MOBILE MARKETING ASSOCIATION

U.S. Consumer Best Practices for Messaging

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Table of Contents

INTRODUCTION: US CONSUMER BEST PRACTICES FOR MESSAGING 4

SCOPE: STANDARD RATE, PREMIUM RATE, AND FREE TO END USER 5
CTIA AUDIT STANDARDS 5
REFERENCES: MMA DOCUMENTS AND LINKS FOR REFERENCE PURPOSES 5
RECENT CHANGES 6

CROSS CARRIER STANDARDS 7

SECTION 1: STANDARD RATE 7
Standard Rate Cross Carrier Guidelines 7
1.0 General Guidelines 7
1.1 Messaging Frequency Guidelines 7
1.2 Guidelines for Advertising Messaging Programs 7
1.3 Advertising to Children 8
1.4 Opt-In 8
1.4.1 Program Messages 9
1.5 Program Termination, STOP and Opt Out 10
1.6 Program Short Code Transfer 11
1.7 Customer Care and HELP Guidelines 11
1.8 Customer Record Maintenance 12
1.9 Terms and Conditions 12
1.10 Tobacco & Alcohol Programs 13
1.11 Sweepstakes & Contests 13
Standard Rate Examples 15
Advertising (Call to Action) Examples 15
Opt-In Examples 16
STOP Message Examples 19
HELP Message Examples 20
Change of Short Code Example Messages 21

SECTION 2: PREMIUM RATE 22

Premium Rate Cross Carrier Guidelines 22
2.0 General Guidelines 22
2.1 Messaging Frequency Guidelines 22
2.2 Tobacco & Alcohol Programs 22
2.3 Guidelines for Advertising Messaging Programs 23
2.4 Advertising to Children 23
2.5 Opt-In Guidelines 24
2.6 Program Termination and Opt Out 28
2.7 Customer Care and HELP Guidelines 29
2.8 Customer Record Maintenance 31
2.9 Sweepstakes & Contests 31
2.10 Terms & Conditions 32
2.11 Affiliate Marketing 32
2.12 Premium WAP Sites 33
2.13 Subscription Programs 34
Premium Rate Examples 36
EXAMPLE: STOP Messages (CCS-EG-02) 37
EXAMPLE: PREMIUM Rate IVR (Initial Opt In IVR) (CCS-EG-04) 38
EXAMPLE: Premium Rated Double Opt In– Alert Subscription (CCS-EG-05) 39
EXAMPLE: Premium Rated Opt In for WAP (CCS-EG-06) 40
EXAMPLE: Billing Renewal Message (CCS-EG-10) 41
SECTION 3: FREE TO END USER (FTEU) 42
Free to End User Cross Carrier Guidelines 42
3.0 General Guidelines 42
3.1 Guidelines for Advertising Messaging Programs 42
3.2 Opt In 43

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3.3 Opt Out 43
3.4 Terms & Conditions 44
3.5 HELP Guidelines 45
FTEU Examples 46

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Introduction: US Consumer Best Practices for Messaging

The Mobile Marketing Association (MMA) is the premier global non-profit trade association representing all players in the mobile marketing value chain. With more than 700 member companies, the MMA is an action-oriented organization with global focus, regional actions and local relevance. The MMA's primary focus is to establish mobile as an indispensable part of the marketing mix. The MMA works to promote, educate, measure, guide and protect the mobile marketing industry worldwide. The MMA's global headquarters are located in the United States and it has regional chapters including North America (NA), Europe, Middle East and Africa (EMEA), Latin America (LATAM), and Asia Pacific (APAC) branches.

The MMA Consumer Best Practices (CBP) for Messaging, for the United States market, provides a guide to implementing short code programs. This guideline document is a compilation of accepted industry practices, common wireless carrier policies, and regulatory guidance that have been agreed upon by representative member companies from all parts of the off-deck ecosystem.

The US Consumer Best Practices Committee for Messaging developed these guidelines in collaboration with representatives from the following member companies:

4INFO, Inc.
Cincinnati Bell Wireless
CTIA
Mobile Messenger

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Scope: Standard Rate, Premium Rate, and Free to End User

From a pricing perspective, there are three categories of short code programs. This document groups the standards according to these categories:

- Standard Rate – The consumer is charged standard messaging fees (per message, or decremented from their messaging bundle) when participating in the program. Premium fees are not charged.
- Premium Rate – The consumer is charged premium fees in addition to standard messaging fees applying.
- Free to End User (FTEU) – The consumer incurs no charges at all for participating in the program. The carrier waives standard message fees for these programs.

CTIA Audit Standards

CTIA Audit Standards were developed by a cross-carrier team in support of the CTIA Compliance Assurance Program. This Program has evolved to take a significant role in channeling common cross-carrier policies and defining compliance in the mobile market. The goal of the CTIA Audit Standards is to outline clear, objective, and executable rules against which program compliance can be evaluated. Rules are designed to meet the obligation of legal settlements entered into by the carriers, as well as to target deceptive practices that represent consumer harm.

References: MMA documents and links for reference purposes

The following documents provide additional sources of information and reference:

MMA Code of Conduct
http://www.mmaglobal.com/codeofconduct.pdf
MMA Glossary of Terms
http://www.mmaglobal.com/glossary.pdf
Mobile Marketing Association Website
http://www.mmaglobal.com
Telephone Consumer Protection Act (TCPA)
http://www.the-dma.org/guidelines/tcpa.shtml
CAN-SPAM
http://www.fcc.gov/cgb/policy/canspam.html
Common Short Code Administration
http://www.usshortcodes.com
COPPA
http://www.ftc.gov/ogc/coppa1.htm
CTIA Common Short Code Monitoring Playbook
http://www.wmcglobal.com/images/CTIA_playbook.pdf

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Recent Changes

Version 7.0

Below is a list of changes modified between version 6.1 of this document and the previous version 7.0

- Alignment of MMA Consumer Best Practices with the CTIA Audit Standards
- Removal of Cross Carrier Matrix for both Standard & Premium
- Removal of Carrier specific playbooks

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Cross Carrier Standards

Section 1: Standard Rate

Standard Rate Cross Carrier Guidelines

1.0 General Guidelines

	Guideline
1.0–1	At a minimum, programs (including short code, IVR and WAP) should be run in a manner that is congruous with the letter and spirit of the MMA Global Code of Conduct for Mobile Marketing. The Code of Conduct is located at: http://www.mmaglobal.com/codeofconduct.pdf
1.0-2	At all times, programs must be in accordance with applicable federal and state laws, rules and regulations. In addition, all programs must be in compliance with the CTIA Audit Standards. http://www.wmcglobal.com/images/CTIA_playbook.pdf
1.0-3	Wireless subscribers have a right to privacy.
1.0-4	Short codes are approved and provisioned based on the specific program submitted to the aggregator and carrier.
1.0-5	If the content provider wishes to run new, modified, or additional programs on the short code, they must submit the additional or modified program for approval to the aggregator/carrier.
1.0-6	For programs that use MMS, all keywords in this document should be supported via both SMS and MMS.

1.1 Messaging Frequency Guidelines

	Guideline
1.1-1	A "one-time" message program results in only one or two messages being delivered to the user at the time the interaction is initiated.
1.1-2	A "recurring" message program results in multiple messages being delivered to the user. This is also called a standard rate subscription program or an alert program.

1.2 Guidelines for Advertising Messaging Programs

	Guideline
1.2-1	When promoting programs, content providers should ensure that their advertising in all forms is clear and conspicuous regarding all terms and conditions associated with offers and adheres to all state and federal regulations.
1.2-2	CTIA audit standards do not permit use of the term free except for cross-carrier free-to-end-user programs. However, when there are no fees or charges other than standard messaging and data charges, synonyms (i.e. complimentary, promotional, no charge) are supported by all carriers and must be used with the phrase "Msg & Data Rates may apply". The communication stating that "Msg&Data Rates May Apply" should be added at the lower third of the commercial or advertisement when "free" appears in the audio or visual. The verbiage around the placement of "Msg&Data Rates May Apply" should be clear and conspicuous on the call to action/promotion/advertising and should NOT be deceptive in any nature nor lead to an indirect subscription of services. Illegible font sizes, font color, or presentment (including scrolling or moving graphics) and

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	obscuring of the disclaimer "Msg&Data Rates May Apply" are prohibited.
1.2-3	Program advertising or its placement must not be deceptive about the functionality, features, or content of the underlying program.
1.2-4	All advertising (print, TV, online, and radio) must include: • Product description • Program name • Product quantity • Link to full T&Cs containing privacy policy and help info • STOP instructions (in bold, for recurring only) • Additional carrier costs disclosure (Message and data rates may apply)
1.2-5	Instructions on using the HELP keyword (i.e. Text HELP for help) may be provided in lieu of full customer service contact information in advertising materials.
1.2-6	If space is not available for the full terms and conditions, the location where the full terms and conditions may be accessed without charge to the consumer must be disclosed (e.g. via a website address and/or toll free phone number).

1.3 Advertising to Children

	Guideline
1.3-1	Industry participants must comply with all applicable laws and industry standards that apply to advertising and marketing to children. This includes compliance with the FCC's Children's Television Act as it applies to the promotion of commercial websites, the FTC's Children's Online Privacy Protection Act (COPPA), FTC advertising regulations, Children's Advertising Review Unit (CARU) guidelines and various trade organization regulations such as those set forth by the MPAA and ESRB.
1.3-2	All industry participants are also expected to ensure that the products being marketed are appropriate for the intended audience. As such, products that would be considered "mature" or might be considered dangerous or harmful to children (including, for example, alcohol, Rx and OTC medication, household cleaners, etc.) should not be marketed to children.

