The CTIA Compliance Monitoring and Enforcement Playbook

As an integral part of initial program approval, before registering a new program or modifying an existing program, the CTIA requires the content provider to submit to the CSC registry a dedicated email address operated by the content provider to receive communications from the CTIA 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 CTIA Compliance Team evaluates premium and standard rate programs against audit standards published as the:

- CTIA Premium Rate Shortcode Violations and Actions Required,
- CTIA Standard Rate Shortcode Violations and Actions Required,
- CTIA Premium Rate Message Flow Violations and Actions Required, and
- CTIA Standard Rate Message Flow Violations and Actions Required lists.

Known collectively as the CTIA audit standards, these lists appear in appendices 1 through 4.

The violations and actions required on the CTIA Premium Rate Shortcode Violations and Actions Required and the CTIA Standard Rate Shortcode Violations and Actions Required lists 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. The CTIA also requires jump pages with a PSMS call-to-action to include all of the required disclosures on every page served to the user. Moreover, the disclosures must appear in print and TV as well as on mobile Websites (WAP sites) and other sources of PSMS and standard rate SMS calls-to-action.

The CTIA Premium Rate Message Flow Violations and Actions Required list applies to five SMS message types: PIN/Opt-In MT, Purchase Confirmation or Second MT, Help MT, Subscription Renewal MT, and Opt-Out Confirmation MT. The CTIA Standard Rate Message Flow Violations and Actions Required list applies to four SMS message types: PIN/Opt-In MT (optional), Confirmation MT, Help MT, and Opt-Out Confirmation MT.

Violations, with their actions required, are organized in *all* the CTIA audit standards in five categories: Program, Pricing, Subscription, T&Cs, and Charges and Billing.

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; nevertheless, all violations cited on that audit are considered valid.

The CTIA audit standards are updated regularly, and before the revisions take effect, the lists are distributed to industry participants. These updates are released at least 30 days before implementation. Please note that in some instances, and depending on the severity and risk level, immediate compliance might be mandated.

Program Violation Notices

To help content providers manage and correct violations cited on their advertising creative, the CTIA distributes color-coded Program Violation Notices, or failure forms, each week. At the top of a failure form for an advertising audit is a unique audit number and the shortcode, content provider, aggregator or aggregators, number of total interceptions, and number of total unique interceptions as well as the notice date and the cure date. A **black** failure form indicates that the most serious violations committed on that shortcode are categorized as Severity 0. A **red** failure form indicates that the most serious violations committed on that shortcode are categorized as Severity 1. And, an **orange** failure form indicates that the most serious violations on the shortcode are categorized as Severity 2.

Content providers and aggregators should consult the failure form for a complete list of violations committed on that shortcode and to learn what to do to bring the advertising into compliance with the CTIA audit standards and Mobile Marketing Association (MMA) Consumer Best Practices (CBP). Below the list of violations and actions required are thumbnail images of each unique piece of advertising creative on that shortcode captured during the review period. For convenience, unique creative are organized and numbered in groups with their duplicates. Therefore, the number of unique creative will correspond directly with the number of groups.

Clicking on any thumbnail allows the user to view an itemized list of the specific violations on that individual unique creative and related duplicates, with severity levels and actions required to correct the violations. Clicking on the thumbnail just above the itemized list takes the user to a full-size screenshot or video clip of the creative as it appeared in market on the capture date. If measurement-based Florida Attorney General (FLAG) violations apply, a link titled "Additional Images" will appear underneath the thumbnail. This link takes the user to a version of the full-size screenshot with measurements (e.g., pixel rulers, fold line, color contrast reading) applied directly to the image. For online advertisements, the Intercept Location link leads to the actual Website where the creative was intercepted. The URLs below the itemized list lead to related duplicate creative. In the event that the unique creative is an affiliate marketer's advertisement, the URLs titled "Page Links To" lead to the content provider's advertisements to which the affiliate advertisement is related.

Message flow failure forms are similar to advertising failure forms, with an image of the advertisement from which the flow was generated followed by the messages subject to audit. Message flow failure forms are associated with the CTIA, but unlike advertising failure forms, they also reference the specific carrier network on which the test was performed. The user can access the related advertisement by clicking on this image and following the link. Below each message in the flow is an itemized list of the violations committed in that message with corresponding severity levels and actions required to correct the violations.

Accessing Program Violation Notices

Where WMC Global detects violations of the CTIA audit standards, both the content provider and the relevant aggregator or aggregators receive a compliance notification via email containing a URL link or links to their Program Violation Notices.

Carriers participating in the CTIA program who have submitted active shortcode program information to the CTIA Compliance Team also will be notified when compliance notifications are published. Although the PSMS Industry Monitor ticketing system sends URLs directly to content providers, all aggregators still retain responsibility for working with the content providers they manage to resolve violations.

Aggregators can log into the PSMS Industry Monitor In-Market Monitoring Portal (IMM Portal) directly and view all violations on shortcodes associated with the content providers they manage. Aggregator associations reflect the most recent program information submitted to the CTIA Compliance Team by participating carriers. Content providers also can log into the IMM Portal but only to view their own audit information. They access the details of their shortcode violations by clicking the URL link or links in the compliance notification email, entering their unique username and password when prompted, and clicking on the appropriate thumbnail images and links in the violation notice, which will take them to the relevant section of the portal or to the Internet. Both aggregators and content providers can access the IMM Portal at http://ctia.psmsindustrymonitor.com/user/login.

Content provider and aggregator staff with compliance contacts on file who misplace their credentials or experience technical difficulties may reset their login credentials at http://ctia.psmsindustrymonitor.com/user/requestReset or contact support@psmsindustrymonitor.com for assistance.

