CTIA Short Code Monitoring Program
Short Code Monitoring Handbook

Version Number	1.5.2
Effective Date	October 1, 2015

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INTRODUCTION

CTIA and its member companies work to protect consumers while fostering a competitive environment for short code programs. We aim to

- Provide consumers the best possible user experience;
- Honor consumer choices and prevent abuse of messaging platforms;
- Deliver flexible guidelines that communicate compliance values clearly;
- Enable the short code industry to self-regulate; and
- Facilitate enforcement measures, if necessary, to protect consumers quickly and consistently.

The Short Code Compliance Handbook (Handbook) guidelines lay the framework for achieving these goals, but CTIA reserves the right to take action against any short code program deemed to cause consumer harm.

The Handbook is not intended as a comprehensive guide to compliance with laws and regulations that apply to short code programs. Service providers are responsible for meeting legal requirements that apply to short code programs they offer, and CTIA and its members make no representation that meeting the guidelines in this Handbook is sufficient to assure legal compliance. Consultation with legal counsel is recommended strongly.

ABOUT THIS HANDBOOK

This Handbook describes best practices for standard rate messaging services (SMS), multimedia messaging services (MMS), and free-to-end-user (FTEU) short code programs with the primary goal of providing the best customer experience for end users. Handbook guidelines *do not* define rules for programs that bill consumers. Guidelines are organized according to use cases that apply. Examples of compliant programs are organized by use case in the appendices.

Carriers reserve the right to implement their own short code program requirements beyond the scope of this Handbook. However, all carriers have reviewed and accepted the Handbook's content.

This Handbook is divided into the following sections: Compliance Framework, In-Market Monitoring Guide, Audit Standards Guide, and Audit Standards. In addition, Appendix A and Appendix B detail sample compliant programs, and Appendix C describes common terms.

REFERENCES

Drawing from experience working with short code programs, the guidelines evolve continually. Handbook v1.5.0 is based on the following:

- Mobile Marketing Association's Consumer Best Practices v7.0,
- CTIA Mobile Compliance Assurance Handbook v1.3,
- California Attorney General Kamala D. Harris's "Privacy on the Go: Recommendations for the Mobile Ecosystem" best practices,
- Telephone Consumer Protection Act (TCPA), [1]
- Florida Attorney General's requirements for mobile content,
- A2P (application-to-person) community feedback, and
- Carrier requirements.

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[1] http://www.gpo.gov/fdsys/pkg/USCODE-2011-title47/pdf/USCODE-2011-title47-chap5-subchapII.pdf

COMPLIANCE FRAMEWORK

This section offers direction regarding compliance of short code programs, including guidelines and requirements. Nonetheless, following this handbook is no guarantee that a short code program is compliant. Short code programs might also need to comply with individual carrier requirements.

UNIVERSAL COMPLIANCE PRINCIPLES

CTIA requires all short code programs to comply with a basic code of conduct that promotes the best possible user experience. As new uses for short codes emerge, the guiding principles in section A.1 should be considered when defining applicable rules. Short code programs that comply technically with the letter of a specific rule but violate the letter or spirit these principles might be subject to enforcement action.

A.1   GUIDING PRINCIPLES

Four principles provide the baseline for all requirements listed below:

1. **Display clear calls-to-action.** All programs must display a clear call-to-action. Customers must be made aware of what exactly they are signing up to receive.
2. **Offer clear opt-in mechanisms.** Customers must consent clearly to opt into all recurring-messages programs. Requiring a customer to enter a mobile phone number *does not* constitute a compliant opt-in. Instead, customers must understand they will receive messages and consent to receive them.
3. **Send opt-in confirmation messages.** A confirmation message must be sent to customers *always*. For recurring-messages programs, confirmation messages must include clear opt-out instructions.
4. **Acknowledge opt-out requests.** Short code service providers must acknowledge and act on all opt-out requests. Monitoring procedures confirm successful opt-out.

