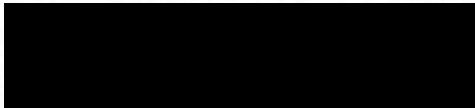


The Information Officer  
Ministry of Communications, Digital Technology & Innovations  
William Tubman Avenue  
Accra, Ghana

**Through:** The Hon. Minister for Communications, Digital Technology & Innovations

**From:** David Kukuia-Galley  
IMANI Center for Policy and Education



**Date:** December 8, 2025

**SUBJECT:** REQUEST FOR INFORMATION UNDER THE RIGHT TO INFORMATION ACT, 2019 (ACT 989)

**Re:** PLANNED SIM REGISTRATION EXERCISE, PROCUREMENT OF SERVICE PROVIDER(S), PPA APPROVALS, AND DEALINGS WITH TRANSACTLY AND THE NATIONAL IDENTIFICATION AUTHORITY (NIA)

Dear Sir / Madam,

**1. Legal basis**

I make this application under Article 21(1)(f) of the 1992 Constitution and the Right to Information Act, 2019 (Act 989), which guarantee the right of access to information held by public institutions, subject to the limited exemptions set out in the Act.

For the avoidance of doubt, this request is made in reliance on the definition of:

- "information" as including any recorded matter, regardless of form or medium, in the possession, custody or control of a public institution, whether or not it was created by that institution; and
- "public institution" as including any body which is owned, controlled or substantially financed by Government, or any private body performing a public function or receiving public resources for that purpose.
- "registration" as it relates to the herein mentioned planned "SIM Card registration" exercise also includes variants of the same, including re-registration, ownership verification, ownership validation, synchronisation, biometric validation, biometric verification, and biometric synchronisation of pre-existing datasets.

**2. Context and time frame**

The request concerns the planned nationwide SIM registration exercise which the Ministry and/or the Minister (of Communications, Digital Technology, and Innovations) has publicly announced or disclosed through the media for rollout from the first quarter of 2026, with:

*Joan Strong*  
08/12/25

- a new Legislative Instrument (L.I.) on SIM registration to be laid before Parliament;
- biometric verification against the National Identification Authority (NIA) / Ghana Card database; and
- the procurement of a “service provider to do the SIM registration”, with public statements that the cost will be billed to telecommunications operators (telcos).

In view of whistleblower accounts, this requests also concerns the relationship and interactions between the Ministry and/or the Minister and a company known as Transactly Limited (ORC Registration Number: CS157791022) whether in relation to the planned nationwide SIM Card registration exercise or other matters.

The relevant period is 1 January 2023 to the date of this application.

### 3. **Scope of the request (general)**

Unless otherwise stated, this application covers all records in the possession, custody or control of the Ministry, including but not limited to:

- correspondence (letters, emails, memos, WhatsApp or other digital messages saved in official records);
- minutes and notes of meetings;
- Cabinet or inter-ministerial briefs submitted by or to the Ministry (with any legitimately exempt passages severed if necessary);
- draft and final policy papers, concept notes, project charters, technical designs and slide decks;
- procurement documents (requests to the Public Procurement Authority (PPA), tender documents, evaluation reports, approvals, contracts, MoUs and NDAs);
- instructions, directives or circulars issued to agencies under the Ministry, to **the** National Identification Authority (NIA), and to telecommunications operators.

Where a document is held by an agency or Special Purpose Vehicle (SPV) under the Ministry, such as:

- National Communications Authority (NCA)
- National Information Technology Agency (NITA)
- Ghana Investment Fund for Electronic Communications (GIFEC)
- Ghana Digital Centres Ltd
- Data Protection Commission
- Cybersecurity Authority
- Smart Infracore Ltd and any successor or related SPV  
and any other agency listed on the Ministry’s website as being under its supervision, I request that:

- the Ministry treat this as a request for all such records under its control, *and*
- where more appropriate, transfer or copy the request to those bodies in line with Act 989, and notify me accordingly.

Where relevant records were created by another public institution (including the Public Procurement Authority and the National Identification Authority) but are held by the Ministry or any of its agencies, I request disclosure of those records as well.

*A. Policy, legal and architecture documents for the new SIM registration exercise*

1. All policy briefs, concept notes and technical architecture documents prepared by or for the Ministry concerning the planned SIM registration exercise, including documents that:
  - describe the objectives, scope and phases of the exercise;
  - define the proposed technical solution and system architecture (including any centralised registration platform, user interface portals and platforms, integration with GHForms, Ghana.gov or other technological or electronic portals);
  - assess options for relying on telcos' existing registration systems versus a new central platform;
  - discuss integration with the NIA / Ghana Card ecosystem and with the Ghana.gov portal or other electronic portals.
2. All drafts and final versions of the Legislative Instrument (L.I.) on SIM registration, together with:
  - any explanatory memoranda or Cabinet / Parliamentary briefing notes prepared by the Ministry;
  - records showing which stakeholders (including telcos, NCA, NIA, NITA, Smart Infracore, Ascend Digital, K-Net, Ghana.gov consortium members, Transactly, and civil society organisations) were consulted in drafting the L.I. and the records of the outcomes of the consultations.

