





# Code of Conduct

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*Approval Record:*

Name	Designation	Signature	Date
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## 1. BUSINESS ADMINISTRATIVE AND CONTACT INFORMATION

- a. Business Name: SPEC3 Technologies Limited
- b. Business Type: Limited liability company
- c. Company Registration #: RC 1437801
- d. Tax reference #: 20589571-0001
- e. VAT #: Same as above
- f. Tel #: +234 806 680 0400 or +234 810 290 3371
- g. Fax #: Not applicable
- h. Email: [info@spec3technologies.com](mailto:info@spec3technologies.com)
- i. Cell #: +234 806 680 0400 or +234 810 290 3371
- j. Physical Address: Architects Place  
3<sup>rd</sup> Floor  
2 Idowu Taylor Street  
Victoria Island  
Lagos State  
Federal Republic of Nigeria
- k. Postal Address: Same as above

## 2. INTRODUCTION

This Code of Business Conduct and Ethics of SPEC3 sets out the principles and practices that are binding to follow unreservedly both in letter and in spirit and it is to be read in conjunction with the Code of Conduct of WASPAN (Wireless Application Service Providers Association of Nigeria) and WASPA (Wireless Application Service Providers association of South Africa).

### a. Company History

SPEC3 is a fully-fledged Nigerian company with registered offices at 2 River Road, Jabi East, Kaduna North and Kaduna State. The operational offices are at Architects Place, 3<sup>rd</sup> Floor, 2 Idowu Taylor Street, Victoria Island and Lagos State. SPEC3 was incorporated on the 12<sup>th</sup> of September 2017 at the Corporate Affairs Commission (CAC). SPEC3 was created as a SPV, Special Purpose Vehicle, for the application and execution of the VAS Aggregation Licence that was offered by the Nigerian Communications Commission (NCC).

### b. Objectives of the Code of Conduct

The primary objective of the Code of Conduct is to ensure that the public can use mobile services with confidence, assured that they will be provided with accurate and reliable information about all services and the pricing associated with those services.

The Code aims to equip customers and consumers with a mechanism for addressing any concerns or complaints relating to services provided by SPEC3, and a framework for impartial, fair, and consistent evaluation and response to any complaints made.

The Code of Conduct also sets standards for advertising mobile application services and includes a framework for the provision of adult services, to ensure adequate protection of children from potentially harmful content.

### **c. Alterations to the Code**

To ensure that this Code of Conduct remains relevant in the face of constantly evolving technology, the provisions of the Code will be reviewed regularly, and this will be posted on the SPEC3's website [www. spec3technologies.com](http://www.spec3technologies.com).

SPEC3 reserves the right to make alterations to this Code of Conduct from time to time, following due consultation with at least 2/3 of members at an Annual General Meeting (AGM) and a resolution haven been passed to that effect.

SPEC3 reserves the right to immediately amend or alter this Code of Conduct without due consultation if directed to do so by a court of law.

SPEC3 will notify its employees, WASPAN, WASPA, NCC and network operators of any alteration to the Code of Conduct.

Any alterations to the Code of Conduct are binding on all members. The current Code of Conduct will always be available on the SPEC3 web site.

### **d. Scope of Code**

Unless otherwise specified, this Code of Conduct applies to all wireless application services accessed by a customer in Nigeria, transmitted by a wireless application service provider and carried by a Nigerian network operator.

### **e. Existing Agreements with Operators**

As well as complying with this Code, WASPAN & WASPA, SPEC3 must also comply with any existing contracts and agreements they have with network operators.

## 3. PROVISION OF INFORMATION

### a. Description of Services

Spec3 is a VAS (Value Added Services) aggregator and a licensed intermediary that provides a single, simplified connection point between content providers and mobile network operators (MNOs). Its core services include routing and transporting VAS content (like SMS, USSD, multimedia), managing billing and revenue sharing, and facilitating internet access for global marketing, all while handling the technical connection complexity for content providers.

### b. Service Contract and Duration

When Spec3 are engaging business partners or content developers, there will be an agreement or Memorandum of Understanding (MOU) in place, often with a commitment to work with a minimum contract duration of three years.

### c. Service Subscription

Spec3 collects various digital content and services from different providers, such as music streaming, video content, and games.

These services are then provided to subscribers through a single channel, using a network operator's platform.