A.2   CHOICE AND CONSENT

Short code programs are expected to deliver sufficient value so consumers elect to participate with full transparency into the delivery conditions.

A.2.01   UNSOLICITED MESSAGES

Unsolicited messages may not be transmitted using short codes. Unsolicited messages are defined as follows:

- Messages delivered without prior express consent from the user or account holder, and
- Messages sent after a user has opted out.[2]

A.2.02   MARKETING CONTEXT

No component of program advertising or messaging may be deceptive about the underlying program's functionality, features, or content. All disclosures present in pre-purchase calls-to-action, advertisements, terms and conditions, and messages must remain clear and consistent throughout the user experience.

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[2] Sending the user a single opt-out message acknowledging the opt-out request is the *only* exception to this rule.

A.2.03   OPT-IN

Messages must be delivered to a consumer's mobile device only after the user has opted in to receive them. A user might indicate interest in a program in several ways. For example, a user might

- Enter a phone number online,
- Click a button on a mobile webpage,
- Send an MO message containing an advertising keyword,
- Sign up at a point-of-sale location, or
- Opt in over the phone using interactive voice response (IVR) technology.

Calls-to-action must be clear and accurate; consent must not be obtained through deceptive means. For example, opt-in details cannot be displayed obscurely in terms and conditions related to other services. Enrolling a user in multiple short code programs based on a single opt-in is prohibited, even when all programs operate on the same short code.

Recurring-messages short code programs should send a single opt-in confirmation message that displays information verifying the customer's enrollment in the identified program. The opt-in confirmation message must be delivered immediately after the customer opts into the program. Additionally, opt-in messages must contain the program (brand) name or product description, customer care contact information, opt-out instructions, product quantity or recurring-messages program disclosure, and the "message and data rates may apply" disclosure.

The opt-in for all short code programs must comply with all legal and regulatory requirements, including the Telephone Consumer Protection Act, 47 U.S.C. § 227, and the Federal Communication Commission's rules under 47 C.F.R. § 64.1200. For example, the express written consent obtained for any program that is "telemarketing" [as defined by 47 C.F.R. § 64.1200(f)(14)] must, unless exempt from the requirement, include the elements of "prior express written consent" set forth in 47 C.F.R. § 64.1200(f)(8). That rule requires a clear and conspicuous disclosure informing the user that:

- By opting in, the user authorizes the seller to deliver or cause to be delivered to the user marketing messages using an automatic telephone dialing system; and
- The user is not required to opt in (directly or indirectly) as a condition of purchasing any property, goods, or services.

Legacy double opt-in (i.e., mobile device confirmation) methods remain acceptable options to obtain express consumer consent.

A.2.04   OPT-OUT

Functioning opt-out mechanisms are crucial for all text messaging programs. Programs must always acknowledge and respect customers' requests to opt out of programs. However, depending on the use case, some short code programs are not required to advertise opt-out instructions. Short code programs must respond to, at a minimum, the universal keywords STOP, END, CANCEL, UNSUBSCRIBE, and QUIT by sending an opt-out message and, if the user is subscribed, by opting the user out of the program. Subsequent text, punctuation, capitalization, or some combination thereof must not interfere with opt-out keyword functionality.

Recurring-messages programs must also display opt-out instructions at program opt-in and at regular intervals in content or service messages, at least once per month. Opt-out information must be displayed in bold type on the advertisement. A program may deliver one final message to confirm a user has opted out successfully, but no additional messages may be sent after the user indicates a desire to cancel a short code program.

A.3   CUSTOMER CARE

Customer care contact information must be clear and readily available to help users understand program details as well as their status with the program. Customer care information should result in users' receiving help. Programs must *always* respond to customer care requests, regardless of whether the requestor is subscribed to the program. At a minimum, the HELP keyword must return the program name and further information about how to contact service providers. Short code programs should promote customer care contact instructions at program opt-in and at regular intervals in content or service messages, at least once per month.

A.4   PROGRAM CONTENT

All content associated with short code programs must promote a positive user experience. Carriers regulate certain types of content, including those listed in this section.

