

# **CTIA Short Code Monitoring Program**

## Short Code Monitoring Handbook

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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 choice and prevent abuse of messaging platforms;
- Deliver flexible, lightweight 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 (the 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 will be sufficient to assure legal compliance. Consultation with legal counsel is strongly recommended.

## ABOUT THIS HANDBOOK

This Handbook describes best practices for SMS, multimedia messaging service (MMS), and free-to-end-user (FTEU) short code programs with the primary goal of providing the best customer experience for end users. These guidelines do not attempt to 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 requirements beyond the scope of this Handbook. However, all carriers have reviewed and accepted this document's content.

## REFERENCES

Drawing from experience working with short code programs, the guidelines evolve continually. Handbook v1.4 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),
- Florida Attorney General's requirements for mobile content,
- A2P (application-to-person) community feedback, and
- Carrier requirements.

# Compliance Framework

## UNIVERSAL COMPLIANCE PRINCIPLES

CTIA requires all short code programs to comply with a basic code of conduct that promotes the best possible user experience for all program types. As new uses for short codes emerge, these guiding principles should be considered in defining applicable rules. Services 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 CHOICE AND CONSENT

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Mobile services are expected to deliver sufficient value so consumers elect to participate with full transparency into the delivery conditions.

#### A.1.01 UNSOLICITED MESSAGES

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

- Messages delivered without prior express written consent from the user or account holder, and
- Messages sent after a user has opted out.<sup>1</sup>

#### A.1.02 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-actions, ads, terms and conditions, and messaging must remain clear and consistent throughout the user experience.

#### A.1.03 OPT-IN

Messages must be delivered to a user's handset 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, or
- Sign up at a point-of-sale location.

Calls-to-action must be clear and accurate; consent must not be obtained through deceptive means. Enrolling a user in multiple programs based on a single opt-in is prohibited, even when all programs operate on the same short code.

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

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<sup>1</sup> Sending the user a single opt-out message acknowledging the opt-out request is the *only* exception to this rule.

- The user is not required to opt in (directly or indirectly) as a condition of purchasing any property, goods, or services.

#### A.1.04 HANDSET CONFIRMATION

Handset possession is confirmed implicitly when a user opts in from a mobile handset (e.g., keyword-based opt-ins, mobile Web opt-ins); all other opt-ins for recurring services must include an additional step to confirm handset possession. Service providers may satisfy this requirement by sending an abbreviated opt-in MT message soliciting an MO response from the user. This message must include information sufficient to identify the program.

#### A.1.05 OPT-OUT

Functioning opt-out mechanisms are crucial for all text programs. Programs must always acknowledge and respect customers' requests to opt out of programs. However, depending on the use case, some 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, and capitalization must not interfere with opt-out keyword functionality.

Recurring programs must also promote 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 service 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 service.

### A.2 CUSTOMER CARE

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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.

### A.3 PROGRAM CONTENT

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

#### A.3.01 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 carrier by carrier.

#### A.3.02 CONTROLLED SUBSTANCES

Promotions of controlled substances might be subject to additional review carrier by carrier. Service providers must receive explicit carrier approval before launching these types of programs. 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., POS in bars). Mobile programs must not promote the use of controlled substances directly. Reference to the abuse of controlled substances is prohibited.

### A.3.03 SWEEPSTAKES AND CONTESTS

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

### A.3.04 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.4 PRIVACY POLICY AND TERMS OF USE

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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.5 PROGRAM RECORDS AND FUNCTIONALITY

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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.5.01 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 numbers and must process this information within three business days of receipt. After porting a 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.5.02 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 v1.4 was designed with different use cases in mind. Please note that all use cases must comply with the Universal Compliance Principles in addition to the specific guidelines described here.

## A.6 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 call-to-action and associated message flow appears in Appendix A.

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

Exhibit 1: SINGLE-MESSAGE USE CASE QUICK REFERENCE GUIDE

	Description	Requirements
<b>Call-to-Action</b>	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 message and understands the nature of the program.	<ul style="list-style-type: none"> <li>▪ Service description</li> <li>▪ Complete terms and conditions or link to terms and conditions</li> <li>▪ Privacy policy or link to privacy policy</li> <li>▪ “Message and data rates may apply” disclosure</li> </ul>
<b>Terms and Conditions</b>	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.	<ul style="list-style-type: none"> <li>▪ Program identification</li> <li>▪ Service description</li> <li>▪ Customer care contact information</li> <li>▪ “Message and data rates may apply” disclosure</li> </ul>
<b>Opt-In</b>	The consumer must actively opt into single message programs.	<ul style="list-style-type: none"> <li>▪ Consumer’s affirmative opt-in</li> </ul>
<b>Message Flow</b>	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.	<p><b>Confirmation MT</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> </ul> <p><b>HELP MT</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> <li>▪ Additional customer care contact information</li> </ul> <p><b>Opt-Out MT</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> <li>▪ Confirmation that no further messages will be delivered</li> </ul>

## A.7 RECURRING-MESSAGES PROGRAMS

Short code programs with recurring messages advertise via the following media:

- Online,
- Print publications,
- Mobile devices,
- Radio, and
- TV.