Enforcement Process

The term *enforcement* simply refers to the process by which the CTIA Compliance Team works with aggregators and content providers to help them resolve outstanding audits by the noted cure date. Within the prescribed time period following issuance of a Program Violation Notice, the aggregator or content provider must confirm via the CTIA compliance email address (compliance@psmsindustrymonitor.com) that all violations have been resolved.

- Severity 0 violations must be resolved *immediately* on notification from the CTIA. Content providers must remove from all carrier networks, without delay, creative that advertises adult content or implies availability of adult or illicit content for download to the mobile handset.

- Severity 1 violations must be resolved *within two days* of distribution of Program Violation Notices to the content providers; Severity 2 must be resolved *within five days* of Program Violation Notices distribution. Content providers must take the specific actions required that are associated with their violations listed on the Program Violation Notices.

Q&A

On receipt of a Program Violation Notice, or failure form, content providers may submit questions to compliance@psmsindustrymonitor.com by replying to the ticket. The reply, which must preserve the ticket subject field, should pose *specific* questions or outline issues relating to the cited violations.

Aggregators and content providers should appreciate that Q&A is a courtesy extended to them solely for the purpose of entertaining good faith questions and helping them understand how they may bring their advertising into compliance. The PSMS Industry Monitor ticketing system and support email are not a venue for arguing about the MMA CBP or the CTIA audit

standards or for winding down the clock. Therefore, users of the ticketing system should refrain from pasting sections of the MMA CBP into, or attaching documents to, email.

The CTIA Compliance Team responds to content provider concerns based strictly on the published actions that the CTIA requires to correct any given published violation. The Compliance Team is unable to address creative design issues, for example, or offer advice on how to lay out a Webpage so it would meet requirements for placement of critical information such as pricing and subscription disclosure. Nor will the carrier nor the Team review and approve revised advertising creative. Asking about the number or status of a content provider's violations monthly count also is inappropriate; therefore, questions of this nature will not be addressed. As often as not, careful reading of this *entire* document, including the relevant CTIA audit standards in the appendices, should suffice.

The Compliance Team responds promptly to all Q&A messages. Generally, except in extreme circumstances, no extension is given on time to bring failed creative into compliance, regardless of Q&A status.

Retests
Responsibility for advising the CTIA Compliance Team when either the requisite changes have been made or the offending advertisement or message flow has been removed from market resides with the content provider. If the Compliance Team fails to receive confirmation, regardless of cause, and the content provider fails to take the actions required, the shortcode is subject to further action. In this case, the audit status is changed to Escalated.

In the case of TV or print advertisements with longer production cycles, content providers may submit a retest request for a future release date. Or, content providers who have been unsuccessful in their attempts to correct their other types of advertising or their message flows might require an additional retest or retests. Retest requests must be made in good faith, with a clear explanation of the changes implemented. Audits at this status are categorized as Pending Retest. Depending on the results of this retest, the audit status is updated to Closed or Retest Failed. Audits that remain in the Retest Failed state beyond the cure date will be reported along with Escalated audits for CTIA action.

Appeals
Content providers who feel they have a legitimate claim may challenge an audit by responding appropriately to compliance@psmsindustrymonitor.com within 48 hours of receiving a Program Violation Notice. The email message should state explicitly why the content provider deems the audit incorrect and should include proof to validate this claim. Appeals must be directed at the application of violations to the specific audit in question; the legitimacy of the audit standards themselves is not open for debate. Although content providers are encouraged to include all details relevant to the appeal, this presentation should be a straightforward account of the facts with evidence. A multiple-page thesis is an inappropriate format in which to couch an appeal.

The CTIA Compliance Team assumes primary responsibility for handling appeals as it does for compliance monitoring, enforcement, and Q&A. When necessary, the Team engages with the CTIA and carriers to resolve issues, but explanations the Team provides govern the appeals process. The descriptor "appeal valid" indicates that the CTIA deems the content provider's claim legitimate and that the relevant violation or violations are removed from the audit. "Appeal denied" indicates that the CTIA has rejected the claim as unsubstantiated and that the prescribed corrective action must be taken.

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Please keep in mind that . . .

- The CTIA audit standards combine requirements published in the MMA CBP with additional guidelines submitted by participating carriers. This collection of standards was drafted and ratified in carrier committee and will be applied uniformly to any program found to support any participating carrier. Carrier support is established by carrier branding, a successful handset test, or both.

- A jump page is defined as any advertisement that "jumps" a user between offers for programs on more than one shortcode. 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.

- Use of the term *free* is prohibited in advertising creative for PSMS offers, and the CTIA 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 PSMS online and mobile Internet (WAP) advertisements is the box designated for entry of the user's mobile phone number; it is *not* the Submit button the user must click after entering his or her phone number in the cell-submit field.

- The action required "Display pricing [or subscription disclosure] within 125 pixels of opt-in field or command" means the pricing and subscription disclosure (e.g., $9.99/month) must appear within 125 pixels directly above or below the cell-submit field or text-in command with no intervening text or graphics.

- The descriptor "stacked marketing," a deceptive form of advertising, refers to cross-selling of several PSMS promotions from the same or different sponsors, sometimes on multiple different shortcodes, within the same online user flow, whereby a user is shown a series of offers in close succession, often with his or her mobile phone number pre-populated in subsequent pages. A Website's initial pitch might solicit the user's number by offering "free" MP3s or ringtones, then cycle the user through the series of offers before he or she can claim the free content.

- Screenshots are taken on a screen size of 1024x768 pixels using the default configuration on a major Web browser, including Internet Explorer, Safari, Firefox, and Chrome.

- All color values are measured using the W3C color contrast formula.

- The term "pixel" refers to an Interactive Marketing Unit (IMU) as defined by the Interactive Advertising Bureau.

