

SIM REGISTRATION IN NIGERIA: WHAT TELECOM OPERATORS MUST KNOW

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SIM card registration in Nigeria is governed by strict legal and regulatory frameworks, particularly the Registration of Communications Subscribers Regulations, 2022 (*“the regulation”*) and the Business Rules & Operational Processes for Implementation of the Registration of Communications Subscribers Regulations (*“business rules”*) issued by the Nigerian Communications Commission (NCC).

These frameworks are crucial for national security, consumer protection, and maintaining the integrity of Nigeria’s digital communications infrastructure. Compliance with these regulations is mandatory for all Mobile Network Operators (MNOs) and telecommunications service providers. Failure to adhere to the provisions of these regulations can result in substantial penalties, as seen in recent enforcement actions by the NCC.¹

Common Regulatory Violations and Associated Penalties

- **Failure to Conduct Physical Presence and Verification requirement:** Licensees are mandated to conduct in-person subscriber registration and physical identity verification.² A breach of this requirement incurs a fine of N200,000.00 for each non-compliant subscription.³
- **Use of Unauthorized Devices and Locations:** SIM registrations must only be conducted at authorized registration centres using NCC approved biometric devices. The use of unapproved devices or locations is a violation of the regulations.
- **Pre-Activation of Unverified SIM Cards:** SIM cards must not be activated before the completion of full registration and verification.⁴ A breach of this requirement incurs a fine of N200,000.00 for each noncompliant.⁵
- **Night-Time Registration of SIM Cards:** SIM registrations conducted between 12:00 a.m. and 6:00 a.m. are presumed non-compliant unless the operator can provide credible justification for such registration.



1 Fejiro Awowede and Oladapo Riliwan, ‘NCC Fines Airtel N104 million over SIM registration breaches’ (Technology times) <https://technologytimes.ng/sim-reg-ncc-fines-airtel-nigeria-%e2%82%a6104-million/> accessed on Monday 21st July 2025.

2 Regulation 12(4) of the Regulation

3 Regulation 18(3) of the Regulation

4 Regulation 12(1) & (4) of the Regulation; Rule 12 of the Business Rules

5 Regulation 18(2) of the Regulation

Compliance Measures for Service Providers

To ensure compliance and avoid sanctions, telecommunications providers should implement the following:

- Maintain strict oversight of registration agents and restrict access to only approved devices and locations.
- Implement comprehensive compliance monitoring and internal audit systems.
- Ensure that no SIM card is activated before all registration and verification processes are completed.
- Keep clear documentation to justify any registration activity that occurs during restricted hours.

Conclusion

Subscriber registration is a fundamental regulatory obligation for telecommunications providers in Nigeria. The NCC's enforcement actions highlight that, breaches whether due to negligence, systemic failure, or fraudulent practices, will attract significant penalties. Service providers must proactively align their operations with the law, improve oversight mechanisms, and invest in strong compliance systems.



Babalakin & Co. is a firm with broad experience on the subject of Telecommunications and all matters encompassing it. If you have any questions or would like information on the issues discussed, please contact:



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