

Step 3: Initial MT

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| Service description → | Thanks for subscribing to Farm League Baseball alerts for \$3.99/month! |
| Frequency of messaging → | Get 4 msgs/month. |
| How to get help → | Txt HELP for help. |
| How to stop → | To stop txt STOP. |
| Additional carrier costs → | Msg&Data Rates May Apply. |

Step 4: MT Alert

User receives the following MT Message:

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| Alert → | Farm League Baseball Alert! Crosstown Rebels battle the Lakeview Titans on 11/11/08 @ 6pm in Dolores Park. Support your local team. Reply Help for Help. |
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EXAMPLE: Premium Rated Opt In for WAP (CCS-EG-06)

Call to Action The following is advertised on web, television, in-store promotional poster, etc.:

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| Program sponsor → | CheckMyRide Tones! |
| Service Description → | Visit wap.checkmyride.com on your phone microbrowser. Visit HELP for help. |
| Customer Support Info → | Txt HELP for help. |
| Opt Out Info → | To stop txt STOP. |
| Additional Carrier Costs → | Msg&Data Rates May Apply. |

Step 1: User responds to Call to Action User visits wap.checkmyride.com

Step 2: WAP Opt In 1 User sees the following WAP/ xHTML page with product offer

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| Program sponsor → | Checkmyride.com! |
| Service Description → | The hottest ringtones sent to your phone every month. |
| Service price → | Get 5 ringtones for \$9.99/month. |
| Link to terms → | Terms and Conditions |
| Additional Carrier Costs → | Msg&Data Rates May Apply. |

Step 3: WAP Opt In 2 Mobile subscriber sees the following WAP/xHTML page after selecting subscription.

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| Program sponsor → | Checkmyride.com! |
| Service Description → | Click "Subscribe" to confirm your purchase of "Check my Ride" tones for \$9.99 per month. |
| Service price → | for \$9.99 per month. |
| Link to terms → | Subscribe Cancel Terms and Conditions |

Additional Carrier Costs → Msg&Data Rates May Apply.

Step 4: WAP Confirmation Mobile subscriber sees the following WAP/xHTML page after being billed.

Service Description & cost → Thank you for your payment of \$9.99 per month. Your subscription has been activated.
 Frequency of messaging → Get 5 ringtones per month.
 How to get help → Txt HELP for help to NNNNN.
 How to Stop → To stop txt STOP to NNNNN

Step 5: Confirmation MT User receives the following MT Message:

Service Description & cost → Thank you for your payment of \$9.99 per month for Check my Ride tones.
 How to get help → Txt HELP for help.
 How to Stop → To stop txt STOP

EXAMPLE: Premium Rated Chat Opt In (CCS-EG-07)

Call to Action The following is advertised on web, television, in-store promotional poster, etc.:

Program sponsor → Sports Talk:
 Service Description → Chat with top sports executives . Txt 'talk' to 54321.
 Customer Support Info → Txt HELP for help.
 Opt Out Info → To stop txt STOP.
 Service Cost → One-to-one txt chat for \$0.50/msg, charged to your wireless bill +
 Additional Carrier Costs → Msg&Data Rates May Apply.

Step 1: User responds to Call to Action Text 'Talk' to 54321.

Step 2: Opt In User receives the following MT Message:

Program sponsor → Welcome to Sports Talk chat.
 Service price → To confirm \$0.50 per msg received, reply YES to start.
 How to get help → Txt HELP for help.
 Additional carrier costs → Msg&Data Rates May Apply.

Step 3: Double Opt In User sends MO message with "YES"

Step 3: Confirmation MT

Service description →

Thanks for joining Sports Talk chat.
Ask us a question for \$0.50 per answer!

How to get help →

Txt HELP for help.

How to stop →

To stop txt STOP.

Step 4: Mobile subscriber chat

User sends MO message with "What is John Madden's next career move?"

Step 5: Mobile Content (\$0.50)

User receives the following MT Message:

Chat →

Madden is working on a new version of his popular PS3 game with EA.

Step 6: Reminder MT

User receives the following MT Message:

Program sponsor →

Sports Talk chat!

Indication of spend limit →

You have spent \$25.00 this month.

Cost of service →

The service cost is \$0.50 per message received. To continue txt MORE.

How to get help →

To stop txt STOP.

How to stop →

4 help txt HELP.

Additional carrier costs →

Msg&Data Rates May Apply.

Step 7: Triple Opt In

User sends MO message with "MORE." May also use ADD, CONTINUE as keywords.

EXAMPLE: FTEU Single Opt In (CCS-EG-08)

Call to Action

The following is advertised on web, television, in-store promotional poster, etc.:

Program sponsor →

Lenders Bank daily bank balance alerts.

