

Compliance Monitoring and Enforcement on the Sprint Network

As an integral part of initial program approval, before launch of a shortcode or direct carrier billing program¹ on its network, Sprint requires the aggregator to submit to support.ctia@psmsindustrymonitor.com a dedicated email address operated by the content provider to receive communications from the Sprint Compliance Team regarding, for example, login credentials. The content provider's email address must be live 24/7, and any changes to that email address must be provided to support.ctia@psmsindustrymonitor.com at least 30 days before taking effect. This address must originate from a domain name registered to the content provider; free email services such as Gmail or Yahoo are unacceptable. The addresses support.ctia@psmsindustrymonitor.com and compliance@psmsindustrymonitor.com must be white listed.

Compliance Monitoring Process

Every week, the Sprint Compliance Team evaluates programs operating on the Sprint network against the:

- Sprint Advertising Audit Standards,
- Sprint Premium Message Flow Audit Standards,
- Sprint Standard Rate Message Flow Audit Standards,
- Sprint Direct Carrier Billing Advertising Audit Standards, and
- Sprint Direct Carrier Billing Message Flow Audit Standards.

Known collectively as the Sprint audit standards, these lists appear in appendices A through C, E, and F. Appendix D contains sample compliant PSMS and SMS message flows, Pay on My Phone Bill screens and message flows, and approved abbreviations for use in SMS messages, and Appendix G contains a sample compliant direct carrier billing message flow. The Sprint audit standards are used to evaluate compliance across all Sprint brands, including prepaid brands operating on the Sprint network (e.g., Virgin Mobile, Boost).

The violations and actions required on the Sprint Advertising Audit Standards apply to landing pages, defined as Webpages having a text-in command or cell-submit field. All required disclosures, as captured in these lists in the appendices, must appear on these pages along with the primary call-to-action. Sprint also requires jump pages with a PSMS call-to-action or quiz environment resulting in a PSMS offer to include all of the required disclosures on every page served to the user. Moreover, the disclosures must appear in print, TV, and radio ads as well as other sources of PSMS calls-to-action.

The Sprint Advertising Audit Standards also outline requirements for conducting a handset-based transaction in which users click a "Pay on My Phone Bill" button to complete a purchase. "Pay on My Phone Bill" purchase flows occur when a user's phone number can be identified by the aggregator. Two screen categories apply to the first stage of the purchase flow. These screens, which should first present a "Buy," "Purchase," or "Subscribe" button followed by a "Pay on My Phone Bill" button, together constitute a double opt-in. All messaging traffic conducted as part of this type of program must use a shortcode provisioned explicitly on the Sprint network for that purpose.

The Sprint Premium Message Flow Audit Standards apply to seven SMS message types: PIN/Opt In, Confirmation, Help, Renewal Reminder, Renewal Confirmation, Spend Notification, and Opt Out. "Pay on My Phone Bill" purchase flows do not require delivery of the PIN/Opt In message. The Sprint Standard Rate Message Flow Audit Standards apply to four SMS

¹ All further references to "shortcode" in this document refer to programs identified by shortcode in the PSMS Industry Monitor In-Market Monitoring Portal, which includes programs employing direct carrier billing.

message types: PIN/Opt In (optional), Confirmation, Help, and Opt Out. In addition, both sets of audit standards contain requirements for content delivery.

The Sprint Direct Carrier Billing Advertising Audit Standards detail requirements for landing pages and PIN-entry pages in direct carrier billing purchase flows. All required disclosures outlined in these audit standards must appear on both page types, unless the actions required specifically reference a single page type. Like the Sprint PSMS Advertising Audit Standards, the direct carrier billing standards also address handset-based transactions that are initiated with users' clicking a "Pay on My Phone Bill" button.

The Sprint Direct Carrier Billing Message Flow Audit Standards apply to the same six message types as the PSMS message flow standards: PIN/Opt In, Confirmation, Help, Renewal Reminder, Renewal Confirmation, and Opt Out. Elements within program advertising creative and related message flows that violate these standards are classified as Severity 0, Severity 1, or Severity 2, based on the seriousness of the infraction, with Severity 0 the most egregious. Each shortcode associated with these advertisements and message flows is then grouped by media type (e.g., online, print, TV) and designated either "Pass" or "Fail," with failures assigned the highest severity level as reflected in the audit. Compliance monitoring is ongoing, throughout 52 weeks of the year. Consequently, noncompliant advertisements intercepted in market at any time result in the related shortcode being cited, even if a previously open audit on that shortcode has just been closed. The descriptor "closed audit" simply means that the message flow or the advertisement or advertisements on that audit have been brought into compliance or are no longer in market.

The Sprint audit standards are updated regularly, and before the revisions take effect, these lists are distributed to the aggregators and content providers whose programs operate through the Sprint gateway. These updates are released approximately 30 days before implementation. Please note that in some instances, and depending on the severity and risk level, immediate compliance might be mandated.

In-Market Monitoring

Please refer to the CTIA Mobile Commerce Compliance Handbook for complete information on in-market monitoring, including descriptions of program violations notices, audit schedules, audit enforcement, and retests.

Appeals

Refer to the CTIA Handbook for general information about the audit appeals process. The Sprint Compliance Team assumes primary responsibility for handling appeals as it does for compliance monitoring, enforcement, and Q&A. When necessary, the Team engages Sprint management personnel to resolve issues, but explanations the Team provides govern the appeals process. The outcome of the appeals process will be validated on a per-creative basis at Sprint's discretion. The descriptor "appeal valid" indicates that Sprint deems the content provider's claim legitimate and that the relevant violation or violations are removed from the audit and, therefore, the month end count. "Appeal denied" indicates that Sprint has rejected the claim as unsubstantiated and that the prescribed penalty applies. Content providers dissatisfied with the outcome of their appeal may take their claim directly to Sprint via their aggregator. The aggregator should use the appropriate form to raise audit-appeal issues with a Sprint representative, presenting it within five business days of receiving a Program Violation Notice.

Repeat Offenders

Shortcodes found to have the same repeat offender compliance violation in two out of three consecutive months (e.g., 10/2010 and 11/2010 or 10/2010 and 12/2010) are barred from acquiring new Sprint subscribers for three months ("three-

month penalty period”), starting within five business days of notification of the second compliance violation. Any shortcode committing the violation “Affiliated with unapproved marketing practices or content” two or more times within one month is subject to repeat offender penalties and suspension of *all* billing.

