



Central Bank of Nigeria

Consumer Protection and Financial Inclusion Department

1 Custom Street, Marina Lagos Island

PMB. 12194, Lagos

Phone: +234 700-225-5226 , +234 800-225-5226

Email: cpd@cbn.gov.ng

Website: www.cbn.gov.ng

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To: Banks, Other Financial Institutions (Including Payment Service Providers) and the General Public

EXPOSURE DRAFT OF THE JOINT CBN-NCC FRAMEWORK FOR RESOLUTION OF FAILED AIRTIME AND DATA PURCHASE TRANSACTIONS

The Consumer Protection & Financial Inclusion Department, in collaboration with the Consumer Affairs Bureau of Nigerian Communications Commission (NCC), mobile network operators, banks, payment service providers, other industry stakeholders and relevant CBN departments, developed a Framework for the Resolution of Failed Airtime and Data Purchase Transactions aimed at addressing rising consumer complaints around failed airtime and data purchase transactions where customers are debited without successful service delivery.

This development buttresses the need for the proposed framework to institutionalise clear accountability, standardise resolution timelines, and ensure a sustainable, coordinated approach to consumer redress across the financial and telecommunications ecosystems.

This draft framework is hereby exposed to banks, other financial institutions, payments service providers and the general public for comments. Inputs should be sent to seelachi@cbn.gov.ng and fcikeaka@cbn.gov.ng not later than February 20, 2026.

Best regards,

Aisha Isa-Olatinwo, (Ph.D.)

Director, Consumer Protection & Financial Inclusion

NATIONAL FRAMEWORK ON FAILED AIRTIME & DATA TRANSACTIONS

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1.0. Introduction

The sale of airtime and data in Nigeria operates under a dual regulatory authority involving the **Nigerian Communications Commission (NCC)** and the **Central Bank of Nigeria (CBN)**. While NCC regulates the telecom infrastructure, players and delivery channels, CBN regulates the financial institutions that facilitate the success of these purchases. This convergence of communication and finance calls for strong inter-regulatory collaboration to ensure transaction success, consumer satisfaction, and system integrity.

2.0. Background

In response to the rising incidences of failed airtime and data purchase transactions by subscribers with corresponding debits to their Bank accounts as well as delays in resolving such complaints the Nigerian Communications Commission (NCC), Central Bank of Nigeria (CBN), Mobile Network Operators (MNO), Deposit Money Banks (DMB), and other relevant stakeholders met to chart resolution in order to enhance transaction efficiency, prompt resolution and clear chargeback process to improve subscriber satisfaction in airtime and data purchase services across Nigeria's digital financial ecosystem.

Consequently, this document presents a unified national framework for addressing failed airtime and data transactions and late/non-resolution of dispute arising from debit of customer Bank account in Nigeria. The framework emphasizes root cause identification, regulatory alignment, Service Level Agreement (SLA) standardization, real-time reconciliation, and regulator-enforced timelines for automated reversals, to restore subscriber trust and ensure accountability.

3.0. Objectives

This Framework aims to:

1. Identify and address the root causes of failed airtime/data transactions.
2. Identify and address late or non-resolution of transaction dispute arising from debit of Bank accounts when purchases of airtime and data products fail.
3. Prescribe enforceable SLA framework.
4. Develop standards that will identify failed or successful transactions and deal with resolution.
5. Document responsibilities of each Stakeholder.

4.0. Stakeholder and Roles

This section seeks to identify all Stakeholders and their responsibilities:

Stakeholder	Responsibilities
Purchaser	<ul style="list-style-type: none"> i. Initiates airtime/data purchase using electronic payment means such as SMS, USSD, Web Channels, MNO Applications, Bank Applications, amongst others. ii. Lodge complaints with either MNO or issuing Bank and requests refund when debited without corresponding value or following purchase of wrong value and/or to wrong phone number.
MNO	<ul style="list-style-type: none"> i. Sells airtime or data bundle products either directly or through licensed third parties. ii. Facilitates technical integrations with the acquirer (Bank/Non-Bank) and NCC Authorized Licensees. iii. Make airtime or data bundle products available to subscribers upon successful purchase. iv. Ensures that NCC Authorized Licensees have the capacity to serve and warehouse Stock of products (airtime, data bundles).
Merchant	<ul style="list-style-type: none"> i. Sell airtime or data bundle products. ii. Handle customers' complaints (where applicable), directly or indirectly. iii. Ensure adequacy of sufficient Stock of products (airtime, data bundles) to serve Purchasers. iv. For small player merchants: These are secondary resellers who source telco products from open market through Established Bulk Resellers (Merchants) and resell products directly via digital channels to Purchasers. / For small player merchants (secondary resellers); v. Possess requisite licence to operate directly or indirectly.
NCC Authorized Licensees	<ul style="list-style-type: none"> i. Sells MNO's airtime or data bundle products. ii. Connects directly to MNO and Acquirers (Bank & Non-Bank).

	<ul style="list-style-type: none"> iii. Serve as intermediaries between MNOs and Merchants. iv. Warehouse stock (airtime and data bundles) v. Provide digital platforms that enable the sale of airtime and/or data bundles. vi. Ensure that all newly introduced products & services are updated on platforms and remove discontinued products & services. vii. Integrate with the Merchant to vend airtime/data upon receiving value from the customer viii. Instruct Merchant to vend airtime/data upon receiving authorization from Acquirer (Bank & Non-Bank).
Payment Acquirer	<ul style="list-style-type: none"> i. Payment acquirers are the Banks or a non-Bank acquirer of the merchant. ii. Processes payments and initiate reversals on escalated failed transactions/erroneous transactions.
Issuing Institution (Bank or Mobile Money Operator)	<ul style="list-style-type: none"> i. Carries out authorization and debits purchaser/cardholder's Bank account. ii. Receives and resolves customer chargeback complaints. iii. Processes refund and credits customer in real-time upon receiving transaction failed notification. iv. Ensure that the NCC Authorized Licensees fulfil the airtime stock demands of the Bank customers.
Regulators: NCC & CBN	<ul style="list-style-type: none"> i. Provide regulatory oversight over Telecommunications and Financial Industry operators (stakeholders or the ecosystem) respectively.

5.0. Root Cause Analysis

The key issues and root causes of failed transactions are summarized below:

Category	Key Issues	Root Causes	Recommendations
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Refund Failures	Non-reversal of funds	<ol style="list-style-type: none"> 1. Network downtime, unclear ownership of liability. 2. Lack of visibility of transaction status across the value chain. 3. Lack of stock by NCC Authorized Licensee. 	<p>Automatic/System trigger reversals (requires no Purchaser intervention):</p> <ol style="list-style-type: none"> i. Stakeholders to deploy end-to-end transaction visibility tools. ii. Establish unique transaction codes to identify process status/visibility (the process status could be failure/success/erroneous/pending points). iii. Review of the current commercial agreement to include Service Level Agreement and minimum (7 days) stock holding
Transaction Delays	Multiple debits due to transaction re-attempts.	No real-time feedback on downtime.	<ol style="list-style-type: none"> i) Banks are to limit re-attempts to twice only. ii) Banks/Merchants to automate Purchasers notifications for transaction re-attempts. iii) Issuing Banks to notify Purchasers on status of pending transaction.

			<p>iv) Merchants to notify Purchasers of successful transactions</p> <p>v) NCC Authorized Licensees to implement queries to extract status of transaction and transmit query output to Bank/merchant.</p> <p>vi) MNOs provide endpoints for this query so NCC Licensees can call the endpoint to ascertain status of transaction.</p>
System Gaps/Glitch	Reconciliation failures.	Unlinked systems; lack of system integration.	<p>i) Standardize response code across Value chain/ stakeholders.</p> <p>ii) Create end to end dashboards for tracking failures.</p>
Failure due to Selection of Wrong Service Provider	Delay in reversal to Purchaser's Bank account	MSISDN does not belong to the respective MNO.	<p>i) Before processing any recharge, MNOs shall validate MSISDN against the ported number database.</p> <p>ii) If the number is flagged as ported out, block the transaction and generate a</p>

			customized error message.
Failure due to input of Invalid Number		MSISDN does not exist	i) Before processing any recharge, MNOs shall validate MSISDN. ii) If the number does not exist, block the transaction and generate a customized error message.
Failure due to input of Incorrect Numbers		MSISDN exist but does not belong to the intended recipient .	iii) Purchaser to complain to the mobile service provider for resolution.