- The premium or standard rate offer and all terms and conditions must be clear and visible using only the default browser scroll bar. Disclosures may not be truncated or obscured by frames or secondary scroll boxes, and the terms and conditions may not be contained within a scroll-box.

Appendix 1: Premium Advertising

		CTIA Premium Rate Shortcode Violations and Actions Required			
	MMA ID	*Guidelines*	*Violations*	*Sev*	*Actions Required*
Program	CCS-25; CCS-265	Advertising may *not* promote unapproved or inappropriate content as defined by participating carriers (e.g., illegal drug use, explicit sexual content, violence, profanity, hate speech).	Advertises inappropriate violent or adult content	0	Remove references to inappropriate violent or adult content
			Implies inappropriate violent or adult content will be available	0	Remove implication of inappropriate violent or adult content
			Contains profanity or hate speech	0	Remove profanity or hate speech
			Contains or promotes illegal drug use	0	Remove all reference to illegal drugs
	n/a	Advertising must match the approved program as described in the CSC registry.	Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry
	SPR-AP-A	Advertising must *not* contain superimposed text.	Contains superimposed text or graphics	1	Correct superimposed text or graphics
	CCS-240; CCS-265	Advertising must disclose the product quantity or frequency with which the user may expect to receive messages (e.g., "You will receive content [daily], [5 per week], [30/month], [no more than 30 per month]") as part of the main offer.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency in main offer
			Product quantity or service delivery frequency hidden in T&Cs	1	State product quantity or service delivery frequency in main offer
	CCS-84	Advertising must contain program sponsor information (i.e., program name, company name, or brand).	Content provider not identified	1	Identify content provider, program sponsor, company name, or associated brand
	CCS-90; CCS-146; CCS-265; CCS-266	Advertising must state clearly and conspicuously that content is unavailable on specific carrier networks, as applicable (e.g., "Works only on carriers X, Y, and Z"; "Unavailable on carrier X"; "Music Alerts unavailable on carrier Z"). Include names of supported carriers while excluding all other carrier names.	Substitution details hidden in T&Cs	1	Display substitution details for all carriers in main offer
	ATT-60; SPR-AP-A; VZW-112	User must *not* be subjected to a series of stacked PSMS marketing offers.	Product offering associated with stacked marketing	1	Remove offer from stacked marketing flow
	CCS-117	Content provider must control MIN- and PIN-entry pages and assumes responsibility for compliance with MMA guidelines and applicable laws.	Cell-submit function located on affiliate-controlled page	2	Move cell-submit and PIN-entry functions to program sponsor-controlled page
	CCS-265	Advertising must include a description of the actual product or service (e.g., "You will receive [jokes]," "[reminders]," "[chat messages]") as part of the main offer.	No service description	2	Describe service in main offer
			Service description hidden in T&Cs	2	Describe service in main offer
	CCS-265; ATT-AU-17	Display only carrier logos distributed from or approved by the carriers. Ensure that *no* AT&T logos are present in advertising.	Misuse of AT&T Mobility logo	2	Remove AT&T logo

	MMA ID	Guidelines	Violations	Sev	Actions Required
CTIA Premium Rate Shortcode Violations and Actions Required *continued*					
Program *continued*	CCS-265; VZW-4; VZW-48	Display only carrier logos distributed from or approved by the carriers. Ensure that "Verizon Wireless" is used in advertising. References to Verizon Wireless must *not* appear as "Verizon" or "VZW."	Misuse of Verizon Wireless name, logo, or both	2	Remove Verizon name, logo, or both
	CCS-26	Advertising must *not* contain language that minimizes the product or service price (e.g., "only," "just").	Language minimizes pricing	2	Remove terms that minimize price (e.g. 'only', 'just')
	VZW-74	Ensure that credit card information is *not* required or requested.	Contains option to pay by credit card	2	Remove credit card payment option
	CCS-211	Chat participants must be able to report and block members whose activities are perceived as abusive, threatening, or inappropriate or that promote illegal activity.	No report abuse option [chat]	2	Implement abuse reporting functionality on opt-in page
			No block functionality [chat]	2	Implement block feature on opt-in page
Pricing	CCS-29; CCS-265	Advertising must state the price point clearly (e.g., "[$0.99] per message," "[$5.99–$9.99]/month") as part of the main offer. Ranges are acceptable.	No pricing	1	Display program pricing in main offer
			Pricing hidden in T&Cs	1	Display program pricing in main offer
	CCS-30; CCS-119; CCS-265	Program must *not* be promoted as "free" when premium fees are incurred with a reasonable level of participation.	Improper use of the term *free*	1	Remove the term *free*
	CCS-265; SPR-AP-A	Advertising must state specific price points clearly for each carrier (e.g., "[$1.99] for carrier X, [$2.99] for carrier Y, and [$3.99] for all other carriers").	Carrier-specific pricing unspecified	1	Specify pricing for each carrier individually
			Unclear or conflicting pricing	1	Display all price points clearly and conspicuously
	CCS-216; SPR-AP-A; TMO-162	In the case of premium chat, billing frequency must be monthly *or* per message. Any other billing frequency is unacceptable.	Unapproved billing frequency for chat	1	Migrate billing frequency to per message or monthly
	CCS-265	Pricing disclosure or range containing highest available price point must: • Be within 125 pixels of the opt-in field or command with no other text in between; • Be at least point size 12 (16px/1em); • Have a color contrast of 125; • Be in numerical format, including the dollar sign ($);	Pricing point size too small	1	Increase pricing point size to at least 12 point font
			Pricing not displayed adjacent to opt-in field or command	2	Display pricing within 125 pixels directly above or below opt-in field or command
			Pricing indistinguishable from background color	2	Alter color scheme to minimum color contrast value of 125
			Incorrect pricing format	2	Display full pricing clearly as numerals with dollar sign ($)
Subscription	CCS-265	Advertising for subscription services must disclose billing frequency (e.g., "$3.99/[month]," "$3.99/[mo]," "$3.99/[monthly]," "$3.99/[each]") in the main offer.	Failure to disclose billing frequency	1	Disclose billing frequency in main offer
			Billing frequency hidden in T&Cs	1	Disclose billing frequency in main offer
			Unclear or conflicting billing frequency	1	Disclose billing frequency clearly