Service Description/Cost →

Txt 'balance' to 43210 to get daily bank balance.

Customer Support Info →

Txt HELP for help.

Opt Out Info →

To stop txt STOP.

Frequency of messaging →

Get 1 msg/day.

Step 1: User responds to Call to Action

Text 'balance' to 43210.

Step 2: Advice of Charge / Confirmation MT User receives the following MT Message:

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| Free message declaration → | Free msg: thanks for joining Lenders Bank daily bank balance alerts. Get 1 msg/day. Txt HELP for help. To stop txt STOP. |
| Service description → | |
| Frequency of messaging → | |
| How to get help → | |
| How to stop → | |

Step 3: MT Alert User receives the following MT Message:

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| Free message declaration → | Free msg: Lenders Bank - The balance for account #009221 is \$12,998.23. |
| Alert → | |

EXAMPLE: Billing Renewal Message (CCS-EG-09)

| Sample Billing Renewal Message | | |
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| Type | Sample Text | Charge |
| MT | Thanks for your continued subscription to XYZ Alerts! A \$5.99 charge will show on your next wireless bill for the next month. Reply STOP at any time to cancel. | Std |

EXAMPLE: Bill Face Descriptor by Carrier (CCS – EG-10)

| Bill-Face Descriptor Format by Carrier | |
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| Carrier | Format |
| AT&T Mobility | 62 Characters <Content Provider Name, Program Description, Merchant Name, Short Code and Campaign ID> |
| Sprint/Nextel | 22 Characters <Provider, Shortcode, Brief Program Description> |
| T-Mobile | 2 Fields: 15 and 25 Characters respectively Field 1 <Service Provider> Field 2 <Shortcode Description> |
| Verizon Wireless | 30 Characters <Shortcode & Brief Program Description> Note: No content provider toll free # allowed |

EXAMPLE : Affiliate Marketing for Premium Services (CCS-EG-11)

GET REAL MUSIC RINGTONES FROM YOUR FAVORITE ARTISTS

ANY CP

1. ENTER YOUR NUMBER

CHOOSE FROM 100,000 PRODUCTS

Enter Your Cell Number
Get 20 Downloads each with a AnyCP subscription for only \$9.99.

I agree to the Terms & Conditions

CONTINUE

AT&T Sprint Verizon Wireless T-Mobile Verizon Wireless CELLULARONE Cincinnati Bell

By subscribing you certify that you are the account holder or have the account holder's permission, and you agree to these terms. The full terms at www.anycp.com. You will be charged \$9.99 per month for the Subscription Plan (10 ringtones/products, 10 graphics and 4 games app) automatically every month until you cancel. Not available on all carriers and all phones. Game ringtones and graphics on Verizon Wireless. Charges will vary by carrier.

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Any CP content is available on the following carriers: AT&T, Verizon Wireless, Sprint, T-Mobile, Alltel, Virgin Mobile, CellularOne and CellularOne.

GET REAL MUSIC RINGTONES FROM YOUR FAVORITE ARTISTS

ANY CP

1. ENTER YOUR NUMBER

CHOOSE FROM 100,000 PRODUCTS

Enter Your Cell Number
For \$9.99, get 20 Downloads with an AnyCP subscription.

I agree to the Terms & Conditions

CONTINUE

AT&T Sprint Verizon Wireless T-Mobile Verizon Wireless CELLULARONE Cincinnati Bell

By subscribing you certify that you are the account holder or have the account holder's permission, and you agree to these terms. The full terms at www.anycp.com. You will be charged \$9.99 per month for the Subscription Plan (10 ringtones/products, 10 graphics and 4 games app) automatically every month until you cancel. Not available on all carriers and all phones. Game ringtones not available on Verizon Wireless. Charges will vary by carrier.

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Any CP content is available on the following carriers: AT&T, Verizon Wireless, Sprint, T-Mobile, Alltel, Virgin Mobile, CellularOne and CellularOne.

Certification

MMA has no standards for this section at this time.

Audit

MMA has no standards for this section at this time.