6.0. Unified Service Level Agreement and Instant Reversal Timelines

i. Successful Transactions

Trigger Event	Action Required	Timeline	Responsible Party
Upon customer's request and the account is debited, the Bank must notify the NCC Authorized Licensee who then notifies the MNO NCC Authorized Licensee releases code to MNO.	Issuing Bank release request code to NCC Authorized Licensee	Real Time	Bank
	NCC Authorized Licensee releases response/request code to MNO.	Real Time	NCC Authorized Licensee
	MNO release final fulfillment code to all.	Real Time	MNO

NCC Authorized Licensee responds on the status of successful transaction to all.	Upon receiving transaction code from NCC Authorized Licensee.	Real Time	NCC Authorized Licensee
Upon Purchaser's complaint	MNO obtains consent from the beneficiary before reversal of unintended airtime/data credit	Post-facto	MNO

ii. Failed Transactions

Trigger Event	Action Required	Timeline	Responsible Party
Failure at Bank: Upon Purchaser's request and the account is debited, the Bank must notify the NCC Authorized Licensee of the failure who then notifies the MNO.	Issuing Bank release failure code to NCC Authorized Licensee	Real Time	Bank
	NCC Authorized Licensees send response code to MNO	Real Time	NCC Authorized Licensee
	Notify Acquirer of failed credit	Real Time	NCC Authorized Licensee
Failure at NCC Authorised Licensee: NCC Authorized Licensee release code to MNO/ Upon customer's request for airtime and data and the account is debited without receiving value	MNO release response code to all	Real Time	MNO
Failure at MNO: Upon receiving transaction code from NCC Authorized Licensee	MNO responds on the status of the transaction	Real Time	MNO

Unfulfilled airtime/data delivery.	Reverse debit of stock into NCC Authorized License's stock position	30 seconds (sandbox to simulate and revert)	MNO
1. Failed transaction at the Bank level. 2. Failed transaction delivery from NCC Authorized Licensees. Failed transaction delivery from MNO to the NCC Authorized Licensee	Refund Purchaser	30seconds (sandbox to simulate and revert)	i. Bank ii. NCC Authorized Licensee iii. MNO
Upon confirmation of Failed transaction.	Initiate reversal to Issuer (Bank to Bank or Bank to Non-Bank and Vice versa)	Real Time	Acquirer
Failed Transactions on Barred Lines /Wrong Number Ranges	Notify customers of transaction failure with reason. Notification should be by the relevant stakeholder, using the transaction error code provided by MNO to stakeholders	Immediately	MNO

iii. Erroneous recharges on ported lines

Trigger Event	Action Required	Timeline	Responsible Party
Upon receipt of transaction request on already ported line	1. Before processing any recharge, validate the MSISDN against the ported number database	Real Time	MNO

NCC Authorized Licensee/ Bank wallet shouldn't be debited by MNO.	<p>2. Proactively stop recharges and send a failure code to Purchaser's bank and send notification to the Purchaser, sample below -</p> <p>“Recharge failed: This number is no longer active on our network. Please contact your current service provider”.</p>		
Transaction failure code sent to MNO by NCC Authorized Licensee and Bank.	In case Customer account balance is debited by the Bank, it should be reversed instantly.	Real Time	<p>i. Bank</p> <p>ii. NCC Authorized Licensee</p>
Airtime or data was credited to the Purchaser, Purchaser has received refund from the Merchant/Reseller or NCC Authorized Licensee for the airtime or data but the notification of failure sent by the MNO to the NCC Authorized Licensee was in error	The MNO is at liberty to deduct the airtime or data from the airtime balance of the customer/Subscriber .In scenario where the balance no longer tallies with the credited value, MNO should continue to deduct until the credited value equals deduction made.	Real Time	MNO
Notifications by MNO to NCC Authorized Licensee of a failed or unsuccessful credit to a Subscriber leads to payment or	The MNO is bound to refund the value of the airtime or data to the NCC Authorized Licensees.		

settlement finality between the MNO and NCC Authorized Licensee.			
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iv. Pending Transactions