Shortcodes found to have the same repeat offender compliance violation, as above, during the three-month penalty period are terminated. All Sprint customers using these shortcodes are unsubscribed from the program over a one-month wind-down period during which the subscribers are sent a termination MT instead of the renewal MT.

Offending content providers’ requests for new shortcodes are considered for activation, solely at Sprint’s discretion, for six months from the start date of the three-month penalty period resulting from discovery of the second compliance violation.

Unresolved Audits

A content provider’s failure to comply promptly and completely with Program Violation Notices will result in Sprint’s swift action against both aggregator and content provider. Sprint reviews all open tickets weekly, including tickets at the Escalated and Retest Failed statuses. The carrier will notify the aggregator directly regarding an audit unresolved by the cure date. Failure to take corrective action within five business days will result in shortcode suspension.

Shortcode Suspension

Suspended shortcodes remain suspended until the responsible content provider brings all overdue tickets into compliance. Shortcodes remaining suspended for 30 days are terminated. All Sprint customers using these shortcodes are unsubscribed from the program over a one-month wind-down period during which the subscribers are sent a termination MT instead of the renewal MT. Offending content providers’ requests for new shortcodes are considered for activation, solely at Sprint’s discretion, for six months from suspension.



Please keep in mind that . . .

- Landing pages must identify the content provider by shortcode for PSMS offers; display the pricing and subscription disclosure, when applicable, in the main offer; and spell out the offer terms and conditions, including billing method, other charges, and opt-out information. In addition, landing pages must comply fully with all other Sprint policies, CSC Handbook, and MMA CBP.
- A jump page is defined as any advertisement that “jumps” a user between offers for programs on more than one PSMS shortcode. Jump pages often are controlled by affiliate marketers but also might jump between different shortcodes belonging to the same content provider. Examples of jump pages include traditional “Select-your-carrier” button bars or dropdown menus as well as cell-submit “host ‘n’ post” pages that direct users to different PIN-entry pages based on handset information.
- Jump pages may not serve as a collection site for phone numbers and PINs; this information may be entered *only* on landing pages controlled by content providers themselves.
- Select-your-carrier jump pages containing information in addition to carrier logos must comply fully with Sprint policies, CSC Handbook and MMA CBP.

- Use of the term *free* is prohibited in advertising creative for products charged via PSMS and direct carrier billing, and Sprint will continue to cite this violation vigorously. The only exceptions include Free as a proper noun—such as in song titles (e.g., “Free Bird,” “Love Is Free”) and artist names (e.g., Free, Free the Robots, Suga Free)—free in common expressions (e.g., hassle-free, toll-free, sugar-free), and other similar usage that clearly does not imply the user will receive something without charge. The term *free* in gibberish text also is prohibited.
- The “cell-submit field” in online and mobile Web (WAP) advertisements for products charged via PSMS and direct carrier billing is the box designated for entry of the user’s mobile phone number; it is *not* the “Submit” button that the user must click after entering his or her phone number in the cell-submit field.
- Storing or prepopulating any part of a Sprint customer’s phone number is expressly prohibited on all PSMS and standard rate SMS offers, including both online and mobile Web (WAP) advertisements. Using a button or other one-click solution to initiate a purchase directly violates this prohibition.
- Screenshots are taken on a screen size of 1024x768 pixels using a basic configuration on a major Web browser, including Internet Explorer, Safari, Firefox, and Chrome. This configuration includes the navigation bar and one open tab at the top of the window and a status bar at the bottom.
- All color values are measured using the W3C brightness formula.
- The term “pixel” refers to an Interactive Marketing Unit (IMU) as defined by the Interactive Advertising Bureau.
- “Viewer data” is defined as information that can be used to identify or track Website visitors, including IP address, mobile handset number, time or date stamp, session variables, and strings of hashed data. Sprint prohibits the collection or use of this type of information in advertising creative.
- The following language satisfies Sprint’s account holder authorization disclosure requirement:
 - All purchases must be authorized by the account holder
 - You must be the account holder or have permission from the account holder
 - The account holder must authorize all purchases
 - The account holder must authorize all donations
- Programs advertising premium video downloads are prohibited from delivering more than 10 videos per month at \$9.99 per month. Video content is capped at 5MB per download.
- Programs delivering standard rate video are capped at 1MB per download.

Reading the Audit Standards

Rows display violations, severity levels, and corrective actions required. Columns at the right side of the table display “x” where violations apply. An “S” indicates that a violation applies only to recurring services.

PSMS Web : Premium call-to-action employing an online MIN-entry page (the same rules also apply to the PIN-entry page)

PSMS Mob : Premium call-to-action employing a handset-based MIN-entry page (the same rules also apply to the PIN-entry page)

- PSMS Text** : Premium call-to-action employing a mobile-originated keyword, (e.g., online, TV, print)
- POMPB Screens** : Premium call-to-action employing a handset-based “Pay on My Phone Bill” button (except where otherwise noted, rules apply to the Opt-In Screen and Purchase Confirmation Screen)
- Std Rate** : Standard rate call-to-action employing any opt-in mechanism
- Opt In** : Handset verification MT message or double opt-in MT message
- Confirm** : Confirmation MT message
- HELP** : HELP MT message, which must be delivered in response to the universal keyword HELP
- Content** : Content MT message
- Renew Remind** : Renewal Reminder MT message
- Renew Confirm** : Renewal Confirmation MT message
- Spend Notify** : Spend Notification MT message
- STOP** : STOP MT message, which must be delivered in response to the universal keyword STOP

Appendices

APPENDIX A: Premium SMS, Standard Rate SMS, and “Pay on My Phone Bill” Advertising