The subscription charges are billed directly to the user's mobile phone airtime or added to their monthly bill.

### d. Contract Terms and Conditions

Spec3 contract terms and conditions are primarily governed by the commercial agreements between the aggregator, network operator, and content providers, as well as by the regulations set by the Nigerian Communications Commission (NCC).

The terms and conditions establish a framework for responsibility, payment, and quality of service among all parties.

- Interconnection and access.
- Revenue sharing and billing.
- Content and Intellectual Property (IP) Liability.
- Consumer Protection and Marketing.
- Quality of Service (QoS).
- Confidentiality and Data Protection.

## e. Opt-in and Opt-out

Spec3 will provide an accessible opt-in and opt-out mechanisms for all services. This ensures consumers consent to services and can stop them at any time to avoid unwanted charges.

- **Opt-in Procedures**

- Subscribers must explicitly consent to receive VAS (a "double-opt-in" system is required) before any service is activated or any charges are incurred. This is typically done through specific actions:

- Explicit consent.
- Do-Not-Disturb (DND) Lists
- a Clear Information.

- **Opt-out Procedures**

- Users have the right to easily stop any service at any time without penalty. Common methods for opting out include.
  - Short codes.
  - SMS commands.
  - Direct contact.
  -

## 4. ADVERTISEMENT AND REPRESENTATION OF SERVICES

### a. Availability of Service

SPEC3 act as technical and commercial intermediaries, linking content providers to mobile network operators (MNOs) through a single platform. Their advertisements and representation of services availability are governed by regulations focused on transparency, consumer consent, and specific communication modes to ensure subscribers can manage the services they receive.

### b. Advertisement of Packaged Services

SPEC3 advertisement model for packaged VAS services relies on targeting subscribers who have opted-in or fall outside the DND list, using the approved channels to drive purchases or subscriptions. The aggregator platform facilitates the technical delivery and ensures the provider adheres to all compliance requirements, including clear unsubscribe mechanisms and transparent customer support for all services offered.

### c. Disclaimer

SPEC3 operate under specific regulations designed to protect consumers regarding advertisement and representation of services.

- **Advertising and E-marketing**
  - Opt-in requirement.
  - National Do Not Disturb (DND) Database.
  - Non-Intrusive Modes.
  - Content Liability.
- **Representation of Services and Consumer Information**
  - Transparency in Information.
  - Opt-Out Mechanism.
  - Customer Support.
  - No Misleading Claims.

This Code of Conduct does not constitute legal advice, nor is it warranted as legal advice.

#### d. Tele-Marketing

SPEC3's primary function in the context of tele-marketing is to provide a single, secure connection point to all network operators. This eliminates the need for each individual content provider or marketer to establish separate physical connections with every network operator (e.g., MTN, Airtel).

Key responsibilities and functions related to tele-marketing include:

- Connectivity and Routing.
- Compliance with Regulations.
- Billing and Revenue Collection.
- Intermediation.
- Quality of Service and Support.

## 5. COMPLAINT HANDLING

### a. Complaint Processes

SPEC3 TECHNOLOGIES LTD's policy is based on the following principles:

- Assurance of billing availability, accuracy, timeliness, and completeness.
- Standard practice for handling Customer bills and charges
- Processes guiding the bill delivery and retention, billing period and delayed bills.
- Guidelines for billing enquiries, Customer complaints, penalties for non-payment of bills.

**Contact the Service Provider First:** The initial step is to contact the specific VAS aggregator or the network operator (e.g., MTN, Airtel) involved in the service you are complaining about. They are required to maintain customer support and deal with complaints within a reasonable timeframe.

- Ensure you obtain a complaint ticket number for your records.

- All advertisements and services should include the contact details (name, telephone numbers, etc.) of the relevant VAS provider.
  
- a. Business Name: SPEC3 Technologies Limited
- b. Tel #: +234 806 680 0400 or +234 810 290 3371
- c. Email: [info@spec3technologies.com](mailto:info@spec3technologies.com)  
[reaan@spec3technologies.com](mailto:reaan@spec3technologies.com)
- d. Physical Address: Architects Place  
3rd Floor  
Idowu Taylor Street  
Victoria Island  
Lagos State  
Federal Republic of Nigeria

## b. Further Recourse

If the service provider does not resolve your complaint to your satisfaction or within a reasonable time, you can escalate the matter to the Nigerian Communications Commission (NCC), which is the regulatory authority responsible for consumer protection in the industry.

