Crisis Management in the Digital Era: Exploring the Application of Situational Crisis Communication Theory Propositions in Managing MTN Nigeria SIM Registration Crisis

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Abstract
Between October 26, 2015, to June 10, 2016, the Mobile Telecommunication Network (MTN Nigeria) SIM card registration crisis presented a good example for exploring the propositions of the Situational Crisis Communication Theory (SCCT) in a crisis in Nigeria. MTN Nigeria was fined US$5.2 million (N1.4 trillion) for not deregistering the inappropriately registered SIMs on its network. At that time, the fine became the largest single fine issued to a telecommunication company globally. Based on a pilot study which showed elements of the SCCT in media reports on the crisis, this paper used the qualitative case study to examine how the SCCT strategies were applied. Three key informants, who are public relations professionals and worked directly with the public relations firms and an internal corporate services manager at MTN Nigeria were purposively selected for the interviews while content analysis was used to identify and provide evidence of media outputs and outcomes that reflected the application of the SCCT. Findings from the study showed that reminder, ingratiation, excuse, apology, compensation, were used by MTN Nigeria in managing the crisis at different points of conversation. The findings also showed that the application of each strategy was situational and did not necessarily follow a sequence of primary and secondary applications. It was concluded that the SCCT propositions and strategies for crisis management were used during the crisis to manage the narratives in favour of MTN Nigeria.

Keywords: crisis communication; crisis response strategies; public relations; reputation building and restoration.

Introduction

Crisis presents differently for different individuals and organisations. When issues are not promptly addressed and they result in crisis, often, managers run helter-skelter to ensure that they save the soul of the business from being negatively affected or from total collapse. Despite the inevitability of crisis in all spheres and all other spheres of life, they are defined differently by many especially as it relates to business. For the Institute of Crisis Management (ICM) a crisis as "a significant business disruption that stimulates extensive news media coverage. The resulting public scrutiny will affect the organisation's normal operations and also could have a political, legal, financial and governmental impact on its business" (Centre *et al*, p. 267). It is an unforeseen disruption to business operations that involves threats to public safety, significant threats to operations, and major financial loss or reputation loss if not handled properly (Coombs, 2014; Cardon, 2015). These definitions depict two major elements of crisis which are disruption and threats to brand reputation. Crisis communication managers often struggle to create a balance particularly when the economic implication is high as it was in the case of the Mobile Telecommunication Network (MTN) Nigeria SIM registration crisis. MTN Nigeria experienced such major disruptions in the twilight of the year 2015 due to an infraction that the Nigerian government found to be a major threat to the fragile security situation in the country. As at 2015, MTN Nigeria has the largest subscriber base among the telecommunication service providers. To reduce the trend in insecurity, the Federal Government of Nigeria directed that the various telecom service providers must capture the biometric data of all subscribers. The Nigerian Communication Commission (NCC), based on the recommendations from the Office of the National Security Adviser gave the directive in 2008 (Odunsi, 2015). Eventually, the process was launched in 2010 and to serve as a deterrent, a sum of N200,000.00 (Two Hundred Thousand Naira Only) was agreed as the fine to be paid on each unregistered GSM line at the expiration of the deadline.

As of 2013 and months after the deadline for the SIM registration exercise, the telecom operators had not fully complied, and particularly affected was MTN Nigeria which had the highest number of subscribers that were not properly registered then (Ohuocha & Motsoeneng, 2015). Another round of registration was ordered to be completed by August 2015. However, at the expiration of the period, another N120 million fine was imposed on the mobile network operators (MNOs) for failing to comply, with MTN Nigeria expectedly, having the largest percentage of the fine because the company has the largest subscriber base among the MNOs.

A serious situation that complicated the matter for MTN Nigeria was the kidnap and abduction of a former minister of Nigeria, Chief Olu Falae on his farm on September 21, 2015. Unfortunately, an MTN SIM which security agents could not trace the owner due to irregularities in the registration, was used by the kidnappers to contact the relatives of the minister to demand a ransom (Ohuocha & Motsoeneng, 2015). Disappointed at the level of non-compliance, the NCC on Monday, October 26, 2015, announced a fine of N1.4 trillion (US$5.2 billion) to be paid by MTN Nigeria. The fine was for the 5.2 million improperly/unregistered subscribers found on the MTN network despite the twelve months extension. Other matters brought against MTN Nigeria by the NCC were the refusal of the company to give full access to its backend to ascertain compliance with the SIM registration exercise; the company's nonchalant attitude to attending NCC meetings in which it sends "low cadre" staff; partial attempt to bar unregistered SIM cards; and persistent violations of NCC directives. (Adepetun & Nelson, 2015; Odunsi, 2015; Opeyemi, 2015). By the fine, MTN Nigeria became the telecommunication company with the largest single fine as of 2015. The others before them were Intel fined US$1.45 billion in 2009 by the European Union for

breaking competition laws and SIEMENS AG fined US$1.6 billion by the United States and German government for bribing government officials (Plunkett, 2014).

