Wireless Application Service Providers

Adult Content Policy & Guidelines

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WARNING	This document contains words that may be viewed as offensive and must therefore be opened and viewed only by WASPs who provide content of an adult nature who therefore voluntarily agree to read this document and indemnify Vodacom accordingly.

ABBREVIATIONS

ACM	Adult Content Management
CUR	Common User Repository
RAB	Real-time Authentication and Billing
SGP	Service Gateway Platform
SMS	Short Message Service
SMSC	Short Message Service Centre
SP	Service Provider
URL	Uniform Resource Locator
USSD	Unstructured Supplementary Service Data
VSP	Vodacom Service Provider
WAP	Wireless Application Protocol
WASP	Wireless Application Service Provider

Definitions

Access Controls	Operational capability, including technical and business process functions, to control access to certain content or services. These are based on user age and/or user preference (covers both on-net and off-net requirements, applies across platforms and includes multiple components and capabilities focussed on barring, filtering and content management solutions)
Age Verification	Process for confirming user's adult status, allowing them to be authenticated prior to accessing age-restricted content
Internet barring	Applying a total block to internet
Internet filtering	Applying filtering tools to limit internet access from a mobile. This attempts to differentiate between "wanted" and "unwanted" content/ products by using a mixture of word-search, URL block/ allows lists, Artificial Intelligence-based examination of web content etc.
Off-net	Third party WAP services and applications, all other internet services and applications
On-net	Vodafone live! branded and hosted content and services
Opt-In	The barring of age-restricted content or services by default. Access to this type of content or services has to be requested by user
Opt-Out	The provision of universal access to age-classified content by default. Those who do not wish to have access must request content or services to be de-activated

Vodacom WASP Adult Content Policy and Guidelines

1. OBJECTIVE

The aim of Vodacom's Adult Content Management (ACM) Policy and Guidelines is to ensure and provide a responsible and legal framework for the provision of adult content which will not only protect children from accessing inappropriate content but also provide business rules that will ensure compliance with the law.

2. ADULT CONTENT CLASSIFICATION

This policy provides for four content categories which are classified as follows:

Content Category	Description
All ages:	Content that is suitable for viewing by all ages.
Age Classified:	Content and applications that, in Vodacom's judgement, are only suitable for customers above a certain age.
Age restricted:	Content and applications which in Vodacom's judgement are restricted to users above 18 years of age. This type of content includes gambling services and some forms of sexually-explicit content
Illegal:	Content which is prohibited by the South African law.

3. ACM POLICY AND GUIDELINES

3.1. WASPs should provide on-net content that does not exceed level 1.7 on the Vodacom ACM Matrix (refer to attached Annexure).

3.2. Access to content with a maximum rating of 1.7 will be allowed with no age verification and no requirement for users to opt-in for this type of content. However, WASPs are

required to place a "warning screen" advising users that the content they are about to view carries an age restriction of 2-16.

3.3. Age restricted off-net content (WAP and WEB) may (subject to clauses 3.4 to 3.5) exceed the level of 1.7 but WASPs will not be permitted to utilise Vodacom's billing systems to charge for that off-net content. Charging via other means (e.g. credit card) will not be prohibited.

3.4. Illegal content is prohibited on the Vodacom Network. Contravention of this business rule will result in the termination of the WASP agreement and may result in prosecution by the law.

3.5. Illegal content will include but not be limited to content which is defamatory, offensive, derogatory, hateful, obscene and as such are prohibited the Vodacom Network. Examples of content that will fall into the following categories, include, but are not limited to:

3.5.1. The portrayal of explicit sexual activity (i.e. contact, intercourse);

3.5.2. Female Genitalia / Aroused male genitalia;

3.5.3. Ejaculation images;

3.5.4. Masturbation;

3.5.5. Oral-genital contact of any kind;

3.5.6. Penetration by finger, penis, tongue, or any object;

3.5.7. Fetish material – whips, chains, bondage materials and dress;

3.5.8. Material (including dialogue) likely to encourage abusive sexual activity:

   (e.g. paedophilia, incest) which may include depiction involving adults role playing as non-adults;

3.5.9. The infliction of pain or physical harm, real or (in a sexual context) simulated;

3.5.10. Depiction of the use of any form of physical restraint, for example, gags and

bonds;

3.5.11. Activity which is degrading or dehumanising (examples include the portrayal

of bestiality, necrophilia, defecation, urolagnia);

3.5.12. Child pornography;

3.5.13. Material containing racial, religious or ethnic hatred or abuse, material

containing discriminatory or defamatory abuse; and

3.5.14. The above applies to both heterosexual and homosexual activities and

cartoon imagery.

3.6. Without limiting the provisions of clause 3.4 and 3.5 WASPs must adhere to all the provisions of the Films and Publications Act, Act 65 of 1996 which includes restrictions on XX and X18 content. The Act stipulates that any content (i.e. falling within the definition of film (which includes still images) OR publication) that is classified as XX or X18 may NOT be distributed to nor be made accessible to mobile phones in South Africa, nor be accessed via a WAP link, whether or not the server is inside South Africa or outside South Africa.

