



REPORT OF PROCEEDINGS AT THE PUBLIC INQUIRY ON THE DRAFT MVNO BUSINESS RULES AT THE NCC MBORA. THE INQUIRY WAS ATTENDED; HYBRID (PHYSICAL AND VIRTUAL) ON JULY 16, 2026.

EXECUTIVE SUMMARY

In line with the provisions of Section 57(2)(b) of the Nigerian Communications Act, 2003, the Nigerian Communications Commission (NCC) conducted a Public Inquiry on the Draft Mobile Virtual Network Operator (MVNO) Business Rules on 16 July 2026. The Public Inquiry was organized to obtain stakeholder input on the proposed regulatory framework intended to guide the operations, obligations, rights, and relationships of licensed Mobile Virtual Network Operators and Mobile Network Operators within the Nigerian communications sector.

The Inquiry attracted broad participation from industry stakeholders including Mobile Network Operators (MNOs), Mobile Virtual Network Operators (MVNOs), legal practitioners, consultants, technology service providers, industry associations, members of the media, and interested members of the public. Proceedings were conducted in a hybrid format to facilitate wider stakeholder engagement.

Participants were taken through presentations on the MVNO Licensing Framework, the rationale for the Draft MVNO Business Rules, and the key provisions of the proposed Rules. The Public Inquiry provided stakeholders with an opportunity to present comments, recommendations, and observations aimed at strengthening the proposed regulatory instrument before its finalization.

IN ATTENDANCE

The Public Inquiry was held in a hybrid format.

A total of **190 participants attended virtually**, while a significant number of stakeholders attended physically at the venue representing various segments of the communications ecosystem including:

- Licensed Mobile Network Operators;
- Licensed Mobile Virtual Network Operators;
- Prospective MVNO applicants;
- Industry Associations;
- Telecommunications Consultants;
- Legal Practitioners;
- Technology Companies;
- Members of the Media;
- Officials of the Nigerian Communications Commission; and
- Members of the General Public.

COMMENCEMENT

The Public Inquiry commenced with the observance of the National Anthem following which participants were welcomed by the Compere, who recognized the distinguished guests, Commissioners, Directors, Management and Staff of the Commission, industry stakeholders, and members of the public in attendance.

The Compere introduced the purpose of the Public Inquiry and outlined the program for the event. Participants were informed that the Commission had published the Draft MVNO Business Rules for stakeholder review and comments in line with its consultative rulemaking process.

OPENING REMARKS BY THE HEAD LEGAL AND REGULATORY SERVICES DEPARTMENT – MRS. CHYZUA WHYTE

Mrs. Chizua Whyte, Head of the Legal and Regulatory Services Department, welcomed stakeholders to the Public Inquiry on the Draft Mobile Virtual Network Operator (MVNO) Business Rules and thanked participants for their continued support towards the

growth of Nigeria's communications sector. She emphasized that stakeholder engagement remains a critical component of the Commission's regulatory process.

She explained that the Nigerian Communications Commission (NCC), pursuant to its mandate under the Nigerian Communications Act, 2003, developed the Draft MVNO Business Rules to provide a clear and effective framework for the operation of Mobile Virtual Network Operators within Nigeria's communications ecosystem.

Mrs. Whyte noted that MVNOs present significant opportunities to increase competition, foster innovation, promote service differentiation, and expand consumer choice. She further stated that MVNOs can leverage existing network infrastructure to serve niche markets and improve access to communications services for underserved and unserved populations, thereby supporting Nigeria's digital inclusion and digital economy objectives.

She highlighted that the Draft Business Rules were designed to establish a transparent, predictable, and balanced regulatory framework governing the relationship between MVNOs and Mobile Network Operators (MNOs). The Rules seek to clarify the rights, obligations, operational responsibilities, and commercial expectations of all parties while promoting regulatory certainty, fair competition, and effective collaboration within the industry.

According to her, the Business Rules are intended not only to provide operational guidance but also to create an enabling environment for investment, network service innovation, market expansion, job creation, efficient infrastructure utilization, and sustainable industry growth.

Mrs. Whyte described the Public Inquiry as an important aspect of the Commission's consultative rule-making process, reflecting its commitment to transparency, inclusiveness, and evidence-based regulation. She stated that the purpose of the Inquiry was to enable stakeholders to review the Draft Rules, identify implementation challenges, and provide recommendations that would strengthen the effectiveness of the proposed framework.