Verizon

Provisioning

| Section | Standard | MMA Id |
|---------------------------------------|---|--------|
| Additions to VZW BP Guidelines | <p>VZW Best Practices – Additions to the VZW BP Guidelines – Dated June 12, 2009 – Revised December 15, 2009</p> <p>Proper Disclosure To Consumers – Programs that include any premium charges must disclose: (1) any premium charges associated with the program including whether any charges are recurring and (2) the nature of the program, including the type of content delivered to the consumer’s mobile device. This disclosure must be clear and conspicuous throughout all marketing materials including on-line, print, or television advertisements, throughout any Internet sites associated with the program, and throughout the opt-in process.</p> <p>For example, programs such as an on-line quiz that require a subscription to a premium charge program to obtain the results of the quiz must include proper disclosures in any advertisements, on each web page associated with the quiz, and during the opt-in process in order to make the consumer aware that the actual program being offered is a premium charge program rather than an on-line quiz.</p> <p>For programs, such as on-line quizzes, in which non-messaging content is offered to consumers as an inducement to participate in a premium charge program, or in cases where a single delivery of content (for example: survey results, quiz results) is promoted in order to induce a consumer to opt-in to a subscription-based program, aggregators are required to: (1) disclose all affiliate marketing and websites within which the program will be advertised including keyword advertisements; (2) provide examples of the actual advertising used and/or text used in keyword advertisements; and (3) provide a fully operational website that details full consumer experience in conjunction with the program.</p> <p>In order for disclosures to meet the above-stated requirement of being clear and conspicuous, the actual nature of programs must not be obscured by unrelated, tangential material. For instance, a premium charge program that provides a ‘joke of the day’ subscription should not be advertised, positioned or promoted as something else (e.g., an IQ quiz, a way to find out the name of a secret admirer, etc.). Premium charge programs should not be operated on a ‘bait and switch’ basis where something like an IQ quiz is used as a ruse to lure consumers to opt-in to a completely unrelated premium charge program such as a ‘joke of the day’ subscription. The advertising, positioning and promotion of premium charge programs, including all affiliate</p> | VZW-01 |

advertising and any associated web sites, must be focused primarily on the content to be provided in exchange for the premium charge and not on unrelated, tangential material.

VZW Best Practices – Additions to the VZW BP Guidelines – Dated September 30, 2009

Repeat Offender Policy:

Effective October 1, 2009, the following policy will be in effect with regard to functional program monitoring and advertising enforcement:

- If a program is found to have the same Severity 2 rule violation in two out of three consecutive months (e.g. 1/2009 and 3/2009, or 2/2009 and 3/2009), then the campaign will be barred from acquiring any new Verizon Wireless subscribers for a period of 90 days, commencing within 3 business days after the second violation.
- If a program is found to have the same Severity 2 rule violation as (1) above during the 90 penalty period, then the program will be terminated and all VZW users will be unsubscribed from the program.
 - Programs will be terminated with a 30 day “wind-down” period, during which VZW subscribers will be sent a termination MT in lieu of the renewal MT.
- New programs from the affected content provider will be considered at the sole discretion of Verizon Wireless after a 90 day period from the last VZW user being unsubscribed.

Advertising Disclosure Requirements:

Effective November 1, 2009, the following policy will be in effect:

15) Website Call to Action (CTA) for Premium Charge Programs – The requirements listed below apply to any web page, whether hosted by affiliate marketers, content providers, aggregators or any other party, that contains a material representation, or CTA, about a premium charge program. A material representation includes, without limitation, any information about the type, quantity, quality or cost (or lack thereof) of content accessible through the program.

- The pricing and billing frequency must be displayed prominently in the CTA on the web page, including any web page where the user enters their cell phone number AND on the PIN code page (if a PIN is used). **At least one pricing and billing period disclosure will be 12 point font and have a 125 color contrast value (using the W3C brightness formula). The above listed advertising disclosure placement must be within 125 pixels above or below or to the right or left of the cell number submit and P.I.N. submit fields. The price point must be numerical including the dollar sign (i.e. \$9.99 per**

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| | <p>month). A reasonable person reviewing the web page should be able to readily notice and understand the pricing and billing frequency associated with premium charge programs.</p> <ul style="list-style-type: none"> • The CTA must not suggest that content, such as ringtones or sports ringtones are available to customers of VZW, if no such content is available through the program. To the extent the content available to customers of VZW is different than that available to the customers of other carriers, this must be made clear in the CTA. To the extent the CTA indicates that specific content is available, such as ringtones or wallpaper for the Atlanta Braves, then such content must be available. If alternative wireless content is available, this disclosure must be 20 or less pixels from the primary offer description and no less than one half the font size for the primary offer (i.e. Get 10 Ringtones [50 font] or a Cool Text service [minimum 25 font].) • A summary of the terms and conditions, or the full text of the terms and conditions, must be displayed, with a minimum of three lines of text above the fold (if there are more than three lines of text to the terms and conditions) on the page where the user enters their cell phone number AND on the PIN code page (if PIN is used). It is not acceptable to have only a link to the terms and conditions. • The terms and conditions must also include pricing disclosures, subscription disclosures, instructions on how to opt-out of/cancel the program, get Help, describe the billing method description (charges will appear on their wireless bill or be deducted from their prepaid balance on your cellphone account), billing frequency, and disclose that Msg&Data Rates May Apply. | |
| | <p>VZW Best Practices – Additions to the VZW BP Guidelines – Dated June 12, 2009</p> <p>Proper Disclosure To Consumers – Programs that include any premium charges must disclose: (1) any premium charges associated with the program including whether any charges are recurring and (2) the nature of the program, including the type of content delivered to the consumer’s mobile device. This disclosure must be clear and conspicuous throughout all marketing materials including on-line, print, or television advertisements, throughout any Internet sites associated with the program, and throughout the opt-in process.</p> <p>For example, programs such as an on-line quiz that require a subscription to a premium charge program to obtain the results of the quiz must include proper disclosures in any advertisements, on each web page associated with the quiz, and during the opt-in process in order to make the consumer aware that the actual program being offered is a premium charge program rather than an</p> | VZW-02 |

