# **TRIPS** Compatibility of Ethiopian Copyright Law

Theodros Woudneh

School of Journalism & Communication

#### Acronyms

IPRsIntellectual Property Rights	
LDCsLeast Developed Countries	
MFNMost Favored Nation	
TRIPSAgreement on Trade-Related Aspects of Intellectual Property Right	nts
WIPOWorld Intellectual Property Organization	
WTOWorld Trade Organization	
Date of Submission: 01-06-2020	Date of Acceptance: 16-06-2020

# I. INTRODUCTION

One of the purposes of copyright law is to reconcile the two conflicting interests: private interest of authors to exploit exclusively the work he/she created and the collective right of the society to dissemination of new information and technologies. Accordingly, copyright law recognizes some exclusive rights of author or owner of the copyright as well as their corresponding limitations and exceptions to safeguard the public interest to access new information and knowledge. The Ethiopian copyright law, specially the Civil Code contains inadequate provisions governing both the rights of authors and exceptions thereto. As there were a lot of gaps in the Civil Code provisions on literary and artistic works, it was replaced by more advanced Copyright and Neighboring Rights Protection Proclamation of 2004. The Proclamation recognizes new rights and exceptions to copyright. It lists the exceptions and limitations exhaustively.

Intellectual property law is basically national law, in spite of the international conventions that address trademarks, copyrights, patents, and other rights.At the international level, the compelling forces of technological change and economic globalization have taken intellectual property law, including the copyright, from the library room to the front pages of policy journals. One of the major characteristics of the emerging international economic order is the treatment of intellectual property rights (IPRs). The absorption of classical intellectual property law into international economic law will gradually establish universal minimum standards governing the relations between innovators and second comers in an integrated world market. Developing countries areparticularly concerned about the impact that the World Trade Organization (WTO) Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS) will have on their economies.

There are least developed countries (LDCs) including Ethiopia on WTO accession negotiation. This requires them, among others, to bring their copyright rules compatible to the norms of TRIPS that prescribes minimum standards national legislation should meet. Though, currently, Ethiopia is not a member of WTO and TRIPS Agreement and hence, has no obligation to adhere to the minimum standards of copyright protection under TRIPS Agreement, addressing the compatibility of Ethiopia's normative and institutional frameworks on copyright law and its protection with that of the TRIPS Agreement is very crucial task at this historical juncture when a country is on verge of WTO accession.

The purpose of this essay is to examine the extent to which Ethiopian copyright law is compatible with the TRIPS Agreement's provisions on copyright protection. Part I describes a brief historical and conceptual frameworks of the TRIPS Agreement. Part II describes and evaluates the relevant provisions of the Ethiopian copyright law and TRIPs Agreement. Part III explores and examines the compatibility of the Ethiopian normative framework, though not claimed to be an exhaustive account of the subject matter, with that of TRIPS Agreement on copyright protection. But, due to time and place limitations, the essay concentrates only on basic points of comparison for compatibility, and hence it cannot be claimed to be an exhaustive analysis of the subject matter under consideration.

# 1. Copyright Law under the TRIPS Agreement: An Overview of Historical and Conceptual Framework

Before we embark on the description and analysis of the compatibility of Ethiopian copyright law with that of the TRIPS Agreement, it is better to shade a light over the historical processes resulted in the adoption of TRIPS Agreement and the conceptual framework of the international copyright law. Accordingly, there are

essentially two sets of international laws with respect to IPRs in general and copyright in particular, those managed by the World Intellectual Property Organization (WIPO) and more recently, those embodied in the TRIPS Agreement of the WTO. TRIPS Agreement came out of the Uruguay Round. Uruguay Round saw the emergence of intellectual property and its protection as a major international trade issue.

During the negotiations resulting in the TRIPs Agreement, developed and developing states defended different positions, indicating that the two different perspectives were at stake, "developed states were primarily concerned with protecting the rights belonging to owners ('sanctity of property') whereas the developing countries wanted to link intellectual property rights to their development strategies and priorities." This site of contestation reflects the fact that in the global economy of today, economic prosperity stems not so much from natural resources or production of industrial goods, but rather from the production of new ideas and new products.