In conclusion, she encouraged participants to engage constructively throughout the proceedings to support the development of a regulatory framework that promotes innovation, competition, investment, inclusion, and the long-term sustainability of Nigeria's communications sector. She wished all participants fruitful deliberations and a successful Public Inquiry

SUMMARY OF THE WELCOME ADDRESS DELIVERED BY MR. USMAN MAMMAN ON BEHALF OF THE EXECUTIVE VICE CHAIRMAN

Mr. Usman Mamman, speaking on behalf of the Executive Vice Chairman/Chief Executive Officer of the Nigerian Communications Commission, Dr. Aminu Maida, welcomed participants to the Public Inquiry on the Draft MVNO Business Rules and thanked stakeholders for their continued partnership with the Commission. He stated that the development of the MVNO Business Rules reflects the Commission's commitment to promoting competition, expanding access to communications services, encouraging innovation, and advancing Nigeria's digital inclusion objectives. He further emphasized the Commission's dedication to transparent, predictable, and fair regulation aligned with international best practices.

He explained that the Draft MVNO Business Rules were developed to provide greater clarity on licensing requirements, operational responsibilities, and the relationship between Mobile Virtual Network Operators (MVNOs) and Host Network Operators, while safeguarding consumer interests and maintaining market integrity. He reiterated the Commission's expectation that all operators comply fully with applicable regulatory requirements.

According to the address, the Commission has continued to engage stakeholders since the issuance of MVNO licences in order to better understand operational realities, implementation challenges, and areas requiring additional regulatory guidance. Consequently, the Draft Business Rules were developed as a practical framework to facilitate the successful implementation of the MVNO licensing regime and clearly define the roles, responsibilities, and expectations of all parties.

The address highlighted key areas covered by the Draft Rules, including onboarding and integration processes, hosting arrangements, interconnection, numbering resources, SIM and eSIM management, quality of service obligations, revenue-sharing principles, infrastructure access, consumer protection, and dispute resolution mechanisms. It also acknowledged stakeholder concerns relating to onboarding delays, technical integration challenges, commercial negotiations, and access to network resources, noting that the proposed Rules seek to promote transparency, fairness, predictability, and non-discriminatory treatment within the MVNO ecosystem.

In concluding, Mr. Mamman emphasized that the Public Inquiry formed part of the Commission's consultative approach to regulation and provided stakeholders with an

opportunity to contribute to the refinement of the Draft Rules. He assured participants that all comments and recommendations would be carefully considered before finalization of the Rules and encouraged constructive engagement aimed at fostering investment, innovation, digital inclusion, and sustainable growth within Nigeria's telecommunications sector. He then formally declared the Public Inquiry open.

OVERVIEW OF THE MVNO LICENSING FRAMEWORK

The presentation on the MVNO Licensing Framework was delivered by Mr. Usman Mamman, Director, Licensing and Authorization, who provided participants with an overview of the MVNO licensing regime and the regulatory objectives underpinning the framework.

The presentation highlighted:

- The Commission's strategic objectives for introducing MVNO services in Nigeria.
- The categories of MVNO licences, currently available.
- The licensing requirements and authorization processes.
- The relationship between MVNOs and Mobile Network Operators.
- Expected benefits of MVNO operations to consumers and the telecommunications industry.
- The need for clear operational business rules to support implementation of the licensing framework is important.

The presentation also underscored the Commission's commitment to encouraging innovation, promoting competition, expanding service offerings, and increasing consumer choice within the Nigerian communications market.

PRESENTATION ON THE DRAFT MVNO BUSINESS RULES

The Commission presented the Draft MVNO Business Rules and highlighted the key provisions designed to govern:

- MVNO-MNO commercial relationships;
- Access and interconnection arrangements;
- Service delivery obligations;
- Consumer protection requirements;
- Quality of Service expectations;

- Reporting and compliance obligations;
- Operational responsibilities of MVNO licensees;
- Dispute resolution mechanisms; and
- Regulatory oversight procedures.

Participants were informed of the policy considerations underpinning the proposed Rules and their intended role in strengthening the implementation of the MVNO licensing regime.

SUMMARY OF STAKEHOLDER COMMENTS SUBMITTED AND DISCUSSIONS HELD AT THE INQUIRY

The Nigerian Communications Act 2003 in Section 58 (d) states that the Commission shall publish, in the manner that it deems appropriate, notice of;- the period, of at least 21 days, within which, and the form in which, members of the public are invited to make submissions to the Commission about the subject matter of the inquiry. Further to the above, the Commission requested comments from Stakeholders and presented the comments and the Commissions remarks at the Inquiry. Kindly find below the summary of the comments received.