### When to escalate:

- Your request for access is denied.
- An already hosted VAS is illegally deactivated.
- You are subscribed to a service without your explicit authorization (e.g., unsolicited messages).
- The provider fails to address your complaint adequately or provide a reason for their decision.

### How to Contact the NCC:

- Toll-Free Number: Call the NCC toll-free number 622.
- On-line Portal: Complete a digital complaint form on <https://consumer.ncc.gov.ng/consumer-complaints/complaint-form>
- Email: Send your complaint to [consumerportal@ncc.gov.ng](mailto:consumerportal@ncc.gov.ng).
- Written Letter: Address a formal letter to the Executive Vice Chairman at the NCC Headquarters in Abuja or any of their zonal offices, marked for the attention of the Director, Consumer Affairs Bureau.
- Social media: Complaints can also be lodged via their official social media accounts on Facebook or X (formerly Twitter) @consumersNCC.

## c. Data Collection and Analysis of Complaints and Outcome

Spec3 use various platforms to collect data from customers, content providers, and network operators:

- **Dedicated Web Portals/Customer Service Centres:** Spec3 establish a recording system for all complaints received through their customer service channels or web interfaces.
- **Direct Feedback Channels:** Complaints can come via phone calls, emails, or SMS directly to the aggregator or the Mobile Network Operator (MNO).
- **Automated Triggers:** Systems to automatically capture feedback at key moments in the customer journey.
- **Regulator-Mandated Reporting:** The Nigerian Communications Commission (NCC) require operators and aggregators to report on complaints data.
- **Social Listening/Web Scraping:** Advanced methods involve monitoring social media and online forums to learn about customer experiences in the marketplace.
- **Internal System Monitoring:** Spec3's own systems track service delivery metrics such as undelivered messages, failed transactions, and double charging, which often form the basis of complaints.

The collected data is stored in a discernible manner to facilitate identification and analysis. The analysis process typically involves:

- **Categorization:** Organizing complaints by type (e.g., unsolicited messages, incorrect billing, service non-delivery, activation/deactivation issues, refund problems).
- **Trend Spotting:** Identifying common themes, recurring issues, and systemic weaknesses in products or services using tools like sentiment analysis or text mining.
- **Root Cause Analysis:** Investigating the specific reasons for the complaint, which might involve verifying transaction details and assessing evidence from all parties involved (customer, content provider, MNO).
- **Performance Metrics:** Tracking metrics such as complaint resolution time, customer satisfaction rates with the handling process, and the incidence of specific failure types.

The results of the analysis inform corrective actions and process improvements:

- **Refunds and Compensation:** A common outcome for valid billing complaints is a refund to the subscriber, usually via the same payment method used originally.
- **Service/Process Improvement:** Insights from data analysis led to rectifying service failures, such as ensuring clear activation/deactivation messages or improving service delivery protocols.
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#### d. Retention of Records

SPEC3 are subject to record retention requirements mandated by several regulatory bodies, including the Nigerian Communications Commission (NCC), the Nigeria Data Protection Commission (NDPC), and the Corporate Affairs Commission (CAC).

SPEC3 must adhere to general business and financial record-keeping laws:

- **Companies and Allied Matters Act (CAMA):** Corporate records, including financial statements, reports, and minutes of meetings, must be retained for at least twenty-four (24) months.
- **Companies Income Tax Act (CITA):** Books of accounts and records of all transactions must be kept for a minimum of twenty-four (24) months after the relevant year of assessment.

Regulations from the NCC and the Nigeria Data Protection Act of 2023 also outline retention periods for operational and personal data. Key requirements include:

- **Consumer Complaints:** Records of complaint handling must be retained for at least twenty-four (24) months after resolution.
- **Billing Information:** Customer billing records must be kept for a minimum of twenty-four (24) months.
- **Traffic Data and Subscriber Information:** Telecommunications service providers must preserve traffic data and subscriber information for two (2) years, as mandated by the Cybercrime Act.
- **Personal Data:** Under the Nigeria Data Protection Act 2023, personal data should be retained only as long as necessary for the purpose it was collected. Where specific laws or contracts do not apply, recommended periods include twenty-four (24) months after the last active use of a digital platform and twenty-four (24) months after the last transaction in a contractual agreement.

