



Report of the Stakeholders' Forum on the Telecommunications Identity Risk Management System (TIRMS)

1. Introduction

The Nigerian Communications Commission (the Commission) in exercise of its powers under the Nigerian Communications Act 2003 (the Act), commenced the process of the draft framework on Telecommunications Identity Risk Management System (TIRMS).

Based on the Commission's policy of participatory rule-making, the framework was published on its website for comments from the general public, particularly its licensees and other Stakeholders. Further to this, the Commission received submissions from a few stakeholders.

As required by Section 58, of the Act, Notice of a Stakeholder Consultative forum was published on the Commission's Website, and in Two (2) National Dailies (Daily Trust and ThisDay Newspaper on February 27, 2026, scheduling a Stakeholders' Forum on the Draft Framework for Thursday, March 26, 2026.

2. The Stakeholders' Forum

The Stakeholders' Forum was held virtually as scheduled. It commenced at 2:10pm and was chaired by the Executive Commissioner Stakeholders Management (ECSM), Ms Rimini Makama, representing the Executive Vice Chairman/Chief Executive Officer, Dr Aminu Maida. Attendees at the Stakeholders' Forum included Staff of the Commission, representatives of Mobile Network Operators (MNOs) and other interested Stakeholders.

2.1 Summary of the Opening Remarks by the Director, Cyber Security & Internet Governance

The Director, Cyber Security & Internet Governance, emphasized the central role of Digital Trust in sustaining Nigeria’s digital economy, noting the trust must be embedded across the telecommunications value chain through secure, privacy-preserving, inclusive, and user-friendly identity systems. The remarks highlighted the purpose of the Telecoms Identity Risk Management System (TIRMS) as centralized, regulatory-backed platform designed to enhance identity assurance of mobile numbers and reduce fraud associated with churned, swapped, and recycled MSISDNs, through inter-agency collaboration.

She further noted that, in line with the Nigerian Communications Act, 2003, the Commission published a Stakeholders’ Consultative Document on February 27, 2026, proposing amendments to the Quality of Service (QOS) Business Rules 2024, and the Registration of Communications Subscribers Business Rules 2022. The consultation forum was convened to present the TIRMS platform, discuss the proposed regulatory amendments, and consider stakeholder feedback. The outcome of the engagement is expected to support the effective implementation of the TIRMS and reinforce trust, consumer protection, and confidence in Nigeria’s digital ecosystem.

2.2 Summary of the Welcome Address Delivered by the Executive Commissioner Stakeholder Management on Behalf of the Vice Chairman of the Nigerian Communications Commission at the Stakeholders’ Forum

The Executive Commissioner, Stakeholder Management (ECSM), welcomed all attendees and delivered the keynote address on behalf of the Executive Vice Chairman/CEO of the Nigerian Communications Commission (NCC), Dr. Aminu Maida.

The speech highlighted the growing risks associated with the fraudulent use of mobile numbers such as churned, recycled, swapped, and barred MSISDNs which increasingly enable identity theft, financial fraud, and weaken public trust in Nigeria’s digital ecosystem. To address these threats, the NCC introduced the TIRMS platform as a secure, regulatory-backed system designed to enhance mobile number integrity, strengthen user accountability, and reduce fraud across key sectors. The platform empowers service providers to verify and validate mobile numbers flagged for suspicious activity before granting access to services.

She further outlined proposed amendments to the Quality of Service (QoS) and Registration of Communications Subscriber Regulations. These amendments will require operators to notify subscribers at least 14 days prior to number churn, submit churn data to TIRMS within seven days, and support a new framework for blocking fraudulently registered or utilized MSISDNs. These measures aim to promote transparency, safeguard subscribers, and reinforce regulatory clarity in support of TIRMS objectives.

On behalf of the EVC, the ECSM reaffirmed the Commission’s commitment to cross-sector collaboration with stakeholders, regulators, and law-enforcement agencies to promote a unified “One Government” approach to digital security. Stakeholders were encouraged to actively participate in the discussions to help strengthen Nigeria’s digital environment and advance the nation’s digital economy.

2.3 Presentation on the Telecoms Identity Risk Management System (TIRMS)

by Emaiban Echono (Senior Manager Cyber Security & Internet Governance)

The Nigerian Communications Commission (NCC) has identified significant and growing risks tied to mobile number misuse in Nigeria. These risks stem from recycled, churned, swapped, barred, or blacklisted phone numbers (MSISDNs) being exploited for fraud, compounded by society’s heavy reliance on mobile-enabled services such as payments, e-commerce, government services, and remote work. Fragmented identity systems have further enabled SIM-swap attacks and identity theft, creating an urgent need for a real-time, privacy-preserving, and interoperable verification solution.