The sequence of events that followed the imposition of the fine on MTN Nigeria depicted all the dynamics of a major crisis that transverse the realm of legislative politics, the bureaucracy, the judiciary, fiscal and monetary policies, international relations, ethnic conflict, decentralization and democratization. The resignation of the Chief Executive Officer, Mr Sifiso Dabengwa, the drop in MTN's Group shares at the Johannesburg Stock Exchange (JSE) in South Africa, concerns raised by MTN's biggest shareholder, Investment Corporation and other minor shareholders and charge from the coalition of Nigerian state governors brought the Company to its knee in terms of reputation management. The clear-out of the Nigerian top executives including the Managing Director further plunged the Company into deeper controversies (Adeyemi & Nelson, 2015; Odunsi, 2015; Ohuocha & Motsoeneng, 2015; Ugwuanyi, 2015; Van Zyl, 2015).

During the visit of the then South African President Mr. Jacob Zuma to the former Nigerian President, Retired General Muhammadu Buhari, the situation degenerated with comments credited to President Buhari that the non-compliance of MTN Nigeria with the NCC directives on SIM registration has contributed to crime, particularly the activities of terrorists in the country. President Buhari was angered by the fact that MTN Nigeria sued the Federal government instead of negotiating for a reduction of the fine. One of the screaming headlines was *"$5.2bn fine: MTN's inaction aided Boko Haram, says Buhari" (The Punch, March 8, 2016)*.

However, eventually, on June 10, 2016, MTN Nigeria and the NCC announced a final resolution. The fine was reduced to N330 billion to be paid over three years. MTN Nigeria was asked to tender an apology to the Federal Government of Nigeria and Nigerians within one month of the execution of the agreement, to ensure efficient subscription and compliance with the Code of Corporate Governance for the telecoms industry and to facilitate the listing of MTN Nigeria in the Nigerian Stock Exchange (NSE) (Okonji *et al*., 2016).

Media reports after the resolution shows a significant level of satisfaction with the outcome among major stakeholders. For instance, the Chief Executive Officer of MTN Nigeria, Mr Fred Moolman expressed the "*apologies of the company for the series of unfortunate events that led to the imposition of the fine given the importance and benefits of the ICT industry to all stakeholders and socio-economic growth in Nigeria*". The MTN Group Executive Chairman, Mr Phutuma Nhleko "*thanked the federal government for the spirit in which the matter was resolved*". Nhleko noted that the negotiation and its outcome are the best for the company, its stakeholders, the Federal Government and Nigerians, as MTN strengthens its relationship with the Federal Government and the NCC. The Executive Vice Chairman of the NCC, Prof. Umar Danbatta, also admitted that "*the NCC was careful not to take decisions that were likely to cripple the business interest of the operators. The reduction of the fine is also informed by the downturn of the global economy that has affected every sector hence the need to be sensitive and flexible on matters regarding the fine*" (Okonji *et al.*, 2016).

In managing the crisis, MTN Nigeria through its Corporate Services unit employed the services of public relations professionals to support in handling the crisis with strategic communication and implementation. The eventual resolution of the crisis to the satisfaction of all parties and comments by some stakeholders in media reports, showed some levels of the application of the Situation Crisis Communication Theory (SCCT) crisis response strategies as revealed in a pilot study conducted by the authors. This article, therefore,

examines the application of SCCT in managing the MTN Nigeria SIM card registration crisis. The specific objectives of the study are to:

1. examine the perspectives of the key informants on the MTN SIM Registration Crisis to crisis.
2. examine how the strategies deployed in managing the MTN SIM registration crisis reflected SCCT approaches to crisis management.

**Situational Crisis Communication Theory (SCCT)**

The situational crisis communication theory (SCCT) was developed and refined by Timothy Coombs in 2002. Coombs initially presented this theory in a 1995. However, the theory was not known as Situational Crisis Communication Theory (SCCT) until 2002. It was known as the symbolic approach to crisis management/communication (Kyhn, 2008). Three basic theories influenced the SCCT (Coombs, 2007). They are the *attribution theory*, the reputational management theory and the neo-institutional theory. The attribution theory posits that people search for the causes of events (make attributions), especially those that are negative and unexpected. That is, a person will likely attribute responsibility for an event and experience an emotional reaction to such an event. Thus, it was concluded that anger and sympathy are the core emotions in attribution theory. The attribution theory provides the rationale for the relationship between many of the variables used in SCCT. The *relationship management theory* states that the condition in which an organisation and its major publics interact and how each party's activities affect the other's political, social, economic, and/or cultural well-being is known as relationship management (Ledingham and Bruning, as stated in Kyhn, 2008). Thus, relationship management theory has shifted the central focus of public relations from communication to relationships, with communication acting as a tool in the initiation, nurturing and maintenance of an organisation's public relationships.