After it is adopted in 1994, TRIPS Agreement becomes one of the more controversial international intellectual property agreements that have entered into force. Its negotiations were highly contentious, and the perspectives of developed and less developed countries on the role of intellectual property protection and enforcement remain far apart. Writers like Christopher May argues "TRIPS agreement privileged the positions of developed countries and will, at least in the short term to medium term, further increases the wealth gap between those who own intellectual property rights and those who wish to use them."

Although the TRIPS Agreement's one-size-fits-all or, more precisely, super-size-fits-all approach is highly problematic, the Agreement, in its defense, includes a number of flexibilities to facilitate development and to protect the public interest. To safeguard these flexibilities, Articles 7 and 8 provide explicit and important objectives and principles that play important roles in the interpretation and implementation of the Agreement.

In general, the TRIPS Agreement lays down norms and standards for seven types of intellectual property, copyright and related rights, trademarks, geographical indications, industrial design, patents, undisclosed information and layout designs of integrated circuits. The manner of legal compliance is left to each individual WTO member.

#### **Basic Principles of TRIPS Agreement**

The most important "basic principle" that applies virtually across the board is that of national treatment, that is non-discrimination against foreign rights holders. This principle of equal treatment under the domestic laws is then carried over to relations between states in the most-favored-nation (MFN) provisions of article 4 of the TRIPS Agreement. The latter article allegedly prevents one member country from offering a better intellectual property deal than is required by international law to nationals of a second member country and then denying similar advantages to the nationals of other member countries.

Beyond these equal-treatment obligations, states must accord to the nationals of other member states those international minimum standards of intellectual property protection that are comprised within "the treatment provided for in TRIPS Agreement." One component of this "TRIPS treatment" consists of the basic substantive provisions of the Paris Convention for the Protection of Industrial Property, of the Berne Convention for the Protection of Literary and Artistic Works and of the Treaty on Intellectual Property in Respect of Integrated Circuits (IPIC Treaty).

Beyond traditional notions of "public interest" and "abuse," the TRIPS Agreement introduces new and more expansive concepts whose outer limits have yet to be delineated at the international level. In particular, article 7 stresses the "promotion of technological innovation and ... the transfer and dissemination of technology ... in a manner conducive to social and economic welfare." Article 8(1) expands potential public-interest exceptions to sectors other than public health and nutrition that are "of vital importance to ... socio-economic and technological development," and article 8(2) seeks to ensure "the international transfer of technology." In addition, article 66 underscores the LDCs' "need for flexibility to create a viable technological base," and it must be read in conjunction with the other provisions favoring this group of countries. All these provisions arm developing and least-developed countries with legal grounds for maintaining a considerable degree of domestic control over intellectual property policies in a post-TRIPS environment, including the imposition of compulsory licenses within article 31 of the TRIPS Agreement and article 5 (A) of the Paris Convention.

# Protection of Computer Programs and Neighboring Rights

Computer Programs as regards information technologies; the TRIPS Agreement opts for copyright (and trade secret) protection of computer programs, not patent protection, the availability of which remains unsettled and controversial in most developed countries. The Berne Convention for the Protection of Literary and Artistic Works, as revised in 1971, provides relatively high and uniform standards of protection for authors and artists. The Berne Convention also contains an appendix of preferential measures, adopted in 1971, which enable nationals of developing countries to secure nonexclusive compulsory licenses on favorable terms. These licenses facilitate local efforts to translate or otherwise reproduce foreign literary, scientific, and artistic works that are

needed for teaching, scholarship, or research purposes. At the same time, the appendix forbids exports of works published under these compulsory licenses, and it recognizes a graduation principle applicable to states that attain higher levels of development.

Progress in international copyright protection under the TRIPS Agreement depended initially on the adherence of the United States to pre-existing minimum standards. This occurred in 1989, when it joined the Berne Union. However, the United States did not adhere to the Rome Convention of 1961, which extended an experimentally protective mantle to certain related or "neighboring" productions not covered by the Berne Convention, including sound recordings, run-of-the-mill radio and television broadcasts and performing artists' renditions of otherwise copyrightable works. The TRIPS Agreement incorporates most (but not all) of the minimum standards set out in the Berne Convention, and it begins the task of harmonizing the protection of neighboring right.