TIRMS is proposed as that solution, a centralised, regulatory-backed data-sharing platform that enables real-time verification of mobile number status by regulators and licensed entities. It addresses the full lifecycle of a phone number, from active use through dormancy, recycling, and reassignment, closing the verification gaps that fraudsters currently exploit. Its core objectives are to improve access to legitimate mobile number services, reduce fraud by helping service providers instantly validate number status, and enhance cross-sector security through proactive, real-time checks.

The platform delivers benefits across the entire ecosystem: operators gain better fraud detection and cleaner subscriber records; consumers are protected from identity theft linked to reused numbers; regulators gain transparent and measurable identity assurance; the financial sector benefits from stronger risk signals and faster case resolution; and law enforcement receives enhanced investigative support. Overall, TIRMS is positioned as a secure, scalable foundation for safeguarding Nigeria’s digital economy through cross-sector governance, real-time verification, improved identity trust, and safer digital and financial transactions nationwide.

2.4 Presentation on the Proposed Changes to Subsidiary Legislations and Regulatory Instruments

by Mr Tewi Tanko (Senior Manager, Telecoms Laws And Regulation)

The proposed amendments to subsidiary legislation and regulatory instruments are necessary to give effect to the Telecommunications Identity Risk Management System (TIRMS). The three core objectives of TIRMS are to improve access to mobile number services across key sectors to aid user accountability, reduce fraud risks by enabling service providers to verify mobile numbers that have been recycled, swapped, barred, or blacklisted before granting access to services, and improve service quality, inclusion, and infrastructure resilience.

The proposed legislative amendments span two key regulatory instruments. The first is the Quality of Service Business Rules (QoS BR), where several changes are proposed. Under Section 2.3.1, a new sub-clause requires operators to notify affected subscribers via an alternative line or email at least 14 days before the final date of churning, applicable to both post-paid and prepaid lines. A further new provision under Section 2.3.2 mandates that operators submit details of all churned numbers to TIRMS within seven days of completing the churn process, ensuring the system maintains an up-to-date record of number lifecycle changes.

The second instrument is the Registration of Communications Subscribers Business Rules (RCSBR). Under Part VI Governance Section 6.1(10), existing provisions requiring operators to flag and deactivate SIMs involved in fraudulent registration will be relocated to a new dedicated Part VII. This new Part VII, titled MSISDN Blocking and Access Limitations, will consolidate all provisions relating to the blocking and restricted access of MSISDNs, setting out clear procedures and rules for blocking fraudulently registered numbers or those identified as having been used in fraud or suspected fraudulent activities. Together, these amendments create the legal and operational backbone required for TIRMS to function effectively as Nigeria's centralised mobile identity risk management infrastructure.

3. Comments From Stakeholders on the Consultation Process for the Telecoms Identity Risk Management Systems (Tirms) Platform

Presented by Anthonia Adaba (Manager Telecoms Laws And Regulation)

MTN Nigeria Communications Plc			
Issue/Matter	Comments	Recommendations	Commission's Remark
Development of the Telecoms Identity Risk Management System (TIRMS)	<p>MTN notes and commends the objectives of the proposed TIRMS platform and respectfully sets out the following context for the Commission's kind consideration:</p> <p>a. MTN notes that although the SIM Replacement and Recycling Notification Solution API, introduced through the CBN-NCC initiative and operated via NIBSS, provides real-time MSISDN lifecycle notifications to financial institutions using a push model, its adoption by banks and other financial institutions has remained very low.</p> <p>b. MTN argues that the proposed TIRMS platform replicates the same design and functionality as the existing SIM</p>	<p>MTN respectfully recommends that: The Commission should establish a multi-stakeholder Technical Working Committee to define the technical, operational, integration, and cost-recovery framework for the TIRMS platform. The Committee will be responsible for defining the technical and operational framework of the TIRMS platform, establishing integration requirements with operators' systems, and developing a fair cost and access model that allows operators to recover expenses incurred in providing real-time MSISDN notifications. The Commission should engage the CBN to</p>	<p>The Commission notes the comments of MTN and wishes to state that all existing processes will be streamlined into the TIRMS Platform. This streamlining will take into consideration the multiple stakeholders and the different functions of the TIRMS Platform and will ensure all stakeholders are onboard and aligned on the processes.</p> <p>MTN should note that TIRMS has functions beyond SIM Swap , it will also cater for churned numbers and fraud related number reporting both of which are not covered in earlier efforts .</p> <p>More so, the Commission will ensure there are uniform standards on data and pricing as part of the deployment process.</p>