The *neo-institutional theory* posits that organisational actions and message strategies are partially constrained by forces within the organisation itself. The theory focuses on an organisation's institutional environment and assumes that the power dynamics within an organisational will result in an institutional setting that is characterized by norms, rules and requirements to gain legitimacy within the social rules guiding the organisation's ecosystem. Thus, what will further help crisis managers decide on the best approach is understanding the crisis responsibility and the crisis history. According to Coombs (2007), crisis responsibility deals with how much stakeholders believe organisational actions or inactions are responsible for the crisis. An organization's crisis history indicates whether or not it has had a similar crisis in the past. This is important since a history of crises indicates an unresolved issue within the organisation.

Leaning on the propositions of these theories, SCCT categorised crisis into three clusters. The first cluster is the victim cluster in which the affected organisation is seen as the victim affected by external factors such as rumours, product manipulation and natural disasters (Ki & Nekmat, 2014). The second cluster is the accidental cluster. Organizations in this cluster are perceived as either not intending for the crisis to occur (lack of volition) or being powerless to stop it (confrontations, technological failures, etc.). The third cluster is the intentional cluster (preventable). Organisations in this cluster are often perceived as culpable in the crisis that they find themselves due to organisational misdeeds, deceptions etc. (Kirlova, 2014). To handle these foregoing crisis clusters, the SCCT proposed four categories of strategies. They are the deny category in which an organisation attacks the accuser to deny

the allegations; the diminish category in which the organisation gives an excuse for the crisis to reduce the reputational damage: and the rebuild category in which the organisation expressly apologises and provides compensation to those affected by the organisation's action leading to the crisis. The fourth category is bolstering which is a supplementary strategy to enhance goodwill by reminding stakeholders of past good deeds (Cooley et al., 2011; Coombs, 2002; Coombs, 2007; Coombs, 2012).

Figure 1: Crisis Situation Model of the Situational Crisis Communication Theory
Source: Coombs (2007)
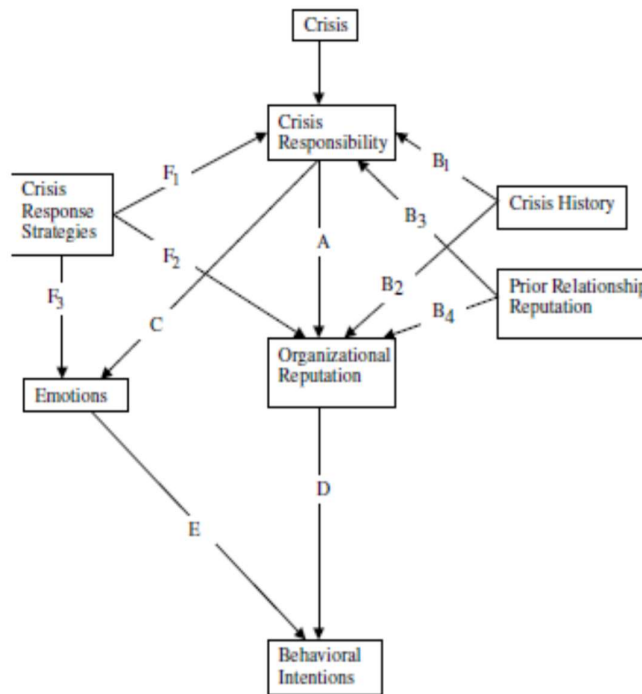
The major strengths of the SCCT included its customizable crisis response strategy. SCCT provides a clear framework for organizations to tailor their crisis responses based on the specific context and perceived responsibility. This increases the chance of effectively mitigating reputational damage. The integration of the propositions of the attribution theory also provides an advantage for deploying SCCT because crisis managers can to a large extent, explain how stakeholders assign responsibility for crises. This allows organizations to predict stakeholder reactions and plan accordingly. The SCCT provides a comprehensive typology of crises. SCCT offers a well-defined categorisation of crises, helping organizations understand the level of threat to their reputation and how to respond appropriately. Regarding practical application, SCCT is widely used in public relations and communication strategies for crisis management, providing organizations with actionable guidelines for real-world scenarios. Scenario planning is better enhanced particularly with the integration of the propositions of neo-institutional theory which situates crisis management and responses within the social context of the crisis. That is, crisis managers must be deliberate in considering how the social environment of an organisation impacts its operation before articulating a crisis response. SCCT emphasises reputation management. The theory prioritizes reputation protection and recovery, addressing one of the most critical aspects of crisis management.