Sprint Advertising Audit Standards

	<i>Violations</i>	<i>Sev</i>	<i>Actions Required</i>	PSMS Web	PSMS Mobile	PSMS Text	POMP Screens	Std Rate
Compliance Principles	Contains or promotes inappropriate, illicit, or adult content ²	0	Remove references to inappropriate violent or adult content	x	x	x	x	x
	Product offering associated with stacked or incentivized marketing	1	Discontinue association with unrelated stacked or incentivized offers	x	x			
	Improper use of the term <i>free</i>	1	Remove the term <i>free</i>	x	x	x	x	x
	Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	x	x	x	x ³	x
	Affiliated with unapproved marketing practices or content	1	Reconcile product or service with original program brief on record, or submit new, accurate program brief for review	x	x	x	x	x
	Displays viewer data or hash code	1	Remove from advertisement information that identifies viewer	x	x	x		x
	User experience modified for select viewers in manner that subverts monitoring	1	Deliver compliant, functional user experience to all viewers	x	x	x	x	x
	Unapproved premium sweepstakes or reverse auction campaign	1	Discontinue unapproved premium sweepstakes or reverse auction campaign	x	x	x	x	
	Customer mobile phone number prepopulated or saved	1	Require customer to enter full phone number for each offer	x	x	x		
	Unapproved standard rate video service	1	Discontinue unapproved standard rate video service					x
	Failure to initiate double opt-in with “Pay on My Phone Bill” purchase flow	1	Require user to agree to offer conditions by selecting “Buy,” “Purchase,” or “Subscribe” on opt-in screen before displaying purchase confirmation screen				x	
	Failure to place or format disclosures in main offer of opt-in and purchase confirmation screens as prescribed ⁴	1	Display and arrange all disclosures in main offer in prescribed format				x	
	Unapproved purchase confirmation screen	1	Remove offer immediately and submit aggregator-controlled URL for carrier approval				x	
	No payment failure screen	2	Implement payment failure screen with program information, failure details, and “Continue” button				x	
	Failure to display payment failure message	2	Disclose that user has not been charged				x	

² Inappropriate content includes reference to abuse of controlled substances or explicit promotion of alcohol consumption.

³ Effective August 1, 2012.

⁴ See Exhibit 3 in Appendix D for examples of compliant mobile purchase flow templates.

Sprint Advertising Audit Standards

	Violations	Sev	Actions Required	PSMS Web	PSMS Mobile	PSMS Text	POMP/B Screens	Std Rate
Compliance Principles <i>continued</i>	Failure to describe failure reason on payment failure screen	2	Describe failure reason in clear terms (e.g., "Error 101" is unacceptable)				x	
	Misuse of carrier endorsement or brand	2	Ensure carrier names, logos, icons, and colors comply with carrier brand use rules	x	x	x	x	x
	Cell-submit function located on affiliate-controlled page	2	Move cell-submit and PIN-entry functions to service provider-controlled page	x	x			
Call-to-Action	No product or service description displayed in main offer	1	Describe product or service in main offer	x	x	x	x	x
	No product quantity or service delivery frequency displayed in main offer	1	State product quantity or service delivery frequency in main offer	x	x	x	x	x
	No pricing in main offer	1	Display program pricing in main offer	x	x	x	x	
	Unclear or conflicting pricing	1	Display all price points clearly and conspicuously	x	x	x	x	
	Failure to disclose billing frequency in main offer	1	Disclose billing frequency in main offer	S	S	S	S	
	Unclear or conflicting billing frequency	1	Disclose billing frequency clearly	x	x	x	x	
	No explicit "Buy" or "Purchase" button on opt-in screen [one-off purchases]	1	Display explicit "Buy" or "Purchase" button on opt-in screen for one-off purchases				x	
	No explicit "Subscribe" button on opt-in screen [subscription services]	1	Display explicit "Subscribe" button on opt-in screen for subscription services				x	
	No explicit "Pay on My Phone Bill" button on purchase confirmation screen	1	Display explicit "Pay on My Phone Bill" button on purchase confirmation screen				x	
	Pricing not displayed adjacent to cell-submit field	1	Display pricing within 125 pixels directly above or below cell-submit field	x				
	Pricing not displayed adjacent to opt-in field	1	Display pricing within one line break of opt-in field		x		x	
	Billing frequency not displayed adjacent to cell-submit field	1	Display billing frequency within 125 pixels directly above or below cell-submit field	S				
	Billing frequency not displayed adjacent to opt-in field	1	Display billing frequency within one line break of opt-in field		S			
	Unapproved billing frequency	2	Migrate to monthly billing frequency	S	S	S	S	
	Minimum subscription period	2	Remove stipulation for minimum subscription period	S	S	S	S	
	No substitution details in main offer	2	Display substitution details for all carriers in main offer	x	x			
	Incorrect pricing format	2	Display full pricing clearly as numerals with dollar sign (\$)	x	x	x	x	
	Language minimizes pricing	2	Remove terms that minimize price (e.g., "only," "just")	x	x	x	x	

Sprint Advertising Audit Standards

	Violations	Sev	Actions Required	PSMS Web	PSMS Mobile	PSMS Text	POMP/B Screens	Std Rate
Call-to-Action <i>continued</i>	Pricing indistinguishable from background color	2	Alter color scheme to minimum color contrast value of 125	x				
			Increase point size and change color scheme to improve contrast				x	
	Pricing point size too small	2	Increase pricing point size to at least 12 point font	x				
			Increase pricing point size to at least 50% of button size				x	
	No "Cancel" button on purchase confirmation screen	2	Implement facility to abort purchase with "Cancel" button directly below "Pay on My Phone Bill" button				x	
No "Continue" button on payment failure screen	2	Implement "Continue" button to enable customer to return to originating offer				x		
Terms and Conditions	T&Cs indistinguishable from background color	1	Alter color scheme to minimum color contrast value of 125	x				
			Increase point size and change color scheme to improve contrast				x	
	No account holder authorization disclosure above fold	1	Disclose above fold at 1024x768 screen resolution that account holder must authorize all purchases	x	x	x		
			Display account holder authorization disclosure on opt-in and purchase confirmation screens ⁵				x	
	No link to comprehensive T&Cs	1	Display link to comprehensive T&Cs	x	x	x	x	x
	No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy	x	x	x	x	x
	Failure to display STOP keyword	1	Display STOP keyword in bold typeface	x	x	x	x	S
	No customer care contact information	1	Display HELP keyword in bold typeface	x	x	x	x ⁶	
	No mention of billing method	1	Disclose billing method	x	x	x	x	
	No facility for manual acceptance of T&Cs before purchase	2	Display checkbox or mechanism for user to accept T&Cs manually before purchase	x	x			
	No customer cancellation disclosure	2	Disclose clearly that service will continue until cancelled	S	S	S		
	Shortcode not disclosed in premium offer	2	Identify program sponsor by shortcode	x	x	x	x	
	T&Cs in motion or inaccessible using primary browser scroll bar	2	Eliminate all motion, scroll boxes, or frames obscuring T&Cs	x	x	x	x	

⁵ Effective August 1, 2012.