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| | <p>on-line quiz.</p> <p>For programs, such as on-line quizzes, in which non-messaging content is offered to consumers as an inducement to participate in a premium charge program, or in cases where a single delivery of content (for example: survey results, quiz results) is promoted in order to induce a consumer to opt-in to a subscription-based program, aggregators are required to: (1) disclose all affiliate marketing and websites within which the program will be advertised including keyword advertisements; (2) provide examples of the actual advertising used and/or text used in keyword advertisements; and (3) provide a fully operational website that details full consumer experience in conjunction with the program.</p> | |
| | <p>VZW Best Practices – Additions to the VZW BP Guidelines – Dated September 29, 2008</p> <p>12) Mobile Banking/Commerce/Payments*</p> <p>*These guidelines supersede prior published guidelines dated June 23, 2008.</p> <p>Allowable Content:</p> <p>Content of the types indicated below may be delivered via short code-based mobile banking messaging programs for purposes of alerts, notifications and core banking services such as intra-bank transfers among accounts of a single bank customer. Banks may offer mobile banking service only to their own customers. Personally identifiable information, however, must not be included in messages. Some examples of personally identifiable information include, but are not limited to, account number, credit card number, billing address, expiration date, SSN, etc. or a combination of these. The last 4 digits of credit card numbers, bank account names and bank customer designated account names may be allowed at the discretion of VzW:</p> <ul style="list-style-type: none"> • Core banking, brokerage and investment services may be allowed if they fall under any of the categories below: <ul style="list-style-type: none"> ○ Alerts and notifications related to account balances and transaction histories as long as they do not contain any personally identifiable information per above. ○ "Call me back" request related to promotions or offers from the banks on an opt-in basis. ○ Account alerts and reminders related to low balance, fraud alerts, authentication message and bill payment reminders. ○ Money transfers between multiple accounts within the same bank and that belong to the same bank customer, but not money transfers among different banks and/or | <p>VZW-03</p> |