#### e. Prevention of Unsolicited SMS

The prevention of unsolicited SMS in Nigeria primarily relies on regulations enforced by the Nigerian Communications Commission (NCC), which mandates a Do Not Disturb (DND) short code (2442) for consumers and holds Value Added Service (VAS) aggregators and network operators accountable for compliance.

The NCC has established a framework to curb unsolicited messages, with specific obligations for VAS providers and aggregators.

- **Consumer Opt-in/Opt-out:** The core of the regulation is the consumer's right to privacy. VAS providers are restricted from sending commercial messages to non-subscribers and must obtain explicit approval (opt-in) before sending messages. Consumers must have an easy way to opt-out of services at any time.
- **Do Not Disturb (DND) Code:** The NCC introduced the universal short code 2442.
  - To stop all unsolicited messages, a subscriber can text "STOP" to 2442.
  - Subscribers can also select which specific VAS categories to block or allow.
- **Aggregator/Operator Responsibility:** Network operators and VAS aggregators are jointly responsible for ensuring no advertisements are sent to numbers on the DND database. They are required to implement technical measures, such as "carrier-grade spam filters" and A2P SMS firewalls, to detect and block spam.
- **Licensing and Liability:** VAS aggregators must be licensed by the NCC and can be held liable for illegal or unsolicited messages sent through their platforms without a valid sender's identity.
- **Enforcement:** The NCC actively monitors compliance and imposes fines on operators who violate the DND rules, demonstrating a commitment to consumer protection.

Spec3 implement the following measures to comply with regulations and prevent spam:

- **Verified Sender IDs:** All bulk SMS messages must have a valid and registered numeric sender ID. Messages without this are blocked at the network level.
- **DND Database Integration:** Spec3 are mandated to check their recipient lists against the central DND database before sending out any commercial or marketing communications.
- **Content Filtering:** Spec3 use technical filtering systems to proactively identify and intercept suspicious or spam-like content.
- **Customer Support:** VAS providers must maintain accessible customer support channels to handle complaints and process opt-out requests within a reasonable timeframe.
- **Opt-in/Opt-out Mechanisms:** They must provide clear and easy-to-use methods for subscribers to manage their subscriptions, ensuring all promotions clearly state the terms, conditions, and pricing.

## 6. CONSUMER OBLIGATIONS

Spec3 have a primary obligation to protect consumers from unwanted and unauthorized services, ensuring that all services are based on explicit consumer consent (opt-in) and are easy to unsubscribe from (opt-out).

Key consumer obligations for Spec3, primarily in the Nigerian market as regulated by the Nigerian Communications Commission (NCC), include:

- **No Unsolicited Messages/Spam:** Spec3 must not send, or allow others to send on their behalf, unsolicited, random, or untargeted commercial messages (spam) to subscribers.
- **Opt-in/Opt-out Mechanism:** Consumers must have the explicit right and easy means to 'opt-in' to a service and to 'opt-out' or stop a service at any time.
- **Adherence to Do-Not-Disturb (DND) List:** Spec3 must ensure that no advertisements or commercial messages are sent to any phone number that has been registered on the national DND database.
- **Clear and Transparent Advertising:** All promotions and advertisements must be clear, simple, and unambiguous. They must clearly state:
  - Whether the service is a subscription.
  - The price, including the quantity of content per unit cost or the period covered by the subscription.
  - All terms and conditions.
- **No Hidden Charges:** There should be no hidden charges, and services must not be promoted as "free" if they involve any cost to the consumer.
- **No Charge for Undelivered or Aborted Services:** The consumer must not be charged for a service that was not successfully delivered or was aborted midway.
- **Effective Customer Support:** Spec3 (along with the VAS providers they represent) are obliged to maintain adequate and accessible customer support for all services.
  - Advertisements must include the name, telephone numbers, and contact details of the relevant service provider.
  - Complaints must be dealt with within a reasonable timeframe, with reasons provided if a complaint is not approved.
- **Refund Mechanism:** If a refund is necessary, it must be processed using the same method the subscriber used to pay for the service, and the subscriber must be notified.
- **Data and Privacy Protection:** Spec3 are responsible for protecting consumer data and privacy regarding information that comes into their possession during service provision.

These obligations are enforced by regulatory bodies like the Nigerian Communications Commission (NCC) to ensure consumer protection and fair practice within the telecommunications industry.