3.7. WASPs should comply with WASPA Code of Conduct in terms of the provision of adult content services including the requirements of age verification.

3.8. Any contraventions will result in revenue being withheld and/or the service in question being terminated and/or the WASP agreement being terminated.

4. BILLING POLICIES AND PROCEDURES

4.1. WASPs that use Vodacom's Online Billing Service to bill are required to indicate the content class by submitting the relevant for the content class parameter as indicated in the OBS interface specification.

00 = All Ages

01 = Age Classified

04 = Age restricted

It is crucial for WASPs to adhere to the OBS requirements as stipulated to prevent systems error.

5. PARENTAL CONTROL

Although the internet world provides a myriad of benefits through the provision of open source of information and communication, it presents a threat in that children have access to inappropriate content. In an effort to protect children from accessing unsuitable content, Vodacom has a parental control mechanism which enables parents to block mobile phones from accessing inappropriate content by dialing *111*123# from the phone to be blocked to enable internet barring of all adult sites and chat services. Once blocked, the mobile phone cannot be unblocked remotely; users must provide their ID to verify their age at their Service Provider.

5.1. WASPs that offer adult content and chat services are required to check whether the user is opted in or out before distributing content or granting service access to the user. Vodacom has an **ACM WASP Query** mechanism which enables WASPs to retrieve the subscriber's ACM information stored on the Vodacom Common User Repository (CUR). Refer to the SGP/WASP Generic Interface Specification and the ACM WASP Query Specification for technical details. Failure to adhere to this business rule will result in the service being terminated.

ANNEXURE - Adult Content Matrix

Rating	Title		Description	Male Male	Comments
CS1.0	**Glamour/Topless**	This type of content is allowed on the Vodacom Network.			
CS1.1		Lingerie	Single Model, no nudity must be wearing bra and panties/swimwear/etc. No nipples, no nipple shadow, no nipple covers, no pubic hair or see-through underwear. Can include full rear view if wearing G-String/panties. No sexually suggestive touching or position. No use of objects to imply sexual activity (See Comments).		Use of Object to convey sexual activity covers the handling, kissing, licking or sucking of phallic-like objects.
CS1.2		Glamour	Single Model, no nipples, no nipple shadow, no nipple covers, no pubic hair or see-through underwear. Can include full rear view if wearing G-String/panties or nudity if photographed from the side. Can include limited sexually suggestive touching or position. No use of objects to imply sexual activity (See Comments).	Penis must not appear erect underneath clothing	Use of Object to convey sexual activity covers the handling, kissing, licking or sucking of phallic-like objects. Borderline images with hand positioned over genital area, if this implies masturbation the image will be uplifted to CS2.6
CS1.3		Medium Shot Female Nude - rear	Medium shot of single model, can include full rear view but not with legs up or apart. No pubic area/hair, outer lips and/or anus. No use of objects to imply sexual activity.	No Penis or genitalia visible	
CS1.4		Topless	Single Model, no genitalia, no pubic hair, can include full rear views in 1.3. No sexually suggestive touching or position. No use of objects to imply sexual activity.	Penis must not appear erect underneath clothing	Sexually Suggestive contact includes hand to breast but excludes kissing/licking of breasts, or any hand contact with pubic area and genitalia.
CS1.5		Topless with sexual suggestion	As CS1.4 above, but in a limited sexually suggestive pose.	Penis must not appear erect underneath clothing	Borderline images with hand positioned over genital area, if this implies masturbation the image will be uplifted to CS2.6
CS1.7		Female Female Topless	More than one model, no genitalia, no pubic hair, can include full rear view. Limited sexually suggestive touching or position (See Comments). No use of objects to imply sexual activity.		Limited sexually suggestive touching excludes hand to breast but can include breast to breast

CS2.0	**Nudity/Initial Sexual Contact**	WASPs' providing this type of content should include warning screens and cannot use Vodacom's billing systems. Other methods such as credit cards and direct deposits should be used.			
CS2.1		Female Female Topless Touching	More than one model, no genitalia, no pubic hair, can include full rear view. Can include kissing, sexually suggestive touching of themselves or each other (See Comments). No use of objects to imply sexual activity.	N/A	Sexually Suggestive contact includes hand to breast but excludes kissing/licking of breasts, or any hand/mouth contact with pubic area and genitalia.
CS2.2		Female Male Topless Touching	More than one model, no genitalia, no pubic hair, can include full rear view. Can include kissing and sexually suggestive touching of themselves or each other. No use of objects to imply sexual activity.	Applies to Male Male	Sexually Suggestive contact includes hand to breast but excludes kissing/licking of breasts, or any hand/mouth contact with pubic area and genitalia
CS2.3		Medium Shot Female Nude - Front	Medium shot of single model, can include full rear view or full frontal but not with legs up or apart. Pubic area/hair may be seen but no view of inner lips. No anus visible. No use of objects to imply sexual activity.	No Penis or genitalia visible	Sexually Suggestive contact is as above, however: This category is sensitive due to the physical variations that will occur between the models. This and the fact that in some images the model may be shaved , could uplift certain images to CS3.1
CS2.4		Female Female Nudity	Nudity as CS2.3 but with more than one model. Can include kissing/licking of breasts. No use of objects to imply sexual activity.	N/A	Sexually suggestive touching excludes any hand/mouth contact with pubic area and genitalia
CS2.5		Female Male Nudity	More than one model, no male genitalia or pubic hair, female nudity as CS2.3. Can include kissing/licking of breasts but excludes kissing/licking/touching of genitalia. No use of objects to imply sexual activity.	Applies to Male Male	When using video content, if soundtrack is used to imply that penetration is happening, the rating would be uplifted to CS10.1 (penetrative sex).
CS3.0	**Genitalia**	WASPs' providing this type of content should include warning screens and cannot use Vodacom's billing systems. Other methods such as credit cards and direct deposits should be used.			
CS3.1		Medium Shot Female Genitalia	Medium shot of naked model in which pubic area and genital detail may be seen and can include legs up or apart. Picture is not to be solely of pubic area. No excretion, no penetration, no pulling apart of lips. No anus visible. No use of objects to imply sexual activity.	N/A	