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| | <p style="text-align: center;">different bank customers.</p> <p>Enrollment:</p> <p>Customers must enroll for mobile banking access with their bank or financial institution using a secured enrollment option to enable opt-in to short code-based mobile banking messaging programs, including an option to opt-out at any time. Industry guidelines will apply to all such programs. Customers should not be able to use mobile banking without enrollment with their bank or financial institution.</p> <p>Banks or their application providers must store opt-in consent for all customers who have opted in to their short code-based messaging programs and they must also record opt-out timestamps when customers opt-out of such programs.</p> <p>Security, Privacy and Fraud Control:</p> <p>Banks, financial institutions and their application providers must (i) ensure that any technology used for short code-based mobile banking messaging programs is secure, (ii) have controls in place to protect bank customer privacy, confidentiality and the integrity of customer information and (iii) employ anti-fraud mechanisms for detecting fraudulent transactions or unusual transaction patterns related to these programs.</p> <p>Customer Care:</p> <p>Banks should implement customer support for mobile banking and would be responsible for any customer complaints and issues related to transaction disputes. Bank customers must be notified of help information for all such issues by the bank during the enrollment process.</p> <p>Mobile Commerce/Payments:</p> <ul style="list-style-type: none"> • Payment support services alerts and notifications may be allowed if they fall under any of the categories below: <ul style="list-style-type: none"> ○ Account balance, available credit and transaction alerts for payment support services, but inter-bank money transfers, bill payment using sms, and/or adding value to loyalty cards will not be allowed. ○ Notification for approval for card purchase but the use of SMS to apply for new services such as a credit card, sign ups for financing offers or opening new accounts will not be allowed. • SMS merchant services may be allowed if they fall under any of the categories below: <ul style="list-style-type: none"> ○ Notification for placing purchase orders online, but payment for online goods purchased using SMS as the | |
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| | <p>billing mechanism will not be allowed except purchases of digital content for wireless devices (ringtones, wallpapers, alerts etc) will be allowed.</p> <ul style="list-style-type: none"> o Order status alerts for shopping cart and reminders for purchase orders. | |
| | <p>VZW Best Practices – Additions to the VZW BP Guidelines – Dated June 23, 2008</p> <p>If a content provider modifies the list of URLs (add or delete) for an existing program, including any URLs by marketing affiliates or other third parties to drive consumers to the URLs of a content provider, they should receive prior approval of the URLs of a content provider by submitting the changes to Product Development. All URLs require prior approval before they can be used in connection with a program. There is no need to clone the program. Product Development will update the CAT tool with the new URL list. For new programs, the content provider should include a full list of URLs on page 1 of the CAT tool application.</p> | VZW-04 |
| White Label Solutions | For both Standard and Premium campaigns, content providers/aggregators must provide full disclosure of all keywords and URLs. Also, a complete list of all content providers associated with the campaign must also be provided. If new content providers are added after launch, the CAT tool application should be cloned and resubmitted for approval. | VZW-05 |
| Single Host | Content provider must be the single host of all pages which require a mobile number submittal or PIN entry. Content provider shall not grant access for any third party to be able to alter offer pages in a production environment. Legacy programs must be compliant with this requirement within 60 days (i.e., by August 23, 2008). | VZW-06 |
| Single Opt-In by Web, IV or Handset | Content provider/aggregator must record and store all single opt-ins and maintain the records of those opt-ins for at least one year past the date of the associated opt-outs. | VZW-07 |
| Double Opt-In by Web, IVR or Handset | Content provider/aggregator must record and store all double opt-ins and maintain the records of those opt-ins for at least two years past the date of the associated opt-outs. | VZW-08 |
| Opt Out (STOP) | Content provider/aggregator must record and store all opt-out transactions for at least one year past the date of the opt-out. | VZW-09 |
| Spending Cap Limits | VZW spending cap limits are based on a calendar month based on the date of initial opt-in. For example, if a user signs up on April 4 th , the spending cap for the month will be calculated until April 30 th . Spending cap limits for subsequent months shall restart the 1 st day of each calendar month. | VZW-10 |
| Subscriptions Renewal Reminder | For all premium charge subscription programs, VZW requires the following: a reminder must be sent to the participating subscriber's handset, 3-5 days prior to renewal, containing program name, short description of program, advice of charge, frequency of content delivery (i.e.3msg/wk), renewal date xx/xx/xx, opt out information, and HELP information. | VZW-11 |

Contests and Sweepstakes

If a program incorporates either a contest or sweepstakes, the requirements described below apply.*

VZW-12

- 1) Contests – A contest is promotional mechanism that includes a prize and a game of skill. A premium charge can be assessed to enter a contest, but there cannot be an element of chance.
 - a. Any contest that is associated with a program must be approved in advance by VZW. This can be accomplished at the time a new program is submitted or by modifying an existing program to include a contest.
 - b. Content provider/aggregator must submit a complete copy of the rules for the contest. The rules cannot be generic (e.g., covering multiple contests of a particular type that may be run in connection with a program), but must relate to an actual contest. The rules must include, at a minimum, the name and contact information for the contest sponsor, any eligibility restrictions applicable to participants or winners (e.g., age, state of residence, etc.), a description of means of entry, a description of the prize(s), the method for awarding the prize(s), the date(s) the prize(s) will be awarded, a description of how the winners will be contacted and a method for obtaining a list of winners. The rules must be prominently located on the web site associated with the contest.
 - c. The prize(s) must be age appropriate (e.g., contests open to 13 year olds should not include a trip to Las Vegas as a prize).
 - d. A legal opinion must also be provided that describes how the contest qualifies as a game of skill and how all elements of chance have been excluded from the contest.
- 2) Sweepstakes – A sweepstakes is a promotional mechanism that includes a prize and a game of chance. A premium charge can be assessed to enter a sweepstakes subject to the following requirements.
 - a. Any sweepstakes that is associated with a program must be approved in advance by VZW. This can be accomplished at the time a new program is submitted or by modifying an existing program to include a contest.
 - b. Content provider/aggregator must submit a complete copy of the rules for the sweepstakes. The rules cannot be generic (e.g., covering multiple sweepstakes of a particular type that may be run in connection with a program), but must relate to an actual sweepstakes. The rules must include, at a minimum, the name and contact information for the sweepstakes sponsor, any eligibility restrictions applicable to participants or winners (e.g., age, state of residence, etc.), a description of means of entry, a description of the prize(s), the method for awarding the prize(s), the date(s) the prize(s) will be awarded, a description of how the winners will be contacted and a method for obtaining a list of winners. The rules must be

