

REVIEW OF THE NIGERIAN COMMUNICATIONS
COMMISSION LICENSING FRAMEWORK FOR
INTERNATIONAL APPLICATION-TO-PERSON
(A2P) MESSAGING IN NIGERIA



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INTRODUCTION



The Nigerian Communications Commission (“NCC or the “Commission”) unveiled a landmark regulatory initiative on 8th July 2025, with the release of its Licensing Framework for International Application-to-Person (“A2P”) Messaging Services in Nigeria (“the A2P Framework”).¹ The objective of the A2P Framework includes the establishment of a robust, regulated, and secure framework for international Application-to-Person (A2P) messaging services in Nigeria. The A2P Framework further introduces the International A2P Messaging Aggregator Licence (“the A2P Aggregator Licence” or the “Licence”).

OVERVIEW OF A2P MESSAGING

A2P messaging refers to any message delivered from a software application to an individual user. Typically initiated via web, mobile applications, or an integrated SMS Application Programming Interface (API). In Nigeria, the current international A2P messaging ecosystem remains largely unregulated. Local Mobile Network Operators (MNOs) independently monetise international SMS traffic using disparate and sometimes unverified technologies, which are not transparent to the regulator. This has resulted in inconsistent tariff structures, revenue leakage, and limited regulatory visibility, leaving the system vulnerable to fraud, spam, and other illegal activities. Moreover, revenues generated from these services are paid offshore in foreign

currencies, depriving the Nigerian economy of tax benefits and inward remittances.

To address these challenges, the NCC has introduced the A2P Framework as a licensing framework centred around a centralised SMS platform and a single gateway. The A2P Framework seeks to standardise tariffs, enforce compliance, and ensure that revenues from international A2P messaging are retained within Nigeria. It is designed to enhance transparency, promote fair competition, bolster security measures, and create a new tax-based revenue stream, while granting the NCC full oversight and control of the international A2P messaging ecosystem.

Key Provisions of the A2P Framework: Outlined below are the core elements of the A2P Framework, along with the regulatory, technical, and commercial requirements for obtaining the Licence:

1. **The objective of the A2P framework** - The A2P Framework aims to establish a centralised platform as the primary channel for all international A2P messaging services in Nigeria. It requires brands, OTT providers, and local mobile operators to integrate with this hub within a set timeframe, ensuring full participation and standardised processing of traffic. By introducing regulated pricing, the framework intends to promote fairness and transparency across all operators and service providers. It also seeks to protect Nigerian subscribers by enforcing strict rules against spam and fraud, while ensuring compliance with data protection and storage laws. In addition, it enhances overall security protocols to safeguard user data, maintain

¹ https://ncc.gov.ng/sites/default/files/2024-12/Licensing_Draft-Framework-A2P-Messaging.pdf

confidentiality, and prevent unauthorised access.²

2. Scope and Services Covered Under the Licence - The A2P Framework outlines the scope of the Licence, which includes the development and oversight of a centralised A2P messaging platform for routing international A2P messages in Nigeria. Services expected to be rendered by the service providers include:

- Deployment of a centralised A2P messaging platform
- Mandatory routing of International A2P messages via the central hub
- Transmission of A2P messages (SMS, MMS, etc.)
- Provision of transactional services (e.g., banking, payment confirmations)
- Sending notifications and alerts
- Implementation of subscriber protection tools (opt-in/opt-out mechanisms)
- Deployment of security and anti-spam measures.³

3. Limitations and Structural Safeguards - To maintain the integrity and structure of the telecommunications ecosystem, the A2P Framework imposes the following obligations on licensees –

- Licensees are expressly prohibited from offering telecom services that fall outside the defined scope of the A2P Licence, or for which the NCC has not granted separate authorisation.

- They are restricted to only the services approved under the A2P Framework and must ensure full compliance with Licence conditions, the Nigerian Communications Act, and any subsequent legislation.
- holding the Licence does not entitle licensees to an International Signalling Point Code or participation in the National Numbering Plan.
- The Licence does not authorise the provision of infrastructure-based telecom services, such as transmission networks, switching facilities, or external fibre links (including inter-city or metro rings).

4. Eligibility Criteria -

- To qualify for the A2P Aggregator Licence requires, amongst other things, incorporation under Nigerian law and an agreement with at least one Host Network Operator or a National Carrier, which should be filed with the NCC.
- The applicant should demonstrate substantial financial capacity to meet both capital (“CAPEX”) and operational (“OPEX”) expenditures necessary for the deployment and operation of the A2P messaging services.
- The NCC may also impose further requirements at its discretion.⁴

² NCC A2P Framework, para. 1.1.