A user opts into recurring messages by texting a keyword to the program’s short code, entering his or her mobile phone number online, or agreeing to receive text messages in apps or in person. 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 campaigns.

An example of a compliant recurring-messages 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 Use Case Quick Reference Guide

	Description	Requirements
<b>Call-to-Action</b>	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 messages and understands the nature of the program.	<ul style="list-style-type: none"> <li>▪ Service description</li> <li>▪ Service delivery frequency or recurring-messages disclosure</li> <li>▪ Complete terms and conditions or link to complete terms and conditions</li> <li>▪ Privacy policy or link to privacy policy</li> <li>▪ “Message and data rates may apply” disclosure</li> </ul>
<b>Terms and Conditions</b>	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.	<ul style="list-style-type: none"> <li>▪ Program identification</li> <li>▪ Service delivery frequency or recurring-messages disclosure</li> <li>▪ Service description</li> <li>▪ Customer care contact information</li> <li>▪ Opt-out instructions in bold type</li> <li>▪ “Message and data rates may apply” disclosure</li> </ul>
<b>Opt-In</b>	Recurring-messages programs should send two messages for all non-mobile opt-ins.	<ul style="list-style-type: none"> <li>▪ Consumer’s affirmative opt-in</li> <li>▪ Handset verification for non-mobile opt-in (i.e., MO from consumer’s handset)</li> </ul>
<b>Message Flow</b>	Unlike other use cases, recurring-messages programs must advertise HELP and STOP commands. They also have the most requirements for service messaging.	<p><b>Opt-In MT (non-mobile opt-in)</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> <li>▪ HELP information</li> <li>▪ Response command or PIN</li> </ul> <p><b>Confirmation MT</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> <li>▪ Opt-out information</li> <li>▪ Customer care contact information</li> </ul>

		<ul style="list-style-type: none"> <li>▪ Product quantity or recurring-messages disclosure</li> <li>▪ “Message and data rates may apply” disclosure</li> </ul> <p><b>HELP MT</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> <li>▪ Additional customer care contact information</li> </ul> <p><b>Opt-Out MT</b></p> <ul style="list-style-type: none"> <li>▪ Program or product name</li> <li>▪ Confirmation that no further messages will be delivered</li> </ul>
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## **A.8 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.9 POLITICAL DONATION PROGRAMS**

Premium 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.10 CHARITABLE DONATION PROGRAMS**

Premium 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 conform to the premium SMS guidelines and audit standards in the Handbook v1.3.

## **A.11 FREE-TO-END-USER PROGRAMS**

FTEU programs are subject to the same requirements as standard rate short code programs. Recurring-messages FTEU programs that market to consumers are subject to all subscription marketing requirements, except disclosing that “message and data rates may apply.”

## **A.12 MMS PROGRAMS**

MMS programs are subject to the same requirements per use case as SMS 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 those 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 this Handbook.

## **CARRIER ONBOARDING**

CTIA is most concerned with mobile programs as they interact with consumers through advertising and text 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. Please 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

## COMPLIANCE AUDITS

The CTIA Compliance Assurance Solution employs data gathered via in-market monitoring. When calls-to-action 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 audits reflect the user experience that real consumers encounter when they interact with these programs in market.

CTIA issues audits weekly for standard rate short codes leased with the CSCA. 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.13 VIOLATION NOTICES

CTIA distributes color-coded Program Violation Notices and Message Flow Violation Notices, known informally as failure forms, each week. At the top of a violation notice is a unique audit number and the short code, service provider, and aggregator or aggregators as well as the notice date and the cure date. Individual violations are classified as Severity 0, Severity 1, or Severity 2, based on their potential for consumer harm, with Severity 0 the most extreme. These violations are based on the compliance guidelines outlined in the Compliance Framework section of this 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.14 SCHEDULE

CTIA compiles and generates violation notices each Monday for audits performed the previous week, and audits are published as soon as they become available. Although audits might be available for review earlier, the official notice date from which the cure date is calculated is 12:00 P.M. Eastern Time on Tuesday.

### A.15 SEVERITY LEVELS

All Program Violation Notices and Message Flow Violation 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: Violation Notice Severities Description

	Definition	Cure Date	Penalties	Violation Notice
<b>Severity 0</b>	Extreme consumer harm	Immediate	<b>CTIA:</b> Immediate registry suspension <b>Carriers:</b> Case by case; immediate suspension or termination possible	
<b>Severity 1</b>	Serious consumer harm	5 business days	<b>CTIA:</b> Unresolved audits; possible registry suspension <b>Carriers:</b> Case by case	
<b>Severity 2</b>	Moderate consumer harm	5 business days	<b>CTIA:</b> Case by case <b>Carriers:</b> Case by case	

## **A.16 COMMUNICATING WITH THE CTIA COMPLIANCE CARE TEAM**

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On receiving a violation notice, service providers may communicate with [compliance@psmsindustrymonitor.com](mailto:compliance@psmsindustrymonitor.com) by replying to the compliance notification email. The reply, which *must* preserve the email subject field, should pose specific questions or outline issues relating to the cited violations. 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.17 RETESTS**

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Within the prescribed period following issuance of a violation notice, the responsible aggregator or service provider must confirm by replying to the initial email ([compliance@psmsindustrymonitor.com](mailto:compliance@psmsindustrymonitor.com)) that it has made changes to or has removed from market the offending ad or message flow. If the Care Team fails to receive confirmation or the service provider fails to take the actions required, the short code is subject to further action.