Trigger Event	Action Required	Timeline	Responsible Party
NCC Authorized Licensee makes request to MNO	No response from MNO, the NCC Authorized Licensee retries	60 minutes	NCC Authorized Licensee
	NCC Authorized Licensee sends failed response to Bank	10 minutes 23 hours	NCC Authorized Licensee MNO
	Bank sends error code to customer and refunds	Realtime	Bank
Pending airtime/data delivery	Reverse debit of stock into NCC Authorized Licensee's stock position	6 hours	MNO

7.0. Compliance

- All parties involved in airtime and data transaction shall take the following actions to ease usage and facilitate consumer satisfaction:
 - Stakeholders must immediately connect **ONLY** to relevant authorized licensees of the NCC and CBN
 - MNOs and Banks must only connect to NCC Authorized Licensees/MNO digital channel Partners for airtime and data vending.
- Notifications of failure creates final settlement obligations between MNO, NCC Authorized Licensees.
- The NCC and CBN will audit Stakeholder compliance jointly or individually at quarterly or other intervals as may be determined.

4. Automate reversal processes across all Stakeholders (Bank/MNO/NCC Authorized Licensees).
5. There shall be a Central Monitoring Dashboard hosted by CBN/NCC for tracking reversals, SLA breaches, and customer complaints. This will facilitate the establishment of a real-time national “Failed Transactions Dashboard” with uniform error code, with end-to-end visibility across the value chain.
6. MNO, Aggregator & Bank shall maintain a daily Success and failed cases report for better visibility and corrective actions. This report shall be shared with respective stakeholders as defined in the Standard Operating Procedure (SOP).
7. Stakeholders shall publish quarterly SLA compliance scorecards for transparency, to encourage self-regulation and efficiency.
8. Purchaser should be notified via SMS by the Aggregator, Bank or MNO where the cases are successful or failed.
9. The CBN and the NCC will take necessary measures to enforce the provisions of this Framework and the SLAs contained therein, and will, where necessary, impose penalties for any breach.

8.0. Dispute Resolution

1. Disputes between Stakeholders pertaining to this framework and its subject matter shall first undergo dual resolution amongst affected parties. Any dispute unresolved within five (5) working days shall be escalated to regulators (CBN and NCC) addressed to the Director Consumer Protection and Financial Inclusion Department of CBN, and/or the Director Consumer Affairs Bureau of NCC.
2. Dispute shall be subjected to first level resolution process among the parties involved and where a resolution is not achieved, the matter shall be escalated to the Regulators (CBN and NCC).

9.0 Review Procedure

This Framework shall be subject to review at such times deemed necessary by NCC and CBN.

10. Template for SLAs

Use Case	Actions Required	Timeline	Responsible Party
Technical/Network Glitches Impacting Airtime/Data Bundle Transactions for Both Banks, MNOs & all relevant Stakeholders *For MNOs, downtime will be service impacting 5% of customer transacting airtime	Notify all stakeholders of downtimes and resolution status. Notification should be sent to direct Stakeholder who in turn is expected to inform all purchasers. Temporarily block airtime/data purchases during downtime.	30 minutes.	<ul style="list-style-type: none"> ▪ MNO ▪ <u>NCC</u> ▪ <u>Authorized Licensees.</u> ▪ Issuing Bank ▪ Payment Acquirers ▪ Merchants
	Prevent or block purchases during downtime/technical issues. Notify customers of downtime during technical issues.	Immediately / Upon receipt of notification	<ul style="list-style-type: none"> ▪ Issuer Bank ▪ VAS ▪ Provider ▪ Merchant ▪ MNO ▪ Acquirer
Wrong Transactions on Ported lines	Confirm and validate the current MNO hosting the MSISDN, through the Central Number Portability Database before processing Airtime/ Data purchase request.	Real Time	<ul style="list-style-type: none"> ▪ MNO ▪ NCC ▪ <u>Authorized Licensee</u>
	Provide error notifications to Purchaser and Bank on transaction failure due to discrepancy in MSISDN porting information, to	Real Time	MNOs to develop and get the API ready.