⁶ A toll-free number will no longer satisfy this requirement effective August 1, 2012.

Sprint Advertising Audit Standards

	<i>Violations</i>	<i>Sev</i>	<i>Actions Required</i>	PSMS Web	PSMS Mobile	PSMS Text	POMP Screens	Std Rate
<i>Terms and Conditions continued</i>	Failure to display first three lines of T&Cs above fold	2	Display first three lines of T&Cs above fold at 1024x768 screen resolution	x				
	STOP keyword indistinguishable from T&Cs text	2	Display STOP keyword in bold typeface	x	x	x	x	S
	Customer care contact information indistinguishable from other T&Cs text	2	Display HELP keyword in bold typeface	x	x	x	x	
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	x	x	x	x	x

APPENDIX B: Standard Rate Message Flow

Sprint Standard Rate Message Flow Audit Standards

	<i>Violations</i>	<i>Sev</i>	<i>Actions Required</i>	Opt-In	Confirm	HELP	Content	STOP
Compliance Principles	Contains or promotes inappropriate, illicit, or adult content ⁷	0	Remove references to inappropriate violent or adult content				X	
	Automatic enrollment in multiple programs	1	Require user to complete dedicated opt-in for each separate program	X	X	X	X	X
	Unsolicited message delivered	1	Cease all messaging associated with program	X	X	X	X	X
	Misrepresentation of product offering	1	Reconcile, among all messages and ad, references to product type	X	X	X		
	Misrepresentation of product quantity	1	Reconcile, among all messages and ad, references to product quantity	X	X	X		
	Improper use of the term <i>free</i>	1	Remove the term <i>free</i>	X	X	X		X
	Affiliated with unapproved marketing practices or content	1	Reconcile product or service with original program brief on record, or submit new, accurate program brief for review	X	X	X	X	X
	Program message delivered by alternate shortcode	1	Initiate all program messaging from single shortcode and reconcile with shortcode advertised	X	X	X		X
	Unauthorized marketing material	1	Discontinue embedded marketing campaign	X	X	X		X
	Failure to identify program clearly and consistently in all messages	2	Display program name consistently in all messages and ad	X	X	X		X
Message Flow	Failure to send required service message	1	Deliver all required service messages	S	X	X		X
	Failure to provide user response command	1	Display response command	X				
	Failure to display STOP keyword	1	Display STOP keyword		S	X		
	Unapproved standard rate video service	1	Discontinue unapproved standard rate video service				X	
	Standard rate video file size limit exceeded	1	Limit standard rate video file size to 1MB or less per download				X	
	Incorrect product quantity delivered	1	Deliver product quantity promoted in messages and ad				X	
	Content not delivered as described in advertising	1	Deliver content as described in messages and ad				X	
	No product or service disclosure	2	Disclose product or service		S	X		
	No product quantity or service delivery frequency	2	State product quantity or service delivery frequency		S	S		
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	X	S	X		
	No customer care contact information	2	Display HELP keyword in service messages and toll-free helpline or Web address in HELP MT message		S	X		
	Failure to confirm message flow termination	2	Inform user that no more messages will be sent					X

⁷ Inappropriate content includes reference to abuse of controlled substances or explicit promotion of alcohol consumption.

APPENDIX C: Premium and “Pay on My Phone Bill” Message Flow

Sprint Premium Message Flow Audit Standards											
	Violations	Sev	Actions Required	Opt-In	Confirm	HELP	Content	Renew Remind	Renew Confirm	Spend Notify	STOP
Compliance Principles	Contains or promotes inappropriate, illicit, or adult content ⁸	0	Remove references to inappropriate violent or adult content				x				
	Automatic enrollment in multiple programs	1	Require user to complete dedicated opt-in for each separate program	x	x	x	x	x	x	x	x
	Unsolicited message delivered	1	Cease all messaging associated with program	x	x	x	x	x	x	x	x
	Misrepresentation of product offering	1	Reconcile, among all messages and ad, references to product type	x	x	x		x	x	x	
	Misrepresentation of product quantity	1	Reconcile, among all messages and ad, references to product quantity	x	x	x		x	x	x	
	Unclear or conflicting pricing	1	Reconcile, among all messages and ad, references to pricing	x	x	x		x	x	x	
	Unclear or conflicting billing frequency	1	Disclose billing frequency clearly	x	x	x		x	x	x	
	Improper use of the term <i>free</i>	1	Remove the term <i>free</i>	x	x	x		x	x	x	x
	Unapproved premium sweepstakes or reverse auction campaign	1	Discontinue unapproved premium sweepstakes or reverse auction campaign				x				
	Premium video download limit exceeded	1	Limit premium video programs to 10 downloads or fewer per month				x				
	Premium rate video file size limit exceeded	1	Limit premium rate video file size to 5MB or less per download				x				
	Affiliated with unapproved marketing practices or content	1	Reconcile product or service with original program brief on record, or submit new, accurate program brief for review	x	x	x	x	x	x	x	x
	Program message delivered by alternate shortcode	1	Initiate all program messaging from single shortcode and reconcile with shortcode advertised	x	x	x	x	x	x	x	x
	Unauthorized marketing material	1	Discontinue embedded marketing campaign	x	x	x	x	x	x	x	x
Failure to identify program clearly and consistently in all messages	2	Display program name consistently in all messages and ad	x	x	x		x	x		x	
Message Flow	Failure to send required service message	1	Deliver all required service messages	x	x	x		x	x	x	x
	No pricing	1	Display program pricing	x	x	x		x	x		

⁸ Inappropriate content includes reference to abuse of controlled substances or explicit promotion of alcohol consumption.