## 7. PROTECTION OF CONSUMER INFORMATION

### a. Data Gathering

The regulatory framework imposes strict obligations on Spec3 and network operators to safeguard consumer data and ensure transparency.

- **Right to Privacy:** Consumers have a fundamental right to privacy. VAS providers are explicitly restricted from sending unsolicited messages to non-subscribers.
- **Opt-In and Opt-Out Mechanisms:** This is a cornerstone of the regulation.
  - **Do-Not-Disturb (DND) List:** Operators and Spec3 must maintain a central, government-mandated database where subscribers can register their phone numbers to prevent the reception of any form of advertisement or unsolicited messages. No adverts are to be sent to numbers on this list.
  - **Opt-In Database:** Providers can only send advertising or marketing messages to subscribers who have explicitly "opted-in" to receive them. Subscribers must also have a simple and clear way to "opt-out" of any service at any time to avoid incurring further charges.
- **Transparency and Information:** All advertising and promotions must be clear, simple, and unambiguous.
  - Information must be provided on the nature, price, terms, and conditions of services at the point of sale, in advertising, and during use.
  - There must be no hidden charges, and all associated costs for services must be fully disclosed. Services cannot be promoted as "free" if they involve any charge to the consumer.
- **Data Responsibility and Liability:**
  - Spec3 and MNOs are responsible for protecting consumer data and privacy when it comes into their possession.
  - Spec3 typically do not have access to the content of confidential one-to-one messages and are exempted from liability for such content; however, they may be liable for bulk SMS messages sent through their platform without a valid sender ID.
- **Customer Support and Complaint Resolution:** VAS providers must maintain accessible customer support channels (at least two methods of contact) and deal with complaints within a reasonable timeframe. All advertisements must include the service provider's name and contact details.

## b. Data Storage

Spec3 act primarily as a secure "concentration point" or conduit between content service providers (CSPs) and mobile network operators (MNOs). Spec3 functions are limited to providing connectivity and facilitating administrative services like billing, not handling consumer data directly.

Key restrictions and protections include:

- **No Access to Content or Data Processing:** Spec3 are explicitly forbidden from accessing the actual information passing through their platforms or performing any data-level processing.
- **Data Hosting Prohibited:** They are not allowed to host or distribute consumer content or applications; this responsibility lies with the content and application service providers.
- **Liability Limitations:** Spec3 are generally exempted from liability for the content of one-to-one or corporate messages transmitted through their systems, further emphasizing their role as neutral conduits.

## c. Data Sharing

Data sharing within the VAS ecosystem is governed by regulatory frameworks (e.g., the Nigerian Communications Commission's VAS Aggregator Framework) that mandate specific agreements and data protection measures.

- **Interconnection Agreements:** Market players must sign agreements detailing the terms of access and data exchange, which often need to be submitted to the regulatory body for review.
- **Subscriber Protection:** Spec3 and network operators are required to protect subscribers from unwanted services, adhering to "Do-Not-Disturb" (DND) directives and ensuring user consent for any advertisement or marketing content.
- **Billing and Revenue Data:** Spec3 offer billing and revenue collection services to content partners, sharing data related to service charges and revenue distribution among the various parties (content owners, aggregators, network operators) based on a pre-agreed formula.
- **Performance Monitoring:** Each entity in the value chain, including the aggregator, is responsible for monitoring network performance data at their interface points to ensure quality of service.

# 8. CONSUMER BILLING

## a. Billing Information

Spec3 handle the billing and revenue collection for Value Added Services, acting as the central link between content providers and mobile network operators (MNOs). Spec3 collect payment via the network operator's billing system.

- **Centralized Platform:** Spec3 provide a single platform that integrates with multiple content providers, MNOs, and billing systems, simplifying the process for all parties.
- **Billing Responsibility:** Spec3 take responsibility for billing the customer and revenue collection, either using an in-house platform or outsourcing it.
- **Payment Mechanisms:** Payments can be collected as follows:
  - Deduction from the user's mobile airtime (prepaid/postpaid account).
- **Charging Models:** The Nigerian Communications Commission (NCC) mandates that the charging model be either usage-based (pay-per-use) or subscription-based, but not a combination of both for a single service.
- **Revenue Sharing:** After collection from the network operator, Spec3 distributes the revenue to the content developer based on mutually agreed-upon commercial terms, which must align with regulatory guidelines.
- **Transparency and Regulation:** Spec3 and operators are required by regulatory bodies like the NCC to ensure transparency in pricing, provide clear opt-in/opt-out mechanisms for subscribers, and address complaints efficiently to avoid issues like unsolicited charges.
- **Tariff Plans:** The NCC approves tariff plans for various VAS offerings, which can range from ₦50 to ₦25,000 depending on the service (e.g., games, music, informative content) and billing frequency (daily, weekly, monthly).