*B. Procurement planning, PPA engagement and approvals*

3. All internal procurement plans, project charters and budgets which:
  - identify the funding source(s) for the SIM registration project (budget, grants, PPP, telco levies, telco pass-through budgets, etc.);
  - indicate whether telecommunications operators will be billed, invoiced, solicited, or levied to recover costs of the registration exercise;
  - discuss whether any private party will be granted exclusive rights or de facto exclusivity in relation to any component of the registration solution.
4. Copies of all documents submitted by the Ministry, or by any agency or SPV under the Ministry acting on its instructions, to the Public Procurement Authority (PPA) in relation to the procurement of a service provider (or providers) for any aspect of the SIM registration exercise and any closely related digital identity or telecom-KYC service, including:

- applications for approval of procurement method (open tender, restricted tender, single-source, framework agreement, etc.);
  - justification memos for any proposed single-source or restricted tender, including where the justification refers to “unique technology”, “proprietary platform”, “integration with existing systems”, or prior pilot projects;
  - PPA decisions, approvals, rejections, queries and responses;
  - any internal minutes or briefing notes prepared for the Ministry’s leadership summarising or reacting to PPA’s decisions.
5. If any such procurement is being conducted on behalf of the Ministry by an agency or SPV (including NCA, NITA, GIFEC, Ghana Digital Centres, Smart Infraco or others), copies of all instructions, authorisations or delegations issued by the Ministry and/or the Minister to that entity, and copies of any PPA submissions, approvals and correspondence held by the Ministry in that regard.

*C. Records specifically relating to TRANSACTLY*

6. Any and all correspondence, minutes, proposals or records of meetings between the Ministry (including its agencies and SPVs listed above) and Transactly (**or any company or SPV in which Transactly’s directors or shareholders have an interest**) concerning:
- SIM registration, SIM re-registration, subscriber identity verification, KYC, mobile-number related services, or telecom fraud controls;
  - digital portals for citizen services, including portals that use or propose to use the Ghana Coat of Arms or the logos of any Ministry, Department or Agency (MDA);
  - integration with Ghana.gov, Ghana Card / NIA systems, or MoCDI-related infrastructure such as Smart Infraco, NITA or the national data centre;
  - any pilot, proof-of-concept, sandbox or test deployment of Transactly solutions in connection with SIM registration or any government digital services.
7. Copies of any contracts, MoUs, NDAs, letters of intent, framework service agreements, correspondence or Service-Level Agreements between:
- the Ministry (or any agency/SPV under it) and Transactly;
  - the Ministry (or any agency/SPV under it) and any entity *sub-contracting to or from* Transactly in relation to SIM registration, e-government, government/public digital services, or Ghana.gov - related services.
8. All records relating to any authorisation, approval or correspondence concerning Transactly’s use of the Ghana Coat of Arms and of official MDA logos on any web portal or mobile app, including:
- the legal basis relied on for granting such authorisation (if any);

- any complaints, queries or internal concerns raised about the use of state insignia by Transactly or any associated entity.

*D. Telco obligations, charging arrangements and potential compulsion*

9. All correspondence, circulars, directives or minutes evidencing discussions with telecommunications operators and the NCA regarding:
  - who bears the cost of the new SIM registration exercise;
  - any intention or decision to “bill the telcos” for the cost of the registration solution or associated services;
  - whether telcos are to be compelled to connect to, integrate with, or contract with, a designated platform or vendor (including but not limited to Transactly) as a condition for participation in the planned nationwide SIM registration/re-registration/ownership-validation exercise or for operating;
  - any proposed changes to licence conditions or regulatory directives that would require telcos to use a specific registration platform, contribute to its costs, or share data with it.
10. Any cost-sharing or levy arrangements considered or approved between the Ministry, telcos, and any service provider for SIM registration/re-registration/ownership-validation, including draft or final financial models, tariff impact analyses and cost-benefit assessments.

*E. Role of agencies and SPVs (NCA, NITA, Smart Infraco, Ghana.gov etc.)*

11. All documents that assign roles to the following bodies in the design, procurement, deployment or operation of the SIM registration/re-registration/ownership-validation solution and associated digital platforms:
  - National Communications Authority (NCA)
  - National Information Technology Agency (NITA)
  - Ghana Digital Centres Ltd
  - National Identification Authority
  - Ghana Investment Fund for Electronic Communications (GIFEC)
  - Smart Infraco Ltd and any successor / related infrastructure SPVs
  - Transactly Limited
  - K-Net Limited/K-Net Ghana Limited
  - operators / managers of the Ghana.gov platform (including the consortium of Hubtel, expressPay and IT Consortium), and any new SPV or PPP created for any revamped government digital services portal.

Specifically, I request:

- copies of any MoUs, contracts and technical agreements between MoCDI (or its agencies) and these entities relating to SIM registration, SIM ownership verification and/or validation (biometrically or otherwise), digital identity integration, or citizen-facing digital services;
- minutes and evaluation reports from any joint working groups or project steering committees on SIM registration/re-registration/ownership-verification/ownership-validation or related digital platforms.