A.4.01   UNAPPROVED OR ILLICIT CONTENT

No programs associated with carrier brands or operating on the carrier networks may promote unapproved or illicit content, including the following:

- Depictions or endorsements of violence,
- Adult or otherwise inappropriate content,
- Profanity or hate speech, and
- Endorsement of illegal or illicit drugs.

Programs must operate according to all applicable federal and state laws and regulations. All content must be appropriate for the intended audience. Additional legal and ethical obligations apply when marketing to children under age 13, and such programs might be subject to additional review by carriers.

A.4.02   CONTROLLED SUBSTANCES

Promotions of controlled substances might be subject to additional review by carriers. Service providers must receive explicit carrier approval before launching these program types. Marketing of hard alcohol and tobacco brands must either include robust age verification (e.g., electronic confirmation of age and identity) at opt-in or restrict promotions to age-verified locations (e.g., points of sales in bars). Mobile programs must not promote the use of controlled substances directly. Reference to the abuse of controlled substances is prohibited.

A.4.03   SWEEPSTAKES AND CONTESTS

Sweepstakes and contests might be subject to additional review by carriers. Service providers must receive explicit approval from carriers before launching these program types. All sweepstakes must support a no-cost entry method. Service providers operating sweepstakes should seek legal guidance.

A.4.04   CONTENT DELIVERY

Users should be informed of the next steps to download and store new content immediately after opt-in. Content must be delivered correctly and must function as advertised.

A.5   PRIVACY POLICY AND TERMS AND CONDITIONS

Service providers are responsible for protecting the privacy of user information and must comply with applicable privacy law. Service providers should maintain a privacy policy for all programs and make it accessible from the initial call-to-action. When a privacy policy link is displayed, it should be labeled clearly.

Use cases might require different disclosures in the full terms and conditions. In all cases, terms and conditions and privacy policy disclosures must provide up-to-date, accurate information about program details and functionality.

A.6   PROGRAM NAME AND PRODUCT DESCRIPTION

Consistent program names and product descriptions in advertisements and messages help consumers connect all parts of the short code experience. All short code programs are required to disclose program names, product description, or both in service messages, on the call-to-action, and in the terms and conditions. The program name is the sponsor of the short code program, often the brand name or company name associated with the short code. The product description describes the product advertised by the program.

A.7   PROGRAM RECORDS AND FUNCTIONALITY

Service providers assume responsibility for maintaining accurate records in carrier systems and the Common Short Code Administration (CSCA) registry. Service providers wishing to modify a program must submit changes to the carriers for review and must update relevant carrier records. Programs promoted in the market *must* match the programs approved.

A.7.01   CUSTOMER RECORDS

All opt-in and opt-out requests should be retained from the time a user initiates opt-in until a minimum of six months after the user has opted out of a program. Service providers assume responsibility for managing information about deactivated and recycled mobile phone numbers and must process this information within three business days of receipt. After porting a mobile phone number between carriers, the user must opt in again to desired programs.

Service providers must track opt-in information by individual user. Selling mobile opt-in lists is prohibited.

A.7.02   MO MESSAGE PROCESSING

All mandatory keywords must be processed correctly, regardless of MO message format (e.g., keywords must function whether sent by MMS or SMS). Service providers must scan MO message logs regularly to identify opt-out attempts and must terminate those subscriptions, regardless of whether the subscribers used the correct opt-out keywords or methods.

USE CASES

Because short code programs vary greatly, depending on their intended purpose, Handbook v1.5.0 was designed with different use cases in mind. *All* short code programs based on the displayed use cases must comply with the Universal Compliance Principles in addition to the specific guidelines described in this section.

A.8   SINGLE-MESSAGE PROGRAMS

Single-message programs, or "one-off" programs, deliver a one-time message in response to user opt-in requests. Examples of single-message programs include but are not limited to the following:

- Informational alert,
- Purchase receipt,
- Delivery notification, and
- Two-factor authentication.

