

Compliance Monitoring and Enforcement on the Sprint Network

As an integral part of initial program approval, before launch of a short code 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 following audit standards:

- Sprint Standard Rate Advertising Audit Standards
- Sprint Standard Rate Message Flow Audit Standards
- Sprint Direct Carrier Billing Advertising Audit Standards
- Sprint Direct Carrier Billing Message Flow Audit Standards

Known collectively as the Sprint audit standards, these lists appear in appendices A, B, D, and E. Appendix C contains sample compliant SMS message flows, Appendix F contains a sample compliant direct carrier billing message flow, and Appendix G contains the Sprint direct carrier billing flow abbreviation guidelines. 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 in the Sprint Standard Rate 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 premium call-to-action or quiz environment resulting in a premium 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 in other sources of premium calls-to-action. All pages from the opt-in screen and onward must be hosted by the aggregator, in accordance with Sprint's aggregator consent management policy. Pages that appear before the opt-in page may be hosted by a content provider or merchant.

The Sprint Standard Rate Message Flow Audit Standards apply to four SMS message types: PIN/Opt In, Confirmation, Help, and Opt Out. Please note that the PIN/Opt In message is required only for subscription programs not initiated from the handset.

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. The direct carrier billing standards address handset-based transactions initiated with users' clicking a "Pay on My Phone Bill" button.

The Sprint Direct Carrier Billing Message Flow Audit Standards apply to six message types: 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 short code associated with these advertisements and message flows is

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

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 short code being cited, even if a previously open audit on that short code 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 Direct Carrier Billing 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.

For Sprint direct carrier billing message flows, aggregators are required to host the following message types:

- Opt-In page (cell-submit)
- PIN-Entry page

Although direct carrier billing “content” messages may be sent by content providers, aggregators are required to send the following message types:

- PIN/Opt In MT
- Confirmation MT
- Renewal Reminder MT
- Renewal Confirmation MT
- HELP MT
- Opt Out MT

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

Short code or direct carrier billing programs found to have the same repeat offender compliance violation in two 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 short code or direct carrier billing program 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.

Short code or direct carrier billing programs found to have the same repeat offender compliance violation, as above, during the three-month penalty period are terminated. All Sprint customers using these short codes are unsubscribed from the program over a one-month wind-down period.

Offending content provider or merchant requests for new short code or direct carrier billing programs 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

An aggregator or 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 short code suspension.

Short Code or Program Suspension

Suspended short codes or programs remain suspended until the responsible content provider brings all overdue tickets into compliance. Short codes remaining suspended for 30 days are terminated. All Sprint customers using these short codes are unsubscribed from the program over a one-month wind-down period. Offending content provider or merchant requests for new short code or direct carrier billing programs are considered for activation, solely at Sprint’s discretion, for six months from suspension.



Please keep in mind that . . .

- Use of the term *free* is prohibited in advertising creative for products charged via direct carrier billing, so 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 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 direct carrier billing and 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 policy.
- 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 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.

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

Opt Out: Opt-out MT message, which must be delivered in response to the universal keyword STOP

Appendices

APPENDIX A: Standard Rate Advertising

Sprint Standard Rate Advertising Audit Standards				
	<i>Violations</i>	<i>Sev</i>	<i>Actions Required</i>	<i>Std Rate</i>
Compliance Principles	Contains or promotes inappropriate, illicit, or adult content ²	0	Remove references to inappropriate, violent, or adult content	x
	Improper use of the term <i>free</i>	1	Remove the term <i>free</i>	S
	Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	x
	Affiliated with unapproved marketing practices or content ³	1	Reconcile product or service with original program brief on record, or submit new, accurate program brief for review	x
	Displays viewer data or hash code	1	Remove from advertisement information that identifies viewer	x
	Misuse of carrier endorsement or brand	2	Ensure carrier names, logos, icons, and colors comply with carrier brand use rules	x
Call-to-Action	No product or service description	1	Describe product or service	x
	No mention that messages are recurring	2	State that messages are recurring	S
Terms and Conditions	No link to comprehensive T&Cs	1	Display link to comprehensive T&Cs	x
	No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy	x
	No customer care contact information ⁴	1	Display toll-free helpline, email address, or HELP keyword	S
	Opt-out indistinguishable	2	Display STOP command in bold typeface	S
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	x

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

³ Rows highlighted in pink indicate Sprint-specific audit standards

⁴ Customer care contact information may appear on a separate page in the terms and conditions.