CS3.2		Medium Shot Male Genitalia	Medium shot of naked model in which pubic area and genital detail may be seen and can include legs up or apart. Picture is not to be solely of pubic area. Penis visible but not erect (45 degrees). No anus visible. No use of objects to imply sexual activity.	Applies to Male Male	Please Note: In some local markets male nudity may be considered more restrictive than some of the categories in CS4.0 and above.
CS4.0	**Female Non-penetrative Sexual Contact**	This content is classified as hardcore and is prohibited on the Vodacom Network			
CS4.1		Female Female	Medium shot of mutual masturbation or implied oral sex. No visible penetration with tongue, fingers etc. No tongue on genitalia. Normal sized and shaped phallic objects can be used in the shot, but the objects must not touch the genitalia.	N/A	
CS4.2		Female Male	Medium shot of male masturbating female or implied oral sex (cunnilingus). No visible penetration with tongue, fingers etc. No tongue on genitalia, if penis visible then must not be erect. Normal sized and shaped phallic objects can be used in the shot, but the objects must not touch the genitalia.	N/A	
CS5.0	**Close Up Female Genitalia**	This content is classified as hardcore and is prohibited on the Vodacom Network			
CS5.1		Natural/Opened	Close up of model where picture is mainly of pubic/genital area. If penis visible then must not be erect. Pose may allow inner and outer lips and genital detail including anus to be seen. No excretion. Normal sized and shaped phallic objects can be used in the shot, but the objects must not touch the genitalia.	N/A	Lips may be held apart.
CS6.0	**Female Penetrative Masturbation**	This content is classified as hardcore and is prohibited on the Vodacom Network			
CS6.1		Fingers/Objects	As CS5.1 but with penetration of vagina with finger or object.	N/A	Only phallic objects of normal size and shape can be used in the shot
CS7.0	**Female Penetrative Foreplay and Cunnilingus**	This content is classified as hardcore and is prohibited on the Vodacom Network			

CS7.1		Fingers	Male or female finger touching or inserted into another female's vagina. If penis visible then must not be erect	N/A	
CS7.2		With Tongue/Object	As CS7.1 but penetration with tongue or object	N/A	Only phallic objects of normal size and shape can be used in the shot
CS8.0	**Erect Male Genitalia**	This content is classified as hardcore and is prohibited on the Vodacom Network			
CS8.1		Medium shot Erect Penis	Medium shot of model from a distance with penis erect, picture not solely of erection. No touching, no penetration, no excretions or simulation of excretions.	Applies to Male Male	
CS8.2		Close Up	Close up of model where picture is solely of genital/pubic area. Anus may be shown. No touching, no penetration, no excretions or simulation of excretions.	Applies to Male Male	
CS8.3		Masturbation of Male by self or female	Medium or close up shot of model with penis erect. Penis may be touched/rubbed by subject or woman. No ejaculation or simulated ejaculation.	Applies to Male Male	
CS8.4		Oral Sex - Fellatio	Medium or close up shot of female performing fellatio with man. No ejaculation or simulated ejaculation.	Applies to Male Male	Must not include any indication of force.
CS9.0	**Penetrative Sex/Ejaculation**	This content is classified as hardcore and is prohibited on the Vodacom Network			
CS9.1		Penis/Vagina	Shot of vagina being penetrated by penis, can be close up. No ejaculation or sign of ejaculation.	N/A	
CS9.2		Ejaculation	Ejaculation on body, face, genitalia or anus.	Applies to Male Male	
CS9.3		Finger/Anus	Shot of anus being penetrated by finger, can be close up.	Applies to Male Male	
CS9.4		Penis, Tongue or Object/Anus	Shot of anus being penetrated by penis, can be close up. Anus can be seen being penetrated by other objects.	Applies to Male Male	Only phallic objects of normal size and shape can be used in the shot
CS9.5		Double	Simultaneous penetration of anus and vagina by penis, fingers and/or objects.		Only phallic objects of normal size and shape can be used in the shot
CS10.0	**Other locally legal sexual activity not detailed above**	This content is classified as hardcore and is prohibited on the Vodacom Network			