In the case of TV and print ads 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.18 APPEALS**

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Aggregators and service providers that believe they have a valid claim may challenge an audit by responding to [compliance@psmsindustrymonitor.com](mailto:compliance@psmsindustrymonitor.com) before the cure date noted on the violation 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.

## READING THE AUDIT STANDARDS

The following pages display tables of audit standards by use case. Advertising audit standards apply to all media 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. Please refer to the glossary below for help with unfamiliar terms.

<b>Opt-In</b>	The first message customers receive in a double opt-in customer experience. The opt-in message contains a PIN or a response command to verify the customer’s messaging preferences. This message is required only for subscription programs, but, if sent, should comply with the Universal Compliance Principles.
<b>Conf. (Confirmation)</b>	The second message customers receive in a double opt-in customer experience. The program enrollment confirmation message contains program details. In some use cases, the confirmation message is the first message customers receive.
<b>HELP</b>	The message service providers send after customers text the HELP keyword. Short codes should reply with additional contact information to customer requests for help.
<b>Opt-Out</b>	The message service providers send after customers text the STOP keyword. The opt-out message confirms that the customer is opted out of the program.
<b>Violation</b>	A specific breach of the Universal Compliance Principles. Auditors check program ads and service messages against lists of violations to identify noncompliance.
<b>Severity</b>	A number representing the customer impact associated with a violation. Severity 0 violations impact customers most. Severity 2 violations are least customer impacting.
<b>Action Required</b>	An action 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.19 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.20 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	x
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	x	x	x	x
Unsolicited message delivered	1	Cease all messaging associated with program	x	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	x
Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information			x	

## RECURRING-MESSAGES PROGRAMS

### A.21 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 <i>free</i>	1	Remove the term <i>free</i>
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 <sup>2</sup>	2	Display toll-free helpline, email address, or HELP keyword
Opt-out indistinguishable	2	Display STOP command in bold type

### A.22 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	x
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	x	x	x	x
Unsolicited message delivered	1	Cease all messaging associated with program	x	x	x	x
Failure to initiate double opt-in	1	Require user response before sending additional messages		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	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		x		
Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information			x	

<sup>2</sup> Customer care contact information may appear on a separate page in the terms and conditions.

### **A.23 MACHINE-TO-MACHINE PROGRAM AUDIT STANDARDS**

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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
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry

# Appendix A: Sample Compliant Single-Message Program

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



## 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 A2: Sample Compliant Single-Message Ad and Service Messages

A Web Page

http://

Enter your mobile number to confirm your account.

You'll receive one message with a passcode.  
Message and Data Rates May Apply

[Privacy Policy](#)   [Terms and Conditions](#)

**Confirmation Message:**

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

**HELP Message:**

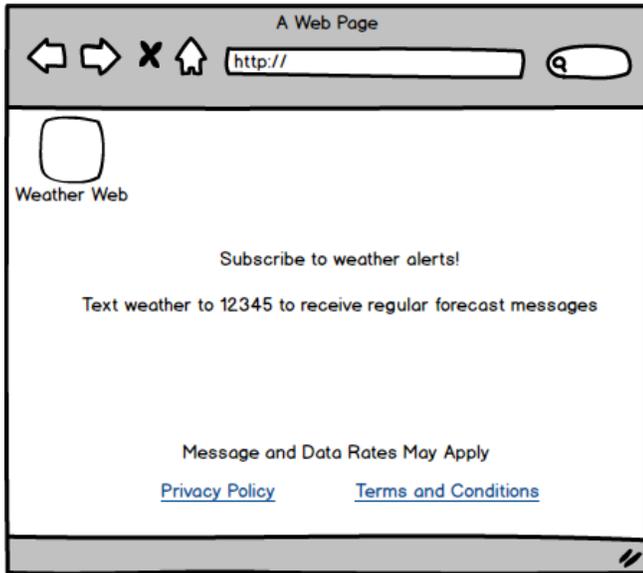
You recently created or modified an account online. Enter your passcode to confirm. Call 1-800-123-4567 for Mobile Confirm support.

**Opt-Out Message:**

Mobile Confirm: You will receive no further messages from shortcode 12345.

# Appendix B: Sample Compliant Recurring-Messages Program

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



## 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:

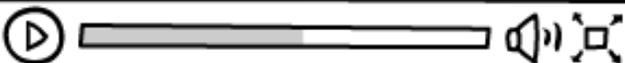
You have opted out of Weather Alerts and will receive no further messages.

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

Exhibit B2: Sample Compliant Recurring-Messages Video Ad 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](https://offers.com/terms) for privacy and terms.



**Confirmation Message:**

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

**HELP Message:**

Good Brands Special Offers. Email [help@goodbrands.com](mailto: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 Point-of-Sale Ad and Message Flow