	<p>swap/recycling notification solution and is therefore likely to face the same adoption challenges. MTN considers that the absence of compulsory adoption could make the TIRMS platform ineffective and expose the sector to the same problems already affecting the current solution.</p>	<p>mandate banks and financial institutions to adopt the TIRMS platform and integrate real-time MSISDN swap/recycle validation into their notification systems.</p>	
<p>Amendment of subscriber churn process under the Quality-of-Service Business Rules- Pre-Churn Notification Process</p>	<p>We note that the new sub-clause (ii) proposed the introduction of a 14-day pre-churn notification to the affected customer via his/her alternative line or email address. MTN aligns with the Commission on the need to ensure that impacted customers are duly notified. In light of the above comment, the Commission should consider the following:</p> <p>a. The proposed 14 - day pre-churn notification to a subscriber's alternative line may not be effective, as it assumes all customers have</p>	<p>Due to limited alternative contact data, the Commission should require pre-churn notifications to the customer's primary number and treat notifications to alternative numbers or emails on a besteffort basis. This best-effort basis would require operators to:</p> <p>a. Send pre-churn notifications to alternative lines or emails only if they are on the operator's network or have been provided by the customer.</p> <p>b. Operators should keep verifiable records of notification attempts to enable</p>	<p>The Commission has noted the Comments/recommendations and will take them into consideration in its final review of the Business Rules.</p>

	<p>another line on the same network. In reality, many subscribers either do not have alternative lines or have them on different networks, which operators cannot access or verify due to the absence of a unified, real-time database of all NIN-linked numbers.</p> <p>b. Relying on email as a notification channel is impractical because email addresses are not mandatory in SIM registration or NIN verification data, and where collected, they are often outdated or unreliable. As a result, operators lack accurate email records, leading to low delivery success and limited effectiveness of such notifications.</p> <p>c. The Commission should note that pre-churn notifications are only likely effective if the customer has the same network secondary line or a valid email address. Based on international practices, regulators in India, the UK, and the</p>	<p>audits, resolve subscriber disputes, and demonstrate good-faith compliance, recognizing that delivery may be affected by factors beyond their control.</p> <p>c. Operators should expand awareness campaigns across multiple channels to educate subscribers on inactivity rules, deactivation risks, and how to maintain or recover their lines.</p> <p>A best-effort notification model balances practicality with compliance, while allowing operators to gradually collect customer emails through consent-based campaigns to improve fallback notification channels in line with data protection rules.</p>	
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	<p>US use flexible approaches to inactivity-based deactivation, relying mainly on primary channels rather than alternative contacts. Nigeria should similarly adopt a robust, multi-layered prechurn notification model that prioritizes the primary MSISDN and uses alternative contacts only when verified and consented.</p>		
<p>Reclaim of Monies Left in Account by Prepaid Customer Upon Line Deactivation</p>	<p>MTN notes that the current Business Rules on reclaiming deactivated line balances are vague and recommends using the proposed modifications to standardize the process in line with the Commission's Guidance on unutilized and unclaimed airtime.</p>	<p>MTN proposes revising the Business Rules to align with the Commission's Guidance, ensuring a consistent and clear process for claiming airtime from deactivated lines. <i>"Subject to the provisions of the Guidance on Unutilized and Unclaimed Subscribers' Recharges in the Nigerian Communications Sector, airtime left in account on deactivation can be claimed by subscribers once proof of ownership can be established at any given time within 1 year (less any fee paid by the operator for the number</i></p>	<p>The Commission has noted the comments/recommendations and will take them into consideration in its final review of the Business Rules.</p>

		<i>within the 1-year of non-RGE)</i> ”.	
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4. Vote of Thanks by Mr Abdulazeez Adamu (Head Online Safety, Cyber Security & Internet Governance

Mr Abdulazeez Adamu expressed honour in delivering the vote of thanks at the Stakeholders Forum, highlighting its role in promoting transparent governance and the Commission’s commitment to regulatory excellence through consensus.

He acknowledged the Chief Host, specially thanking Dr. Aminu Maida, the Executive Vice Chairman of the Commission, for his leadership and dedication to advancing the communications sector. Recognition was also extended to Ms. Rimini Makama, the Executive Commissioner for Stakeholder Management, the Director of Cyber Security and Internet Governance Department, and the Head of Legal and Regulatory Services Department, for their efforts in coordinating the Stakeholders Forum.

Gratitude was further extended to Stakeholders, Licensees, Communications Experts, the Public, and the media for its participation.

The Speaker thanked everyone for their time and wished all safe journey home.

Dated May 12, 2026

Dr. Aminu Maida
EVC/CEO
Nigerian Communications Commission