1.4 Opt-In

	Guideline
1.4-1	Content providers must obtain opt-in approval from subscribers before sending them any SMS or MMS messages or other content from a short code.
1.4-2	Program flow and information must not be misleading in any way.
1.4-3	Recurring standard rate programs require a single opt-in.
1.4-4	When opt-in to a recurring program occurs via the web or other non-mobile point of origination, the content provider must obtain verification that the subscriber is in possession of the handset being opted-in to the service.
1.4-5	For recurring standard rate programs, subscribers should indicate their willingness to participate in a program and receive messages from the program as follows:
1.4-6	1. Subscriber initiates opt-in to a recurring Standard Rate Program by responding to a call to action (CTA): i.) Subscriber may send a Mobile Originated (MO) message from their handset to the short code. ii.) Subscriber may initiate opt-in from a web interface

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	iii.) Subscriber may initiate opt-in from a WAP interface iv.) Subscriber may initiate opt-in from an IVR system 2. Program responds with pertinent phone, program, and contact information and handset verification steps, if required.
1.4-7	If web-based opt-in is used for a standard rated campaign, the use of a PIN code, although not required, is suggested to confirm possession of the handset.
1.4-8	Requirements for the PIN code (or Reply Yes) MT, in cases where it is used are: • Program sponsor (Defined as the program name, company name or brand associated with the campaign.) • the PIN code sent to the subscriber for confirmation, which may be placed anywhere in the message • Customer support information (HELP) • Frequency of messaging • Additional carrier costs (e.g. Msg&Data Rates May Apply) • Opt-out information (STOP) does not need to be in the initial PIN (or Reply Y) MT message.
1.4-9	After opt-in to a recurring program, a confirmation Mobile Terminating (MT) message must be sent to the subscriber containing, at minimum, the following information: a) Service description b) Program Sponsor c) Additional carrier costs (e.g. Msg&Data Rates May Apply) d) Frequency of messaging e) Customer support information (HELP) f) Opt-Out information (STOP)
1.4-10	This opt-in applies only to the specific program a subscriber is subscribed to and should not be used as a blanket approval to promote other programs, products, and services. However, after the subscriber has been given the complete details about the opt-in scope, the subscriber may opt-in to receive other messages. A content provider may, however, communicate with existing opted-in subscribers through non-premium messages that a) notify subscribers of updates to their existing service or b) are part of a retention program for that particular service. Directions to unsubscribe from these messages must be clearly available with the delivery of each message.
1.4-11	Selling mobile opt-in lists is prohibited.
1.4-12	When a subscriber ports his/her telephone number between carriers, he/she is required to re-opt-in to all short code programs.

1.4.1 Program Messages

	Guideline
1.4.1-1	For both recurring and one-time message programs, no compliance language is required in program content MTs. (STOP, HELP, Msg&Data Rates May Apply are not required to be in program content messages.)
1.4.1-2	Reminder messages are not required for one-time message programs.
1.4.1-3	When used, reminder messages must include the following: • Identity of program sponsor • Short description of program—For example, Giants Score Alerts. • Frequency of messaging • HELP information – For example, Reply HELP for HELP • Opt-Out information – For example, Reply STOP to Cancel • Pricing terms for the program—Msg&Data Rates May Apply
1.4.1-4	Within MMS messages, the following types of third party ads are allowed: text, picture, audio, and video. Ads may be inserted prior to, within the content being

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	sent or following the content of the MMS Message.

1.5 Program Termination, STOP and Opt Out

	Guideline
1.5-1	Content providers must offer subscribers the opportunity to cancel the service at any time. The following rules govern program opt-out:
1.5-2	A subscriber must be able to stop participating and receiving messages from any program by sending STOP to the short code used for that program. • END, CANCEL, UNSUBSCRIBE or QUIT should also be opt-out key words for all programs; however, content providers should feature the word STOP in their advertising and messaging. Messaging content providers must process a stop message from a subscriber regardless of the keyword STOP's case sensitivity • The STOP keyword must work in the native language of the program. In a non-English program, the English keyword must not return an error message. • Short code programs must ignore subsequent non-keyword text included in STOP MOs. • Short codes running MMS programs should handle the STOP keyword correctly, regardless whether the subscriber sends the keyword via MMS or SMS. • When sent, these words cancel the subscriber's previous opt-in for messaging.
1.5-3	If the subscriber is participating in multiple programs on the short code, there are two options for the content provider when a subscriber sends an opt-out request: 1) The content provider sends a menu of the programs the subscriber is subscribed to and the subscriber has the responsibility to reply with the specific keyword to the specific program they would like to be opted out of. To ensure subscribers also have a way to opt-out of all programs within this menu, STOP ALL must be added to the menu choices. The stop menu message does NOT need to contain i) "Msg&Data Rates May Apply" ii) Sponsor contact information. 2) Or if the subscriber sent STOP or STOP ALL to the short code, they are opted-out of all programs they were enrolled in on that short code.
1.5-4	When STOP, or any of the opt-out keywords above, is sent to a program, the program must respond with an MT message, whether or not the subscriber is subscribed to the program.
1.5-5	When the user is subscribed to a recurring program, an MT message confirming the opt-out must be sent to the subscriber. This must not be a premium message. This message should reference the specific program the subscriber has opted-out from and indicate that no further messages will be sent. No further messages should be sent to the subscriber from this program, including marketing messages for any related or unrelated programs.
1.5-6	When the user is not currently subscribed to a recurring program, or the program is a one-time program where the subscriber will not receive additional messages, then an MT message may be sent that only confirms that the user is not subscribed to any programs on this short code and indicates that no further messages will be sent.
1.5-7	This STOP command functionality requirement applies to all programs, including one-time use programs where the subscriber will not receive additional messages. This is to avoid subscriber confusion around the use of the STOP command.
1.5-8	The STOP command should never result in an error being sent back to the subscriber.

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1.5-9	Any IVR system that offers the possibility to opt-in to a mobile service must also offer the possibility to opt-out. This should be available through the IVR, customer service, a web site, or SMS.
1.5-10	The content provider must record and store all opt-out transactions.
1.5-11	If a user is inactive (no program MTs or MOs exchanged) in any recurring message program for eighteen months, the opt-in should expire. At that time, it is permissible to send the subscriber one final MT message notifying them that his/her username and other subscription information will be deleted from the program. No messages to the subscriber after the expiration are permitted unless the subscriber re-opts-in to the program.

1.6 Program Short Code Transfer

	Guideline
1.6-1	A subscriber to a recurring program may be transferred to a new short code without a new opt-in, as long as the content and purpose of the alerts remain the same as what the subscriber opted-in to receive and the content provider has not changed. Under these circumstances, the following notifications must be provided:
1.6-2	The subscriber must receive notice on the short code they originally opted into that the program will be moving to a new short code. This message must include instructions on how to opt-out of the program. This should be the last message sent by the program on the old short code.
1.6-3	When the program initiates on the new short code, the first alert the subscriber receives must remind subscribers of the short code change and include instructions on how to opt-out of the program.
1.6-4	Any alert list transferred or sold to a new content provider for the purposes of remarketing is considered SPAM and is grounds for short code de-provisioning.

1.7 Customer Care and HELP Guidelines

	Guideline
1.7-1	Help messaging commands, phone numbers, URLs, and email addresses should result in the subscriber receiving help with his issue. Dead ends that do not provide a manner in which the subscriber may resolve his issue are not acceptable.
1.7-2	A subscriber can receive help information by sending the keyword HELP to any program. The HELP keyword should work on all short code programs. HLP is optional for HELP, but not required. • The HELP keyword sent by the consumer cannot be case sensitive • For short codes running MMS programs, a help response should be returned whether the subscriber sends in HELP to the short code via MMS or SMS • The HELP keyword must work in the native language of the program. In a non-English program, the English keyword must not return an error message.
1.7-3	To help subscribers understand their participation, each program should respond with the program details listed below when the subscriber sends the keyword HELP to the program short code.
1.7-4	• Identity of program sponsor—This is defined as the program name, company name, or brand associated with the campaign.
1.7-5	• Customer support info — Either a toll-free number, Web address, or e-mail address. Note that Sprint requires a toll free number for all programs and T-Mobile requires a URL for all programs.
1.7-6	• Service description of program — For example, Fun Stuff Trivia.

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1.7-7	• Opt-out information
1.7-8	• Program frequency
1.7-9	• Pricing Information – Msg&Data Rates May Apply
1.7-10	If the short code has multiple programs (keywords) on the same short code, the application should respond in one of two ways: 1) If the subscriber has opted in to only one program, the application should supply the information for the program the subscriber is opted-in to. 2) If the subscriber has opted-in to multiple programs, the application should present a multiple-choice question asking the subscriber what program they would like help on. The first help menu does NOT need to include: • "Msg&Data Rates May Apply" • STOP, Or Sponsor Contact Information The menu should contain a question asking what the subscriber seeks help with and a list of options for the user to get help on. Once the user has identified the program they want help with, the appropriate help information must be in the subsequent MT.
1.7-11	When HELP is sent to a program, the program must respond with an MT message, whether or not the subscriber is subscribed to the program, and whether the program is a subscription program or not. HELP must always result in a response.
1.7-12	Subscribers must be able to reach customer service through the IVR for assistance with an IVR mobile program.

1.8 Customer Record Maintenance

	Guideline
1.8-1	To the extent that carriers supply deactivation and recycled number information, content providers and aggregators are required to have appropriate and effective systems and processes for managing deactivation and recycled number information. These systems and processes should be designed to ensure that mobile content programs subscribed to by previous holders of a specific phone number do not continue to be delivered or billed to a subsequent holder of that number when it is reassigned. Content providers and aggregators must process deactivation information within three business days of receipt.
1.8-2	Independent of method of entry (SMS, MMS, Web, WAP, IVR) opt-in and opt-out records - including single, double and triple opt-in records – should be retained from the time the subscriber opts-in until a minimum of six months after the subscriber has opted-out of the program (minimum opt-in archiving period is one calendar year). These records should be made available to the aggregator or carrier upon request.
1.8-3	The content provider is responsible for tracking program opt-in information by subscriber.

1.9 Terms and Conditions

	Guideline
1.9-1	Terms and Conditions at a minimum must contain the following:
1.9-2	• STOP instructions in BOLD lettering
1.9-3	• HELP instructions in BOLD lettering

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1.9-4	• Program sponsor information, defined as the program name, company name, or brand associated with the campaign
1.9-5	• For standard rate programs: "Msg&Data Rates May Apply". The text "standard rates may apply" is no longer being used. To better inform consumers that message and data changes may be applicable the new terminology above has been adopted. Different forms of the above text include: Message and Data Rates May Apply, Msg&data rates may aply, Msg&data rates may apply, Msg&DataRatesMayAply.
1.9-6	• Customer Service Contact Information: either a toll-free number, a web submission form or an email address.
1.9-7	• Guidance on the frequency with which the subscriber may expect to receive messages for the duration of the program. Note that for many applications, this cannot be precisely predetermined by the content provider. In this case, the guidance should relate to the expected message frequency under normal circumstances. Note that CTIA audit standards accept "recurring" or "periodic" for product quantity for standard rate.
1.9-8	All material terms and conditions of the program should be clearly communicated.
1.9-9	If a checkbox is used to indicate a consumers' acceptance of the terms and conditions, it is not permissible for the checkbox to be pre-checked.