Additionally, the TRIPS Agreement applies minimum standards contained in the Berne Convention to all WTO member countries, whether or not members of the Berne Union, except that moral rights under article 6bis are excluded. The Agreement also provides rental rights to owners of copyrighted cinematographic works, at least in principle, and, in a roundabout way, to the producers of sound recordings, which are otherwise treated as related or neighboring rights. These rental rights are not absolute, however. For example, a member state can exempt cinematographic works from this obligation by showing that commercial rental activity has not led to widespread copying that is "materially impairing the exclusive right of reproduction . . . conferred on authors," an exception that presumably applies to the United States.

#### **II. NORMATIVE FRAMEWORK OF COPYRIGHT PROTECTION IN ETHIOPIA**

Ethiopian copyright system is basically consists of the Civil Code, Criminal Code and the Proclamation to Protect Copyright and Related Rights. The Ethiopian Copyright Proclamation defines copyright as "an economic rights subsisting in a work and where appropriate includes moral rights of an author." So, it as "a legal protection provided for works of authorship under specific conditions." Work is a production in literary, scientific and artistic fields. The author on the other hand is the person who has intellectually created the work. In addition to an intellectual creativity, to get a legal protection, the work has to be original and fixed.

Though the Ethiopian copyright law provides for originality, the Berne Convention does not require as a condition of protection that the work should be original. Under Ethiopian copyright law, the author is entitled to economic rights like the right of reproduction of the work, translation of the work, adaptation, arrangement or other transformation of the work, distribution of the original or a copy of the work to the public by sale or rental, importation of original or copies of the work, public display of the original or copy of the work, performance of the work, broadcasting of the work and other communication of the work to the public. When we see the Berne Convention, it also recognizes the rights to translation and adaptation.

In addition to the above economic rights, Ethiopian copyright law protects the moral rights of the author. Similarly, article 6bis of the Berne Convention also states that "independently of the author's economic rights, and even after transfer of the said rights, the author shall have the right to claim authorship of the work and to object to any distortion, mutilation or other modifications of, or derogatory action relation to the said work, which would be prejudicial to his honor or reputation."

# III. THREE-STEP-TEST UNDER THE BERNE/TRIPS AGREEMENT AND EXCEPTIONS TO AND LIMITATIONS OF COPYRIGHT UNDER ETHIOPIAN LAW: A COMPARISON

The current copyright law of Ethiopia acknowledges both the basic exclusive right of copyright owner, as briefly discussed above on one hand, and the exceptions and limitations thereto on the other hand. The basic intention of the law is just to strike the balance between the two conflicting rights and interests of the public and author/s. This can be inferred from the Preamble of the Proclamation, which provides "Literary, artistic and similar creative works have a major role to enhance the cultural, social, economic, scientific and technological development of a country." The exceptions and limitations, as provided from article 9 through 19 of the Copyright Proclamation, put restrictions to the exclusive rights such as reproduction of the work, for the purpose of teaching, reproduction by libraries, archives and similar institutions, quotation, reproduction for personal purposes, broadcasting and other communication to the public for informatory purpose, reproduction and adaptation of computer program, importation for personal purposes, and private performance free of charge and distribution of copies of works after it has been sold to the public.

International treaties on copyright, including the Berne Convention and the TRIPS Agreement, contain provisions granting flexibilities to their members to limit the rights of authors under specific conditions and circumstances.

# **Three-Step-Test**

Article 13 of the TRIPS Agreement subjects all exceptions to copyright to the three-step-test and the limitations of copyright "do not unreasonably conflict with a normal exploitation of the work and do not unreasonably prejudice the legitimate interest of the right holder." This is designated as 'fair practice' or 'fair use' in common law legal system and its counterpart in civil law is 'fair dealing' and Fikremarkos, after analyzed the concept under the two legal systems, reiterated that the Ethiopian Copyright Proclamation, while listing the exceptions, "seems to be based on a combination of the common law and civil law approaches."

The TRIPs Agreement indirectly addresses the scope of copyright protection by echoing article 9(2) of the Berne Convention. It thus authorizes limitations on and exceptions to the specified exclusive rights for "certain special cases which do not conflict with a normal exploitation of the work" and which do not "unreasonably prejudice" the rights holders' interests. The three-step-test is provided under article 13 of the TRIPS Agreement and article 9 (2) of the Berne Convention. The later provides that "it shall be a matter for legislation in the countries of the Union to permit the reproduction of such works in certain special cases, provided that such reproduction does not conflict with a normal exploitation of the work and does not unreasonably prejudice the legitimate interest of the author." While the reproduction right under the Berne Convention is subjected to this test, all rights under the TRIPS Agreement are subject to it. "This means that all exceptions and limitations on copyright should meet the "three-step-test" to be valid under the TRIPS Agreement."