An example of a compliant single-message program and associated message flow appears in Appendix A.

Exhibit 1 displays a quick reference guide for a single-message program.

Exhibit 1: SINGLE-MESSAGE PROGRAM USE CASE QUICK REFERENCE GUIDE

	Description	Requirements
Call-to-Action	The call-to-action for a single-message program can be simple. The primary purpose of disclosures is to ensure a consumer consents to receive a text message and understands the nature of the program.	▪ Product description ▪ Complete terms and conditions or link to terms and conditions ▪ Privacy policy or link to privacy policy ▪ "Message and data rates may apply" disclosure
Terms and Conditions	Comprehensive terms and conditions may be presented in full beneath the call-to-action, or they may accessible from a link or a popup presented near the call-to-action.	▪ Program (brand) identification ▪ Product description ▪ Customer care contact information ▪ "Message and data rates may apply" disclosure
Opt-In	The consumer must actively opt into single-message programs.	▪ Consumer's affirmative opt-in
Message Flow	Although single-message programs are not required to display HELP and STOP keywords, they should support HELP and STOP commands, as described in the Universal Compliance Principles.	**Opt-In Confirmation MT** ▪ Program (brand) name OR product description **HELP MT** ▪ Program (brand) name OR product description ▪ Additional customer care contact information **Opt-Out MT** ▪ Program (brand) name OR product description ▪ Confirmation that no further messages will be delivered

A.9   RECURRING-MESSAGES PROGRAMS

A user opts into a recurring-messages program by texting a keyword to the program's short code, entering his or her mobile phone number online or agreeing in apps or in person to receive text messages. Examples of recurring-messages programs include but are not limited to the following:

- Content or informational alert subscriptions (e.g., horoscopes, news, weather),
- Flight status notifications (multiple messages), and
- Marketing and loyalty promotions.

An example of a compliant recurring-messages program call-to-action and associated message flow appears in Appendix B.

Exhibit 2 displays a quick reference guide for a recurring-messages program.

Exhibit 2: RECURRING-MESSAGES PROGRAM USE CASE QUICK REFERENCE GUIDE

	Description	Requirements
Call-to-Action	Because of their ongoing touch points with consumers, recurring-messages programs require the most disclosures among use cases. The primary purpose of disclosures is to ensure the consumer consents to receive text messages and understands the nature of the program.	- Product description - Service delivery frequency or recurring-messages disclosure - Complete terms and conditions or link to complete terms and conditions - Privacy policy or link to privacy policy "Message and data rates may apply" disclosure
Terms and Conditions	Comprehensive terms and conditions might be presented in full beneath the call-to-action, or they might be accessible from a link or a popup presented near the call-to-action.	- Program (brand) name - Service delivery frequency or recurring-messages disclosure - Product description - Customer care contact information - Opt-out instructions in bold type "Message and data rates may apply" disclosure
Opt-In	Consumers must provide prior express written consent to enroll in *all* text message programs (i.e., single-message programs or recurring-messages programs). Recurring-messages programs must send one message confirming opt-in consent. Double opt-in is optional.	Consumer's affirmative opt-in
Message Flow	Recurring-messages programs confirming opt-in with a single text message MUST state explicitly to which program the user enrolled and provide clear opt-out instructions in the Opt-In Confirmation MT.	**Opt-In Confirmation MT** - Program (brand) name OR product description - Opt-out information - Customer care contact information - Product quantity or recurring-messages disclosure "Message and data rates may apply" disclosure **HELP MT** - Program (brand) name OR product description - Additional customer care contact information **Opt-Out MT** - Program (brand) name OR product description - Confirmation that no further messages will be delivered

A.10   MACHINE-TO-MACHINE PROGRAMS

Machine-to-machine (M2M) short code programs, which should never interact with consumers, only need keep an updated program brief on file with the CSCA and the carriers.