	MMA ID	Guidelines	Violations	Sev	Actions Required
		**CTIA Premium Rate Shortcode Violations and Actions Required** *continued*			
Subscription *continued*	CCS-265; CCS-267	Advertising for subscription services must display the word "subscription" or equivalent in main offer. The disclosure "3.99/month" is *in*sufficient.	No subscription disclosure	1	Display the word "subscription" in main offer
			Subscription disclosure hidden in T&Cs	1	Display the word "subscription" in main offer
	ATT-05; SPR-AP-A	Billing frequency (e.g., "$3.99/[month]," "$3.99/[mo]," "$3.99/[monthly]," "$3.99/[each]") must be displayed adjacent to the opt-in field or command.	Billing frequency not displayed adjacent to opt-in field or command	2	Display billing frequency within 125 pixels directly above or below opt-in field or command
	ATT-55	Advertising for subscription services must summarize an estimated total monthly cost (e.g., "$0.99 each equals $30.00/mo.").	Failure to summarize total monthly cost	2	Summarize price as monthly cost (e.g., $0.99 each equals $30.00/mo.)
	CCS-180; ATT-36; SPR-AP-A	Billing frequency must be per month. Other subscription renewal cycles (e.g., "1-week subscription" or "6-month subscription") are *un*acceptable.	Daily, weekly, quarterly, or annual subscription	2	Migrate to monthly subscription
	CCS-199	Minimum subscription periods are prohibited for all programs.	Minimum subscription period	2	Remove stipulation for minimum subscription period
T&Cs	CCS-265; SPR-AP-A	Privacy statement or link to privacy policy must be present in advertising.	No privacy policy or link to privacy policy	1	Add Privacy Statement or link to Privacy Statement in advertising
	CCS-88	All material terms and conditions of the program must be communicated with the offer (e.g., a clearly labeled "Terms and Conditions" section).	No T&Cs	1	Display at least basic T&Cs
	VZW-20	Ensure that users are informed conspicuously of their terms and conditions agreement (e.g., verbiage indicating that "by entering a PIN," "by checking a box," or "by texting YES," the user agrees to the terms and conditions).	No disclosure that user agrees to T&Cs	1	Implement verbiage indicating user acceptance of T&Cs
			Disclosure that user agrees to T&Cs displayed inconspicuously	1	Display verbiage conspicuously indicating user acceptance of T&Cs
	CCS-266	Give notice that the user must be the account holder or have the account holder's permission to participate.	No account holder authorization disclosure[1] [online]	1	Disclose exactly: "All purchases must be authorized by account holder"
	CCS-31	All advertising must disclose clearly in the audio and visual that the user must be 18 years or older or have permission from a parent or guardian to participate.	No legal age or parental permission disclosure	1	Disclose clearly that user must be age 18 or older or have parental permission to participate
	CCS-89	If a checkbox is used to indicate user acceptance of the terms and conditions, the checkbox may not be prechecked.	Prechecked T&Cs	1	Uncheck T&Cs acceptance box
	CCS-266	All terms and conditions must be clear and visible using only the default browser scroll bar. Disclosures may *not* be truncated or obscured by frames or scroll boxes.	Ad contained within invisible scrolling frame (accessible *only* with scroll wheel)	1	Reveal scroll bar
			T&Cs contained in separate scroll-box	1	Remove scroll from offer

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[1] Acceptable language includes: "All purchases must be authorized by account holder," "You must be the account holder or have permission from the account holder," "The account holder must authorize all purchases," and "The account holder must authorized all donations."

		CTIA Premium Rate Shortcode Violations and Actions Required *continued*			
	MMA ID	*Guidelines*	*Violations*	*Sev*	*Actions Required*
T&Cs *continued*	CCS-83	Terms and conditions must contain HELP instructions in **bold** lettering.	No HELP information	1	Display HELP command, toll-free number or email address on opt-in page
			HELP information indistinguishable from promotional or T&Cs text	2	Display HELP information in bold typeface
	CCS-82	Terms and conditions must display STOP instructions in **bold** lettering.	No opt-out information	2	Display STOP as opt-out command on opt-in page
			Incorrect opt-out information	2	Display STOP as opt-out command
			Opt-out information indistinguishable from promotional or T&Cs text	2	Display opt-out information in bold typeface
	CCS-266	Websites must display at least the first three lines of terms and conditions text above the fold as viewed on a 1024x768 resolution monitor.	T&Cs displayed below fold	2	Display first three lines of T&Cs above fold at screen resolution 1024x768
	SPR-AP-A	Ensure that *no* portion of the terms and conditions moves or scrolls. Terms and conditions must be static and viewable all at once.	Scrolling T&Cs [TV]	2	Display static T&Cs
	CCS-225	Advertising must contain verbiage indicating that the user can unsubscribe at any time.	No minimum subscription disclosure	2	Disclose that user can unsubscribe at any time
	CCS-266	Advertising must contain verbiage indicating that renewal occurs automatically and that charges continue until the customer cancels.	No customer cancellation disclosure	2	Disclose clearly that service will continue until cancelled
Charges and Billing	CCS-266	Advertising must disclose that the premium charge will be added to the user's wireless phone bill or will be deducted from his or her prepaid balance account.	No mention of billing method	1	Disclose billing method
	CCS-85; CCS-266	Advertising must disclose additional carrier charges clearly. The text "standard rates may apply" is no longer acceptable. Approved language includes: "Message and Data Rates May Apply," "Msg&data rates may apply," "Msg&data rates may aply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply

Appendix 2: Standard Rate Advertising

		CTIA Standard Rate Shortcode Violations and Actions Required			
	MMA ID	*Guidelines*	*Violations*	*Sev*	*Actions Required*
Program	CCS-25; CCS-265	Advertising may *not* promote unapproved or inappropriate content as defined by individual carriers (e.g., illegal drug use, explicit sexual content, violence, profanity, hate speech).	Advertises inappropriate violent or adult content	0	Remove references to inappropriate violent or adult content
			Implies inappropriate violent or adult content will be available	0	Remove implication of inappropriate violent or adult content
			Contains profanity or hate speech	0	Remove profanity or hate speech
			Contains or promotes illegal drug use	0	Remove all reference to illegal drugs
	n/a	Advertising must match the approved program as described in the CSC registry.	Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry
	SPR-AP-B	Advertising must *not* contain superimposed text.	Contains superimposed text or graphics	1	Correct superimposed text or graphics
	CCS-240	Advertising must disclose the product quantity or the frequency with which the user may expect to receive messages (e.g., "You will receive content [daily], [5 per week], [30/month], [no more than 30 per month]") as part of the main offer.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
	CCS-84	Advertising must contain program sponsor information (i.e., program name, company name, or brand).	Content provider not identified	1	Identify content provider, program sponsor, company name, or associated brand
	CCS EG; SPR-AP-B	Advertising must include a description of the actual product or service (e.g., "You will receive [jokes]," "[reminders]," "[chat messages]") as part of the main offer.	No service description	2	Describe service in advertising
	ATT-AU-17	Display only carrier logos distributed from or approved by the carriers. Ensure that *no* AT&T logos are present in advertising.	Misuse of AT&T Mobility logo	2	Remove AT&T logo
	VZW-4; VZW-48	Display only carrier logos distributed from or approved by the carriers. Ensure that "Verizon Wireless" is used in advertising. References to Verizon Wireless must *not* appear as "Verizon" or "VZW."	Misuse of Verizon Wireless name, logo, or both	2	Remove Verizon name, logo, or both
Pricing	CCS-30; CCS-119	Use of the word "free" varies by carrier. However, when no fees or charges other than standard messaging and data charges apply, synonyms are supported (e.g., "complimentary," "bonus"). The word "free" and all related terminology must be accompanied by the phrase "Msg&Data Rates may apply."	Improper use of the term *free*	1	Remove the term *free*

	MMA ID	Guidelines	Violations	Sev	Actions Required
CTIA Standard Rate Shortcode Violations and Actions Required *continued*					
T&Cs	SPR-AP-B	Privacy statement or link to privacy policy must be present in advertising.	No privacy policy or link to privacy policy	1	Add Privacy Statement or link to Privacy Statement in advertising
	CCS-89	If a checkbox is used to indicate user acceptance of the terms and conditions, the checkbox may not be prechecked.	Prechecked T&Cs	1	Uncheck T&Cs acceptance box
	CCS-83	Terms and conditions must contain HELP instructions in **bold** lettering.	No HELP information	1	Display HELP command, toll-free number or email address on opt-in page
			HELP information indistinguishable from promotional or T&Cs text	2	Display HELP information in bold typeface
	CCS-82	Terms and conditions must display STOP instructions in **bold** lettering.	No opt-out information	2	Display STOP as opt-out command on opt-in page
			Incorrect opt-out information	2	Display STOP as opt-out command
			Opt-out information indistinguishable from promotional or T&Cs text	2	Display opt-out information in bold typeface
Charges and Billing	CCS-85	Advertising must disclose additional carrier charges clearly. The text "standard rates may apply" is no longer acceptable. Approved language includes: "Message and Data Rates May Apply," "Msg&data rates may apply," "Msg&data rates may aply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply

Appendix 3: Premium Rate Message Flow

		MMA ID	Guidelines	Violations	Sev	Actions Required
			CTIA Premium Rate Message Flow Violations and Actions Required			
PIN/Opt-In MT	**Program**	CCS-37; CCS-120	Premium rate programs require double opt-in, and premium users must acknowledge positively their acceptance of a premium charge.	Failure to send PIN/Opt-In message	1	Send PIN/Opt-In message with PIN or response command for double opt in
		CCS-131	The authorized user must acknowledge opt-in. An MT message can either deliver a PIN code for entry on the Website or instruct the user to respond affirmatively with "Y" or "YES."	Failure to provide user PIN or response command	1	Display PIN or response command
		CCS EG05; SPR-AP-D; TMO-127; TMO-140; TMO-150;	Initial MT must state clearly the content delivery frequency.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
		CCS-146	Content providers should *not* redirect the user from one program type (e.g., ringtone subscription) to another (e.g., horoscope alert subscription).	Substitute program	1	Display substitution details for all carriers before program enrollment
		CCS-133	For premium campaigns, the PIN code or "reply YES"–type text must be displayed after the program pricing information.	Failure to locate PIN or response command *after* pricing information *only*	2	Display PIN or response command *after* pricing information *only*
		CCS-125	Initial MT must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad
		CCS-127	Initial MT must include a short program description (e.g., premium chat).	No product or service disclosure	2	Disclose product or service
		CCS-104	Program flow and information must *not* be misleading in any way.	Misrepresentation of product offering	2	Reconcile, among all messages and ad, references to product type
				Misrepresentation of product quantity	2	Reconcile, among all messages and ad, references to product quantity
	Pricing	CCS-128; CCS-132	Initial MT must disclose the program pricing terms (e.g., "$0.99 per message," "$3.99 per month").	No pricing	1	Display program pricing
				Unclear pricing	1	Display program and carrier-specific pricing
		CCS-263	In all materials (advertising, opt-in, terms and conditions), the price must be expressed in numerical format, including the dollar sign ($).	Incorrect pricing format	1	Display full pricing clearly as numerals with dollar sign ($)
		CCS-119	Program must *not* be promoted as "free" when premium fees are incurred with a reasonable level of participation.	Improper use of the term *free*	1	Remove the term *free*
		CCS-104; SPR-AP-D	Price point in advertising must match the price point in all MT messages.	Conflicting pricing	2	Reconcile, among all messages and ad, references to pricing