As it is discussed above, though Ethiopia is currently not a member to WTO and obligations under it, like the TRIPS Agreement, the pledge she made for acceding to it can be taken as a good instance to access the compatibility of Ethiopian laws in general and copyright right law in particular with the TRIPS Agreement. Thus, the rough looking at Ethiopian copyright law in light of the possible obligation to be imposed on her after accession can be seen as follows.

# **Reproduction for Personal Use**

Article 9 (1) of the Proclamation allows every user of copyright material to reproduce a copy of the work without being constrained by copyright considerations. It does not require that the copy from which a reproduction is made is acquired lawfully. By analyzing this against the three-step-test under TRIPS Agreement, some argue that this limitation cannot pass the requirements of the test. For instance, Bruke argued that reproduction refers to the activities before the emergence of new technologies, which can be conducted through hand copying or type writing of the manuscripts. He further contends that "especially on the Internet private users are directly reached out by right holders without the need for intermediaries (distributors) and private reproduction constitutes the main market for right holders." Similarly, he argues "even if the limitation may pass the first test of the TRIPS triple test, there is no way that it will pass the other two (economic) tests." But, the close look at subsequent sub-articles of this provision makes the problem related with this exception easier. This is because of the fact that article 9 (2) (e) provides for the prohibition of reproduction for personal purposes that "would conflict with or unreasonably harm the normal exploitation of the work or the legitimate interest of the author." This sub-article is indirectly manifests the second and third tests of the triple test under international copyright law. So, this exception is compatible with the three-step-test of TRIPS Agreement.

# Quotations

Article 10 of the Ethiopian Copyright Proclamation and article 10 (1) of the Berne Convention stipulate that quotation is an exception to copyright protection. So, quotation is taken as an exception to protected right under article 7 (1) (a) of the Proclamation. So, since this exception is specifically provided under the Berne Convention, there is no need to examine the compatibility of this exception with the TRIPS triple test. But under Ethiopian legal system quotation applies to published works only, whereas the Berne Convention uses a work "lawfully made available to the public", which some writers argued as the exception under the later is broader than the former. Under Ethiopian law quotation from useful unpublished sources. Hence, the "Ethiopian Copyright Proclamation appears to have limited the scope of the exception."

# **Utilization for Teaching Purposes**

Article 11 (1) of the Proclamation states "Notwithstanding the provision of Article 7 (1) (a) of this Proclamation the owner of copyright cannot forbid, without exceeding fair practice and the extent justified by the purpose, a reproduction of a published work or sound recording for the purpose of teaching." On this point article 10 (2) of the Berne Convention uses the broader term, 'utilization of the work' and on this exception also the Ethiopian law tends to be stricter than the requirements under international copyright law. The Proclamation also fails to clearly provide what is known in other jurisdictions as exception for research and private study. Bruke argues that these exceptions have obviously firm public interest explanations and are likely to be TRIPS Compliant.

# Other Exceptions

Other exceptions are reproduction by libraries, archives and similar institutions as provided under article 12 of the Copyright Proclamation, reproduction, broadcasting and other communication to the public for information purposes as provided under article 13 of the Copyright Proclamation and compulsory license under article 17 of the Copyright Proclamation.

Parallel import is also one of the limitations and exceptions to copyright. It refers to a situation whereby copyrighted product placed on the market in one country is subsequently imported into a second country without the permission of the copyright holder. When we consider parallel import as an exception to copyright, the Proclamation does not contain provision to this effect. It allows only importation of a copy of a work by a physical person for personal purposes. There is no provision expressly providing for the restriction of parallel importation in the treaty signed at the Bern Convention for the protection of Literary and Artistic Works. Therefore, individual countries are at liberty to pass their own legislation concerning this issue.

#### **Duration of Copyright Protection**

As far as duration of protection is concerned, Ethiopian law provides that the standard period of protection of economic rights is the lifetime of the author plus fifty years after his/her death. The fifty years period, in case of a work of joint authorship, will start to run from the death of the last surviving author. Under Berne Convention the duration of copyright is the life of the author plus not less than fifty years after his death.