APPENDIX B: Standard Rate Message Flow

Sprint Standard Rate Message Flow Audit Standards								
	Violations	Sev	Actions Required	Opt-In	Conf.	HELP	Content	Opt-Out
Compliance Principles	Contains or promotes inappropriate, illicit, or adult content ⁵	0	Remove references to inappropriate, violent, or adult content	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	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
	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 short code	1	Initiate all program messaging from single short code and reconcile with short code advertised	x	x	x	x	x
	Unauthorized marketing material	1	Discontinue embedded marketing campaign	x	x	x	x	x
Message Flow	Failure to initiate double opt-in	1	Require user response before sending additional messages		S			
	Failure to display STOP keyword	1	Display STOP keyword		S			
	Incorrect response to STOP command	1	Terminate all of customer's active programs after he or she texts STOP, and send one opt-out message					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 program name	2	Disclose product or program name	x	x	x	x	x
	No indication that program is recurring	2	State that program is recurring		S			
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply		S			
	No customer care contact information	2	Display toll-free helpline, email address, or HELP keyword		S			
	Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information				x	

⁵ Inappropriate content includes reference to abuse of controlled substances or explicit promotion of alcohol consumption.

APPENDIX C: Sample Compliant Standard Programs

Sample Compliant Single-Message Program

Exhibit C1: Sample Compliant Single-Message Ad and Service Messages



Program Enrollment Confirmation Message:

Coupon King: Show this text at the register for 50% off your next purchase!

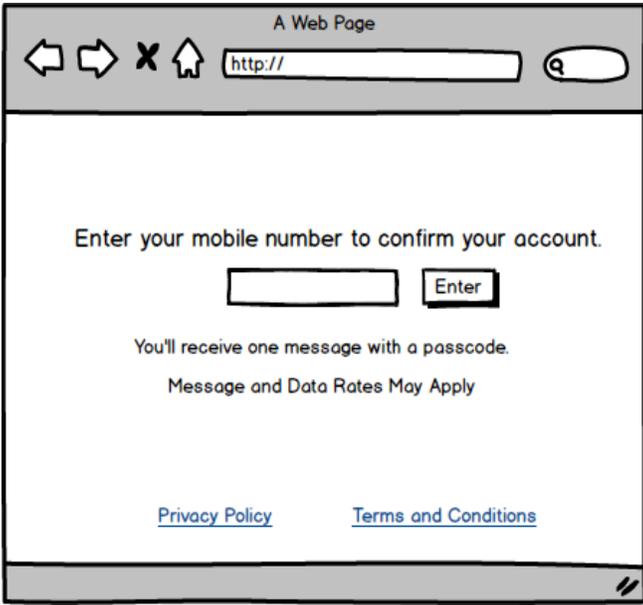
HELP Message:

Thanks for texting Coupon King! Call 1-800-123-4567 for support.

Opt-Out Message:

You are not subscribed to any Coupon King programs. You will receive no further messages.

Exhibit C2: Sample Compliant Single-Message Ad and Service Messages



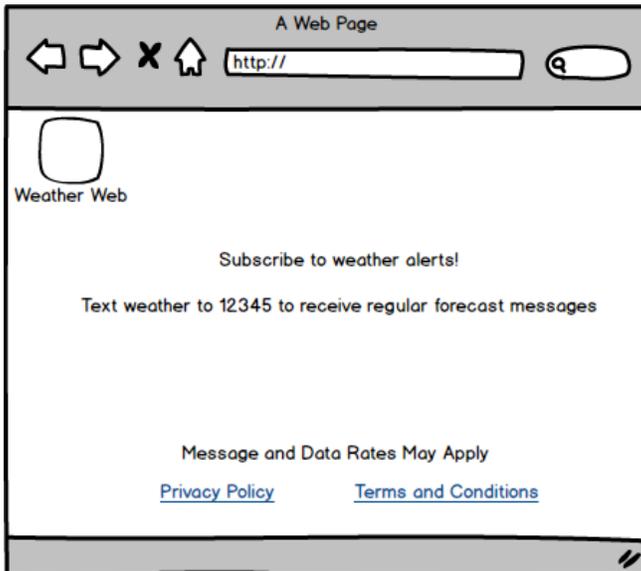
Program Enrollment Confirmation Message:
Mobile Confirm: Your passcode is 9876. Enter it online to confirm your account.

HELP Message:
You recently created or modified an account online. Enter your passcode to confirm. Call 1-800-123-4567 for Mobile Confirm support.

Opt-Out Message:
Mobile Confirm: You will receive no further messages from short code 12345.

Sample Compliant Recurring-Messages Program

Exhibit C3: Sample Compliant Recurring-Messages Web Ad and Message Flow



Program Enrollment Confirmation Message:

You're now subscribed to daily Weather Alerts. Reply STOP to cancel at any time. Call 1-800-123-4567 for support. Message and data rates may apply.