		MMA ID	**Guidelines**	**Violations**	**Sev**	**Actions Required**
			CTIA Premium Rate Message Flow Violations and Actions Required *continued*			
PIN/Opt-In MT *continued*	**Subscription**	CCS-178	Initial MT must identify subscription programs and disclose the billing interval.	No subscription disclosure	1	Display explicit subscription disclosure
				Failure to disclose billing frequency	1	Disclose billing frequency
				Unclear or conflicting billing frequency	1	Disclose billing frequency clearly
	T&Cs	CCS-126; CCS-129	Initial MT must provide the program sponsor's contact details (i.e., a toll-free number, HELP via text message, or Web address).	No HELP contact information	1	Display HELP text command, phone number, or Web address
	Charges and Billing	CCS EG05; SPR-AP-D; TMO-126, -138, -149	Initial MT must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply
Purchase Confirmation/Second MT	**Program**	CCS-37; CCS-120	Premium users must acknowledge positively their acceptance of a premium charges before such charges are applied to their account.	Failure to initiate double opt-in	1	Require user to enter PIN online or reply "Yes," "Go," "Okay," or similar affirmative to PIN/Opt-in message before sending billed MT
		CCS-274; SPR-AP-D; TMO-87; VZW-24	After the user opts in successfully, a confirmation MT message must be sent.	Failure to confirm program enrollment	1	Send confirmation message
		CCS-08; CCS-103	Each opt-in applies only to one specific program and must *not* be used as a blanket approval to promote other programs, products, and services.	Automatic enrollment in multiple programs	1	Require user to complete dedicated opt-in for each separate program
		CCS-146	Content providers should *not* redirect the user from one program type (e.g., ringtone subscription) to another (e.g., horoscope alert subscription).	Substitute program	1	Display substitution details for all carriers before program enrollment
		CCS-274; SPR-AP-D; TMO-83	Confirmation MT must state clearly the content delivery frequency.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
		CCS-125	Confirmation MT must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad
		CCS-127	Confirmation MT must include a short program description (e.g., premium chat).	No product or service disclosure	2	Disclose product or service
		CCS-104	Program flow and information must *not* be misleading in any way.	Misrepresentation of product offering	2	Reconcile, among all messages and ad, references to product type
				Misrepresentation of product quantity	2	Reconcile, among all messages and ad, references to product quantity

		MMA ID	Guidelines	Violations	Sev	Actions Required
			CTIA Premium Rate Message Flow Violations and Actions Required *continued*			
Purchase Confirmation/Second MT continued	*Pricing*	CCS-128	Confirmation MT must disclose the program pricing terms (e.g., "$0.99 per message," "$3.99 per month").	No pricing	1	Display program pricing
				Unclear pricing	1	Display program and carrier-specific pricing
		CCS-263	In all materials (advertising, opt-in, terms and conditions), the price must be expressed in numerical format, including the dollar sign ($).	Incorrect pricing format	1	Display full pricing clearly as numerals with dollar sign ($)
		CCS-119	Program must *not* be promoted as "free" when premium fees are incurred with a reasonable level of participation.	Improper use of the term *free*	1	Remove the term *free*
		CCS-104; SPR-AP-D;	Price point in advertising must match the price point in all MT messages.	Conflicting pricing	2	Reconcile, among all messages and ad, references to pricing
	Subscription	CCS-178	Confirmation MT must identify subscription programs and disclose the billing interval.	No subscription disclosure	1	Display explicit subscription disclosure
				Failure to disclose billing frequency	1	Disclose billing frequency
				Unclear or conflicting billing frequency	1	Disclose billing frequency clearly
	T&Cs	CCS-176	Confirmation MT must provide the program sponsor's contact details (i.e., a toll-free number, HELP via text message, or Web address).	No HELP contact information	1	Display HELP text command, phone number, or Web address
		CCS-39; CCS-274	On opting into a program, the user must be told how to opt out of the program.	No opt-out information	1	Display STOP as opt-out command
	Charges and Billing	CCS EG05; SPR-AP-D; TMO-126, -138, -149	Confirmation MT must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply
HELP MT	*Program*	CCS-53; CCS-281	Program must respond to user HELP requests with an MT message, regardless of whether the user is subscribed to the program and whether the offer is a subscription program. HELP always must result in a response.	Failure to respond to user message for HELP	1	Send HELP message
		CCS-55	HELP response must supply information for only the program the user is opted into when he or she has enrolled in only one program.	Incorrect use of HELP menu	1	Display program-specific HELP message when user opts into only one program
		CCS EG01; SPR-AP-D	HELP response must state clearly the content delivery frequency.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
		CCS-58	HELP response must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad

		MMA ID	Guidelines	Violations	Sev	Actions Required
	Program *continued*	CCS-60	HELP response must include a short program description (e.g., premium chat).	No product or service disclosure	2	Disclose product or service
		CCS-104	Program flow and information must *not* be misleading in any way.	Misrepresentation of product offering	2	Reconcile, among all messages and ad, references to product type
				Misrepresentation of product quantity	2	Reconcile, among all messages and ad, references to product quantity
	Pricing	CCS-61	HELP response must disclose the program pricing terms (e.g., "$0.99 per message," "$3.99 per month").	No pricing	1	Display program pricing
				Unclear pricing	1	Display program and carrier-specific pricing
		CCS-263	In all materials (advertising, opt-in, terms and conditions), the price must be expressed in numerical format, including the dollar sign ($).	Incorrect pricing format	1	Display full pricing clearly as numerals with dollar sign ($)
		CCS-119	Program must *not* be promoted as "free" when premium fees are incurred with a reasonable level of participation.	Improper use of the term *free*	1	Remove the term *free*
		CCS-104; SPR-AP-D	Price point in advertising must match the price point in all MT messages.	Conflicting pricing	2	Reconcile, among all messages and ad, references to pricing
	Subscription	CCS-61	HELP response must identify subscription programs and disclose the billing interval.	Failure to disclose billing frequency	1	Disclose billing frequency
				Unclear or conflicting billing frequency	1	Disclose billing frequency clearly
	T&Cs	CCS-59	HELP response must provide a toll-free phone number to contact the program sponsor.	No additional HELP contact information	1	Display toll-free phone number
		CCS-62	HELP response must contain opt-out information.	No opt-out information	1	Display STOP as opt-out command
	Charges and Billing	CCS EG01; SPR-AP-D; TMO-36; VZW-124	HELP response must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply
	Program	CCS-193.5	Before the subscription is renewed, a renewal message must be sent to the user's handset.	Failure to send subscription renewal message	1	Deliver renewal message monthly before billing
		CCS-192	Renewal MT must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad
		SPR-AP-D; VZW-11	Renewal MT must include a short program description (e.g., premium chat).	No product or service disclosure	2	Disclose product or service

The table is titled: **CTIA Premium Rate Message Flow Violations and Actions Required** *continued*

Left vertical labels: *HELP MT continued* (top section), *Subscription Renewal MT* (bottom section)

		MMA ID	Guidelines	Violations	Sev	Actions Required
Subscription Renewal MT *continued*	***Pricing***	CCS-194	Renewal MT must disclose program pricing terms (e.g., "$0.99 per message," "$3.99 per month").	No pricing	1	Display program pricing
				Unclear pricing	1	Display program and carrier-specific pricing
		CCS-263	In all materials (advertising, opt-in, terms and conditions), the price must be expressed in numerical format, including the dollar sign ($).	Incorrect pricing format	1	Display full pricing clearly as numerals with dollar sign ($)
		CCS-119	Program must *not* be promoted as "free" when premium fees are incurred with a reasonable level of participation.	Improper use of the term *free*	1	Remove the term *free*
		CCS-104; SPR-AP-D	Price point in advertising must match the price point in all MT messages.	Conflicting pricing	2	Reconcile, among all messages and ad, references to pricing
	Subscription	CCS-193	Renewal MT must identify the program as a subscription that will be renewed.	Failure to notify user of subscription renewal	1	Disclose program renewal
				No subscription disclosure	1	Display explicit subscription disclosure
		CCS-194	Renewal MT must disclose the billing interval.	Failure to disclose billing frequency	1	Disclose billing frequency
				Unclear or conflicting billing frequency	1	Disclose billing frequency clearly
	T&Cs	CCS EG10; TMO-155; VZW-11	Renewal MT must provide the program sponsor's contact details (i.e., a toll-free number, HELP via text message, or Web address).	No HELP contact information	1	Display HELP text command, phone number, or Web address
		CCS-195	Renewal MT must contain opt-out information.	No opt-out information	1	Display STOP as opt-out command
	Charges and Billing	CCS EG10	Renewal MT must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply
Opt-Out Confirmation MT	***Program***	CCS-40; CCS-50	User can stop participating and receiving messages from any program by sending STOP to the shortcode used for that program. • The opt-out keyword STOP sent by the user may *not* be case sensitive. • The STOP keyword must work in the native language of the program. • Shortcodes running MMS programs must handle the STOP keyword correctly, regardless of whether the user sends the keyword via MMS or SMS. • Shortcode programs must ignore subsequent non-keyword text included in STOP MOs.	Failure to respond to user message to STOP service	1	Send message informing user that service has been terminated and that no more messages will be sent
				User STOP message with subsequent text not recognized	1	Ignore subsequent text in user STOP message
				STOP command case sensitive	1	Recognize STOP command regardless of text case

The title row spanning the table reads: **CTIA Premium Rate Message Flow Violations and Actions Required** *continued*

		CTIA Premium Rate Message Flow Violations and Actions Required *continued*				
	MMA ID	*Guidelines*		*Violations*	*Sev*	*Actions Required*
Opt-Out Confirmation MT	CCS-48; CCS-275	MT message confirming opt-out should be sent to the user. This message, which may *not* be premium, must reference the specific program from which the user has opted out. No further messages may be sent to the user from this program, including marketing messages for related or unrelated programs. When the user is not currently subscribed to a recurring program, or when the program is a one-time offer for which the user will receive no additional messages, an MT message may be sent confirming only that the user is not subscribed to programs on this shortcode and indicating that no further messages will be sent.		Unsolicited message received after user sent STOP	1	Cease all messaging associated with program
				Failure to confirm service termination	2	Inform user that service has been terminated
				Failure to confirm message flow termination	2	Inform user that no more messages will be sent
				Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad

Appendix 4: Standard Rate Message Flow

		CTIA Standard Rate Message Flow Violations and Actions Required				
		MMA ID	*Guidelines*	*Violations*	*Sev*	*Actions Required*
PIN/Opt In MT [optional[2]]	*Program*	SPR-AP-E VZW EG-1	Initial MT must state clearly the content delivery frequency.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
		SPR-AP-E VZW EG-1	Initial MT must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad
		SPR-AP-E VZW EG-1	Initial MT must include a short program description (e.g., news alerts).	No product or service disclosure	2	Disclose product or service
		CCS-104	Program flow and information must *not* be misleading in any way.	Misrepresentation of product offering	2	Reconcile, among all messages and ad, references to product type
				Misrepresentation of product quantity	2	Reconcile, among all messages and ad, references to product quantity
	T&Cs	SPR-AP-E	Initial MT must provide the program sponsor's contact details (i.e., a toll-free number, HELP via text message, or Web address).	No HELP contact information	1	Display HELP text command, phone number, or Web address
	Charges and Billing	SPR-AP-E; TMO-111	Initial MT must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply
Confirmation MT	*Program*	CCS-274	After the user opts in successfully, a confirmation MT message must be sent.	Failure to confirm program enrollment	1	Send confirmation message
		CCS-08; CCS-103	Each opt-in applies only to one specific program and must *not* be used as a blanket approval to promote other programs, products, and services.	Automatic enrollment in multiple programs	1	Require user to complete dedicated opt-in for each separate program
		CCS-274	Confirmation MT must state clearly the content delivery frequency.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
		SPR-AP-E; TMO-112, -116	Confirmation MT must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad
		CCS-274; CCS-EG	Confirmation MT must include a short program description (e.g., news alerts).	No product or service disclosure	2	Disclose product or service
		CCS-104	Program flow and information must *not* be misleading in any way.	Misrepresentation of product offering	2	Reconcile, among all messages and ad, references to product type
				Misrepresentation of product quantity	2	Reconcile, among all messages and ad, references to product quantity

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[2] Although delivery of a PIN/Opt-In MT is optional for standard rate campaigns, it is recommended for recurring subscriptions and Web-based opt-ins. This message must comply with stated guidelines.

		CTIA Standard Rate Message Flow Violations and Actions Required *continued*			
		MMA ID	*Guidelines*	*Violations*	*Sev*	*Actions Required*

		MMA ID	*Guidelines*	*Violations*	*Sev*	*Actions Required*
Confirmation MT cont.	*T&Cs*	CCS-274	Confirmation MT must provide the program sponsor's contact details (i.e., a toll-free number, HELP via text message, or Web address).	No HELP contact information	1	Display HELP text command, phone number, or Web address
		CCS-39; CCS-274	On opting into a program, the user must be told how to opt out of the program.	No opt-out information	1	Display STOP as opt-out command
	Charges and Billing	CCS-274; SPR-AP-E; TMO-111	Confirmation MT must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply
HELP MT	*Program*	CCS-53; CCS-281	Program must respond to user HELP requests with an MT message, regardless of whether the user is subscribed to the program and whether the offer is a subscription program. HELP always must result in a response.	Failure to respond to user message for HELP	1	Send HELP message
		CCS-55	HELP response must supply information for only the program the user is opted into when he or she has enrolled in only one program.	Incorrect use of HELP menu	1	Display program-specific HELP message when user opts into only one program
		CCS EG; SPR-AP-D	HELP response must state clearly the content delivery frequency.	No product quantity or service delivery frequency	1	State product quantity or service delivery frequency
		CCS-58	HELP response must identity the program sponsor clearly (i.e., program name, company, or brand).	Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad
		CCS-60	HELP response must include a short program description (e.g., news alerts).	No product or service disclosure	2	Disclose product or service
		CCS-104	Program flow and information must *not* be misleading in any way.	Misrepresentation of product offering	2	Reconcile, among all messages and ad, references to product type
				Misrepresentation of product quantity	2	Reconcile, among all messages and ad, references to product quantity
	T&Cs	CCS-62	HELP response must include opt-out information.	No opt-out information	1	Display STOP as opt-out command
	Charges and Billing	CCS EG; SPR-AP-E; TMO-36; VZW-124	HELP response must state clearly that "Msg&Data Rates May Apply."	No mention that message and data rates may apply	2	Disclose that message and data rates may apply

		MMA ID	Guidelines	Violations	Sev	Actions Required
CTIA Standard Rate Message Flow Violations and Actions Required *continued*						
Opt-Out Confirmation MT	*Program*	CCS-40; CCS-50	User can stop participating and receiving messages from any program by sending STOP to the shortcode used for that program. • The opt-out keyword STOP sent by the user may *not* be case sensitive. • The STOP keyword must work in the native language of the program. • Shortcodes running MMS programs must handle the STOP keyword correctly, regardless of whether the user sends the keyword via MMS or SMS. • Shortcode programs must ignore subsequent non-keyword text included in STOP MOs.	Failure to respond to user message to STOP service	1	Send message informing user that service has been terminated and that no more messages will be sent
				STOP command case sensitive	1	Recognize STOP command regardless of text case
				User STOP message with subsequent text not recognized	1	Ignore subsequent text in user STOP message
		CCS-48; CCS-275	MT message confirming opt-out should be sent to the user. This message, which may *not* be premium, must reference the specific program from which the user has opted out. No further messages may be sent to the user from this program, including marketing messages for related or unrelated programs. When the user is not currently subscribed to a recurring program, or when the program is a one-time offer for which the user will receive no additional messages, an MT message may be sent confirming only that the user is not subscribed to programs on this shortcode and indicating that no further messages will be sent.	Unsolicited message received after user sent STOP	1	Cease all messaging associated with program
				Failure to confirm message flow termination	2	Inform user that no more messages will be sent
				Failure to identify program	2	Display program name
				Failure to identify program clearly	2	Display program name consistently in all messages and ad