Sprint Premium Message Flow Audit Standards

	Violations	Sev	Actions Required	Opt-In	Confirm	HELP	Content	Renew Remind	Renew Confirm	Spend Notify	STOP	
Message Flow continued	Failure to disclose billing frequency	1	Disclose billing frequency	S	S	S		S	S			
	Failure to provide user PIN or response command <i>after pricing information only</i>	1	Display PIN or response command <i>after pricing information only</i>	x								
	Failure to initiate double opt-in	1	Require user response before sending billed MT message	x	x							
	Failure to display STOP keyword	1	Display STOP keyword		x	x		x	x	x		
	Failure to notify user of subscription renewal	1	Disclose program renewal					x				
	Failure to deliver \$25 spend notification	1	Send spend notification after user spends \$25 within calendar month								x	
	Failure to deliver \$50 spend notification [postpaid]	1	Send spend notification after user spends \$50 within calendar month, and require user to confirm acceptance of charges before continuing								x	
	Failure to initiate triple opt-in at \$50 [postpaid]	1	Require user to respond positively to confirm wish to continue								x	
	Failure to deliver \$50 spend cap notification [prepaid]	1	Send spend cap notification when user spends \$50 within calendar month								x	
	Failure to cap maximum billed amount at \$50 per month [prepaid]	1	Cap service immediately when user has spent \$50 within one month on single account								x	
	Failure to deliver \$75 spend notification [postpaid]	1	Send spend notification after user spends \$75 within calendar month, and require user to confirm acceptance of charges before continuing								x	
	Failure to initiate triple opt-in at \$75 [postpaid]	1	Require user to respond positively to confirm wish to continue								x	
	Failure to deliver \$100 spend cap notification [postpaid]	1	Send spend cap notification when user spends \$100 within calendar month								x	
	Failure to cap maximum billed amount at \$100 per month [postpaid]	1	Cap service immediately when user has spent \$100 within one month on single account								x	
	Failure to display spend amount before any other information in notification	1	Locate spend amount at beginning of notification, before any other information								x	
Incorrect product quantity delivered	1	Deliver product quantity promoted in messages and ad					x					

Sprint Premium Message Flow Audit Standards

	Violations	Sev	Actions Required	Opt-In	Confirm	HELP	Content	Renew Remind	Renew Confirm	Spend Notify	STOP
Message Flow <i>continued</i>											
	Content not delivered as described in advertising	1	Deliver content as described in messages and ad				x				
	No product or service disclosure	2	Disclose product or service	x	x	x		x	x		
	No product quantity or service delivery frequency	2	State product quantity or service delivery frequency	S	S	S		S	S		
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	x	x	x		x	x	x	
	No customer care contact information	2	Display HELP keyword in service messages and toll-free helpline or Web address in HELP MT message	x	x	x		x	x	x	
	Incorrect use of HELP menu	2	Display program-specific HELP message when user opts into only one program			x					
	Failure to inform user of participation status	2	Display remaining credits or renewal date			x		x			
	Incorrect participation status	2	Inform user of correct participation status			x		x			
	Failure to confirm service and message flow termination	2	Inform user that service has been terminated and that no more messages will be sent								x

Appendix D

Exhibit 1: Sample Compliant Premium Message Flow

Category	Message	Characters
PIN/Opt In	LuckyBag Ringtones. 10 bonus credits + 10 more ea. mo, \$9.99/mo. Enter PIN 2182! Msg&Data Rates May Apply. Reply HELP for help.	128
Confirmation	Welcome to LuckyBag Ringtones! 10 bonus credits + 10 more ea. mo, \$9.99/mo. Msg&Data Rates May Apply. Reply HELP for help. Reply STOP to cancel.	147
HELP	LuckyBag Ringtones. \$9.99/mo. for 10 credits. Msg&Data Rates May Apply. You have 8 credits. Renews 10/01/10. Help: 8001234567. Reply STOP to cancel.	152
Spend Notification (\$25)	You have spent \$25 this month. Reply HELP for help. Reply STOP to cancel. Msg&Data Rates May Apply.	99
Spend Notification (\$50)	You have spent \$50. Reply YES to continue. Reply HELP for help. Reply STOP to cancel. Msg&Data Rates May Apply.	111
Spend Notification (\$75)	You have spent \$75. Reply YES to continue. Reply HELP for help. Reply STOP to cancel. Msg&Data Rates May Apply.	111
Spend Cap Notification	You have spent the \$100 maximum this month. You may resume next month. Reply HELP for help. Reply STOP to cancel. Msg&Data Rates May Apply.	139
Renewal Reminder	Your \$9.99/mo. LuckyBag Ringtones subscription renews on 10/01/10. 10 credits/mo. Msg&Data Rates May Apply. Help: 8001234567. Reply STOP to cancel.	147
Renewal Confirmation	Thanks for renewing LuckyBag Ringtones! 10 credits for \$9.99/mo. Msg&Data Rates May Apply. Reply HELP for help. Reply STOP to cancel.	133
Opt Out	Your LuckyBag Ringtones subscription is cancelled. You'll receive no more messages.	86

Exhibit 2: Sample Compliant Standard Rate Message Flow

Category	Message	Characters
Confirmation	Welcome to Actual World News daily news alerts. No charge but msg&data rates may apply. Reply HELP for help. Reply STOP to cancel.	130
HELP	You are subscribed to Actual World News daily news alerts. Msg&data rates may apply. For help call 1-800-555-NEWS. Reply STOP to cancel.	136
Opt Out	Your subscription to Actual World News has been cancelled and you will receive no more messages. For help call 1-800-555-NEWS.	126

Exhibit 3: Sample Compliant PSMS "Pay on My Phone Bill" Flow

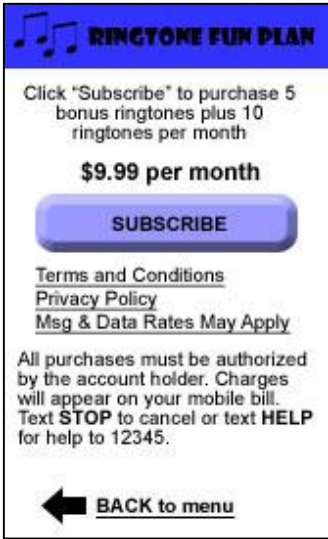

Category	Screen or Message	Characters	
Opt-In Screen		<p>All disclosures in the main offer must be displayed in the following order with no intervening text:</p> <ul style="list-style-type: none"> ▪ Program description, including product or service disclosure and product quantity ▪ Price and subscription term, if applicable ▪ "Buy," "Purchase," or "Subscribe" button ▪ Terms and conditions link ▪ Privacy policy link ▪ Message and data rates disclosure <p>Summary terms and conditions must include:</p> <ul style="list-style-type: none"> ▪ Billing method ▪ Opt-out information ▪ Program sponsor (shortcode) ▪ Help information ▪ Account holder disclosure 	NA
Purchase Confirmation Screen		<p>All disclosures in the main offer must be displayed in the following order with no intervening text:</p> <ul style="list-style-type: none"> ▪ Program description, including product or service disclosure and product quantity ▪ Price and subscription term, if applicable ▪ "Pay on My Phone Bill" button ▪ "Cancel" button ▪ Terms and conditions link ▪ Privacy policy link ▪ Message and data rates disclosure <p>Summary terms and conditions must include:</p> <ul style="list-style-type: none"> ▪ Billing method ▪ Opt-out information ▪ Program sponsor (shortcode) ▪ Help information ▪ Account holder disclosure 	NA