1.10 Tobacco & Alcohol Programs

	Guideline
1.10-1	Hard alcohol programs should only be marketed in locations that have age verification (bars, nightclubs).
1.10-2	Alcohol marketing should not directly promote the use of or consumption of alcohol.
1.10-3	Any reference to the abuse of alcohol, drugs, tobacco or other controlled substances is strictly prohibited. This includes verbal and non-verbal actions in which a person could conclude that promotion of drug use is intended.
1.10-4	Tobacco companies engaging in promotional mobile marketing programs, defined as programs that DO NOT directly advocate or promote the use or consumption of tobacco, must maintain their commitment to responsible marketing via age verification practices compatible with mobile program opt-in methods.
1.10-5	Any program brief submitted for carrier approval on behalf of a tobacco brand must illustrate the integration of electronic age verification methods (use of third party vendors to confirm legal age and identity) into the program opt-in process.
1.10-6	Program opt-in is only completed once the mobile subscriber has been verified as an adult tobacco consumer.

1.11 Sweepstakes & Contests

Sweepstakes and contests, including those conducted on the mobile platform, are among the most regulated of marketing tactics.

Mobile Sweepstakes and Contests definitions:

Sweepstakes *- A sweepstakes is a legal game that includes a prize, and a game of chance. No consideration is allowed.*

Contest *- A contest is a promotional mechanism that includes a prize, and a game of skill. Consideration is allowed, but there cannot be any element of chance.*

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Lottery *- A lottery is a game that includes a prize, a game of chance, and consideration. Federal legislation and State laws govern (and disallow) all lotteries for promotional purposes.*

Consideration *- Although the definition of consideration varies from state to state, generally, consideration means that a willing participant is required to purchase something or pay for access to be eligible to enter a game.*

	Guideline
1.11-1	Consideration may be monetary or non-monetary (an example of non-monetary consideration is a sweepstakes where the participant is required to provide detailed consumer information to be eligible).
1.11-2	All sweepstakes must offer a free Alternative Method Of Entry (AMOE). Allowing participants to enter via mail, internet, fax or IVR via a toll free number are all forms of AMOE, but are not the only forms of free AMOE.
1.11-3	Anyone running a sweepstakes should seek legal guidance when drawing up rules.

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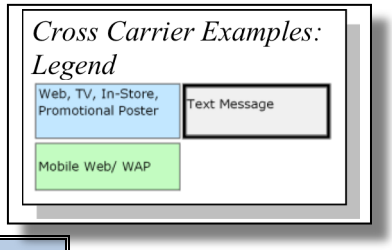
Standard Rate Examples



Advertising (Call to Action) Examples

CCS-SR-EG- 1 Standard Rate Print Advertising Example

Get Daily Recipes via text message from Bonjour Farms!

Get a link to a recipe of the day, featuring fresh, seasonal, local foods. Text FOOD to 12345 to subscribe.

Additional costs → Message and Data Rates May Apply

Terms & Conditions→ Terms & Conditions at www.text123.com/terms

Opt-Out Info → To stop text STOP to 12345

CCS-SR-EG- 2 Standard Rate Television, Radio, or Audio Advertising Example

"Get breaking news alerts from KGO Radio, just text NEWS to 12345. Message and data rates may apply."

CCS-SR-EG- 3 Standard Rate Web Advertising Example

Get Daily Recipes via text message from Bonjour Farms!

Get a link to a recipe of the day, featuring fresh, seasonal, local foods. One message per day.

Frequency →

Enter your phone number to subscribe now:

Additional costs → Msg&Data Rates May Apply

Terms & Conditions→ Terms & Conditions at www.text123.com/terms

Opt-Out Info → To stop text STOP to 12345.

Support Information → For help, reply HELP to 12345.

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Opt-In Examples

CCS-SR-EG- 4 Standard Rate Single Opt In – Recurring Alert Subscription

Call to Action: The following is advertised:

Program sponsor →	Upmobile Ski Alerts!
Service Description →	Send us the resort name, we'll send you the snow conditions. Txt 'Mammoth' to 12345 to receive ongoing alerts for Mammoth resort.
Frequency of Messaging →	Get 10 msgs/month.
Customer Support Info →	Text HELP for help.
Opt Out Info →	To stop text STOP.
Additional Carrier Costs →	Msg&Data Rates May Apply.
Terms & Conditions →	T&Cs avail at www.mammoth.com/mobile.

Step 1: User responds to Call to Action and sends an MO "Mammoth"

Step 2: Confirmation MT User receives the following MT Message:

Service description→	Welcome to Upmobile: Mammoth Ski Alerts!
Additional carrier costs→	Msg&Data Rates May Apply.
Frequency of messaging→	Get 2 msgs/week.
Customer Support Info →	Reply HELP for help.
Opt Out Info →	Reply STOP to cancel.

Step 3: Alert MT User receives the following MT Message:

Alert →	UpMobile: Mammoth Ski Alert @ 5pm PST! 12" of fresh powder fell! Roadways are open with light traffic.

Step 4: Renewal Reminder (OPTIONAL, except Sprint) User receives the following MT Message:

Service description→	REMINDER: Subscribed to Upmobile: Mammoth Ski Alerts!
Additional carrier costs→	No Charge, but Msg&Data Rates May Apply.
Customer Support Info →	Reply HELP for help
Opt Out Info →	Reply STOP to cancel.

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CCS-SR-EG- 5 Standard Rate Single Opt In – One Time Message

Call to Action: The following is advertised:

Program sponsor →	Upmobile Ski Alerts!
Service Description →	Send us the resort name, we'll send you the snow conditions. Txt 'Mammoth' to 12345 to receive an alert for Mammoth Resort.
Additional Carrier Costs →	Msg&Data Rates May Apply.
Terms & Conditions →	T&Cs avail at www.mammoth.com/mobile.

Step 1: User responds to Call to Action and sends an MO "Mammoth"

Step 2: Alert MT User receives the following MT Message:

Program sponsor →	UpMobile / Mammoth Mountain:
Content→	12" of fresh powder fell! Roadways are open with light traffic.

CCS-SR-EG- 6 Invalid Keyword Example Message

Example of optional response message to be sent when an invalid keyword MO is received.

User receives the following Mobile Terminating (MT) Message:

Program sponsor →	Farm League Baseball Alerts
Unrecognized keyword, HELP→	Sorry, we did not recognize that keyword. Text HELP for HELP.
Opt-Out Info→	Reply STOP to cancel receiving Farm League Baseball Alerts.

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CCS-SR-EG- 7 Reminder Example Message

Example of reminder message for recurring message programs. *NOTE: This message may be required by some carriers while optional for others.*

User receives the following Mobile Terminating (MT) Message:

	Reminder! You are subscribed to
Sponsor & description→	Farm League Baseball Alerts.
Frequency→	Up to 30 messages per month.
HELP→	Text HELP for HELP.
Opt-Out Info→	Reply STOP to cancel.
Pricing→	Msg&Data Rates May Apply

CCS-SR-EG- 8 Standard Rate IVR Opt In

Call to Action The following is advertised:

Program sponsor →	WOD: Weather on Demand.
Service Description →	Call 888-222-2222 to get current weather for your area sent to your phone. Dial 0 for help.
Customer Support Info →	Txt HELP for help to 12345.
Opt Out Info →	To stop txt STOP to 12345.
Additional Carrier Costs →	Msg&Data Rates May Apply.

Step 1: User responds to Call to Action — User calls 888-222-2222 [Mobile subscriber calls and is prompted to select SMS to phone]

Step 2: Mobile Content MT — User receives the following MT Message:

Mobile Content →	WOD: Partly sunny with chance of showers in late afternoon. Highs in the 70 during the day, and 62 at night.

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STOP Message Examples

CCS-SR-EG- 9 Stop (Single Service)

User receives the following Mobile Terminating (MT) Message:

Program sponsor → Farm League Baseball Alerts.

Discontinuation of Service → You have opted out. You will not receive additional messages.

CCS-SR-EG- 10 Stop (Multiple Services)

Step 1: User sends STOP Mobile Originating (MO) Msg

Step 2: Help menu MT response to a STOP MO from a user

Program sponsor → Farm League Baseball: which service to stop?

STOP ALL → STOP ALL or

Option A → For Sports Reply STOP SPORT to cancel

Option B → For Horo Reply STOP HORO to cancel

Step 3: User responds STOP SPORT.

Program sponsor → You will receive no more messages from Farm League Baseball:

Discontinuation of Service → Sports service.

You have canceled the service.

Step 4: User responds STOP HORO.

Program sponsor → You will receive no more messages from Farm League Baseball: horoscope service.

Discontinuation of Service → You have canceled services.

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HELP Message Examples

CCS-SR-EG- 11 HELP Message, Single Service

Step 1: User sends HELP Mobile Originating (MO) Msg

Step 2: Help MT response:

Program sponsor →	Farm Baseball Alerts!
Service Description →	Text us your zip, we send local game day weather.
Additional Carrier Costs →	Msg&Data Rates May Apply.
Frequency of Messaging →	4 msgs/mo
Customer Support Info →	Contact: flb.com/help or 800 888-8888.
Opt Out Info →	Reply STOP to cancel.

CCS-SR-EG- 12 Help Message, Multiple Services

Step 1: User sends HELP Mobile Originating (MO) Msg

Step 2: Help menu MT response to a HELP MO from a user

Program sponsor →	Farm Baseball: which service would you like help on?
Option A →	For Sports Reply HELP SPORT for help.
Option B →	For Horo Reply HELP HORO for help

Step 3: User responds HELP SPORT. Help menu MT response is:

Program sponsor →	Farm Sports service:
Service Description →	Txt us your zip, we send local scores and news.
Additional Carrier Costs →	Msg&Data Rates May Apply.
Customer Support Info →	Contact: flb.com/help or 800-888-8888.
Opt Out Info →	Reply STOP to cancel.