A.11   PREMIUM RATE POLITICAL DONATION PROGRAMS

Premium rate short code programs that solicit political donations are subject to additional regulations, available at http://www.ctia.org/policy-initiatives/voluntary-guidelines/federal-political-campaign-contributions-wireless-carrier-bill. Premium political donation programs also must conform to the premium SMS guidelines and audit standards in the Handbook v1.3.

A.12   PREMIUM RATE CHARITABLE DONATION PROGRAMS

Premium rate short code programs that solicit charitable donations are subject to additional regulations, available at http://www.ctia.org/policy-initiatives/voluntary-guidelines/mobile-giving-via-wireless-carrier%27s-bill. In addition, premium charitable donation programs must to conform to the premium SMS guidelines and audit standards in Handbook v1.3.

A.13   FREE-TO-END-USER PROGRAMS

FTEU programs are subject to almost all of the same requirements as SMS short code programs. FTEU programs must display a clear call-to-action, capture consumers' affirmative opt-in, send an opt-in confirmation message, and abide by customers' requests to opt-out. However, all FTEU programs are exempt from displaying "message and data rates may apply" in advertisements, terms and conditions, and messages.

A.14   MMS PROGRAMS

MMS programs are subject to the same requirements per use case as SMS short code programs. All mandatory keywords must be processed correctly, regardless of MO format (e.g., keywords must function whether sent by MMS or SMS). Service providers must scan MO logs regularly to identify opt-out attempts and must terminate associated subscriptions, regardless of whether the subscribers used the correct opt-out keywords or methods.

Additional best practices specific to MMS will be released in an upcoming version of the Handbook.

CARRIER ONBOARDING

CTIA is most concerned with short code programs as they interact with consumers through advertising and service messaging. However, several facets of SMS programs happen behind the scenes. Recommended best practices for onboarding new programs follow.

Carriers may maintain individual playbooks tailored to their customers' needs and must sometimes respond to emerging risks that fall outside the Handbook. Refer to carriers' playbooks for onboarding information regarding

- Program certification and migration processes,
- Program brief details,
- Advertising of controlled substances,
- Sweepstakes approval processes, and
- Marketing to children.

IN-MARKET MONITORING GUIDE

In this section, in-market monitoring, including details about audit notices, communication, retests, and appeals, is explained.

COMPLIANCE AUDITS

The CTIA Compliance Assurance Solution employs data gathered via in-market monitoring. When programs are deployed in market, the live programs are captured and audited. This method is more effective than program brief review or routine keyword testing because compliance audits reflect the user experience that actual consumers encounter when they interact with short code programs in market.

CTIA issues compliance audits weekly for standard rate short codes leased with the CSCA. Compliance audits performed by CTIA are available to all major U.S. carriers, and CTIA compliance metrics can be incorporated into individual carrier compliance policies.

A.15   AUDIT NOTICES

CTIA distributes Audit Notices each week. Each audit notice displays a unique audit number, short code, service provider, aggregator or aggregators, notice date, and cure date at the top. Individual violations are classified as Severity 0, Severity 1, or Severity 2, based on their potential for consumer harm, with Severity 0 representing the most extreme violations. Violations are based on the compliance guidelines outlined in the Compliance Framework section of the Handbook. Taking the severity level of the gravest violation cited, a failed audit must be resolved in the appropriate timeframe (i.e., before or on the cure date).

A.16   SCHEDULE

CTIA compiles and generates audit notices each Monday for audits performed the previous week, and audits are published Tuesday at 2:00 A.M. EST. Although audits might be available for review earlier, the official notice date from which the cure date is calculated is 12:00 P.M. EST each Tuesday.

A.17   SEVERITY LEVELS

All audit notices are assigned severity levels based on the extent to which the associated findings might harm consumers. Cure dates and penalties vary based on severity, as detailed in Exhibit 3.