Exhibit 3: Sample Compliant "Pay on My Phone Bill" Flow *continued*


Category	Screen or Message	Characters
Purchase Failure Screen	 <p>The main offer must include:</p> <ul style="list-style-type: none"> ▪ Payment failure message with failure reason ▪ Payment failure reason ▪ Help information ▪ "Continue" button ▪ Privacy policy link ▪ Message and data rates disclosure ▪ Account holder disclosure 	NA
Confirmation (SMS)	Welcome to RingtoneFunPlan! 5 bonus tones + 10 more ea. mo, \$9.99/mo. Msg&Data Rates May Apply. Reply HELP for help. Reply STOP to cancel.	138
HELP (SMS)	RingtoneFunPlan. \$9.99/mo. for 10 tones. Msg&Data Rates May Apply. You have 8 credits. Renews 11/01/10. Help: 8001234567. Reply STOP to cancel.	143
Renewal Reminder (Subscriptions only)	Your RingtoneFunPlan subscription renews on 11/01/10. \$9.99/mo. for 10 tones. Msg&Data Rates May Apply. Help: 8001234567. Reply STOP to cancel.	143
Renewal Confirmation (Subscriptions only)	Your RingtoneFunPlan subscription has been renewed. \$9.99/mo. for 10 tones. Msg&Data Rates May Apply. Reply HELP for help. Reply STOP to cancel.	144
Opt Out (SMS)	Your RingtoneFunPlan subscription is cancelled. You'll receive no more messages.	80

Exhibit 4: Sprint Message Flow Abbreviation Guidelines

<i>Term or Phrase</i>	<i>Abbreviation Guidelines</i>
Message	Msg
Per	/
Reply	No abbreviations allowed. Must use "reply."
For	No abbreviations allowed. Must use "for."
To	No abbreviations allowed. Must use "to."
You	No abbreviations allowed. Must use "you."
Text	Txt
Per Month	/mo ea. mo. /mth
Plus	+
Cancel	No abbreviations allowed. Must use "cancel."
Numbers	Use the numeric format only.
Message and Data Rates May Apply	Msg&Data Rates May Apply Msg&Data Rates May Aply
Help	No abbreviations allowed. Must use "help."
Stop	No abbreviations allowed. Must use "stop."
Reply HELP for help	No abbreviations allowed. Must use "Reply HELP for help."
Reply STOP to cancel	No abbreviations allowed. Must use "Reply STOP to cancel."
Acceptable variations of "HELP" & "STOP" instructions	"Reply HELP for help. Reply STOP to cancel." "Reply HELP for help, reply STOP to cancel." "Reply HELP for help, STOP to cancel."
\$	\$

APPENDIX E: Direct Carrier Billing Advertising

Sprint Direct Carrier Billing Advertising Audit Standards						
	Violations	Sev	Actions Required	Web	Mobile	POMP Screens
Compliance Principles	Contains or promotes inappropriate, illicit, or adult content ⁹	0	Remove references to inappropriate violent or adult content	x	x	x
	Product offering associated with stacked or incentivized marketing	1	Discontinue association with unrelated stacked or incentivized offers	x	x	
	Improper use of the term <i>free</i>	1	Remove the term <i>free</i>	x	x	x
	Affiliated with unapproved marketing practices or content	1	Reconcile product or service with original program brief on record, or submit new, accurate program brief for review	x	x	x
	Displays viewer data or hash code	1	Remove from advertisement information that identifies viewer	x	x	
	User experience modified for select viewers in manner that subverts monitoring	1	Deliver compliant, functional user experience to all viewers	x	x	x
	Unapproved premium sweepstakes or reverse auction campaign	1	Discontinue unapproved premium sweepstakes or reverse auction campaign	x	x	x
	Customer phone number prepopulated or saved	1	Require customer to enter full phone number for each offer	x	x	
	Failure to initiate double opt-in with "Pay on My Phone Bill" purchase flow	1	Require user to agree to offer conditions by selecting "Buy," "Purchase," or "Subscribe" on opt-in screen before displaying purchase confirmation screen			x
	Failure to place or format disclosures in main offer of opt-in and purchase confirmation screens as prescribed	1	Display and arrange all disclosures in main offer in prescribed format			x
	Unapproved purchase confirmation screen	1	Remove offer immediately and submit aggregator-controlled URL for carrier approval			x
	No payment failure screen	2	Implement payment failure screen with program information, failure details, and "Continue" button			x
	Failure to display payment failure message	2	Disclose that user has not been charged			x
	Failure to describe failure reason on payment failure screen	2	Describe failure reason in clear terms (e.g., "Error 101" is unacceptable)			x
Misuse of carrier endorsement or brand	2	Ensure carrier names, logos, icons, and colors comply with carrier brand use rules	x	x	x	

⁹ Inappropriate content includes reference to abuse of controlled substances or explicit promotion of alcohol consumption.