However, SCCT has some limitations. One of the limitations is the oversimplification of crises. SCCT's classification of crises into only three types (victim, accidental, and preventable) may oversimplify complex situations where multiple factors and stakeholders contribute to the crisis. SCCT is context-dependence. The theory assumes that stakeholder reactions are universally predictable based on the crisis type, but cultural, political, or industry-specific contexts might influence how responsibility is attributed. Experts have argued that this may not be true in all situations. Moe so, SCCT primarily focuses on external stakeholders, often neglecting the internal stakeholders (e.g., employees) whose reactions to crises can also significantly impact an organization's recovery. In such situation, the inside-out approach to managing crisis may be jettisoned, often to the detriment of the brand or company. It has also been argued that SCCT is reputation-centric. While SCCT emphasizes reputational damage, it may not fully address other important dimensions of crisis management, such as operational recovery, legal repercussions, or long-term brand rebuilding. Operationally, experts have also argued that SCCT is reactive rather than preventive. SCCT largely provides a framework for managing crises once they occur, but it does not give as much attention to proactive crisis prevention or pre-crisis planning. In this instance, SCCT assumes rational stakeholder behaviour. SCCT assumes that stakeholders will respond to crises in predictable ways based on rational assessments of responsibility, but in reality, emotions and social media dynamics may lead to less predictable reactions. Therefore, scholars argued that although SCCT is a widely adopted, practical theory for crisis communication, the theory should be adapted and supplemented based on the specific crisis context and evolving stakeholder expectations.

In summary, the assumptions of the SCCT in the field of crisis communication suggest that crisis managers should match strategic crisis responses to the level of crisis responsibility and the reputational threat posed by a crisis to an organisation. Evaluating the crisis type, crisis history and prior relationships between the organisation and its stakeholders, will help crisis managers predict the level of reputational threat, how the stakeholders will perceive the crisis and attribute crisis responsibility. Eventually, the organisation/crisis managers would expect that stakeholders' emotions and the intended behaviours sway in their favour and resolve the crisis. These explications affirmed the relevance of the situational crisis communication theory to this study and the management of a multi-level crisis such as the MTN Nigeria SIM registration crisis.

Methods

A qualitative case study was used in this investigation. A qualitative case study is a strategy of inquiry that involves an in-depth investigation of a phenomenon within its real-world context. This type of qualitative descriptive research closely examines a single or small group of participants, making inferences about them exclusively within the specific setting. Therefore, qualitative case studies provide a study design with diverse methods to examine the contextual factors relevant to understanding the why and how of a phenomenon within a case. Among qualitative case study relies on multiple sources of evidence, such as documents, artifacts, interviews, or observations, to present a complete and nuanced understanding of the phenomenon under investigation (Priya, 2021; Baxter & Jack, 2015; Njie & Asimiran, 2014; Starman, 2013; Crowe, Cresswell, Robertson, Huby, Avery & Sheikh, 2011).

The MTN Nigeria SIM Registration crisis was selected as a case study due to the significant effects that the case's settlement, or lack thereof, may have had on the socioeconomic well-being of the more than 65 million Nigerians who at the time were MTN

Nigeria subscribers and indeed Nigeria's GDP. Whatever happened to this sizeable portion of the population would have a considerable impact on the overall social, economic, and political well-being of the nation. More so, the unprecedented amount of the fine at US$5.2 million (N1.4 trillion) made the case interesting in this study.

Three key informants, who are public relations professionals and worked directly with the public relations firms and an internal corporate services manager at MTN Nigeria were purposively selected for the interviews because they a PR professionals, who by training are proficient in crisis management (Pereira, 2024; Dey, 2024). The key informant interview (KII) procedure involves gathering data that entails verbal exchanges between a field researcher and a local expert who has specialized knowledge that would otherwise be inaccessible or difficult to find but which may be essential for the investigator to learn (Gabor, 2017). The instrument for the key informant interview was a 13-item interview guide developed based on the assumptions and approaches in the SCCT and designed to address the study objectives. The interviews, conducted at different times and independently with each of the key informants, were concluded in 4 weeks.