HELP Message:

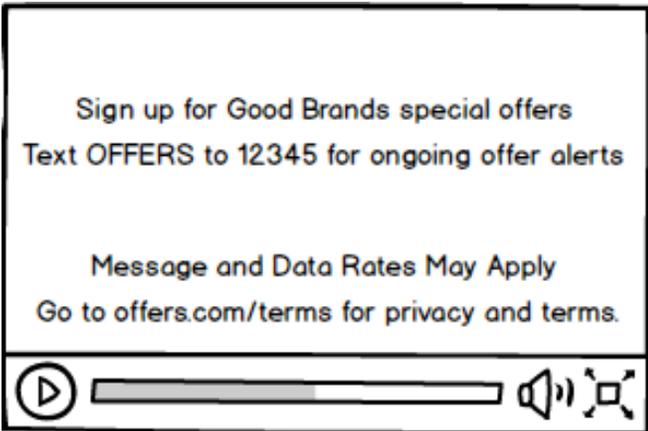
Contact us at 1-800-123-4567 with questions about Weather Alerts.

Opt-Out Message:

You have opted out of Weather Alerts and will receive no further messages.

Complete terms and conditions should include customer care contact information, opt-out instructions, and information about program content. Some program types (e.g., sweepstakes) have additional requirements carrier by carrier.

Exhibit C4: Sample Compliant Recurring-Messages Video Ad and Message Flow



Program Enrollment Confirmation Message:

You'll now receive special offers from Good Brands!
Reply STOP to opt-out. Email help@goodbrands.com with questions. Msg&Data rates may apply.

HELP Message:

Good Brands Special Offers. Email help@goodbrands.com or call 1-888-123-4567 for support.

Opt-Out Message:

Good Brands. You will receive no further messages from short code 12345.

APPENDIX D: 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 ⁴	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
	No payment failure screen	2	Implement payment failure screen with program information, failure details, and "Continue" button			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
Cell-submit function located on unapproved page or screen	2	Move cell-submit and PIN-entry functions to approved pages or screens	x	x		

⁴ 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>	<i>Web</i>	<i>Mobile</i>	<i>POMP Screens</i>
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		
		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	

Sprint Direct Carrier Billing Advertising Audit Standards						
	Violations	Sev	Actions Required	Web	Mobile	POMP Screens
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 ⁵
	No customer cancellation disclosure	2	Disclose clearly that service will continue until cancelled	S	S	
	Short code disclosed in offer	2	Remove short code 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	

⁵ On POMPB flows, the purchase confirmation screen must include a facility for manual acceptance of Sprint billing terms.

APPENDIX E: Direct Carrier Billing Message Flow

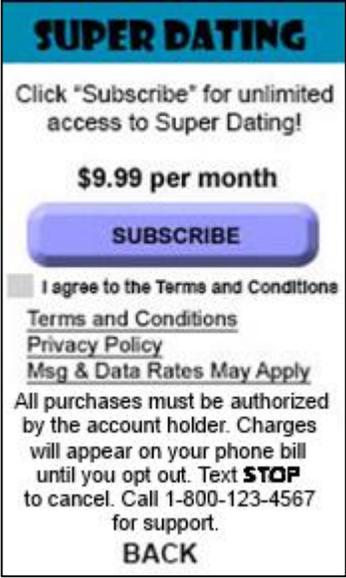
Sprint Direct Carrier Billing Message Flow Audit Standards									
	Violations	Sev	Actions Required	Opt-In ⁶	Confirm	HELP	Renew Remind	Renew Confirm	Opt Out
Compliance Principles	Automatic enrollment in multiple programs	1	Require user to complete dedicated opt-in for each separate program	x	x	x	x	x	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 short code	1	Initiate all program messaging from single short code and reconcile with short code 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	
	No mention that message and data rates may apply	2	Disclose that message and data rates may apply	x	x	x	x	x	

⁶ The opt-in MT is not required in POMPB flows.

Sprint Direct Carrier Billing Message Flow Audit Standards									
	Violations	Sev	Actions Required	Opt-In ⁶	Confirm	HELP	Renew Remind	Renew Confirm	Opt Out
Message Flow <i>continued</i>	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						X

APPENDIX F: Sample Compliant Direct Carrier Billing Message Flows and “Pay on My Phone Bill” Flows

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

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 ▪ Customer cancellation disclosure (subscription) 	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 ▪ Customer cancellation disclosure (subscription) 	NA

Sample Compliant Direct Carrier Billing "Pay on My Phone Bill" Flow <i>continued</i>			
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	

APPENDIX G: Sprint Direct Carrier Billing Message Flow and “Pay on My Phone Bill” Flow Abbreviation Guidelines

Sprint Direct Carrier Billing Message Flow and “Pay on My Phone Bill” 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 Apply
Help	No abbreviations allowed. Must use “help.”
Opt Out	No abbreviations allowed. Must use “stop.”
“HELP” and “Opt Out” instructions	“Reply HELP for help. Reply STOP to cancel.” “Reply HELP for help, reply STOP to cancel.” “Reply HELP for help, STOP to cancel.”