Step 4: User responds HELP HORO. Help menu MT response is:

Program sponsor →	Farm Horoscope svc:
Service Description →	Txt us your bday, we send ur horoscope
Additional Carrier Costs →	Msg&Data Rates May Apply.
Customer Support Info →	Contact: flb.com/help or 800-888-8888.
Opt Out Info →	Reply STOP to cancel.

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Change of Short Code Example Messages

CCS-SR-EG- 13 Last Alert on Old Short Code

User receives the following Mobile Terminating (MT) Message:

Program sponsor →	Farm League Baseball Alerts
Change to new code →	are moving to short code 12345. Future alerts will come from that code.
Opt-Out Information →	Reply STOP to cancel receiving Farm League Baseball Alerts.

CCS-SR-EG- 14 First Alert on New Short Code

User receives the following Mobile Terminating (MT) Message:

Program sponsor →	Farm League Baseball Alerts.
Notification of new code →	will now be delivered on short code 12345.
Opt-Out Info →	Reply STOP to cancel receiving Farm League Baseball Alerts.

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Section 2: Premium Rate

Premium Rate Cross Carrier Guidelines

2.0 General Guidelines

	Guideline
2.0–1	At a minimum, programs (including short code, IVR and WAP) should be run in a manner that is congruous with the letter and spirit of the MMA Global Code of Conduct for Mobile Marketing. The Code of Conduct is located at: http://www.mmaglobal.com/codeofconduct.pdf
2.0-2	At all times, programs must be in accordance with applicable federal and state laws, rules and regulations. In addition, all programs must be in compliance with the CTIA Audit Standards. http://www.wmcglobal.com/images/CTIA_playbook.pdf
2.0-3	Wireless subscribers have a right to privacy.
2.0-4	STOP and HELP keywords must work in the native language of the program and English.
2.0-5	For programs that use MMS, all keywords in this document should be supported via both SMS and MMS.

2.1 Messaging Frequency Guidelines

	Guideline
2.1-2	A "one-time" message program results in only one or two messages being delivered to the user at the time the interaction is initiated.
2.1-3	A "recurring" message program results in multiple messages being delivered to the user.

2.2 Tobacco & Alcohol Programs

	Guideline
2.2-1	Hard alcohol programs should only be marketed in locations that have age verification (bars, nightclubs).
2.2-2	Alcohol marketing should not directly promote the use of or consumption of alcohol.
2.2-3	Any reference to the abuse of alcohol, drugs, tobacco or other controlled substances is strictly prohibited. This includes verbal and non-verbal actions in which a person could conclude that promotion of drug use is intended.
2.2-4	Tobacco companies engaging in promotional mobile marketing programs, defined as programs that DO NOT directly advocate or promote the use or consumption of tobacco, must maintain their commitment to responsible marketing via age verification practices compatible with mobile program opt-in methods.
2.2-5	Any program brief submitted for carrier approval on behalf of a tobacco brand must illustrate the integration of electronic age verification methods (use of third party vendors to confirm legal age and identity) into the program opt-in process.
2.2-6	Program opt-in is only completed once the mobile subscriber has been verified as an adult tobacco consumer.

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2.3 Guidelines for Advertising Messaging Programs

	Guideline
2.3-1	When promoting programs, content providers should ensure that their advertising in all forms is clear and conspicuous regarding all terms and conditions associated with offers and adheres to all state and federal regulations.
2.3-2	All rules delineated below also apply to any affiliate marketing sites used to promote the service with the exception of web carrier-select jump pages.
2.3-3	CTIA audit standards do not permit use of the term free with respect to premium programs.
2.3-4	All advertising must clearly disclose in the audio and visual that you must be 18 years or older or have permission from the account holder.
2.3-5	All advertising must clearly disclose the subscription term, billing interval and information on how the charges will be applied (i.e., that the charges will be billed on the customer's wireless phone bill or deducted from the customer's prepaid balance).
2.3-6	All advertising must clearly disclose all methods of canceling the service.
2.3-7	Advertising must include a resource (such as a website or phone number) where subscribers can reference all terms and conditions.
2.3-8	Program advertising or its placement should not be deceptive about the functionality, features, or content of the underlying program.
2.3-9	If a checkbox is used to indicate a consumers' acceptance of the terms and conditions, it is not permissible for the checkbox to be pre-checked.

2.4 Advertising to Children

	Guideline
2.4-1	Industry participants must comply with all applicable laws and industry standards that apply to advertising and marketing to children. This includes compliance with the FCC's Children's Television Act as it applies to the promotion of commercial websites, the FTC's Children's Online Privacy Protection Act (COPPA), FTC advertising regulations, Children's Advertising Review Unit (CARU) guidelines and various trade organization regulations such as those set forth by the MPAA and ESRB.
2.4-2	All industry participants are also expected to ensure that the products being marketed are appropriate for the intended audience. As such, products that would be considered "mature" or might be considered dangerous or harmful to children (including, for example, alcohol, Rx and OTC medication, household cleaners, etc.) should not be marketed to children.
2.4-3	Marketing should not contain language that minimizes the price of a product or service (such as "only" or "just").
2.4-4	Advertisements should not contain language that exhorts children to buy or obtain a product or service.
2.4-5	Advertisements should not contain language that conveys a sense of urgency about an offer or service that does not expire.
2.4-6	Advertising must contain clear disclaimers in the audio and visual explaining the cost of premium or other fees.

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2.5 Opt-In Guidelines

	Guideline
2.5-1	Premium rate programs require double opt-in
2.5-2	Premium subscribers must positively acknowledge the acceptance of a premium charge before premium charges are applied to their account.
2.5-3	There are three mechanisms for acceptable opt-in activity: Web-based, IVR, and handset-based. In all instances, however, the subscriber must take affirmative action to signify acceptance of the program criteria, and the content provider or aggregator should record and store the acceptance (i.e. the IVR system must store the opt-in). While there are different methods of subscriber opt-in and many ways to say the same thing, the basic tenet should be that all of the required information listed below is delivered to the subscriber in a clear and unambiguous manner.
2.5-4	Regardless of type, the goal of any opt-in is to clearly communicate to the subscriber the financial obligation they are about to incur by entering the program.
2.5-5	Separate programs, even if they are offered on the same short code, require a separate opt-in.
2.5-6	If a match notification service is offered as part of a **chat** program, and the service generates premium charges, an additional opt-in should be obtained from the subscriber for this service.
2.5-7	Within the double opt-in flow, the following information (at a minimum) must be provided to the subscriber:
2.5-8	• Identity of program sponsor—Defined as the program name, company name or brand associated with the campaign.
2.5-9	• Contact details for the program sponsor— Either a toll free number, HELP via text message or a website address.
2.5-10	• Short description of program—For example, Fun Stuff Premium Chat.
2.5-11	• Pricing terms for the program—For example, $0.99 per mobile originated message; $3.99 per month.
2.5-12	Content providers should not redirect subscribers from one type of program (i.e. Ringtone subscription) to another type of program (i.e. Horoscope alert subscriptions) due to handset or account limitations. The two offers cited above are materially different and should be treated as such in all advertising and promotion.
2.5-13	In all materials (advertising, opt in, terms and conditions) the price must be in numerical format including the "$" sign.
2.5-14	Selling mobile opt-in lists is prohibited
2.5-15	When a subscriber ports his/her telephone number between carriers, he/she is required to re-opt-in to all short code programs.

2.5.1 Premium Rate Double Opt In via SMS

	Guideline
2.5.1-1	Affirmative double opt-in confirmation via handset is required.
2.5.1-2	Examples of affirmative double opt-in responses include these: YES, Y, GO, OKAY, OK, K, O.K., SURE, YEP, YEAH

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2.5.1-3	Content providers must provide the following information to users before applying any premium charges: • Identity of the program sponsor • Contact details for the program sponsor • Short description of program • Pricing and terms for the program • Opt-out information. Opt-out information does not need to be in the initial PIN (or Reply Y) MT message. • In replacement of STOP, HELP must be included in the initial PIN (Or Reply Y) MT message. • Message and Data Rates May Apply Sample Language: Msg&Data Rates May Apply. Call 888-888-8888/Text Help to XXX/www.XXX.com for terms. You will be charged $X.XX. Call 888-888-8888/Text HELP to XXX.www.XXX.com for terms. Msg&Data Rates May Apply. Call 888-888-8888/Text HELP to XXX/www.XXX.com for terms. [Disclose additional charges in message chain] "You must be 18 or older or have a parent or guardian's permission before downloading." "Call 888-888-8888 or text STOP to cancel."
2.5.1-4	Confirmation message after affirmative acceptance of opt-in must disclose the premium charge has been billed or deducted from the users account.

2.5.2 Premium Rate Double Opt In from Internet-MIN and PIN Entry Page

	Guideline
2.5.2-1	Many consumers prefer to provision and interact with SMS programs using the Internet. Initial opt in may be performed at the content provider hosted web MIN entry page. MIN and PIN entry pages must only be controlled by content providers.
2.5.2-2	If the second opt-in is from the Internet, the content provider must positively confirm that the authorized subscriber is acknowledging the opt-in. This can be done by the user inputting (on website)a PIN code sent via an MT message to the mobile phone number that the consumer has provided on the website ("PIN Confirmation Msg"), or the consumer responding via an MO message, such as replying Y or YES, to an MT message that is sent to the mobile phone number the consumer provided.
2.5.2-3	This PIN message must also include program pricing and terms.
2.5.2-4	For premium campaigns the PIN code, or "reply Yes" type text, must be after the program pricing information.
2.5.2-5	In addition, the content provider should use this channel to provide more detailed information about the program. Regardless of the web opt-in details, the goal is that the entire terms of the offer must be clear to the subscriber through the process.