Qualitative content analysis was used to examine latent contents to draw meanings from media reports on the crisis. Content analysis was used to identify and provide evidence of media outputs and outcomes that reflected the application of the SCCT as such were expressed by the key informants. With a large amount of qualitative material, qualitative content analysis reduces the qualitative data and creates meaning by attempting to find essential consistencies and meanings. The first step in the coding process is to apply a theory or relevant results from research. The researchers then immerse themselves in the data and look for emerging themes. A theory or conceptual framework, like the SCCT, can be expanded or validated using this method (Patton, 2002; Hsieh & Shannon, 2005). For the content analysis, three daily newspapers- *ThisDay, Vanguard* and *The Nation* were randomly selected from the top twelve papers recorded in *Media Facts* (2016). The newspapers were randomly chosen to aid an unbiased analysis. Media reports from October 2015 to July 2016 were analysed in the selected newspapers. The MTN Nigeria YouTube page was also purposively selected because it is assumed that for a multinational organisation of such status, the company would want to engage its stakeholders both online and offline in a crisis.

For this study, the researchers found the narrative analysis suitable because it provides a simple format for presentation to create a trend of thought as expressed by the key informants and confirmed in the media reports. According to Schutt (2019), narrative techniques use interviews, documentation, and occasionally observations to understand the trajectory of people's conversations. It is "a form of qualitative analysis in which the analyst focuses on how respondents impose order on the flow of experience in their lives and thus make sense of events and actions in which they have participated" (p. 756). Since narrative analysis provides an opportunity for telling stories and making meanings (Warren 2020), the researchers believe that this approach can help with contextualizing the findings of this study to address the research objectives. For data familiarization and to capture the interviewees' exact expressions to establish a trend, transcriptions of the key informants' audio recordings were used. Through this method, the researcher was able to construct phrases, statements, or ideas that the interviewees consistently used to help the researcher identify and describe how SCCT propositions were reflected in the management of the MTN-Nigeria SIM-registration crisis.

Results and Discussion

The key informants in the study have been pseudonymized with four codes viz: SIM-A, SIM-B, SIM-C and SIM-D. The average number of years of operation among their organisations is 22. The gender distribution of the interviewees was 3 males and 1 female. Their average age was 49.8 years while the average years of work experience as a public relations professional was 23. The interviewees have degrees in history, international relations, economics, business administration and mass communication. They are members of the Nigerian Institute of Public Relations, the Advertising Regulatory Council of Nigeria, the Institute of Chartered Economists of Nigeria; Chartered Institute of Marketers, UK. The analysis in this study relies mainly on the responses of the key informants and supported by media outputs and outcomes during the period of the crisis that reflected the application of SCCT approaches gathered from the responses of the key informants. As stated by Coombs (2007), news media is the primary source of information that stakeholders gather about organisations, therefore, media attention is crucial to reputation management.

Research Objective 1: To examine the perspectives of the key informants on the MTN SIM Registration Crisis.

Addressing the first research objective was based on the assertion of Coombs (2007) that crisis manager can choose which crisis response technique or method will enhance reputational protection by *first comprehending the crisis*. Although the key informants were deliberately shielded from the researchers' intention to test the application of SCCT in managing crisis, their perspectives towards handling the crisis reflected elements of the propositions of the SCCT in crisis management. For the key informants, the reputational damage that MTN Nigeria would suffer, particularly with the lopsided narrative that existed during the crisis informed how decisions on managing the crisis was taken. SIM-C noted that "there were many narratives locally and internationally. The government was driving a narrative that MTN Nigeria had engaged in an activity that led to a breach of security arrangement in the country while MTN Nigeria felt that given their contribution to the Nigerian economy, even where there are breaches, it should have been managed less harshly". Another "dangerous narrative" noted by SIM-D was that of a 'quiet' apathy against MTN Nigeria because some believe that the company lacked empathy and was only about its interest and taking advantage of Nigerians. The key informants noted that there was a need to "control" (SIM-A) the information vis-à-vis the reputation of the company which appears to have been battered, to manage the socio-economic damage of the negative narrations.

These perspectives reflected the key informants' understanding of the crisis responsibility, crisis history and the prior relationship reputation challenges that contributed to the crisis, in line with the assertion of Coombs (2007). In this instance, the government and some subscribers, as noted by the key informants, believe that MTN Nigeria was negligent regarding issues of national security and that the company lacks empathy for Nigerians. Media reports alluded to by SIM B also provide a context for the crisis. SIM B noted that "MTN Nigeria has a history of issues with the regulators, although sometimes it is not their fault. Therefore, we itemized the stakeholders involved in the matter and tried as much as possible to keep the best scenario that addressed the different possibilities". This perspective creates a context for MTN Nigeria's crisis history. For instance, in 2013, media reports showed that MTN Nigeria received the highest fine of N29.2 million based on 146 pre-registered SIM cards that were found on its network at the expiration of the second deadline given for the SIM registration harmonization (Ohuocha & Motsoeneng, 2015).