Sprint Direct Carrier Billing Advertising Audit Standards

	<i>Violations</i>	<i>Sev</i>	<i>Actions Required</i>	Web	Mobile	POMP Screens
Compliance Principles <i>continued</i>	Cell-submit function located on unapproved page or screen	2	Move cell-submit and PIN-entry functions to approved pages or screens	x	x	
Call-to-Action	No product or service description displayed in main offer	1	Describe product or service in main offer	x	x	x
	No product quantity displayed in main offer	1	State product quantity in main offer	x	x	x
	No pricing in main offer	1	Display program pricing in main offer	x	x	x
	Unclear or conflicting pricing	1	Display all price points clearly and conspicuously	x	x	x
	Failure to disclose billing frequency in main offer	1	Disclose billing frequency in main offer	S	S	S
	Unclear or conflicting billing frequency	1	Disclose billing frequency clearly	x	x	x
	No explicit "Buy" or "Purchase" button on opt-in screen [one-off purchases]	1	Display explicit "Buy" or "Purchase" button on opt-in screen for one-off purchases			x
	No explicit "Subscribe" button on opt-in screen [subscription services]	1	Display explicit "Subscribe" button on opt-in screen for subscription services			x
	No explicit "Pay on My Phone Bill" button on purchase confirmation screen	1	Display explicit "Pay on My Phone Bill" button on purchase confirmation screen			x
	Pricing not displayed adjacent to submit or entry fields	1	Display pricing within 125 pixels directly above or below opt-in and PIN-entry fields	x		
		1	Display pricing within one line break of opt-in and PIN-entry fields		x	x
	Billing frequency not displayed adjacent to opt-in or entry fields	1	Display billing frequency within 125 pixels directly above or below opt-in or PIN-entry fields	S		
		1	Display billing frequency within one line break of opt-in or PIN-entry fields		S	S
	Unapproved billing frequency	2	Migrate to monthly billing frequency	S	S	S
	Minimum subscription period	2	Remove stipulation for minimum subscription period	S	S	S
	No substitution details in main offer	2	Display substitution details for all carriers in main offer	x	x	
	Incorrect pricing format	2	Display full pricing clearly as numerals with dollar sign (\$)	x	x	x
	Language minimizes pricing	2	Remove terms that minimize price (e.g., "only," "just")	x	x	x
	Pricing indistinguishable from background color	2	Alter color scheme to minimum color contrast value of 125	x		
		2	Increase point size and change color scheme to improve contrast			x
Pricing point size too small	2	Increase pricing point size to at least 12 point font	x			

Sprint Direct Carrier Billing Advertising Audit Standards

	<i>Violations</i>	<i>Sev</i>	<i>Actions Required</i>	Web	Mobile	POMP Screens
Call-to-Action <i>continued</i>		2	Increase pricing point size to at least 50% of button size			X
	No "Cancel" button on purchase confirmation screen	2	Implement facility to abort purchase with "Cancel" button directly below "Pay on My Phone Bill" button			X
	No "Continue" button on payment failure screen	2	Implement "Continue" button to enable customer to return to originating offer			X
Terms and Conditions	T&Cs indistinguishable from background color	1	Alter color scheme to minimum color contrast value of 125	X		
		1	Increase point size and change color scheme to improve contrast			X
	No account holder authorization disclosure above fold	1	Disclose above fold at 1024x768 screen resolution that account holder must authorize all purchases	X	X	
		1	Display account holder authorization disclosure on opt-in and purchase confirmation screens			X
	No link to comprehensive T&Cs	1	Display link to comprehensive T&Cs	X	X	X
	No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy	X	X	X
	Failure to display STOP keyword	1	Display STOP keyword in bold typeface	S	S	S
	No customer care contact information	1	Display toll-free support number	X	X	X
	No mention of billing method	1	Disclose billing method	X	X	X
	No facility for manual acceptance of T&Cs before purchase	2	Display checkbox or mechanism for user to accept T&Cs manually on landing page	X	X	X
	No facility for manual acceptance of Sprint billing terms before purchase	2	Display checkbox or mechanism for user to accept Sprint billing terms manually on PIN-entry page	X	X	X ¹⁰
	No customer cancellation disclosure	2	Disclose clearly that service will continue until cancelled	S	S	
	Shortcode disclosed in offer	2	Remove shortcode from advertisement	X	X	X
	T&Cs in motion or inaccessible using primary browser scroll bar	2	Eliminate all motion, scroll boxes, or frames obscuring T&Cs	X	X	X
	Failure to display first three lines of T&Cs above fold	2	Display first three lines of T&Cs above fold at 1024x768 screen resolution	X		
	STOP keyword indistinguishable from T&Cs text	2	Display STOP keyword in bold typeface	S	S	S
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	X	X	X

¹⁰ On POMP flows, the purchase confirmation screen must include a facility for manual acceptance of Sprint billing terms.

APPENDIX F: Direct Carrier Billing Message Flow

Sprint Direct Carrier Billing Message Flow Audit Standards									
	Violations	Sev	Actions Required	Opt-In ¹¹	Confirm	HELP	Renew Remind	Renew Confirm	STOP
Compliance Principles	Automatic enrollment in multiple programs	1	Require user to complete dedicated opt-in for each separate program	x	x	x	x	x	x
	Unsolicited message delivered	1	Cease all messaging associated with program	x	x	x	x	x	x
	Misrepresentation of product offering	1	Reconcile, among all messages and ad, references to product type	x	x	S	x	x	
	Misrepresentation of product quantity	1	Reconcile, among all messages and ad, references to product quantity	x	x	S	x	x	
	Unclear or conflicting pricing	1	Reconcile, among all messages and ad, references to pricing	x	x	S	x	x	
	Unclear or conflicting billing frequency	1	Disclose billing frequency clearly	x	x	S	x	x	
	Improper use of the term <i>free</i>	1	Remove the term <i>free</i>	x	x	x	x	x	x
	Affiliated with unapproved marketing practices or content	1	Reconcile product or service with original program brief on record, or submit new, accurate program brief for review	x	x	x	x	x	x
	Program message delivered by alternate shortcode	1	Initiate all program messaging from single shortcode and reconcile with shortcode advertised	x	x	x	x	x	x
	Unauthorized marketing material	1	Discontinue embedded marketing campaign	x	x	x	x	x	x
	Failure to identify program clearly and consistently in all messages	2	Display program name consistently in all messages and ad	x	x	S	x	x	S
Message Flow	Failure to send required service message	1	Deliver all required service messages	x	x	x	x	x	x
	No pricing	1	Display program pricing	x	x	S	x	x	
	Failure to disclose billing frequency	1	Disclose billing frequency	S	S	S	S	S	
	Failure to provide user PIN or response command <i>after</i> pricing information <i>only</i>	1	Display PIN or response command <i>after</i> pricing information <i>only</i>	x					
	Failure to initiate double opt-in	1	Require user response before sending billed MT message	x	x				
	Failure to display STOP keyword	1	Display STOP keyword		S	S	S	S	
	No product or service disclosure	2	Disclose product or service	x	x	S	x	x	
	No product quantity	2	State product quantity	x	x	S	x	x	

¹¹ The opt-in MT is not required in POMPB flows.