	enable reversal of transaction in favor of the purchaser already debited.		
Inability to provide value to subscribers during Downtimes	Implement Auto reversal of failed transactions. Suspend all transactions during downtimes (applies to downtimes above 10 minutes) and notify customers.	30 mins	<ul style="list-style-type: none"> ▪ MNO ▪ NCC Authorized Licensee ▪ Bank
No Visibility of Failed Transactions	Creation of codes and notifications to stakeholders	Online Real-time	<ul style="list-style-type: none"> ▪ MNO ▪ Merchant ▪ Bank ▪ NCC Authorized Licensee
	Develop a dashboard to track status of transactions	Online	<ul style="list-style-type: none"> ▪ CBN ▪ NCC
Inability to provide value to subscribers during Downtimes (service degradation)	Suspend all transactions during downtimes (applies to downtimes above 10 minutes) and notify customers	Immediately	<ul style="list-style-type: none"> ▪ Bank ▪ MNO ▪ NCC Authorized Licensee
	Establish protocol to handle customer funds during outages (reverse collected funds)	Immediately	
Non-availability of online portal for transaction status	Provide report of failed transactions to NCC Authorized Licensee.	3 times a day On request	<ul style="list-style-type: none"> ▪ MNO ▪ NCC Authorized Licensee ▪ Bank ▪ MNO

			<ul style="list-style-type: none"> ▪ NCC ▪ Authorized Licensee ▪ Bank
Create “pending” error code for transactions with ambiguous status	Change status of such transactions to failed	24 hours	
Training and Updates	Conduct regular training and updates on SLA compliance	Half yearly	All Parties
Ensure that Partners are licensed	Conduct routine audits of partners to verify compliance and operational capability	Regulators to conduct audit	<ul style="list-style-type: none"> ▪ CBN ▪ NCC
Difficulty in Recouping Funds from subscribers due to Unclear Transaction Status	<p>Create clear guidelines for tracking and recouping funds</p> <p>Implement a tracking system for real-time visibility of transaction status</p>	<p>24 hours</p> <p>Immediately</p>	<ul style="list-style-type: none"> ▪ Bank ▪ NCC ▪ Authorized Licensee ▪ MNO
Transaction timeout within purchase	Reverse transaction and refund customer	Instant	Issuing Bank
	Monitor compliance with timeframes and report violations	Immediately	MNO/Merchant
MNOs’ Non-Visibility of Debited Funds	Provide real-time visibility of debited funds and claw back mechanisms	Online Realtime	Banks
	Ensure that customers are updated on refund status	Real Time	Banks
Standard Display of	Implement a standard format for displaying transaction values	Immediately	<ul style="list-style-type: none"> ▪ Merchant ▪ Bank

Purchase Value for Ease of Recognition	Ensure all parties use agreed price display formats	30 days	All Parties NCC Licenses
No Response from Recipient of erroneous airtime/ data	<p>Establish a formal process for obtaining recipient consent for transactions</p> <p>An Affidavit of Indemnity or notarized indemnity letter will be required before processing.</p> <p>An authorized personnel (Chief Audit Executive or designate) member can initiate a letter to recall the erroneous airtime/data.</p>	Within 3 hours the case is reported	Bank/MNO
	Provide mechanisms for customers to report non-responses.	Immediately	MNO
Used Portion of Airtime/Data Credited in Error (In cases of erroneous transfer of airtime/data)	Create a protocol for handling disputes regarding used airtime/data (reversal of funds net of administrative charges)	Immediately upon report	<ul style="list-style-type: none"> ▪ MNO/ NCC Authorized Licensee
	1. Place a lien on a third party related credit		
	2. Provide clear communication with customers about credit usage	Within 24 hours	<ul style="list-style-type: none"> ▪ Provider/Bank ▪ MNO
	3. For high value fraudulent transactions an Affidavit of Indemnity or notarized indemnity	Within 3 hours of the case	