EXHIBIT 3: AUDIT NOTICE SEVERITIES DESCRIPTION

	Definition	Cure Date	Penalties
Severity 0	Extreme consumer harm	Immediate	**CTIA:** Immediate registry suspension **Carriers:** Vary by case; immediate suspension or termination possible
Severity 1	Serious consumer harm	5 business days	**CTIA:** Unresolved audits; possible registry suspension **Carriers:** Vary by case
Severity 2	Moderate consumer harm	5 business days	**CTIA:** Vary by case **Carriers:** Vary by case

A.18   CTIA COMPLIANCE CARE TEAM COMMUNICATION

On receiving an audit notice, service providers may communicate with the CTIA compliance care team by leaving a comment on the audit notice or contacting us.support@wmcglobal.com. The CTIA Compliance Care Team (Care Team) responds promptly to all messages. Although Care Team specialists are unable to preapprove compliant designs, they assist service providers as much as possible with understanding how to resolve violations and close their audits.

A.19   RETESTS

Within the prescribed period following issuance of an audit notice, the responsible aggregator or service provider must confirm on the audit notice that it has made changes to or has removed from market the offending advertisement or message flow. Should the CTIA Compliance Care Team fail to receive confirmation or should the service provider fail to take the actions required, the short code is subject to further action.

In the case of TV and print advertisements with longer run cycles, aggregators and service providers may submit a retest request for a rerelease date. 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.

A.20   APPEALS

Aggregators and service providers that believe they have a valid claim may challenge an audit by contacting us.support@wmcglobal.com before the cure date noted on the audit notice. The email message should explain why the service provider deems the audit incorrect. Appeals must pertain to the application of violations cited on the specific audit in question.

AUDIT STANDARDS GUIDE

The following pages display tables of audit standards by use case. Advertising audit standards apply to all advertisements hosting calls-to-action for short code programs; message flow audit standards apply to required service messages. Message categories for which specific standards apply are marked with an "x" in the tables. Refer to the glossary below for help with unfamiliar terms.

Opt-In Confirmation	Short code programs should send a single opt-in confirmation message displaying information verifying the customer's enrollment in the identified program and describing how to opt out. The opt-in confirmation message must be delivered immediately after the customer opts into the short code program. Additionally, opt-in messages must contain the program (brand) name or product description, customer care contact information, product quantity or recurring-messages program disclosure, and the "message and data rates may apply" disclosure.
HELP	Message service providers send after customers text the HELP keyword. Short codes should reply with additional contact information to customer requests for help.
Opt-Out	Message service providers send after customers text the STOP keyword. The opt-out message confirms that the customer has been opted out of the program.
Violation	Specific breach of the Universal Compliance Principles. Auditors check program advertisements and service messages against lists of violations to identify noncompliance.
Severity	Number representing the customer impact associated with a violation. Severity 0 violations impact customers most. Severity 2 violations are least customer impacting.
Action Required	Action or actions the responsible service provider must take to correct the associated violation.

AUDIT STANDARDS

The audit standards listed below distill the principles listed in the narrative portion of the Handbook into test scripts for monitoring. Advertising audit standards apply to media displaying short code calls-to-action. Message flow audit standards apply to required service messages.

SINGLE-MESSAGE PROGRAMS

A.21   SINGLE-MESSAGE PROGRAM ADVERTISING AUDIT STANDARDS

Violation	Severity	Action Required
Contains or promotes unapproved or illicit content	0	Remove unapproved or illicit content or references to it
No product or service description	1	Describe product or service
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry
No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy
No link to comprehensive T&Cs	1	Display link to comprehensive T&Cs
No mention that message and data rates may apply	2	Disclose that message and data rates may apply

A.22   SINGLE-MESSAGE PROGRAM MESSAGE FLOW AUDIT STANDARDS

Violation	Severity	Action Required	Applicable Message		
			Opt-In Conf.	HELP	Opt-Out
Contains or promotes unapproved or illicit content	0	Remove unapproved or illicit content or references to it	x	x	x
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	x	x	x
Unsolicited message delivered	1	Cease all messaging associated with program	x	x	x
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
No product or program name	2	Display program or product name	x	x	x
Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information (e.g., a toll-free helpline or email address)		x	