Given Coombs's categorization of types of crisis and the responses from the key informants, it can be concluded that the MTN Nigeria SIM registration crisis falls under the preventable (intentional) cluster because critical consideration of earlier incidences and conscientiously yielding to regulatory directories and warnings could have helped the organisation prevent the crisis. Organisations, whose crises fall in this cluster, often take inappropriate actions or violate a law or regulation. Therefore, a crisis in this cluster often has strong attributions of crisis responsibility with a severe reputational threat.

Research Objective 2: To examine how the strategies deployed in managing the MTN SIM registration crisis reflected SCCT approaches to crisis management.

Responses from the key informants showed that the crisis managers agreed to use the all of paid, earned, shared and owned media to communicate strategic messaging to the identified stakeholders. SIM-A noted that "we felt we needed to be measured in our communication. We needed to maintain a balance between what we were saying in the media and what we were publishing...*because we felt at this stage all we needed to concentrate on was to let the government and Nigerians realize the importance of MTN Nigeria to the people and Nigeria's economy*. Most of these were communicated through third-party advocates because the organisation realized that "for our messaging to be credible, it should not be us talking about ourselves lest it would be seen as chest-beating and arrogant". This approach according to SIM-D follows a global alignment with the MTN team on "an objective and a communication strategy to control communication", particularly in what SIM-C described as a "disintermediated media" environment. SIM-D explained that "we identified the strongest partners in the media through relationships and media spend and reached out with our angle to the issue, throwing more light on agreeable engagements. *The narratives reflected MTN's contribution to education and social investments and the contribution to government, which focused on the contributions to employment and its multiplier effect on the larger communities*".

The key informants' responses also depicted the application of reminder and ingratiation strategies. SIM-A explained that "we realized as part of the strategy that it was not enough to push full pages of fantastic editorial or opinion piece in the newspapers because it is not everyone that reads such things, as they are not interested. *However, when you have a pictorial on a spread on what MTN had supported or projects done by the MTN Foundation in pictures across national newspapers in the form of advertorials, some people would see it and say, "Wow, so MTN did this"? Hence, for us to dilute the negativity in conversations despite what has happened, we showcased what the business too has done to positively impact Nigeria*. Whether it is paid, shared, earned or owned, you just have to maintain a balance and get out your information on the platforms you want". The reminders and ingratiation were pushed with the components of paid, earned, shared and owned media. SIM-B stated that "paid media was used with online influencers. On radio, we leveraged on-air personalities who had very strong programming, and a lot of these were paid for. However, in the print media, we had to leverage it by identifying those who were friends of MTN in the media, using columnists who had strong opinions. On owned media, if you wanted information about the crisis real-time when you go on the MTN website and the *Twitter* handle, the news was right there". Another application of the reminder and ingratiation strategies was the incorporation of thought leadership presentations as part of the means for communicating the messages. SIM-A informed that "for thought leadership, we identified some of our executives who are knowledgeable about things like technology and development and the platforms on which they could speak. *They spoke on the steps taken by MTN Nigeria to develop Nigeria and their comments were amplified on all the platforms.*

With that, we discovered that when we tie messaging to a credible person, the chances are that people will listen more than when you have despairing voices saying so many things". These assertions affirmed Coombs's (2007) proposition that to attract public attention and sympathy, crisis managers should create frames in the media and present their sides of the story.

To address the issue of apathy towards MTN Nigeria among the subscribers, the reminder strategy was also deployed. SIM-B explained that "people forgot that about 80% of MTN Nigeria's management were Nigerians. However, by the time the implications of shutting down the business were pushed through the media, people began to understand that it would affect everybody including MTN's social services responsibilities, employment and those connected to the employed staff of MTN Nigeria and taxes and levies accrued to the government". SIM-C added that "since communication has to communicate something, particularly in a situation of multifaceted stakeholders, we must be interested in what is communicated. The ability to get the influencers (both online and offline) to understand our messages helped change the narratives and their own perception on the matter". Evidence of such control of the narratives was observed in a YouTube video posted on the YouTube page of MTN Nigeria. In the video, the former Human Resources and Corporate Services Executive of MTN Nigeria, Mrs Amina Oyagbola made a direct but strategic allusion in support of the drive of the Federal Government of Nigeria to achieve a unified database that may be used whenever it is necessary through SIM card registration. She related the MTN Nigeria revamped SIM card registration to be in support of the government's objective. This approach given the assumptions of the ingratiation strategy can be considered as a calculated appeal to the conscience of those in authority and policymakers to view MTN Nigeria as an organisation that is ready to comply with the directives and policies of the government. Excerpts from the comment by Oyagbola stated that,

> Am really *pleased that the government is doing this because in pursuing SIM registration, essentially, what the government is trying to do is build a national identity database*. MTN as a leading ICT provider in the country and the largest customer base has a very significant role to play. *We are very committed to trying to do everything humanly possible as an organisation to support that effort in our collective interest"* (MTN Nigeria/YouTube, 2016).