## b. Timing for Issuance of Bill

Value Added Services (VAS) aggregators are generally required to issue bills and include all charges incurred within a specified billing period within 10 days of the closure of each billing period.

Specific requirements for billing include issuing bills within 10 days after the billing period ends. While monthly billing is common, other frequencies can be arranged with the customer. VAS providers must inform customers in writing of any changes to the billing frequency. All charges must be clearly disclosed without hidden fees, and itemized billing details should be available on the bill or upon request. These rules are designed to protect consumers and ensure fair billing practices, as outlined in the Value-Added Services Aggregator Framework and other NCC regulations.

## c. Payment Confirmation

The payment confirmation process is a key regulatory and operational step designed to protect both users and operators, as an integral part of the service delivery flow.

The process ensures accountability within the complex VAS value chain, which typically involves content developers, content service providers, VAS aggregators, and mobile network operators.

- **Service Request:** A subscriber requests a VAS (e.g., premium SMS, digital content, trivia game, etc.).
- **Payload Handover:** The content provider hands over the service content (payload) to the network operator via Spec3's platform.
- **Delivery Confirmation:** The network provider or the aggregator's system must receive confirmation that the service has been successfully delivered to the subscriber's device.
- **Charging:** Only after the successful delivery confirmation is received is the subscriber's account (usually airtime credit) charged.
- **No Charge for Failure:** If the service is not delivered to the subscriber, the subscriber must not be charged. The involved parties (content provider and network operator) then settle the internal transport costs based on where the failure occurred in the chain.
- **Consumer Protection:** It prevents "double charging" or charging for services that were never received, which is a key consumer issue addressed by regulatory bodies like the Nigerian Communications Commission (NCC).
- **Revenue Assurance:** Spec3's system includes checks for fraud and delayed delivery to protect revenue for all partners in the value chain.
- **Reconciliation:** The confirmation process provides an auditable trail for reconciliation between the various partners in the VAS ecosystem.

#### d. Billing Frequency

The billing frequency for Value Added Service (VAS) aggregators to end-users can be on-demand (one-off payment) or subscription-based (recurring deductions).

- **On-Demand:** Users are charged per minute or per request for specific services, such as an IVR (Interactive Voice Response) call, an SMS, or a one-off content download.
- **Subscription-Based:** Users opt-in for a service that charges them on a recurring basis, which can be daily, weekly, or monthly.
- **Prohibited Combinations:** A VAS provider cannot combine a usage-based and a subscription-based model for the same service for end-users.

For the content developer/aggregator, the revenue collection from subscribers happens through the mobile network operator's (MNO) billing system (prepaid/postpaid account).

- The MNO collects the revenue from the user.

- The MNO then credits the developer or aggregator based on the agreed revenue-sharing formula and timeframe.

Overall, the billing cycle between the aggregator and its partners (MNOs and content providers) is 60 days as by mutual agreement and outlined in their contracts. Regulations often focus on protecting the end-user from unfair practices, such as double charging or unsolicited charges.

#### e. Prepaid Services

Spec3 provides a bridge between content providers and network operators, enabling a wide range of prepaid services like mobile data, games, video streaming, and utility payments to be delivered to end-users. These services are charged to the customer's prepaid balance, via the network provider's billing system. Spec3 handle the technical integration, revenue collection, and sharing between the various parties.

- **Content Aggregation:** Spec3 consolidate various VAS products and content from multiple service providers.
- **Network Integration:** Spec3 provide a single point of integration to network operators, simplifying the connection for the network.
- **Prepaid Service Delivery:** Spec3 facilitate the delivery of these services to prepaid subscribers, who can purchase and use them using their airtime balance.
- **Billing and Revenue Sharing:** Spec3 manage the billing and revenue-sharing process between the content providers and the network operators.

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