RECURRING-MESSAGES PROGRAMS

A.23   RECURRING-MESSAGES PROGRAM ADVERTISING AUDIT STANDARDS

Violation	Severity	Action Required
Contains or promotes unapproved or illicit content	0	Remove unapproved or illicit content or references to it
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry
No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy
No link to comprehensive T&Cs	1	Display link to comprehensive T&Cs
No product or service description	1	Describe product or service
Improper use of the term *free*	1	Remove the term *free*
Failure to display STOP keyword	1	Display STOP keyword[3]
No mention that messages are recurring	2	State that messages are recurring
No mention that message and data rates may apply	2	Disclose that message and data rates may apply
No customer care contact information[4]	2	Display toll-free helpline, email address, or HELP keyword
Opt-out indistinguishable	2	Display STOP command in bold type

A.24   RECURRING-MESSAGES PROGRAM MESSAGE FLOW AUDIT STANDARDS

Violation	Severity	Action Required	Applicable Message Opt-In Conf.	HELP	Opt-Out
Contains or promotes unapproved or illicit content	0	Remove unapproved or illicit content or references to it	x	x	x
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	x	x	x
Unsolicited message delivered	1	Cease all messaging associated with program	x	x	x
Failure to display STOP keyword	1	Display STOP keyword	x		
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
No indication that program is recurring	2	State that program is recurring	x		
No product or program name	2	Display program or product name	x	x	x
No mention that message and data rates may apply	2	Disclose that message and data rates may apply	x		
No customer care contact information	2	Display toll-free helpline, email address, or HELP keyword[5]	x		
Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information (e.g., a toll-free helpline or email address)		x	

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[3] Opt-out information may appear on a separate page in the terms and conditions.
[4] Customer care contact information may appear on a separate page in the terms and conditions.
[5] Customer care URLs are also acceptable.

A.25 MACHINE-TO-MACHINE PROGRAM AUDIT STANDARDS

M2M programs, which should never interact with consumers, only need keep an updated program brief on file with the CSCA and the carriers. If an M2M program is found advertising to consumers, it is subject to immediate enforcement action.

Violation	Severity	Action Required
Failure to match approved program in CSC registry	1	Remove unapproved program elements or update program details in CSC registry

APPENDIX A:
SAMPLE COMPLIANT SINGLE-MESSAGE PROGRAM

Exhibit A1: Sample Compliant Single-Message Advertisement and Service Messages

A Web Page
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Coupon Brand

Text coupon to 12345 for 50% off your next purchase

Message and Data Rates May Apply

Privacy Policy   Terms and Conditions

Opt-In 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:

"Coupon King: You will receive no further messages."

Exhibit A2: Sample Compliant Single-Message Advertisement and Service Messages

Opt-In Confirmation Message:

"Mobile Confirm: Your passcode is 9876. Enter it online to confirm your account."
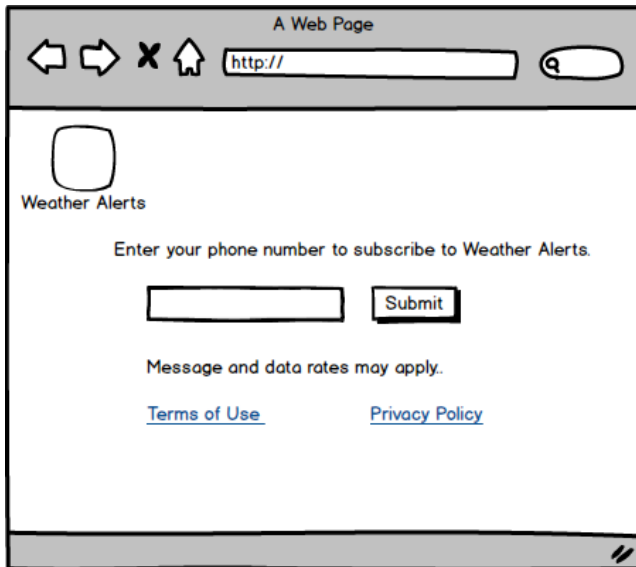
HELP Message:

"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."