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2.5.2-6	The following guidelines apply to MIN and PIN entry pages: • Display pricing within 125 pixels directly above or below cell-submit field • Display pricing font size to at least size 12 point font • Pricing color scheme must have a minimum color contrast of 125 • Display full pricing clearly as numerals with dollar sign ($) • The total price must be shown as it will appear on the customer's bill. • The price and term must not contain any other text besides the price and term. The page must include: • Disclosure of actual product/service, quantity, whether it is a subscription service and renewal term must be present as part of the main offer; • Display only carrier logos distributed from or approved by carriers; • The word 'free' must not be used • Privacy policy or clearly labeled link to privacy policy. • Indication that games/applications are not available for specific carriers, as applicable • Do not promote binary programs for non-binary carriers
2.5.2-7	The following guidelines apply to the Terms and Conditions on the MIN and PIN entry pages: • Wording should be identical if both pages are used in the purchase flow • Website MIN and PIN entry pages must display at least the first three lines above the fold of the screen as viewed on a 1024x768 resolution monitor. If the full terms of service are not displayed, then there must be a link to them as part of the summary T&Cs. (Some carriers/audit agencies measure 1024 x 632 pixels within the browser to equal resolution of 1024x768" using the Firefox web browser.) • Information must apply to the specific product(s) being sold • Carrier compatibility should be stated • If not all content is compatible with all handsets, that should be stated • Give notice that a would-be participant is the account holder or has the account holder's permission to participate • T&Cs cannot be in scrolling box • State price, billing frequency and "message and data rates may apply" • If the service is a subscription, indicate the billing term, that renewal occurs automatically and that charges continue until cancelled by the customer • Disclose that the premium charge will be added to the subscriber's wireless phone bill or deducted from their prepaid balance account • Give help instructions and toll free customer care number where available

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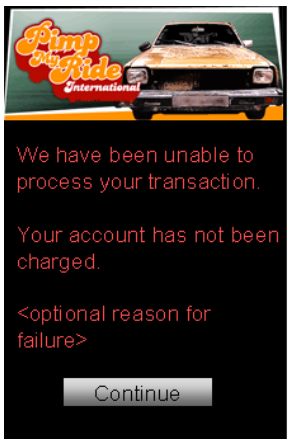
2.5.3 Premium Rate Double Opt In via IVR

	Guideline
2.5.3-1	Some consumers prefer to initiate new SMS services from an IVR (Interactive Voice Response) platform. The IVR phone number is used in the provider's call to action. After the details of the program have been relayed to the subscriber via the IVR system, the subscriber is prompted to press a key to enter into the IVR program. This key press is recorded by the system and constitutes the caller's second opt-in to the program. Regardless of the opt-in process, the goal is that the entire terms of the offer must be clear to the subscriber through the process. An example of Opt-in via IVR can be found at CCS-EG-04.
2.5.3-2	Some mobile related services are initiated from an IVR platform. An IVR phone number (800 number, local number, premium rate number, pound (#) code or other) is used in the provider's call to action.
2.5.3-3	When the consumer dials into the IVR system and responds to acceptance prompt (initial opt-in), the IVR should outline the service and offer details
2.5.3-4	The IVR system should then subsequently ask the consumer to confirm their purchase with a key press (secondary opt-in).
2.5.3-5	The user's input must be captured to record his/her consent of the purchase (double opt-in).
2.5.3-6	The IVR should then send a confirmation MT message to the user's handset.
2.5.3-7	In cases where the number the user is calling from differs from the number the service will be billed to (for example in the case of land-line callers); a PIN verification message has to be sent out by the IVR to the mobile number the service will be billed on.
2.5.3-8	The consumer must input the PIN into the IVR system prior to the provider initiating and billing the service
2.5.3-9	The above confirmation step should be recorded and stored by the IVR system. See 2.9.2 for storage length of Opt-ins.
2.5.3-10	In the case where content is purchased, users should be informed of the next steps to download and install their new content on their phone.
2.5.3-11	Consumers should be re-informed of how to call back and get help in case of problems downloading or installing their content.

2.5.4 Premium Rate Double Opt In via Mobile Web/ WAP

	Guideline
2.5.4-1	Best practice includes ensuring that the consumer is advised of any failures in the WAP payment flow. A payment failure page should be presented in the event that the billing request is unsuccessful. 
2.5.4-2	The page should contain the text set out in the items below: • Clicking "Continue" from this failure page should take the user back to the content provider site.

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2.5.4-3	• There is an optional field to provide more detail on the reasons for failure (out of funds, unsuccessful connection, etc.) where the billing platform provides this information in real-time.
2.5.4-4	• Carrier ability to waive double opt-in—In certain instances, carriers may waive the double opt-in on a program-by-program basis.
2.5.4-5	Because opt-in and opt-out messages are administrative in nature, they should not result in any premium charges for the subscriber.

2.6 Program Termination and Opt Out

	Guideline
2.6-1	Directions on how to unsubscribe from the program should be included in program messaging on a regular basis.
2.6-2	Content providers must offer subscribers the opportunity to cancel the service at any time. Charges for services that are billed daily may only be applied for services received up to the date of cancellation.
2.6-3	Content providers must offer subscribers the opportunity to cancel the service at any time. The following rules govern program opt-out:
2.6-4	A subscriber can stop participating and receiving messages from any program by sending STOP to the short code used for that program. • END, CANCEL, UNSUBSCRIBE or QUIT must also be supported opt-out key words for all programs; however, content providers should feature the word STOP in their advertising and messaging. Note: Programs can support additional opt-out key words. • The STOP keyword must work in the native language of the program. In a non-English program, the English keyword must not return an error message.
2.6-5	If the subscriber is participating in multiple programs on the short code, there are two options for the content provider when a subscriber sends an opt-out request: • The content provider sends a menu of the programs the subscriber is subscribed to and the subscriber has the responsibility to reply with the specific keyword to the specific program they would like to be opted out of. To ensure subscribers also have a way to opt-out of all programs within this menu, STOP ALL must be added to the menu choices. The stop menu message does NOT need to contain i) "Msg&Data Rates May Apply" ii) Pricing iii) Sponsor contact information. • Or if the subscriber sent STOP ALL to the short code, they are opted-out of all programs they were enrolled in on that short code.
2.6-6	This STOP command functionality requirement applies to all programs, including one-time use programs where the subscriber will not receive additional messages. This is to avoid subscriber confusion around the use of the STOP command.
2.6-7	Short codes running MMS programs should handle the STOP keyword correctly, regardless whether the subscriber sends the keyword via MMS or SMS.
2.6-8	Short code programs must support mixed case opt-out commands and ignore subsequent non-keyword text.
2.6-9	An MT message confirming the opt-out should be sent to the subscriber. This must not be a premium message. This message should reference the specific program the subscriber has opted-out from. No further messages should be sent to the subscriber from this program, including marketing messages for any related or unrelated programs.
2.6-10	When STOP, or any of the opt-out keywords above, is sent to a program, the program must respond with an MT message, whether or not the subscriber is subscribed to the program.

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2.6-11	Content providers should periodically scan their MO logs for subscribers that are clearly trying to unsubscribe to a service, but are not following the programmed rules and then take the action to end their subscription based on those MO logs.
2.6-12	The content provider must record and store all opt-out transactions.
2.6-13	If a subscriber is inactive in any program for six months, the opt-in should expire. At that time, it is permissible to send the subscriber one final MT message notifying them that his/her username and other subscription information will be deleted from the program. No messages to the subscriber after the expiration are permitted. This provision does not apply to programs where the subscriber may have stored value (i.e., remaining credits) with the content provider.
2.6-14	Subscribers should be able to terminate their participation in a subscription program as specified in the opt-out section. Below are additional requirements for terminations of subscription programs:
2.6-15	• When a subscriber opts-out of a program, no further premium charges should be submitted or applied to the subscribers account by that program for that subscriber.
2.6-16	• There should be no minimum subscription periods for any program. For clarity, this does not mean that pro-ration is required.
2.6-17	• For subscription services that do not originate from an MO text message, but originate for example from a direct URL entry or search link to a WAP site, the payment advice page must clearly and conspicuously present the following program details:
2.6-18	• Identification of the program as a subscription and the billing interval.
2.6-19	• Contact details for the program sponsor—Either a toll-free number or a Web site address for opt-out details.
2.6-20	This includes use of the STOP command or its variants, as set out above, and a mobile or PC website where the user can list live subscriptions and cancel any or all of these.
2.6-21	**For chat programs**, the subscriber should be opted-out after 90 days of inactivity. An informational message informing the subscriber of the opt-out may be sent.
2.6-22	Regardless of the subscriber's status, he/she should be able to opt-out of the program at any time.

2.7 Customer Care and HELP Guidelines

	Guideline
2.7-1	It is important for subscribers to understand and be in control of their participation in short code programs; therefore, program information should be transparent. Regardless of manner of entry for a subscriber, help messaging commands, phone numbers, URL's, and email addresses should result in the subscriber receiving help with their issue. Dead ends that do not the result in the ability for subscribers to resolve their issues are not acceptable.
2.7-2	Subscribers must be able to reach customer service through the **IVR** for assistance with the IVR mobile program.
2.7-3	A subscriber can receive help information by sending the keyword HELP to any program. HELP or HLP keywords should work for all subscriber requests. HLP is optional for HELP, but not required. • The HELP keyword sent by the consumer cannot be case sensitive and should ignore subsequent non-keyword text • The HELP keyword must work in the native language of the program. In a non-English program, the English keyword must not return an error message.

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2.7-4	For short codes running MMS programs, a help response should be returned whether the subscriber sends in HELP to the short code via MMS or SMS.
2.7-5	HELP messages should not result in premium charges to the subscriber's bill.
2.7-6	Responses to HELP requests should be available to anyone who requests help information from the short code via SMS.
2.7-7	To help subscribers understand their participation, each program should respond with the program details listed below when the subscriber sends the keyword HELP to the program short code.
2.7-8	• Identity of program sponsor—This is defined as the program name, company name, or brand associated with the campaign.
2.7-9	• Customer support info — Either a toll-free number, Web address, or e-mail address. Note that Sprint requires a toll free number for all programs and T-Mobile requires a URL for all programs.
2.7-10	• Service description of program — For example, Fun Stuff Premium Chat.
2.7-11	• Service price—For example, $0.99 per mobile originated message; $3.99 per month.
2.7-12	• Opt-out information
2.7-13	• Frequency
2.7-14	• Must include "Msg&Data Rates May Apply"
2.7-15	• Privacy statement, if applicable.
2.7-16	Help messages do not need to contain renewal date information. (Sprint carrier rules apply. Requires the renewal date as well as any credits remaining.)
2.7-17	If the short code has multiple programs (keywords) on the same short code, the application should respond in one of two ways: 1) If the subscriber has opted in to only one program, the application should supply the information for the program the subscriber is opted-in to. 2) If the subscriber has opted-in to multiple programs, the application should present a multiple-choice question asking the subscriber what program they would like help on. The first help menu does NOT need to include: · "Msg&Data Rates May Apply" · STOP, Or Sponsor Contact Information The menu should contain a question asking what the subscriber seeks help with and a list of options for the user to get help on. Once the user has identified the program they want help with, the appropriate help information must be in the subsequent MT.
2.7-18	Where there is no short code initiating access to the service, help must be provided as a link from WAP payment presentation pages. This page containing help should, at a minimum, identify services that are currently opted into, opt-out information, pricing and payment terms. It is recommended that a PC-accessible web site be provided into which a user entering their cell phone number can retrieve detailed information on all live services provided by that program sponsor.

