inform and not to deceive the public" among other functions. Also in section 12.13 as a regulatory agency to undertake the administration of the professional code of ethics in addition to registration and accreditation of journalists. The Nigerian Communication Commission also came into being through Decree No 75 of 1992. Largely, the implementation of the policy tilted heavily towards strengthening regulation and control of communication machinery by the government, while the document was silent on communication genre such as advertising and public relations.

However, the glaring shortcoming in the 1990 version, which we will still examine in another section of this paper and the fact that some structural changes had occurred in Nigeria (Nigeria returned to civilian rule in 1999) and the communication landscape (like the formal establishment of the National Broadcasting Commission, NBC in 1992) propelled the call for the review of the communication policy and the formulation of a version that would serve the new political and socio-economic systems better. An examination of the highlights of the review of the 1990 policy will suffice.

Highlights of the Review of the 1990 National Communication Policy

In mid-2004, government ordered a review of the 1990 National Communication Policy. The 24-member review committee was chaired by former information Minister, Chief Ayo Ogunlade. It submitted its report in November 2004.

Interestingly, when the 2004 report was released, it clearly showed a paradigm shift from what Magbogu (2014:22), described as an "over bearing government control to a focus on democratization, popular participation, equity and access and communication." The 2004 version also shifted drastically from government control to a regime that encouraged a degree of freedom of expression and reception, social integration, pluralism and diversity and coherence with other sectorial policies, while a whole chapter was dedicated to advertising and public relations.

In the same vein, the 2004 report also provided the impetus for Nigeria to meet the expectation of participating in the global program of migrating from analogue to digital broadcasting. The global deadline for this migration/transition was 2015. Apart from setting a local, country-specific deadline (at 2012) and approving December 2007 as the country's transition start-off date, the government of Nigeria took virtually no other step for some time. But in late 2008, the government inaugurated a Presidential Advisory Committee (PAC) to design a road-map for the digitization programme. The 27-member Committee submitted its report in June 2009. Thereafter, no follow-up plan was made as the federal government failed to inaugurate the implementation committee recommended by the PAC report to drive the process, thus, the country specific deadline of 2012 could not be met, and the ITU-mandated June 17, 2015 was also missed. Again, after missing two previous deadlines, the process was reactivated with a target to wrap up the transition by June 17, 2017. This target has also been missed. Presently, the NBC has devised a new means of transiting which it termed 'regional migration' whereby in a round of digital migration launch, a state is picked for the launch from each of the six-geopolitical zones.

Highlights of the Review of the 2013 National Communication Policy

Although, efforts to review the 1990 National Communication Policy in 2004 produced an elaborate and a more comprehensive policy document that incorporated, largely, some of the developments in the Nigeria communication environment that had occurred since 1990, unfortunately, much was not achieved in terms of action plan and implementation, thus, the document remained a draft, so, in 2013, another fresh attempt was made to revise it but with modification of its nomenclature as National Information Policy. The policy document provides, in its concluding section, what informed the modification thus:

"A draft National Communication Policy was put in place to serve the erstwhile Ministry of Information and Communication. However, following the demerger of the now Federal Ministry of Communication Technology from the Federal Ministry of Information, there was the need to recast and compartmentalize the policy document to fit into their respective ministries. The resultant document on the side of information Ministry was renamed draft National Information Policy. This document was endorsed for further reviews at the 42nd meeting of the National Council on Information in Calabar. An in-house Committee was set up in the Ministry to re-edit and streamline the document to produce an untainted Information Policy devoid of policy overlap with that of the Communication Ministry. In addition to the work of the Committee, a broad-based stakeholders' input from all the parastatals of the Ministry has significantly enriched the policy document. The end result of these harmonization processes, coupled with the earlier reviews organized through the assistance of UNICEF, in collaboration with Child Right

Information Bureau (CRIB) of the Ministry, has helped in the development of the draft National Information Policy document that can provide flexible framework within which modern information systems strategies can be deployed for national development in line with international best practices" (NCP, 2013).