<u>Stakeholder</u>	<u>Key Issues Raised</u>
Vitel	Preservation of Tier 3 licence rights, direct interconnection rights, VAS independence, grandfathering of existing investments, stronger non-discrimination obligations, protection of existing commercial agreements and transitional arrangements.
Banwo & Ighodalo	Requested extensive legal clarification throughout the Rules, including definitions, onboarding obligations, revenue-sharing framework, confidentiality protection, dispute resolution, enforcement safeguards and phased implementation.
HyMobile	Called for mandatory wholesale access obligations, stronger onboarding enforcement mechanisms, higher Tier 5 revenue shares, outage compensation, stronger enforcement measures and provisions addressing MVNO exits and financial distress.
Jackson Etti & Edu	Focused on mobile number portability, data protection, hosting refusal criteria, onboarding timelines, numbering allocation, QoS

<u>Stakeholder</u>	<u>Key Issues Raised</u>
	responsibility allocation, dispute resolution timelines and enforcement procedures.
Association of MVNO Operators (AMVON)	Raised concerns regarding mandatory wholesale access, BSP methodology, revenue-sharing floors, eSIM governance, onboarding obligations, multi-homing, data protection, QoS allocation, business continuity, exit procedures and stronger anti-competitive safeguards.
Systegra	Requested stronger onboarding enforcement, review of BSP structure, recognition of digital onboarding/eKYC and clarification of QoS accountability between MVNOs and HNOs
Smile Communications	Emphasized commercial flexibility, opposed mandatory hosting obligations, sought broader deductible costs, advocated negotiated revenue-sharing arrangements and requested recognition of legitimate traffic management practices.
CISL	Requested explicit recognition of Tier 4 MVNO participation in shared infrastructure, neutral-host networks and rural connectivity deployments.
MTN	Requested objective onboarding criteria, broader hosting request requirements, additional technical review timelines, and flexibility in revenue-sharing arrangements, wholesale credit-risk protections and clarification of BSP application.
Airtel	Sought reciprocal obligation between HNOs and MVNOs, stronger onboarding qualification requirements, expanded justifications for onboarding delays, greater pricing flexibility, recognition of HNO investment costs and longer transition periods.
Moblize Communications	Requested stronger QoS protections, transparent capacity allocation, compliance cost reductions and greater HNO accountability for service failures affecting MVNOs.
Living (Robert & John Ltd.)	Supported preservation of Tier 3 interconnection rights, revenue-sharing based on actual revenues, tariff flexibility,

<u>Stakeholder</u>	<u>Key Issues Raised</u>
	stronger numbering activation processes and clarity on transition arrangements.
IPNX	Focused on digital onboarding, biometric verification standards, eSIM governance, IoT/M2M regulation and stronger protections against commercial use of MVNO subscriber data by HNOs.
VAS2NET (Lebara)	Generally supported the Draft Rules and endorsed onboarding obligations, BSP oversight, anti-margin squeeze protections, limited deductions and the proposed Tier 5 revenue-sharing benchmark.
EMTS (9mobile)	Opposed mandatory hosting and regulated pricing structures, advocated commercial negotiations over regulatory mandates, requested broader refusal grounds and greater flexibility regarding onboarding timelines.
Routelink	Requested wholesale pricing advantages for MVNOs, revenue-sharing floors, QoS parity, margin squeeze protections, settlement transparency and dedicated NCC oversight structures.
Telewyz	Focused on fintech/financial-services MVNOs, conflict-of-interest protections, multi-homing rights, stronger onboarding obligations, direct numbering rights, data separation requirements and NCC-CBN coordination.
Mobilise Communications Ltd.	Requested greater QoS accountability, fair treatment by HNOs, lower compliance barriers, stronger onboarding enforcement and protection of MVNO pricing flexibility.
MaayHakas Consulting	Supported the overall framework while recommending a Vertical Service MVNO category, stronger CDR data rights, shorter onboarding timelines, BSP transparency, digital inclusion measures, direct numbering rights and formal NCC cross-sector regulatory coordination.