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2.8 Customer Record Maintenance

	Guideline
2.8-1	To the extent that carriers supply deactivation and recycled number information, content providers and aggregators are required to have appropriate and effective systems and processes for managing deactivation and recycled number information. These systems and processes should be designed to ensure that mobile content programs subscribed to by previous holders of a specific phone number do not continue to be delivered or billed to a subsequent holder of that number when it is reassigned. Content providers and aggregators should process deactivation information within three business days of receipt.
2.8-2	Independent of method of entry (SMS, MMS, Web, WAP, IVR) opt-in and opt-out records - including single, double and triple opt-in records – should be retained from the time the subscriber opts-in until a minimum of six months after the subscriber has opted-out of the program (minimum opt-in archiving period is one calendar year). These records should be made available to the aggregator or carrier upon request.
2.8-3	The content provider/aggregator is responsible for tracking program opt-in information by subscriber.

2.9 Sweepstakes & Contests

Sweepstakes and contests, including those conducted on the mobile platform, are among the most regulated of marketing tactics.

Mobile Sweepstakes and Contests definitions:

Sweepstakes *- A sweepstakes is a legal game that includes a prize, and a game of chance. No consideration is allowed. (Sprint's definition of sweepstakes includes anything with a prize component regardless of the method of prize delivery.)*

Lottery *- A lottery is a game that includes a prize, a game of chance, and consideration. Federal legislation and State laws govern (and disallow) all lotteries for promotional purposes.*

Contest *- A contest is a promotional mechanism that includes a prize, and a game of skill. Consideration is allowed, but there cannot be any element of chance.*

Consideration *- Although the definition of consideration varies from state to state, generally, consideration means that a willing participant is required to purchase something or pay for access to be eligible to enter a game.*

	Guideline
2.9-1	Consideration may be monetary or non-monetary (an example of non-monetary consideration is a sweepstakes where the participant is required to provide detailed consumer information to be eligible).
2.9-2	All sweepstakes must offer a free Alternative Method Of Entry (AMOE). Allowing participants to enter via mail, internet, fax or Interactive Voice Recognition (IVR) via a toll free number are all forms of AMOE, but are not the only forms of free AMOE.
2.9-3	Anyone running a sweepstakes should seek legal guidance when drawing up rules. This is especially important if premium SMS is being considered as part of the sweepstakes.

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2.10 Terms & Conditions

	Guideline
2.10-1	Terms and Conditions must contain the following: • Pricing and billing frequency
2.10-2	• Product description and quantity
2.10-3	• Program identification including billing shortcode
2.10-4	• Opt-out instructions (must be displayed in bold typeface)
2.10-5	• Message and Data Rates may apply
2.10-6	• Links to privacy policy and comprehensive terms and conditions.
2.10-7	• Customer Care Contact info (#800, email address, or website)
2.10-8	• Billing method. Information disclosing that the premium charge will be added to the subscriber's wireless phone bill or deducted from their prepaid account
2.10-9	• Account holder authorization
2.10-10	• Customer cancellation (ie. notice that charges will recur until cancelled; subscriptions/recurring programs only)
2.10-11	• If the service is a subscription
2.10-12	The above terms apply to WAP sites IF the subscriber is charged for accessing the WAP site home (or landing) page. Otherwise, all advice of charges must be clearly and conspicuously presented within the site, as shown in the example **CCS-EG-06.**
2.10-13	Comprehensive terms and conditions must be hosted on a static Website to which a user may return. Comprehensive terms and conditions must contain all disclosures present in the abbreviated terms and conditions.

2.11 Affiliate Marketing

Affiliate Marketing *is a process whereby a content provider provides financial consideration to one or more persons or entities in exchange for their agreement to offer content providers' products and/or services to consumers.*

	Guideline
2.11-1	To ensure that advertising of mobile products and services offered via Affiliate Marketing is clear and accurate, content providers engaging in Affiliate Marketing agree that: • Marketing via the email channel shall comply with the CAN-SPAM Act of 2003 (Controlling the Assault of Non-Solicited Pornography & Marketing Act) and any and all implementing regulations promulgated by the Federal Trade Commission and the Federal Communications Commission, and;
2.11-2	• Mobile Identification Number (MIN) entry, and Personal Identification (PIN) entry pages (including but not limited to pages that provide a mechanism for users to make a purchase of content providers' products and services) must be controlled and monitored by the applicable content provider or Application Service Provider for compliance to applicable state laws and MMA Guidelines.

2.11.1 Affiliate Marketing Web-based Carrier Select Page

	Guideline
2.11.1-1	Content providers should terminate their relationship with any party engaged in Affiliate Marketing on their behalf that is found to be non-compliant. Web pages used for affiliate marketing are commonly known as Jump Pages. Jump pages, which are third party hosted pages that redirect a consumer to one or more content provider's

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	websites, are known as Carrier-Select Jump Pages. The following describes what is required and not allowed on Carrier-Select Jump Pages: **Required** • If any alternative wireless content is being advertised it must be disclosed in a font no smaller than 1/2 the font size of the primary offer description and no further than 20 pixels from the primary offer description with a minimum of 25 point font size • Carrier logos distributed from or approved by carriers **Not allowed** • Purchase flow • Request/take MIN or PIN information • Inappropriate or unapproved content per individual carrier guidelines • Inappropriate use of the word 'free' (CCS-30) • Use of carrier logo or name if advertising any service when that service is not supported by that carrier

2.12 Premium WAP Sites

	Guideline
2.12-1	Access to content presented in the form of browse-able WAP sites may be initiated by SMS short code, by WAP push from a PC website, by direct entry of a URL, by clicking a search link, etc. While opt-in may not originate through an SMS short code, subscribers are still billed "on-net" through PSMS or direct carrier billing connections, placing such sites under the governance of these Consumer Best Practice Guidelines.
2.12-2	The same opt-in rules apply for WAP sites as for SMS programs. Double opt-in is required IF there is any charge associated with accessing the first page of a WAP site presented when the subscriber selects a service message (embedded link or WAP push message), or browses to that page by any other means.
2.12-3	There is no requirement for opt-in text messages IF the first page of a WAP site presented to the user does not incur a charge, and any subsequent charges are clearly set out, requiring an explicit user action as described below.
2.12-4	Before any billing events can be generated, the advice of charge must be presented clearly to the customer, in substantially the same format as the payment flow shown below.
2.12-5	There must be an explicit "Buy" button visible to the user on the first screen of the payment details page. Only when the user clicks this button should a billing event be generated. "Buy" may be replaced with "Subscribe" or "Purchase" terminology.
2.12-6	There must be an explicit "Cancel" button available to the user on the first screen of the payment details page immediately below the Buy button and visible without requiring the user to scroll down the screen.
2.12-7	There must be an explicit "Terms and conditions" link available to the user, listed directly after the "Cancel" button. The Terms and conditions page shown to the user should contain at a minimum the following information:
2.12-8	That the payment will be made to the subscriber's wireless phone bill.
2.12-9	• That the user will be advised of all charges before being billed.
2.12-10	• The description that will appear on the subscriber's phone bill or deducted from their pre-paid balance.
2.12-11	• There should be a link providing customer care contact information and advising that other ancillary charges, such as carrier data charges, that may be incurred.

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2.13 Subscription Programs

*A **subscription program** is any program the subscriber opts-in to where the result is that the subscriber passively incurs premium charges over time for content delivery. There are two kinds of subscription programs:*
1) A program for a set period of time, such as one month.
2) A program for a set number of uses, after which the subscriber may be charged for another "bucket" of uses.

	Guideline
2.13-1	In addition to the information required in the double opt-in mechanisms in sections 2.6 & 2.6.1 Premium Rate Double Opt In via SMS, the opt-in flow for a subscription program must also include the following: • Identification of the program as a subscription and the billing interval.
2.13-2	• The word "subscription" or equivalent must be used in the advertising and T&Cs.
2.13-3	• Contact details for the program sponsor—Either a toll free number or a Web site address for opt-out details.
2.13-4	Subscription periods should not be longer than one month.
2.13-5	Regardless of the subscription period (daily, weekly, monthly, for example), the subscriber should be notified of the subscription pricing in conjunction with the subscription period.
2.13-6	Before the program is renewed, or at a minimum of once per month, a renewal message must be sent to the participating subscriber's handset containing these details:
2.13-7	• The name of program
2.13-8	• The fact that the program is a subscription and is being renewed
2.13-9	• Billing period and advice of charge for the program
2.13-10	• Opt-out details
2.13-11	• Must include "Msg&Data Rates May Apply" and customer support information.
2.13-12	This information may be supplied in other program-related messaging to the handset but should coincide with the subscription anniversary.
2.13-13	Each subscription service must be renewed independently of when the subscription was originally ordered.

2.13.1 Subscription Double Opt In via Mobile Web/ WAP

	Guideline
2.13.1-1	For subscriptions opted-in to through the WAP flow, the advice of charge page shown below must be presented to the subscriber by the content provider. This page describes the purchase terms of the subscription, including the billing frequency, and the purchase link name is changed from "Buy" to "Subscribe"
2.13.1-2	The payment advice page should include the following content: • Click <Subscribe> to confirm your purchase of <content description> for <price> per <billing period>.
2.13.1-3	• A link or button that activates the subscription. The name of this link should clearly convey to the subscriber that clicking on the link will activate the subscription. e.g. "Subscribe", "Buy Now", "Charge my phone bill"
2.13.1-4	• A link or button directly below the activation link that says "Cancel".