Indeed, the 2013 document is a great improvement over the 2004 version. It has 12 chapters with enlarged guiding principles and objectives of communication policy. Each chapter follows the pattern of having sub-sections such as introduction, policy vision, policy principles, policy objectives and implementation strategies. Essentially, the 2013 document was driven by Nigeria's vision to become a stable democracy and vibrant economy, peaceful within its borders, capable of providing leadership for peace and development within Africa and intervening successfully in the international arena as a major voice for just and equitable relations.

However, in what appeared like a fall-out of the review exercise for the National Information Policy in 2013, the federal government in April 2015 announced the granting of broadcast license to a total of 17 community radio stations distributed across the six geo-political zones of the country. The indication that the aggressive campaign for the existence of this third tier of broadcasting which began in 2003 would eventually bear fruit first emerged in October 2010 at the biennial conference of the National Broadcasting Commission with the presidential public announcement that the Federal Executive Council meeting had not only approved the Community Radio Policy 2006, but it had also devolved power to the broadcast regulator, NBC to start issuing the licence once the criteria had been met by the applicants. It however took another five years of intense lobbying for the announcement to become a reality.

Revisiting the 2013 National Communication Policy document

Interestingly, there was another attempt to have some aspects of the policy that had not been implemented reviewed again this time in October 2016. Again, stakeholders in the media including communication experts and academics gathered at the National Institute for Policy and Strategic Studies (NIPSS), Kuru, Jos for yet another session on the national communication policy. Obviously, it took government more than five years to muzzle enough political will to rereview the policy that Onukwube (2015:3), remarked 'badly needs to be reworked and reformatted'. But the Kuru conference was to address the plethora of shortcomings in the previous documents.

In his presentation at the conference, Akinfeleye (2016) canvassed the need for a forward looking policy that will capture global contemporary developments and that anticipate changes that can or may occur in the ever evolving communication super highway. Akinfeleye also underscored the need to re-format the national communication architecture in order to give impetus to a robust economy, promote national re-orientation, inspire innovation, as well as enable entrepreneurship and create choices. A reformatted policy, Akinfeleye argues, will undoubtedly improve the country's performance in a sphere that is dominated by considerations of power and foreign concrete interests. Also, Akinfeleye was of the opinion that the new policy should within the framework of the 'Protectionist freedom' and in line with the global clamour for press freedom create favourable conditions for the media to perform their assigned roles and operate freely. Furthermore, Akinfeleye proposed a review of the policy in such a way that it will provide for regulatory convergence, the type that will see the convergence of regulatory authorities in the ICT industries (Akinfeleye, 2016). As Akinfeleye puts it "the convergence I propose is such that separate functions can be overseen within the same organization. Convergence in itself has its advantages especially now that technologies in broadcasting,

information technology and communications continue to converge" (Akinfeleye, 2016: 34).

Clearly, both the 1990 and the 2004 policies, in spite of their often lofty and enthusiastic vision, came short of concrete proposals and cogent rationalizations that support the fortification of a virile democracy and tolerant polity. Besides some of the areas of focus and emphasis as enshrined in the previous policies have either been eroded with time or have been achieved and so they ought to be reviewed. For instance, there are now very obvious and compelling issues that have arisen from the growth of the telecommunication industry and from the boom in the film industry. This is coupled with the evolution in the new media environment, advancement in ICT and the challenges of information security. It follows then that a new national communication policy was long overdue for review as the targets envisaged in the policy have long been overtaken by so many developments in the sector. Even the federal government had in 2010 acknowledged that a new communications policy was very crucial given the dynamic nature of the industry and the rapid growth that has been witnessed in the communication sector (Onukwube, 2015). Government had observed that it was necessary to have the policy reviewed as a way of providing short, medium and long term goals, initiatives, investment plans and measurement indicators. Therefore, the new policy was expected to eliminate the glaring gaps, bridge the gaps in the existing policy, as well as address emergent issues that would prepare the nation for efficiency and more growth. A brief examination of some of the glaring gaps will suffice.