Responses from the key informants also reflected the application of the bolstering strategy of the SCCT to control and strengthen the narratives by MTN Nigeria. SIM-C explained that the narratives were curated for 'discipline'. He noted that "initially, the narratives were negative against MTN. However, as we deployed through the components of the integrated media model, it started changing and needed to shift. Therefore, the narratives were no longer lopsided and there comes a bit of a balance. We somehow 'disciplined' the narrative since we know there will always be negative comments. As the negotiations went on, the media narratives were changing because we were deploying information through all the channels". SIM-D further emphasised that "the target audience (the public, policymakers, regulatory, lobbyists, competition) caught on to the message and started to shift in opinion due to superior arguments from the sustained lobbying and advocacy positions through the various media channels. *These messages linked the several layers of the economy and benefits of MTN Nigeria's operations*". The internal stakeholders were not left out because SIM-D recalled that "we had to engage on our internal social platform to update staff on happenings and calm the internal storms with a series of emails and HR memos as well as departmental Heads' memos to teams. This gave perspective to the issues, and the handling of

it and also limited the unwarranted rumours and managed conversations. Owned media was seen as a potential stabilizing tool for controlling the narrative inside-out."

The claims by the key informants that there was a shift in stakeholders' perception due to a sustained messaging were evident in some editorials, opinions and articles in the newspapers that were sampled for this study. For instance, excerpts from *Candid Notes*, a column by Yinka Odumakin published on page 20 of the *Vanguard* newspaper on November 24, 2015, cautioned that,

> If MTN folds up today, 6,000 Nigerians employed by it risk losing their jobs with 500,000 others gainfully employed in its value chain facing the same disaster. How many jobs is the Nigerian government in a position to create for them? This column insists MTN must pay a fine for the infraction but not the crazy N1.4 trillion. They and all other operators must also comply with the rules.

Also, excerpts from an editorial published in *This Day* newspaper on March 7, 2016, on page 15 stated,

> With the withdrawal of the court case by MTN and the commencement of negotiations, we believe that we are on the route to an amicable resolution of this crisis. The government and the regulatory authority have made their points while MTN has demonstrated corporate penitence and a desire to obey our laws. The rest should be a sensible negotiation that should lead to a further downward review of the hefty fine…The authority should apply the right mix of regulatory fairness with business-friendly common sense…We should be mindful of one fact, whatever we do here and on this issue, prospective investors across the world are watching and listening*".*

The company also applied the *apology strategy* which is one of the rebuild crisis response strategies in SCCT. SIM-A explained that "(since) no one wanted to know if it was true or not, the best thing to do was to *apologise* through paid advertorials and even through our owned media, which are our website, social media handles etc." To effectively do this, the company utilized the paid media to publish advertorials in which they *apologise* to their subscribers and other key stakeholders to bear with the company as the process of SIM card registration goes on amidst discussions on reducing the fine. This approach is also consistent with two of Benoit's (1997) suggested crisis response strategies, which are taking corrective actions and admitting or confessing wrongdoing and begging for forgiveness. In this strategy, crisis managers publicly confess blame and accept responsibility by apologising to stakeholders (Coombs, 2012).

For instance, the bold headline on the apology advertorial "Please bear with us" and contents in the body of the advertorial reflected a reconciled position to rebuild stakeholders' confidence in the ability of the company to do the right thing. The contents reflected both an apology and an appeal to the subscribers to help MTN Nigeria do the right thing in recognition of the laws and regulations guiding its operations. The contents are as follows:

> My name is Omastola Barrow, Sales and Distribution Executive, MTN Nigeria. I sincerely apologise to you for any inconvenience you may have experienced in the course of updating your details and thank you for your continued patience and understanding. I assure you that the process has been streamlined to make the exercise quicker and easier for you. Kindly oblige us by visiting the nearest MTN Nigeria SIM registration point to update

your details including your finger prints and pictures. A valid means of identification will also make the process easier. Please, bear with us and promptly update your details today. Once again, we at MTN are truly sorry for any inconvenience. We hope you will give us a chance to serve you better (MTN Advertorial, *The Nation*, 2016)

The strategic use of the pictures of members of the top management of MTN Nigeria in the advertorials as seen in Figures 1 and 2, further showed the strategic intention to rebuild stakeholders' confidence in the brand. The strategy conforms to the assertions of Schweitzer *et al* (2015) and Kellerman (2006) that top management officials including the Chief Executive Officer (CEO) should apologise because they are recognised as ultimately responsible for the problem and serve as institutional figures during a crisis. They agreed that the more serious the crisis, the more necessary it becomes that a senior leader should make the apology because a leader's apology is a performance in which every expression matters and every word becomes part of the public record.