³ NCC A2P Framework, para. 4.1.

⁴ NCC A2P Framework, para. 5.0.

5. Technical Requirements: Applicants must be able to:

- Demonstrate the capability to integrate with Local MNOs and operate within a secure and reliable network environment.
- Implement robust systems for fraud detection, data protection, and continuous security monitoring, including the use of firewalls and encryption protocols to guard against unauthorised access and spam.
- Route all messaging traffic through the NCC’s centralised SMS firewall or any other technology mandated by NCC.⁵

Licencees are all required to comply with all the technical standards and specifications issued by the NCC.

6. Mandatory Conditions for A2P Messaging Providers - Section 4.6 of the A2P Framework outlines key compliance obligations for A2P Messaging Providers, including adherence to the Nigerian Communications Act 2003, relevant regulations, and data/consumer protection laws. Providers must ensure strong privacy and security protocols, reject messages lacking valid sender IDs (especially those from the internet or unauthorised gateways), and strictly avoid sending unsolicited or spam messages. These measures are designed to protect subscriber rights and promote responsible messaging practices.

7. Data Protection, Privacy, and Cybersecurity Compliance Obligations -

The A2P Framework imposes comprehensive obligations on licensees and A2P Messaging Providers to ensure data protection, subscriber privacy, and cybersecurity. Specifically, it mandates A2P service providers to comply with the Nigerian Communications Act 2003, all applicable NCC regulations, and relevant laws, including the Nigeria Data Protection Act (“NDPA”). In furtherance of these obligations, licensees are required to adhere to all relevant NCC regulations, including those relating to data privacy, cybersecurity, and consumer protection standards. They must also submit periodic reports to the Commission, detailing traffic data, service quality indicators, and revenue figures.⁶ Additionally, all licensees must implement robust security protocols such as centralised SMS firewalls to eliminate spam and unauthorised traffic, encryption of SMS traffic data to guard against breaches, and fraud detection systems to proactively identify and address suspicious activities.⁷

8. Licence Fee, Tenure, and Market Structure -

The Proposed Licence fee is ₦10,000,000 (*Ten Million Naira*) only. The tenure of the Licence is set at five (5) years and may be renewed for an additional five-year term upon expiration, subject to the licensee providing six (6) months' prior notice and fulfilling all regulatory and financial obligations.

⁵ NCC A2P Framework, para. 6.0.

⁶ NCC A2P Framework, para. 7.0.

⁷ NCC A2P Framework, para. 8.0.

9. Enforcement and Sanctions - Any breach of the Licence conditions may result in regulatory sanctions, including fines, suspension, or outright revocation of the Licence. Specific violations such as failure to comply with tariff regulations, non-adherence to security standards, or involvement in tax evasion will attract penalties as prescribed by the Commission.⁸

Compliance Overview - Applicants should note the following:

- MNOs are not eligible to apply for the A2P Messaging Aggregator Service Licence.
- Where an applicant will rely on a technical partner to deploy the service, one unique, suitable, and competent technical partner is allowed per applicant.
- License Application Forms are available on the Commission's website.
- A 5% non-refundable administrative fee of the Licence cost is payable at submission.
- Inquiries can be directed to licensing@ncc.gov.ng.
- Applications are due by 15th July 2025.⁹

Challenges, Strategic Considerations, and Legal Recommendations - While the A2P Framework presents a structured path for regulating international A2P messaging in Nigeria, it is important to note the likely challenges that prospective licensees may encounter. These include the stringent technical and financial requirements for eligibility, the obligation to integrate with the centralised messaging platform, and the need to continuously comply

with evolving data protection and cybersecurity standards. Businesses interested in securing the Licence should engage in proactive regulatory alignment, ensure robust technical partnerships, and develop internal compliance mechanisms for data governance, opt-in/opt-out frameworks, and anti-spam protocols. From a legal standpoint, applicants need to undertake due diligence on host network agreements, ensure clarity on revenue-sharing terms, and seek legal guidance on structuring their operations within the boundaries of the A2P Framework and their Licence conditions.

For further insights or legal support regarding the NCC's A2P Framework and its implications for digital communication services in Nigeria, please reach out to us at the Telecoms, Media & Technology ("TMT") Practice Group at Advocaat Law Practice. Our team advises clients on telecoms licensing, compliance strategy, regulatory engagement, and commercial structuring across Nigeria's evolving digital infrastructure space.

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⁸ NCC A2P Framework, para. 12.0.

⁹ <https://ncc.gov.ng/media-center/public-notice/commencement-licensing-provision-international-a2p-messaging-aggregator>

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