#### **Enforcement of Copyright**

On the issue of enforcement, the TRIPS Agreement links it with international trade law and has detailed provisions on the enforcement of IPRs, whereas the Copyright Proclamation provides for enforcement measures like provisional measures, civil remedies, criminal remedies and border measures. The TRIPS Agreement contains several rule-of-law provisions that bring a measure of stability, predictability, and transparency to a country's domestic legal environment. For example, besides the obligation to provide domestic protection for core IPRs, the TRIPS Agreement contains twenty-five articles that require WTO members to have in place effective administrative and judicial machinery for securing IPRs, for challenging alleged IPR infringements, and for preventing the importation of goods that infringe IPRs.

# **IV. CONCLUSION**

Copyright should be designed in such a way that it could strike balance between the exclusive rights of author or owner of copyright work on one side and the interests of the public to access of information and new knowledge on the other. Accordingly, copyright law provisions are meant to govern both private and public interests. It safeguards users' interests by incorporating exceptions and limitations to the exclusive right of owners of copyright. The exceptions and limitations may be provided for either exhaustively or non-exhaustively in different legal systems.

Unlike the Ethiopian copyright law which exhaustively list outs limitation, TRIPS Agreement provides for rights specifically and mandatorily while limitations are not systematized and optional. This means states can accord better copyright protection than the minimum standards under TRIPS Agreement though it is not their obligation. Some proponents raise concerns on the fact that national systems are left free hand with regard to copyright limitations under major international instruments including the TRIPS Agreement, especially from the perspectives of least developed countries like Ethiopia. These concerns are that "these counties lack the technical human resources and institutional competence to systematically provide coherent and acceptable system of limitations in their domestic laws and whatever room for flexibility is left for domestic legislation usually remains highly unexploited."

The Proclamation lists the exceptions and limitations on copyright protection in an exhaustive manner. There is no room for courts to justify acts against copyright other than those mentioned under the law. It is the opinion of the writer that exhaustively listing the limitations to copyright will create difficulty to accommodate new technologies. As a result, it may adversely affect the right of public users of copyrighted works. Bruke Haile argued that "Ethiopian copyright law in many instances failed to craft appropriate system of copyright limitation in tune with its domestic realities within the framework of TRIPS flexibilities." Thus, the lists of exceptions and limitations to copyright under the proclamation should be amended in such a way that they are listed in non-exhaustively or open-ended manner so as to accommodate new developments and the flexibilities of TRIPS Agreement and the three-step-test consideration.

#### Books

[1]. Christopher May, (2000), A Global Political Economy of Intellectual Property Rights: - The New Enclosures? (Rutledge, London, NY)

REFERENCES

- [2]. Fikremarkos Merso, The Ethiopian Law of Intellectual Property Rights: Copyrights, Trademarks, Patents, Utility Models and Industrial Designs: A Textbook, (AAU School of Law), (2012)
- [3]. Rickeston, S. (1987), *The Berne Convention for the Protection Literary and Artistic Works*, 1886 1986, London