Sprint Direct Carrier Billing Message Flow Audit Standards									
	Violations	Sev	Actions Required	Opt-In ¹¹	Confirm	HELP	Renew Remind	Renew Confirm	STOP
Message Flow <i>continued</i>	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	x	x	x	x	x	
	No customer care contact information	2	Display toll-free helpline	x	x	x	x	x	
	Incorrect use of HELP menu	2	Display program-specific HELP message when user opts into only one program			x			
	Failure to inform user of participation status	2	Display renewal date			S	S		
	Incorrect participation status	2	Inform user of correct renewal date			S	S		
	Failure to confirm service and billing termination	2	Inform user that service and billing have been terminated						

Appendix G

Exhibit 5: Sample Compliant Direct Carrier Billing Message Flow (Web and Mobile Opt-Ins)

Category	Message	Characters
PIN/Opt In	Ninja Saga. 50 game credits for \$4.99/mo. Enter PIN 2182! Msg&Data Rates May Apply. Call 8001234567 for help.	109
Confirmation	Ninja Saga. You bought 50 game credits/mo for \$4.99/mo. Msg&Data Rates May Apply. Call 8001234567 for help. Reply STOP to cancel.	129
HELP	Ninja Saga. \$4.99/mo for 50 game credits. Msg&Data Rates May Apply. Renews 10/01/12. Help: 8001234567. Reply STOP to cancel.	124
Renewal Reminder	Your \$4.99/mo Ninja Saga subscription renews on 10/01/12. 50 game credits/mo. Msg&Data Rates May Apply. Help: 8001234567. Reply STOP to cancel.	143
Renewal Confirmation	Thanks for renewing Ninja Saga! 50 game credits for \$4.99/mo. Msg&Data Rates May Apply. Call 8001234567 for help. Reply STOP to cancel.	135
Opt Out	Your Ninja Saga game credits subscription is cancelled. You'll receive no more charges.	88

Exhibit 6: Sample Compliant Direct Carrier Billing "Pay on My Phone Bill" Flow

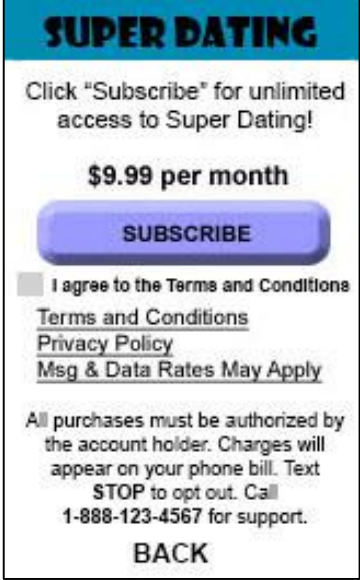

Category	Screen or Message	Characters	
Opt-In Screen		<p>All disclosures in the main offer must be displayed in the following order, with no intervening text:</p> <ul style="list-style-type: none"> ▪ Program description, including product or service disclosure and product quantity ▪ Price and subscription term, if applicable ▪ "Buy," "Purchase," or "Subscribe" button ▪ Terms and conditions link ▪ Privacy policy link ▪ Message and data rates disclosure <p>Summary terms and conditions must include:</p> <ul style="list-style-type: none"> ▪ Billing method ▪ Opt-out information (subscription) ▪ Help information ▪ Account holder disclosure 	NA
Purchase Confirmation Screen		<p>All disclosures in the main offer must be displayed in the following order with no intervening text:</p> <ul style="list-style-type: none"> ▪ Program description, including product or service disclosure and product quantity ▪ Price and subscription term, if applicable ▪ "Pay on My Phone Bill" button ▪ "Cancel" button ▪ Terms and conditions link ▪ Privacy policy link ▪ Message and data rates disclosure <p>Summary terms and conditions must include:</p> <ul style="list-style-type: none"> ▪ Billing method ▪ Opt-out information (subscription) ▪ Help information ▪ Account holder disclosure 	NA

Exhibit 6: Sample Compliant Direct Carrier Billing "Pay on My Phone Bill" Flow


Category	Screen or Message	Characters
Purchase Failure Screen	 <p>The main offer must include:</p> <ul style="list-style-type: none"> ▪ Payment failure message with failure reason ▪ Payment failure reason ▪ Help information ▪ "Continue" button ▪ Privacy policy link ▪ Message and data rates disclosure 	NA
Confirmation (SMS)	Welcome to Super Dating! Unlimited access, \$9.99/mo. Msg&Data Rates May Apply. Call 8001234567 for help. Reply STOP to cancel.	126
HELP (SMS)	Super Dating. \$9.99/mo. Unlimited access. Msg&Data Rates May Apply. Renews 11/01/12. Help: 8001234567. Reply STOP to cancel.	124
Renewal Reminder (Subscriptions only)	Your Super Dating subscription renews on 11/01/12. \$9.99/mo. for unlimited access. Msg&Data Rates May Apply. Help: 8001234567. Reply STOP to cancel.	148
Renewal Confirmation (Subscriptions only)	Your Super Dating subscription has been renewed. \$9.99/mo. for unlimited access. Msg&Data Rates May Apply. Call 8001234567 for help. Reply STOP to cancel.	154
Opt Out (SMS)	Your Super Dating subscription is cancelled. You'll receive no more charges.	77

Exhibit 7: Sprint Message Flow Abbreviation Guidelines

Term or Phrase	Abbreviation Guidelines
Message	Msg
Per	/
Reply	No abbreviations allowed. Must use "reply."
For	No abbreviations allowed. Must use "for."
To	No abbreviations allowed. Must use "to."
You	No abbreviations allowed. Must use "you."
Text	Txt
Per Month	/mo ea. mo. /mth
Plus	+
Cancel	No abbreviations allowed. Must use "cancel."
Numbers	Use the numeric format only.
Message and Data Rates May Apply	Msg&Data Rates May Apply Msg&Data Rates May Aply
Help	No abbreviations allowed. Must use "help."
Stop	No abbreviations allowed. Must use "stop."
Reply HELP for help	No abbreviations allowed. Must use "Reply HELP for help."
Reply STOP to cancel	No abbreviations allowed. Must use "Reply STOP to cancel."
Acceptable variations of "HELP" & "STOP" instructions	"Reply HELP for help. Reply STOP to cancel." "Reply HELP for help, reply STOP to cancel." "Reply HELP for help, STOP to cancel."
\$	\$