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| | <p>prominently located on the web site associated with the sweepstakes.</p> <ul style="list-style-type: none"> c. The prize(s) must be age appropriate (e.g., sweepstakes open to 13 year olds should not include a trip to Las Vegas as a prize). d. Any sweepstakes involving a premium charge must include an alternate free method of entry, such as a mail in or web entry option, and must prominently indicate that no purchase is necessary to enter or win. Any sweepstakes involving a premium charge must also provide entrants with something of tangible, commensurate value in exchange for the premium charge (e.g., ringtone, wallpaper, etc.). The premium charge to enter a sweepstakes cannot vary. <p>*These guidelines supersede prior published guidelines</p> | |
| <p>Mobile Banking/ Commerce/ Payments</p> | <p>Content of the types indicated below may be delivered via programs for purposes of alerts and notifications. Personally identifiable information related to users, however, must not be included in messages. Some examples of personally identifiable information include, but are not limited to, account numbers, credit card numbers, billing addresses, expiration dates, SSNs, etc or a combination of these. The last 4 digits of credit card numbers, bank account names and user designated account names may be allowed at the discretion of VZW:</p> <ul style="list-style-type: none"> • SMS core banking, brokerage, and investment services may be allowed if they fall under any of the categories below: <ul style="list-style-type: none"> ○ Alerts and notifications related to account balances and transaction histories as long as they do not contain any personally identifiable information per above. ○ "Call me back" requests related to promotions, offers from the banks for which users have opted-in to receive promotional messages and alerts. ○ Account alerts and reminders related to low balances, fraud alerts, authentication messages, and bill payment reminders. • SMS payment support services alerts and notifications may be allowed if they fall under any of the categories below: <ul style="list-style-type: none"> ○ Account balances, available credit and transaction alerts for payment support services, but transfers between accounts, bill payment using SMS, and/or adding value to loyalty cards will not be allowed. ○ Notifications for approval for card purchases, but the use of SMS to apply for new services such as a credit card, sign ups for financing offers or opening new accounts will not be allowed. • SMS merchant services may be allowed if they fall under any of | <p>VZW-13</p> |

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| | <p>the categories below:</p> <ul style="list-style-type: none"> o Notifications for placing purchase orders online, but payments for online goods purchased using SMS as the billing mechanism will not be allowed except for purchases of digital content for wireless devices (e.g., ringtones, wallpapers, alerts, etc.) will be allowed. o Order status alerts for shopping cart and reminders for purchase orders. | |
| <p>Mobile Giving</p> | <p>CTIA and its industry partners have created a task force to examine mobile charitable giving and to develop best practices for implementation and ongoing support. VZW expects that process to be quick and to address issues important to charities as well as to citizens who deserve to know their contributions are having the impact they intended. VZW will consider new requests to enable mobile giving programs once the industry adopts best practices.</p> | <p>VZW-14</p> |
| <p>Peer to Peer Communication</p> | <p>Peer-to-peer programs enable person-to-person messaging where message recipients, initially, have not opted-in to the program. These programs are sometimes referred to as word of mouth marketing or viral programs and are distinguished from other social networking programs, such as chat programs, where messages are sent only to those who have opted-in to the programs. Until the MMA establishes parameters for peer-to-peer programs that are acceptable to VZW, VZW will review such programs on a case-by-case basis and will only approve those programs if they are standard rate programs, the recipients of messages are able to determine who sent the messages and the recipients of messages are provided an acceptable measure of control over their receipt of messages.</p> | <p>VZW-15</p> |
| <p>Website Call to Action (CTA) for Premium Charge Programs</p> | <p>The requirements listed below apply to any web page, whether hosted by affiliate marketers, content providers, aggregators or any other party, that contains a material representation, or CTA, about a premium charge program. A material representation includes, without limitation, any information about the type, quantity, quality or cost (or lack thereof) of content accessible through the program.</p> <ul style="list-style-type: none"> • The pricing and billing frequency must be displayed prominently in the CTA on the web page, including any web page where the user enters their cell phone number AND on the PIN code page (if a PIN is used). It is not acceptable to have this information in a significantly smaller font than the CTA or in a color that would make it difficult to distinguish it from the rest of the web page. The pricing and billing frequency cannot be buried only in the terms and conditions for the program. A reasonable person reviewing the web page should be able to readily determine that the pricing and billing frequency associated with premium charge programs. • The CTA must not suggest that content, such as ringtones or sports ringtones are available to customers of VZW, if no such content is available through the program. To the extent the content available to customers of VZW is different than that available to the customers of other carriers, this must be made clear in the CTA. To the extent the CTA indicates that specific content is available, such as ringtones or wallpaper for the | <p>VZW-16</p> |