	<p>letter will be required before processing.</p> <p>4. An authorized personnel (Chief Audit Executive or designate) member can initiate a letter to recall the erroneous credit and Head Revenue Assurance for the MNOs</p>	being reported	
Reversal of erroneous over purchase of airtime/data by owner	Standardization in line with the extant consumer rights law.	24 Hours	<ul style="list-style-type: none"> ▪ MNO ▪ NCC ▪ Authorized Licensee ▪ Bank
Reversal of erroneous airtime/data purchase to a wrong phone number	<p>For larger amounts, i.e., threshold of N20,000 upwards, an Affidavit of Indemnity or notarized indemnity letter will be required before processing.</p> <p>However, for smaller amount (N1000 to below N 20,000) request for recipient's consent should be done by MNO.</p>	24 Hours	<ul style="list-style-type: none"> ▪ MNO ▪ NCC ▪ Authorized Licensee ▪ Provider/Bank
Recipient Refutes Erroneous Claim	Create a dispute resolution process for handling claims from the purchaser.	Immediately	Bank MNOs
	Ensure that all claims are documented and processed in a timely manner.	At all times	MNO
	Ensure compliance with data protection regulations (e.g. NDPR, GDPR)	In line with the Regulation	All Parties

Data Privacy and Compliance	Conduct regular audits to verify compliance.	Quarterly	All Parties
Customer Support Response Time	Set a standard response time for customer inquiries and complaints	24 hours	All Parties
	Regularly review response times and improve processes where needed	As needed	All Parties
Integration Issues with relevant stakeholders	Develop a standardized API for integration with all relevant stakeholders	Within 14 days from the published report.	All parties
	Ensure that relevant stakeholder services are regularly tested for compatibility		MNO NCC Authorized Licensees

Definition of Terms

S/N	TERM	DEFINITION
1	CBN	The Central Bank of Nigeria.
2	Deposit Money Banks (DMBs)	Financial institutions licensed by the CBN to accept deposits from the public.
3	Established Bulk Resellers (Merchants)	These will include Fintechs, Banks and NCC Authorized Licensees with valid operating licence.
4	Failed Transaction	A purchase of airtime or data where a subscriber's account is debited but the corresponding value (airtime or data bundle) is not delivered successfully to the intended mobile number.

5	Issuing Bank (Issuer)	The financial institution (Bank or non-Bank) that holds the customer's account and carries out the authorization and debit for an airtime or data purchase.
6	Merchant	An entity with valid operating licence that sells airtime or data bundle products directly or indirectly to end-users. This includes small player merchants who resell products sourced from the open market through established bulk resellers.
7	Mobile Network Operator (MNO)	A telecommunications service provider licenced by the NCC to provide mobile communication services, including the sale of airtime and data bundles.
8	MSISDN	Mobile Station International Subscriber Directory Number. It refers to a subscriber's mobile phone number.
9	NCC Authorized Licensees	A company licenced by NCC for distributing airtime and data. They serve as an intermediary between MNOs and merchants/retailers, often warehousing stock and facilitating technical integrations.
10	NCC	The Nigerian Communications Commission.
11	Payment Acquirer (Acquirer)	The financial institution (Bank or a licensed non-Bank) that processes payment transactions on behalf of the merchant or NCC Licensed Aggregator.
12	Ported Line/Number	A mobile number that has been transferred from its original Mobile Network Operator (MNO) to a new MNO under the Mobile Number Portability (MNP) scheme.
13	Purchaser/Subscriber	The end-user customer who initiates and pays for airtime or data purchase.
14	Real Time	This refers to an automated system response typically expected within seconds of a trigger event,

		with a maximum allowable time defined in specific SLA tables.
15	Reversal	The automated process of crediting a subscriber's Bank account following a failed airtime or data transaction
16	Service Level Agreement (SLA)	A binding agreement that defines the level of service, roles, responsibilities, and timelines expected between stakeholders, as stipulated in this framework.
17	Stakeholders	All entities involved in the airtime and data transaction value chain, including but not limited to Purchasers, MNOs, Merchants, NCC Licensed Aggregators, Payment Acquirers, Issuing Banks, and Regulators (NCC & CBN).
18	SOP	Standard Operating Procedure
19	Vending	The act of electronically delivering airtime or data bundles to a subscriber upon successful payment authorization.

Nigerian Communications Commission

Representative [Name] [Position]

Nigerian Communications Commission

Representative [Name] [Position]

Central Bank of Nigeria

Representative

Name] [Position]

Central Bank of Nigeria

Representative

Name] [Position]