Glaring gaps in the 1990 and 2004 National Communication Policy

In a memorandum submitted to the government committee on the 2010 review of the national mass communication policy in Nigeria, a body - the Initiative on Building Community Radio Broadcasting in Nigeria identified some structural defects in the current National Communication Policy. They identified areas like ownership and control, regulatory structure, funding and sustainability as areas where the defects were more illustrated. They pointed to the issue of regulation of the broadcast sector and they argued that the 1990 policy offered a superficial appreciation of the complexities of the sector. They observed a cross reference of functions between the regulatory demands of telecommunication, broadcasting and even the print media. Besides, the policy when it attempted to address concrete issues of mediation between medium and consumers and between different strands of medium, ended up with declarations rather than a reasonable explanation and analysis of specific prescriptions.

Also, another glaring gap in the policy is the failure to put in place an appropriate composition of management and specify modality for the independence of the broadcasting regulatory body. Although the policy recognized the appointment of a board with a chairman and 14 members drawn mainly from government ministries and media industry groups, and all to be appointed by the President and Commander-in-Chief, the policy excluded vital broadcast sector stakeholders that are either not in government or the industry such as civil society. The implication of this is that the NBC by the provision of the Act functions more like a 'processing house' than a regulatory body. All they do is to 'whisper' (instead of to bark and bite) to erring broadcast stations, collate broadcast license applications, and forward to the Minister of Information, who in turn sends to the appropriate membership and powers to function as a proper independent regulatory body.

One other major shortcoming of the 1990 policy is its failure to address the funding issues in the communication industry especially provision of 'bail outs' for public broadcaster within the general framework of tackling the pervasive problem of sustainability, growth and development

of programming, engineering and presentation in broadcasting.

The issue of training was also not captured in the national policy document even with the growing outcry about the quality of personnel in the communication sector. There is currently a dearth of journalism and properly accredited communication schools in the country. Where they exist, most of them lack adequate facilities as well as grant support to maintain internship and retraining opportunities.

Towards a National Communication Architecture for Nigeria

No doubt, the task of concretely addressing the plethora of shortcomings in the National communication policy remains urgent. There is a need to consolidate efforts at developing a national communication policy for Nigeria that is geared towards eliminating weakness in Nigeria communication policy making which as Opubor et al (2010:4), identified as 'the absence of strong continuous public involvement and consistent private sector and civil society participation'. Clearly, the optimum performance of the communication systems is largely dependent on the enabling environment that should be provided by the policy, which will apart from providing general directive, offer appropriate strategies. Indeed, what is urgent too is the provision of a forward looking policy that will capture global contemporary developments and that anticipate changes that can or may occur in the ever evolving communication super highway.

To this end, there is urgent need to re-format the national communication architecture in such a way that it would properly articulate the status of the public broadcaster in the existing broadcast policy. There is currently a mischaracterization of the place/ role and operations of a public broadcaster as distinct from the state broadcaster.

In addition, effort should be made to review the aspect of broadcast media ownership and control. The existing policy and the 1992 NBC Act sort of sublimate the operation of public broadcasting to the political purpose of ruling parties as we saw during the 2015 presidential election. Also, the new policy should, within the framework of ACB recognize a pluralist-media sector, with a clear three-tier structure, which includes public broadcasting, private/commercial broadcasting and community broadcasting.

Furthermore, the policy should also recognize the difference between decentralized state owned media apparatus and genuine community broadcasting. Importantly, the policy should recognize the place of citizen journalism and contemporary media trends. The policy should also ensure that in line with the ACB framework, public media should belong to the people.

More crucial is the need for the revised policy to insist on an independent regulator, in this case the National Broadcasting Commission (NBC). The commission must operate independently and its membership should be a fair reflection of stakeholders in broadcasting, which should be fully empowered to perform all regulatory activities relating to the issuance of broadcasting licenses and which would report to and draw its budget directly from the national legislature. Moreover, the new policy must point to a clear cut direction on how to harness the digital dividends for the political and socio-economic growth of Nigeria.

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