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| | <p>Atlanta Braves, then such content must be available.</p> <ul style="list-style-type: none">• A summary of the terms and conditions must be displayed on the page where the user enters their cell phone number AND on the PIN code page (if PIN is used). It is not acceptable to have only a link to the terms and conditions.• The terms and conditions must also include instructions on how to opt-out of the program, get Help, describe the billing method description (charges will appear on their wireless bill or be deducted from their prepaid balance), billing frequency, and disclose that standard message charges may apply. | |
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VZW Examples Compliance Matrix Chart: Initial Opt In (First MT)
VZW-EG-01

| | SMS Opt In | Web Opt In | Advertising | Subscription Billing Reminder | Standard | WAP |
|--|------------|---------------|----------------------|-------------------------------|----------|-----|
| | | (pin message) | | | | |
| Program Sponsor | X | X | | X | X | X |
| Program Name/Description | X | X | | X | X | X |
| Sponsor contact/Help | X | X | | X | X | X |
| Price | X | X | X | X | | X |
| Subscription Duration | X | X | X | X | X | X |
| Opt-Out Instructions (VZW req. use of word "STOP") | | | X | X | | |
| Billed to Wireless Bill or deducted from prepaid account | | | X | | | |
| Msg&Data Rates May Apply | | | x | | x | |
| Service availability on carrier by carrier basis | | | X | | | |
| Renewal date | | | | X | | |
| MTC - age qualifier | | | X (where applicable) | | | |

X = required

**Confirmation MT
VZW-EG-02**

| | *SMS Opt In Confirmation | *Web Opt In Confirmation | WAP |
|--------------------------|---------------------------------|---------------------------------|------------|
| Program Sponsor | X | X | X |
| Program Name/Description | X | X | X |
| Sponsor contact/Help | X | X | X |
| Price | X | X | X |
| Subscription Duration | X | X | X |
| Opt-Out Instructions | X | X | X |

| Section | Standard | MMA Id |
|---------|---|--------|
| | <p>VZW Best Practices – Additions to MMA Consumer Best Practice Guidelines – Dated November 9, 2007</p> <p>Daily Pricing – VZW has instituted a maximum daily pricing cap of \$0.32. New programs need to adhere to the new policy immediately. New programs that are submitted with daily pricing over \$0.32 per day (\$10 per month) will be returned by Business Development through the CAT tool. The Content Provider will need to revise the daily price point and message flow and resubmit the program. Legacy programs need to transition to this daily price cap by December 10, 2007.</p> | VZW-17 |
| | <p>VZW Best Practices – Additions to MMA Consumer Best Practice Guidelines – Dated July 16, 2007</p> <p>1) Keywords – If a Content Provider modifies the list of keywords (add or delete) for an existing program, they should submit the changes to Product Development. There is no need to clone the program. Product Development will update the CAT tool with the new keyword list. For new programs, the Content Provider should include a full list of keywords on Page 1 of the CAT tool application.</p> <p>2) Premium Sweepstakes and Reverse Auctions – VZW will reject programs that could be considered gambling (i.e. premium rate contests and reverse auctions) due to litigation risk unless the program includes some consideration (like a factoid with bid confirmation) and makes it clear in the terms of service that there is some benefit other than paying for a chance at getting a good at a vastly reduced price. The VZW rule and examples are listed below.</p> <p>The VZW rule is that customers must receive something of value</p> | VZW-18 |

with a bid/sweeps entry that involves a premium charge and the value needs to correspond to the premium charge. It could be a factoid, a trivia question, an alert, wallpaper, or a ringtone. Any premium charge program where there is 1.) a prize or 2.) a chance to buy something at a vastly reduced price (a reverse auction) there must be a factoid, binary content, alert, trivia (which does NOT have an effect on whether you can have an entry and which corresponds to the value of the premium charge). Alerts which encourage the user to use the service are NOT acceptable as there is no added benefit, its just advertising.

Examples:

- Reverse Auction involving a reasonable premium charge with free factoid is acceptable.
- Reverse auction with loyalty points is acceptable unless points are almost useless.
- Reverse Auction involving a reasonable premium charge with free ring tone is acceptable.
- Reverse Auction with alerts about other auctions is NOT acceptable.
- Reverse Auction involving a reasonable premium charge with voting is acceptable if results are publicly announced (user gets to influence outcome as benefit).
- Sweepstakes involving a reasonable premium charge with free factoids are acceptable.
- Trivia question where only right answers get sweeps entry is NOT acceptable without other benefits described above. Question is barrier to entry, not an 'added benefit.'
- Trivia questions where any answer right or wrong gets sweeps entry is acceptable.
- Sweepstakes involving a reasonable premium charge with free tone downloads are acceptable
- Sweepstakes involving a reasonable premium charge with voting is acceptable if results publicly announced (user gets to influence outcome as benefit).