#### Journals

- [4]. Anna Lanoszka, "The Global Politics of Intellectual Property Rights and Pharmaceutical Drug Policies Countries," International Political Science Review, Vol.24, No. 2, (April 2003)
- [5]. Biruk Haile, "Scrutiny of the Ethiopian System of Copyright Limitations in the Light of International Legal Hybrid Resulting from (the Impeding) WTO Membership: Three Step Test in Focus", 25 Journal of Ethiopian Law, No. 2, (September 2012)
- [6]. Daniel Gervais, "China—Measures Affecting the Protection and Enforcement of Intellectual Property Rights WT/DS362/RA,"The American Journal of International Law, Vol. 103, No. 3 (Jul., 2009)
- [7]. Elias N. Stebek, "WTO Accession in the Ethiopian Context: A Bittersweet Paradox," Mizan Law Review, Vol. 1, No. 1 (June 2007)
- [8]. J.H. Reichman, "Universal Minimum Standards of Intellectual Property Protection under the TRIPS Component of the WTO Agreement," The International Lawyer, Vol. 29, No. 2 (Summer 1995)
- [9]. Kevin Kennedy, "The 2005 TRIPS Extension for the Least-Developed Countries: A Failure of the Single Undertaking Approach?" The International Lawyer, Vol. 40, No. 3 (Fall 2006)
- [10]. Mandefro Eshete and Mola Mengistu, "Exceptions and Limitations under the Ethiopian Copyright Regime: Assessment of the Impact on the Expansion of Education" 25 Journal of Ethiopian Law, No. 1, (2011)
- [11]. Marsha A. Echols, "Geographical Indications for Foods, Trips and the Doha Development Agenda," Journal of African Law, Vol. 47, No. 2 (2003)
- [12]. Melaku Gebeyo, "Ethiopia's Reluctant Move to Join the WTO: A Preliminary Look at Legal and Institutional Implications of Accession", Journal of Ethiopian Law, Vol. 22, No. 1, (2008)
- [13]. Peter K. Yu, "The Objectives and Principles of the Trips Agreement" 46 Houston Law Review, (2009)
- [14]. Philippe Cullet, "Human Rights and Intellectual Property Protection in the TRIPS Era," Human Rights Quarterly, Vol. 29, No. 2 (May, 2007), pp. 403-430
- [15]. Shiferaw Kebede, "PARALLEL IMPORTS AND EXHAUSTION OF COPYRIGHTS: IMPACTS ON THE EXPANSION OF EDUCATION IN ETHIOPIA", Addis Ababa University Student Law Review, Vol. 1, No. 2 (Dec. 2010)
- [16]. Sol Picciotto, "Private Rights vs. Public Interests in the TRIPS Agreement," Proceedings of the Annual Meeting (American Society of International Law), Vol. 97(April 2-5, 2003)

#### Laws and International Instruments

- [17]. Berne Convention for the Protection of Literary and Artistic Works, Sept. 9, 1886, as last revised at Paris, July 24, 1971, 828 U.N.T.S. 221
- [18]. Berne Convention Implementation Act of 1988, Pub. L. No. 100-568, 102 Stat. 2853 (1988)
- [19]. Civil Code of the Empire of Ethiopia, 1960, Proclamation No.165, Neg. Gazette, Gazette Extraordinary, Year 19, No.2
- [20]. Copyright and Neighboring Rights Protection Proclamation, 2004, Proc. No. 410, Fed. Neg.Gazette, Year 10, No. 55
- [21]. Criminal Code of the Federal Democratic Republic of Ethiopia, Proclamation 414/2004
- [22]. Geneva Convention for the Protection of Producers of Phonograms against Unauthorized Duplication of their Phonograms, WIPO Copyright Treaty (WCT) of 1996
- [23]. International Convention for the Protection of Performers, Producers of Phonograms and Broadcasting Organizations, adopted at Rome, Italy, Oct. 26, 1961, 496 U.N.T.S. 43
- [24]. Marrakesh Agreement Establishing the World Trade Organization], Annex 1C: Agreement on Trade-Related Aspects of Intellectual Property Rights
- [25]. Paris Convention for the Protection of Industrial Property, Mar. 20, 1883, as last revised at Stockholm, July 14, 1967, 21 U.S.T. 1583, 828 U. N.T. S. 305
- [26]. Paris Convention for the Revision of Bern Convention (1971)
- [27]. WIPO Performers and Phonograms Treaty (WPPT) of 1996
- [28]. World Intellectual Property Organization, Guide to the Rome Convention and to the Phonograms Convention (1981)

#### Others

- [29]. Claudia Schulz and Mark Wu, "The TRIPS Agreement and Intellectual Property Protection in Brazil," Proceedings of the Annual Meeting (American Society of International Law), Vol. 98 (March 31-April 3, 2004)
- [30]. Ruth L. Okediji, International Copyright System: Limitations, Exceptions and Public Interest Considerations of Developing Countries, (UNCTAD – International Center for Trade and Development, Issue Paper No. 15), (2006)
- [31]. Views of WTO Panel on US-Section 110 (5) Copyright Act (DS160)
- [32]. World Trade Organization (WTO), "Doha Ministerial 2001: Declaration on the TRIPS Agreement and Public Health," International Legal Materials, Vol. 41, No. 3 (May 2002)

Theodros Woudneh. "TRIPS Compatibility of Ethiopian Copyright Law." *IOSR Journal of Humanities and Social Science (IOSR-JHSS)*, 25(6), 2020, pp. 01-07.

\_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_ \_