APPENDIX B:
SAMPLE COMPLIANT RECURRING-MESSAGES PROGRAM

Exhibit B1: Sample Compliant Recurring-Messages Web Advertisement and
Message Flow

Opt-In 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:

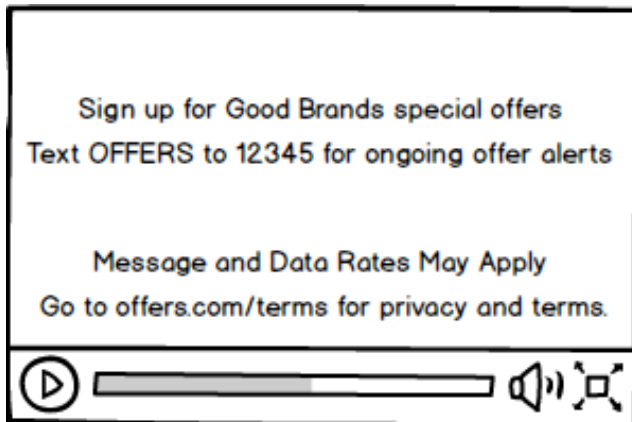"You have opted out of Weather Alerts and will receive no further messages."

Advertisement

Although opt-out instructions are not required on the advertisement itself, they must appear in the terms and conditions.

Terms and Conditions

Complete terms and conditions should include customer care contact information; complete opt-out instructions, displayed in bold; a recurring message disclosure, a product description and a program (brand) name. Some program types (e.g., sweepstakes) have additional requirements carrier by carrier.

Exhibit B2: Sample Compliant Recurring-Messages TV or Web Advertisement and Message Flow

Sign up for Good Brands special offers

Text OFFERS to 12345 for ongoing offer alerts

Message and Data Rates May Apply

Go to offers.com/terms for privacy and terms.

Advertisement

Although opt-out instructions are not required on the advertisement itself, they must appear in the terms and conditions.

Terms and Conditions

Complete terms and conditions should include customer care contact information; complete opt-out instructions, displayed in bold; a recurring message disclosure; a product description; and a program (brand) name. Some program types (e.g., sweepstakes) have additional requirements carrier by carrier.

Opt-In 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."

Exhibit B3: Sample Compliant Recurring-Messages Appointment Reminders

Want to sign up for appointment reminders by text? We'll send an opt-in message to your phone. Message and data rates may apply.

Recurring-Messages Appointment Reminder

Service representative records customer's request for messages and customer's phone number. Program terms and conditions, including complete opt-out information, and privacy policy are available from the representative.

Opt-In Confirmation Message:

"Doctor Message thanks you for enrolling! You'll now receive appointment reminders. Text HELP for help. Reply STOP to cancel. Msg&Data Rates May Apply."

HELP Message:

"Email help@doctormessage.com for support with appointment reminders service. Reply STOP to cancel."

Opt-Out Message:

"You are now opted out of Doctor Message appointment reminders. You will receive no further messages."

APPENDIX C: COMMON TERMS

Term	Description
Audit Notice	Report issued to noncompliant short code programs detailing the specific violations and actions required to bring the program into compliance
Call-to-Action	Language urging a customer to opt into a short code program, and the mechanism (e.g., button displaying "buy now") allowing them to do so
Compliance Audit	Test performed to determine the compliance of a short code program
Consent	Act of agreeing to opt into a short code program and the terms and conditions associated with the purchase
Content Message	Text message delivering purchased content or displaying instructions for how to access purchased content
Message Platform	Application through which messages are received and sent
Mobile Originated (MO)	Text message sent from a user's mobile device
Mobile Terminated (MT)	Text message sent to user in response to user texting a keyword
Service Message	Text message offering details about the short code program, including opt-in instructions, opt-out instructions, summary terms and conditions, and support information (e.g., helpline)
Short Code Program	Program to which a user opts in by entering a short code