Figures 1 and 2: A female and male MTN Nigeria's top management in an apology advertorial to their subscribers. Source: The Nation Newspaper

Figure 1   *Figure 2*

Lazare (2004) analysed apology from a psychological approach. In offering an apology, Lazare noted that the concerned individual might experience emotions like shame, guilt and humiliation, all of which were expressed in the contents of the advertorial. To achieve the desired forgiveness and the re-establishment of an organisation's reputation, Coombs *et al* (2010) identified the three elements in crisis communication that must be strategically handled which are the *content, source and timing* of an apology. *Content* focuses on the legal liabilities of the occurrence. According to Schweitzer *et al* (2015) the content (substance) of an apology, in terms of words and actions must show *candour, remorse and a*

commitment to change. An apology that shows candour will leave deflate equivocation or misinterpretation and makes it clear that the organisation acknowledges both the harm that was caused and its responsibility. The organisation would demonstrate *a commitment to change* if it distanced itself from its "old self" that committed the violation and established a "new self" that will not engage in similar behaviour, avoid being evasive and not show high-handedness to reduce its vulnerability in the crisis. (Broom, 2009) An organisation in crisis should never sound defensive or try to justify a violation, however, it should provide detailed explanations and information that can help in addressing issues generated by the crisis. Therefore, the content of an apology must show remorse to convince the stakeholders. Excerpts of expressions used in the advertorials in figures 1 and 2 were "I sincerely apologise to you for any inconvenience you may have experienced"; "…thank you for your continued patience and understanding"; "Once again, we at MTN are truly sorry for any inconvenience". "We hope you will give us a chance to serve you better". These expressions depicted MTN Nigeria's desire to emotionally connect with its customers despite the challenges.

For stakeholders particularly subscribers who might have been affected in the course of the crisis, MTN Nigeria used the *compensation strategy*, espoused in the SCCT strategies to persuade the subscribers to support the process because the company was keen on rebuilding its reputation among its subscribers. In compensation, gifts or money are offered to the stakeholders affected by the action. Because the inability of MTN Nigeria to properly register the SIM cards of their subscribers resulted in some difficulties for the subscribers, the compensation approach is to "lure" the subscribers back with the good intentions of the company. The compensation from MTN Nigeria according to SIM A included free airtime and data. The announcement of the compensation for subscribers can be seen in figure 3.

Figure 3: MTN Nigeria advertisement offering compensation to subscribers who come to register their SIM cards during the crisis. Source: The Nation Newspaper

Conclusion

It can be concluded from this study that the management of the MTN Nigeria SIM registration crisis reflected the application of the SCCT propositions based on the perspectives of the key informants and the pieces of evidence of reports in the selected media. The perspectives of the key informants showed that the MTN SIM registration crisis falls in the preventable crisis cluster of the SCCT propositions. It can also be concluded that the SCCT crisis response strategies that were prominent in managing the MTN Nigeria SIM-registration crisis were reminder, ingratiation, excuse, apology and compensation. The response strategies were situational and specific to what is been experienced at a particular time in the crisis.

In applying the SCCT some perspectives provided by the interviewees and data gathered from the media reports may serve as prompters for areas of further studies on SCCT. First, SCCT strategies like reminder and ingratiation can be better applied using third-party advocates who can support the course of the organisation in crisis on the advocates' platforms. MTN Nigeria used its owned media to amplify its messaging but tagged influencers and popular columnists who aligned with the company's course. Second, strategic SCCT approaches like an apology when tied to the top management of the organisation in crisis add to the credibility of the message by the stakeholders. Third, incorporating an established media model like the paid, earned, shared and owned (PESO) integrated media model can facilitate the application of the SCCT strategies during a crisis. Fourth, the application of the SCCT strategies may not follow a sequence of primary or secondary considerations but the exact situation at hand will determine which strategy comes first and which one follows.

Explicating the application of SCCT in the case of MTN Nigeria SIM card registration crisis has offered more perspectives on the approaches to implementing strategies postulated in the SCCT. However, not too many studies on how SCCT is applied to crisis management in a multicultural and multiethnic society like Nigeria are available. Therefore, it is expected that the findings and conclusions in this study will add to existing knowledge, expand and ignite further studies on SCCT across different societies.

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