Cross-Cutting Themes Emerging from the Stakeholder Comments above;

<u>Theme</u>	<u>Stakeholder Position</u>
Onboarding & Hosting Obligations	Strong support from MVNOs and service providers for mandatory hosting and enforceable timelines, while MNOs sought greater flexibility and qualification criteria.
Revenue Sharing & BSP	Stakeholders were divided. MVNO stakeholders generally sought stronger revenue-share protections and BSP transparency, while MNOs advocated commercially negotiated arrangements.
Data Protection & Subscriber Information	Multiple stakeholders requested stronger protection of MVNO customer data and restrictions on HNO use of subscriber information.
eSIM, Digital Onboarding & IoT	Widespread support for digital onboarding, eSIM deployment and development of dedicated IoT/M2M frameworks.
QoS & Consumer Protection	Stakeholders requested clearer allocation of responsibilities between MVNOs and HNOs, outages compensation frameworks and stronger QoS enforcement.
Numbering & Portability	Several stakeholders advocated direct numbering allocations, number portability rights and reduced dependency on host networks.
Transitional Arrangements	Broad consensus that the proposed transition period may be insufficient and that existing agreements and investments should be protected.

Following the presentations, stakeholders made observations and recommendations regarding the Draft MVNO Business Rules.

The major themes emerging during discussions included:

1. Clarity of Roles and Responsibilities

Stakeholders emphasized the need for clear delineation of responsibilities between Mobile Network Operators and Mobile Virtual Network Operators to avoid duplication, operational conflict, and regulatory uncertainty.

2. Commercial and Wholesale Arrangements

Participants discussed the importance of establishing fair and transparent principles governing wholesale access agreements, pricing arrangements, service level expectations, and commercial negotiations between MVNOs and host network operators.

3. Consumer Protection

Stakeholders highlighted the need to ensure that consumer rights remain fully protected regardless of whether services are provided by an MNO or an MVNO.

4. Quality of Service

Comments were made regarding service quality obligations and the need for measurable service standards applicable to MVNO operations.

5. Competition and Market Development

Participants generally welcomed the initiative and noted its importance in fostering innovation, increasing market participation, promoting service differentiation, and driving healthy competition within the sector.

6. Regulatory Certainty

Stakeholders advocated clear compliance requirements and regulatory guidance to support investment decisions and long-term business planning.

7. Dispute Resolution Framework

Contributors recommended efficient procedures for resolving operational and commercial disputes that may arise between MVNOs and host Mobile Network Operators.

The Commission acknowledged the comments received and assured stakeholders that all submissions and observations would be carefully reviewed by the Technical Review Committee as part of the finalization process.

GENERAL OBSERVATIONS

The Public Inquiry demonstrated strong stakeholder interest in the continued development of Nigeria's MVNO ecosystem.

Participants generally expressed support for the Commission's efforts to establish a comprehensive operational framework capable of:

- Encouraging innovation;
- Facilitating new market entry;
- Enhancing competition;
- Expanding service choices for consumers;
- Providing investment certainty; and
- Supporting the Nigerian digital economy.

The discussions reflected a shared commitment among stakeholders toward building a sustainable and vibrant MVNO market in Nigeria.

SUMMARY OF VOTE OF THANKS

The Vote of Thanks was delivered on behalf of the Commission at the conclusion of the Public Inquiry. Appreciation was extended to:

- The Executive Vice Chairman/Chief Executive Officer of the Commission for his leadership and support;
- Members of Management and Staff of the Commission;
- Presenters and Moderators;
- Industry Stakeholders;
- Physical and Virtual Participants; and
- Members of the Organising Committee.

Stakeholders were commended for their active participation and valuable contributions during the Public Inquiry. The Commission reaffirmed its commitment to maintaining an open and consultative regulatory process and expressed appreciation for the continued collaboration of industry stakeholders in advancing a robust regulatory framework for the communications sector.

The Public Inquiry was thereafter formally brought to a close and participants were invited for a group photograph.

CONCLUSION

The Public Inquiry on the Draft MVNO Business Rules provided an important platform for collaborative engagement between the Commission and industry stakeholders. The feedback received will assist the Commission in refining the Draft Rules and ensuring that the final instrument supports innovation, competition, consumer protection, and sustainable growth within Nigeria's telecommunications sector.

The Commission remains committed to fostering an enabling regulatory environment that promotes investment, protects consumers, and supports the continued evolution of Nigeria's communications ecosystem.

Dated 20th August, 2026

Dr. Aminu Maida

Executive Vice Chairman/CEO

Nigerian Communications Commission