#### *F. Data protection, security and impact assessments*

12. Copies of any Data Protection Impact Assessments, privacy assessments, or security risk assessments conducted or commissioned for:
  - the planned SIM registration/re-registration/ownership-verification/ownership-validation solution or set of solutions;
  - any role assigned to Transactly or other private providers in processing SIM registration data, providing connectivity (including API connectivity, user interfaces, database management or maintenance, and/or other services related to the SIM registration/re-registration/ownership-verification/ownership-validation exercise/policy;
  - any proposed data flows between telcos, NIA, Ghana.gov, Smart Infraco / NITA, Ascend Digital, infrastructure, and any third-party vendors.
13. Any correspondence with the Data Protection Commission regarding:
  - legal bases for data sharing for SIM registration/re-registration/validation;
  - registration of Transactly or any other SIM-registration/re-registration/validation service provider as a data controller or processor;
  - conditions or recommendations issued by the Commission in respect of the SIM registration/re-registration/ownership-verification/ownership-validation project.

#### *G. NIA–Ghana Card arrangements and private vendors in that chain*

14. Copies of all MoUs, contracts, data-sharing agreements, SLAs or technical integration agreements between the Ministry (including its agencies and SPVs) and the National Identification Authority (NIA) relating to:
  - use of Ghana Card / NIA data and services for SIM registration, telecom KYC or subscriber verification;
  - API integrations, middleware, authentication services or other technical interfaces between NIA systems and any SIM registration platform;
  - any changes to such arrangements in anticipation of the planned Q1 2026 SIM registration/re-registration/ownership-verification/ownership-validation exercise.
15. Copies of all correspondence, minutes, concept notes and technical documents between the Ministry (including its agencies and SPVs) and NIA in which:

- the design of the SIM - Ghana Card linkage is discussed;
- the participation, selection or evaluation of private vendors providing Ghana Card-based verification or middleware of any kind for SIM registration/re-registration/ownership-verification/ownership-validation is discussed.

16. Any records in the custody or control of the Ministry that refer to:

- Transactly (**or any company related to Transactly's directors or shareholders**) being proposed or considered as a provider of Ghana Card-based identity verification or middleware for SIM registration, government or public related digital services, e-government, or other service involving the Ministry;
- advice or opinions received from NIA regarding the suitability, security or legality of involving such private vendors.
- If the Ministry asserts that any relevant relationship, agreement, understanding, or contract is between telcos/MNOs and a private vendor, please provide the "No Objection" letter or policy document from the Ministry that authorized the selection of said vendor as an approved contractor or provider for national biometric verification.

## 5. Form of access requested

I request:

- electronic copies of the requested records (PDF, Word, Excel, or other standard formats) sent to my email address; or
- where the records are voluminous, an index of documents with an opportunity to inspect them physically and specify which documents I wish to receive copies of.

If any fees are to be charged, kindly inform me of the amount and basis before processing, as contemplated under Act 989 and relevant RTI manuals.

## 6. Partial disclosure, severing and exemptions

If you consider any part of a requested record to be exempt under sections 5–17 of Act 989, please:

- sever the exempt portions and disclose the remainder; and
- provide an index of documents withheld in whole or in part, indicating for each:
  - the type and date of the document;
  - the exemption provision(s) relied upon; and
  - a brief description of the nature of the information withheld, sufficient to enable me to decide whether to seek internal review or appeal to the RTI Commission.

## 7. Transfer of application where appropriate

If any information requested is more appropriately held by another public institution (for example, NCA, NITA, GIFEC, Ghana Digital Centres, Smart Infraco, NIA or the Public Procurement Authority), please:

- transfer the relevant part of this application to that institution in accordance with Act 989;
- inform me of the transfer; and
- provide the contact details of the receiving institution's Information Officer.

## **8. Pre-emption**

I anticipate the potential invocation of Section 10 (Commercial Economic Interests) of Act 989. I pre-emptively submit that the following circumstances exist:

1. *Public Interest Override:* The integrity of the national biometric registry is a matter of paramount public interest. The public's right to know who holds their biometric data outweighs the commercial sensitivity of a private vendor's pricing model.
2. *Quasi-Public Function:* While Transactly and other relevant companies may be incorporated as private entities, they are performing a function (national identity verification, e-government, public digital services, or similar) mandated by state law. They are, therefore, subject to the transparency obligations of public institutions in this context.
3. *Statistical Data:* Pursuant to Section 6(2) of Act 989, information containing factual or statistical data (such as the number of SIMs to be registered and the unit cost per registration) cannot be exempted.

## **9. Timelines**

I kindly remind the Ministry of the statutory 14-day time limit for responding to this request, and the rights of internal review and appeal in the event of refusal or deemed refusal.

I look forward to your response.

Yours faithfully,

**David Kukuia-Galley**

IMANI Center for Policy and Education

Board Members: Mr. Sam Poku(Chairman), Dr. Tony Oteng-Gyasi, CEO, Tropical Cable & Conductor Limited,Capt. (Rtd) Budu Koomson, CEO, Nexus Consulting. Franklin Cudjoe, President, IMANI