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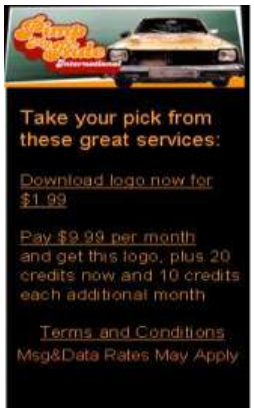
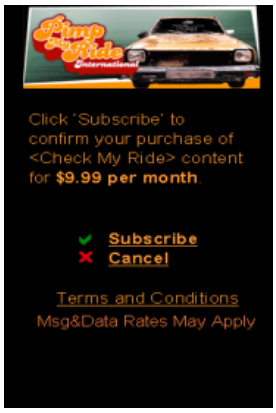
2.13.1-5	• A link saying "Terms & Conditions". This link must lead to a page listing detailed terms and conditions of the service, including at a minimum the name and contact details of the content provider.
2.13.1-6	• A link saying "Msg&Data Rates May Apply". This link must lead to a page describing the standard rate data and messaging charges that may apply, depending on a subscriber's plan
2.13.1-7	When the subscriber clicks the "Subscribe" or subscription activation link, the page to which they are re-directed containing the content for download should display the following confirmation text: • Thank you for your payment of <price>. Your subscription has been activated
2.13.1-8	This confirmation page must also state how to use the HELP and STOP text commands to the relevant short code.
2.13.1-9	Once a subscriber has successfully opted into the program via a Mobile Web browser, an MT message should be sent notifying the subscriber of the purchase, serving as the notice of charge for the transaction. This message should be sent to the subscriber within twelve hours of opting in and should include the following information: program name, price of subscription, billing period, HELP to receive help, and STOP to opt-out.
2.13.1-10	Example of WAP Subscription  First Opt-in  Second Opt-In Confirmation Page

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Premium Rate Examples

EXAMPLE: HELP Messages (CCS-EG-01)

Cross Carrier Examples: Legend

Web, TV, In-Store, Promotional Poster | Text Message | Mobile Web/ WAP

Help (Single Service)

Step 1: User sends HELP Mobile Originating (MO) Msg

Step 2: Help MT response:

Program sponsor →	*AcmeMobileRingtonesClub:*
Service Description & Frequency→	*Subscribed for 5 Ringtones for $5.99/mo.*
Customer Support Info →	*800-000-0000. www.HELPURL.com.*
Additional Carrier Costs →	*Msg&Data Rates May Apply*
Opt Out Info →	*Reply STOP to cancel,*
Sprint family requires: Renewal date/credits remaining →	*Renews:10/10*

Help (Multiple Services)

Step 1: User sends HELP Mobile Originating (MO) Msg

Step 2: Help menu MT response to a HELP MO from a user

Program sponsor →	*AcmeMobileRingtonesClub:*
Option A →	*Send HELP TONE1 for Poly club or*
Option B →	*HELP TONE2 for Truetone club*
	STOP to cancel

Step 3: User responds HELP TONE1.

Program sponsor →	*AcmeMobileRingtonesClub:*
Service Desc & Freq→	*Subscribed for 5 Polytones for $5.99/mo.*
Customer Support Info →	*800-000-0000. www.HELPURL.com.*
Additional Carrier Costs →	*Msg&Data Rates May Apply*
Opt Out Info →	*Reply STOP to cancel,*
Sprint family requires: Renewal date/credits remaining →	*Renews:10/10*

Step 4: User responds HELP TONE2.

Program sponsor →	*AcmeMobileRingtonesClub:*
Service Desc & Freq→	*Subscribed for 5 Truetones for $5.99/mo.*
Customer Support Info →	*800-000-0000. www.HELPURL.com.*
Additional Carrier Costs →	*Msg&Data Rates May Apply*
Opt Out Info →	*Reply STOP to cancel,*
Sprint family requires: Renewal date/credits remaining →	*Renews:10/10*

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EXAMPLE: STOP Messages (CCS-EG-02)

Stop (Single Service)

User receives the following Mobile Terminating (MT) Message:

Program sponsor →	*AcmeMobileRingtonesClub:*
Discontinuation of Service →	*Your Ringtone subscription is cancelled.*
Discontinuation of Charges →	*You will get no more messages or charges.*
Additional Carrier Costs→	*Msg&Data Rates May Apply.*
Customer Support Info →	*www.HELPURL.com*

Stop (Multiple Services)

Step 1: User sends STOP Mobile Originating (MO) Msg

Step 2: Help menu MT response to a STOP MO from a user

Program sponsor →	*AAcmeMobileRingtonesClub:*
Option A →	*Send STOP TONE1 for Polytone club or*
Option B →	*STOP TONE2 for Truetone club*

Step 3: User responds STOP TONE1.

Program sponsor →	*AcmeMobileRingtonesClub:*
Discontinuation of Service →	*Your Polytone subscription is cancelled.*
Discontinuation of Charges →	*You will get no more messages or charges.*
Additional Carrier Costs→	*Msg&Data Rates May Apply.*
Customer Support Info →	*www.HELPURL.com*

Step 4: User responds STOP TONE2.

Program sponsor →	*AcmeMobileRingtonesClub:*
Discontinuation of Service →	*Your Truetone subscription is cancelled.*
Discontinuation of Charges →	*You will get no more messages or charges.*
Additional Carrier Costs→	*Msg&Data Rates May Apply.*
Customer Support Info →	*www.HELPURL.com*

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EXAMPLE: PREMIUM Rate IVR (Initial Opt In IVR) (CCS-EG-04)

Call to Action	The following is advertised on web, television, in-store promotional poster, etc.:
Program sponsor →	WOD: Weather on Demand.
Service Description →	Call 888-222-2222 to get current weather for your area sent to your phone. Dial 0 for help.
Price and Frequency →	$5.99/mo for daily info (7 per week)
Customer Support Info →	Text HELP for help.
Opt Out Info →	To stop text STOP.
Additional Carrier Costs →	Msg&Data Rates May Apply.
Step 1: User responds to Call to Action	User calls 888-222-2222 [Mobile subscriber calls and is prompted to select SMS to phone]
Step 2: Mobile Content MT	User receives the following MT Message:
Mobile Content →	WOD: Partly sunny with chance of showers in late afternoon. Highs in the 70 during the day, and 62 at night. Reply Help for Help.

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EXAMPLE: Premium Rated Double Opt In– Alert Subscription (CCS-EG-05)

Call to Action

The following is advertised on web, television, in-store promotional poster, etc.:

Program sponsor →	Farm league baseball!
Service Description →	Txt us your farm town zip code. Txt <Your Zip Code> to 12345.
Service Cost →	We send game day reminder for $3.99/month, charged to your wireless bill.
Frequency of Messaging →	Get 4 msg/month.
Customer Support Info →	Txt HELP for help.
Opt Out Info →	To stop txt STOP.
Additional Carrier Costs →	Msg&Data Rates May Apply.

Step 1: User responds to Call to Action

Text '44521' to 12345.

Step 2:

User receives the following MT Message:

Program sponsor →	Farm League Baseball Alerts!
Service price →	To confirm $3.99 monthly alerts, reply YES.
Frequency of messaging →	Get 4 msgs/month.
How to get help →	Reply HELP for help
Additional carrier costs →	Msg&Data Rates May Apply.

Step 3: Double Opt In

User sends MO message "YES"

Step 4: Initial MT

Service description →	Thanks for subscribing to Farm League
Service price →	Baseball alerts for $3.99/month!
Frequency of messaging →	Get 4 msgs/month.
How to get help →	Reply HELP for help.
How to stop →	Reply STOP to cancel.
Additional carrier costs →	Msg&Data Rates May Apply.

Step 4: MT Alert

User receives the following MT Message:

Alert →	Farm League Baseball Alert! Crosstown Rebels battle the Lakeview Titans on 11/11/08 @ 6pm in Dolores Park. Support your local team. Reply Help for Help.

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EXAMPLE: Premium Rated Opt In for WAP (CCS-EG-06)

Please refer to specific carrier guidelines on Mobile Web and Premium WAP detailed requirements.

Call to Action

The following is advertised on web, television, in-store promotional poster, etc.:

Program sponsor →	CheckMyRide Tones!
Service Description →	Visit wap.checkmyride.com on your phone microbrowser. Visit HELP for help.
Customer Support Info →	Txt HELP for help.
Opt Out Info →	To stop txt STOP.
Additional Carrier Costs →	Msg&Data Rates May Apply.

Step 1: User responds to Call to Action

User visits wap.checkmyride.com

Step 2: WAP Opt In 1

User sees the following WAP/ xHTML page with product offer:

Program sponsor →	Checkmyride.com!
Service Description →	The hottest ringtones sent to your phone every month.
Service price →	Get 5 ringtones for $9.99/month.
Link to terms→	Terms and Conditions
Additional Carrier Costs →	Msg&Data Rates May Apply.

Step 3: WAP Opt In 2

Mobile subscriber sees the following WAP/xHTML page after selecting subscription.

Program sponsor →	Checkmyride.com!
Service Description →	Click "Subscribe" to confirm your purchase of "Check my Ride" tones for $9.99 per month.
Service price →	**Subscribe** **Cancel**
Link to terms→	Terms and Conditions
Additional Carrier Costs →	Msg&Data Rates May Apply.

Step 4: WAP Confirmation

Mobile subscriber sees the following WAP/xHTML page after being billed.

Service Description & cost →	Thank you for your payment of $9.99 per month. Your subscription has been activated.
Frequency of messaging →	Get 5 ringtones per month.
How to get help→	Text HELP for help to 12345.
How to Stop →	Text STOP to cancel to 12345

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Step 5: Confirmation MT

User receives the following MT Message:

Service Description & cost →
How to get help→
How to Stop →

> Thank you for your payment of $9.99 per month for Check my Ride tones.
> Reply HELP for help.
> Reply STOP to cancel

EXAMPLE: Billing Renewal Message (CCS-EG-10)

	Sample Billing Renewal Message	
Type	**Sample Text**	**Charge**
MT	Your XYZ Alerts Subscription Renewed, 5 msg/month for $5.99/mo.800-000-0000 Msg&Data Rates May Apply.www.HELPURL.com.Reply HELP for help, STOP to cancel	Std

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Section 3: Free To End User (FTEU)

Free to End User Cross Carrier Guidelines

3.0 General Guidelines

	Guideline
3.0–1	At a minimum, programs should be run in a manner that is congruous with the letter and spirit of the MMA Global Code of Conduct for Mobile Marketing. The Code of Conduct is located at: http://www.mmaglobal.com/codeofconduct.pdf
3.0-2	At all times, programs must be in accordance with applicable federal and state laws, rules and regulations.
3.0-3	Wireless subscribers have a right to privacy.
3.0-4	An individual program may be set up as FTEU on carriers which support the functionality and standard rate (SR) on carriers who do not support FTEU, provided that the application does not inherently have to be delivered as FTEU (for example, for legal reasons), and further provided that Content Providers ensure that all advertising, marketing and other consumer materials regarding the program clearly indicate on which carriers the program is offered as a standard rate program. The guidelines for FTEU programs and SR programs should apply on each carrier as appropriate.
3.0-5	Charging Disclosure: FTEU Mobile Terminated (MT) messages sent to subscribers by the program should be disclosed as such. The text message must start with "FREE" and the text message must include wording so that it's clear to a consumer that it's a free message, but the text message no longer must start with the words "Free Msg". These examples are acceptable: "Free Mammoth Ski Alert", "Free Lender's Bank Msg", "Free Msg: WOD alerts".
3.0-6	FTEU programs are approved based on the following information submitted by the content provider through the carrier:
3.0-7	• The information submitted to the carrier for program approval should include the estimated frequency with which end users will receive FTEU messages.
3.0-8	• A formal restriction should not be placed on the number of messages, which may be sent as part of an individual FTEU program. However, carrier approval may be given on a case-by-case basis for programs where the estimated number and frequency of FTEU messages is determined by the carrier to be appropriate for the application and approved by carrier. Note that many potential FTEU applications will involve event-triggered alert messages, the frequency of which cannot precisely be predetermined.
3.0-9	Not all carriers support FTEU messaging

3.1 Guidelines for Advertising Messaging Programs

	Guideline
3.1-1	When promoting programs, content providers should ensure that their advertising in all forms is clear and conspicuous regarding all terms and conditions associated with offers and adheres to all state and federal regulations.
3.1-2	Program advertising or its placement must not be deceptive about the functionality, features, or content of the underlying program.
3.1-3	Print and Web Advertising must include: • Language outlining that the service is free • A resource (such as a website or phone number) where subscribers can reference all terms and conditions. • The frequency of the messaging

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	• Instructions for obtaining help (HELP) • If the program is recurring, instructions on cancelling or opting-out of the service must be included. If the program being advertised is non-recurring, then STOP messaging is not required.
3.1-4	Instructions on using the HELP keyword (i.e. Text HELP for help) may be provided in lieu of full customer service contact information in advertising materials.
3.1-5	If space is not available for the full terms and conditions, the location where the full terms and conditions may be accessed without charge to the consumer must be disclosed (e.g. via a website address and/or toll free phone number).

3.2 Opt In

	Guideline
3.2-1	Content providers must obtain opt-in approval from subscribers before sending them any SMS or MMS messages or other content from a short code.
3.2-2	FTEU programs require single opt-in
3.2-3	As with standard rate programs, FTEU programs should be subject to single opt-in mechanisms. The mechanism should be sufficient to establish the subscriber's willingness to participate in the program and possession of the handset. The opt-in applies to the specific program and should not be used as a blanket approval to promote other programs, products or services.
3.2-4	Frequency of messages: For programs whereby the user defines the rate of message occurrence, a confirmation MT or Help MT does not need to include a defined frequency. All other frequency requirements will follow the standard rate frequency guidelines.

3.3 Opt Out

	Guideline
3.3-1	Subscribers should be able to stop participation in a FTEU program when desired, except for messages related to their underlying mobile service.
3.3-2	Content providers must offer subscribers the opportunity to cancel the service at any time. The following rules govern program opt-out:
3.3-3	A subscriber must be able to stop participating and receiving messages from any program by sending STOP to the short code used for that program. • END, CANCEL, UNSUBSCRIBE or QUIT should also be opt-out key words for all programs; however, content providers should feature the word STOP in their advertising and messaging. • A content provider must process a stop message from a subscriber regardless of the keyword STOP's case sensitivity. The STOP keyword must work in the native language of the program. In a non-English program, the English keyword must not return an error message. • Short code programs must ignore subsequent non-keyword text included in STOP MOs. • Short codes running MMS programs should handle the STOP keyword correctly, regardless whether the subscriber sends the keyword via MMS or SMS. • When sent, these words cancel the subscriber's previous opt-in for messaging.

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3.3-4	If the subscriber is participating in multiple programs on the short code, there are two options for the content provider when a subscriber sends an opt-out request: 1) The content provider sends a menu of the programs the subscriber is subscribed to and the subscriber has the responsibility to reply with the specific keyword to the specific program they would like to be opted out of. To ensure subscribers also have a way to opt-out of all programs within this menu, STOP ALL must be added to the menu choices. The stop menu message does NOT need to contain i) "Free Msg" ii) Sponsor contact information. 2) Or if the subscriber sent STOP ALL to the short code, they are opted-out of all programs they were enrolled in on that short code.
3.3-5	When STOP, or any of the opt-out keywords above, is sent to a program, the program must respond with an MT message, whether or not the subscriber is subscribed to the program or not.
3.3-6	When the user is a subscribed to a recurring program, an MT message confirming the opt-out must be sent to the subscriber. This must be a free message. This message should reference the specific program the subscriber has opted-out from. No further messages should be sent to the subscriber from this program, including marketing messages for any related or unrelated programs.
3.3-7	When the user is not currently subscribed to a recurring program, or the program is a one-time program where the subscriber will not receive additional messages, then an MT message may be sent that only confirms that the user is not subscribed to any programs on this short code and indicates that no further messages will be sent.
3.3-8	This STOP command functionality requirement applies to all programs, including one-time use programs where the subscriber will not receive additional messages. This is to avoid subscriber confusion around the use of the STOP command.
3.3-9	The STOP command should never result in an error being sent back to the subscriber.
3.3-10	The content provider must record and store all opt-out transactions.

3.4 Terms & Conditions

	Guideline
3.4-1	Terms and Conditions at a minimum must contain the following:
3.4-2	• STOP instructions in BOLD lettering
3.4-3	• HELP instructions in BOLD lettering
3.4-4	• Program sponsor information, defined as the program name, company name, or brand associated with the campaign
3.4-5	• For free to end user programs: Disclose that standard carrier messaging charges do not apply to messages received as part of the service (where relevant, list on a carrier-by-carrier basis whether this applies).
3.4-6	• Customer Service Contact Information: either a toll-free number, a web submission form or an email address.
3.4-7	• Guidance on the frequency with which the subscriber may expect to receive messages for the duration of the program. Note that for many applications, this cannot be precisely predetermined by the content provider. In this case, the guidance should relate to the expected message frequency under normal circumstances.
3.4-8	All material terms and conditions of the program should be clearly communicated.
3.4-9	Carrier compatibility - clearly and conspicuously disclose that content is not available on all carriers, as applicable. Include list of supported carrier names whilst excluding all other carrier names.

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3.4-10	If the content provider offers multiple services, separate T&C's per service should be provided instead of generic T&C's that cover all offered services.
3.4-11	If a checkbox is used to indicate a consumer's acceptance of the terms and conditions, it is not permissible for the checkbox to be pre-checked.

3.5 HELP Guidelines

	Guideline
3.5-1	Help messaging commands, phone numbers, URL's, and email addresses should result in the subscriber receiving help with his issue. Dead ends that do not provide a manner in which the subscriber may resolve his issue is not acceptable.
3.5-2	A subscriber can receive help information by sending the word HELP to any program. The HELP keyword should work on all short code programs. HLP is optional for HELP, but not required. • A content provider must process a help message from a subscriber regardless of the keyword's case sensitivity. • For short codes running MMS programs, a help response should be returned whether the subscriber sends in HELP to the short code via MMS or SMS • The HELP keyword must work in the native language of the program. In a non-English program, the English keyword must not return an error message.
3.5-3	To help subscribers understand their participation, each program should respond with the program details listed below when the subscriber sends the keyword HELP to the program short code.
3.5-4	• Identity of program sponsor—This is defined as the program name, company name, or brand associated with the campaign.
3.5-5	• Customer support info — Either a toll-free number or Web address, or e-mail address
3.5-6	• Service description of program — For example, ABC Bank Alerts.
3.5-7	• Opt-out information
3.5-8	If the short code has multiple programs (keywords) on the same short code, the application should respond in one of two ways: 1) If the subscriber has opted in to only one program, the application should supply the information for the program the subscriber is opted-in to. 2) If the subscriber has opted-in to multiple programs, the application should present a multiple-choice question asking the subscriber what program they would like help on. The first help menu does NOT need to include: "Free msg", STOP, Or Sponsor Contact Information The menu should contain a question asking what the subscriber seeks help with and a list of options for the user to get help on. Once the user has identified the program they want help with, the appropriate help information must be in the subsequent MT.
3.5-9	When HELP is sent to a program, the program must respond with an MT message, whether or not the subscriber is subscribed to the program, and whether the program is a subscription program or not. HELP must always result in a response. Help responses can vary dependent on whether you're signed up for the program or not.

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FTEU Examples

Cross Carrier Examples: Legend

Web, TV, In-Store, Promotional Poster | Text Message | Mobile Web/ WAP

EXAMPLE: FTEU Single Opt In

Call to Action — The following is advertised on web, television, in-store promotional poster, etc.:

Program sponsor →	Lenders Bank daily bank balance alerts.
Service Description/Cost →	Txt 'balance' to 43210 to get daily bank balance.
Customer Support Info →	Txt HELP for help.
Opt Out Info →	To stop txt STOP.
Frequency of messaging →	Get 1 msg/day.

Step 1: User responds to call of action and sends MO "balance".

Step 2: Confirmation MT — User receives the following MT Message:

Free message declaration & Service description →	Free Lenders Bank balance alerts
Frequency of messaging →	Get 1 msg/day.
How to get help →	Reply HELP for help.
How to stop →	Reply STOP to cancel.

Step 3: MT Alert — User receives the following MT Message:

Free message declaration → Alert →	Free Lenders Bank alert - The balance for account #009221 is $12,998.23.

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