3) Monthly Subscription Pricing – VZW has instituted a maximum monthly subscription pricing cap of \$10. New programs need to adhere to the new policy immediately. New programs that are submitted with subscription pricing over \$10 will be returned by Business Development through the CAT tool. The Content Provider will need to revise the price point and message flow and resubmit the program. Legacy programs need to transition to this subscription price cap by September 27th

4) Customer Care – Content Providers should no longer put Toll Free Help number on the bill face descriptor. Aggregators need to update "Purchase Names" to exclude/remove Toll Free Help numbers on the VZW bill face by September 27th.

5) Request for 3rd party information - VZW will not accept any program that allows the user to increase their odds of winning by

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| | <p>providing third party information, especially without the third party's explicit consent.</p> <p>6) Content Ratings – Content providers must provide a Content Rating with all new program submissions. The Content Ratings should adhere to the guidelines presented by VZW. Legacy programs must be rated by August 1, 2007.</p> <p>7) Urgent Alerts - Alert notifications should not have an "Urgent" status unless they are critical breaking news. For example, a program notification for TV shows is not urgent.</p> <p>8) IVR Double Opt-in – See accompanying presentation for VZW guidelines</p> | |
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Verizon Certification

Certification process overview to be provided by VZW in future revision

Verizon Audit

VZW Functional Audit Standards

| Rule ID | category | name | description | severity |
|---------|-----------------|--|---|----------|
| 1 | GENERAL CONDUCT | The active program matches the description of the approved program | Compare the actual program to the program description in the PMP. You do not need to be fully opted in to complete this test ACTION: Review PMP details, text HELP to shortcode on phone & review site. | 4 |
| 2 | GENERAL CONDUCT | Only approved programs offered to VZW subscribers | Only approved (as described in PMP) programs offered to VZW subscribers. It is acceptable for a site to list programs other than the one you are testing as long as they are approved (to confirm see View Programs - note that site may include programs for different codes as well, which is acceptable). ACTION: Check website. | 3 |
| 3 | GENERAL CONDUCT | Website operational | Website operational ACTION: Check URL. | 3 |
| 4 | GENERAL CONDUCT | Website does not misrepresent VZW's participation in a program or misuses VZW logos (must be Verizon Wireless not Verizon) | Website does not misrepresent VZW's participation in a program or misuses VZW logos (must be Verizon Wireless not Verizon) ACTION: Check website. | 4 |

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| 5 | GENERAL CONDUCT | There is customer care contact info on site or in text that matches the info in the approved program | There is customer care contact info that matches info in PMP ACTION: Active test on phone (HELP); check website. | 4 |
| 6 | GENERAL CONDUCT | VZW is supported as a carrier | VZW is supported as a carrier ACTION: Check website to see if VZW is listed as a supported carrier (with correct logo or not - if wrong logo usage, fail under that question only). Send HELP and keyword to shortcode. | 4 |
| 7 | GENERAL CONDUCT | Program is active | Program is active ACTION: Send HELP (for phone opt-in, send HELP and keyword) to shortcode; check website. | 4 |
| 8 | GENERAL CONDUCT | No error messages are received; content downloaded as expected | No error messages are received; content downloaded as expected. ACTION: Opt into program; check phone for content. | 4 |
| 9 | DOUBLE OPT-IN | The information returned must not refer to another shortcode | The information returned must not refer to another shortcode ACTION: Check all MTs on phone; check website. | 4 |
| 10 | DOUBLE OPT-IN | Premium rate services and all subscription services must have a double opt-in before content delivery or premium billing event (web and phone may both be used) | Premium rate services and all subscription services must have a double opt-in before content delivery or premium billing event (web and phone may both be used) ACTION: Send keyword to shortcode; check phone. | 3 |
| 11 | DOUBLE OPT-IN | Shortcode services must not be priced other than as stated in the approved program description | Shortcode services must not be priced other than as stated in the PMP ACTION: Send HELP and keyword to shortcode; check website. | 3 |
| 12 | DOUBLE OPT-IN | Shortcode services must not use opt-in/opt-out language that varies from the approved program description | Shortcode services must not use opt-in/opt-out language that varies from the approved program description. ACTION: Active test on phone (HELP); check website. | 4 |
| 13 | DOUBLE OPT-IN | Double opt-in MT must display: program sponsor contact details - phone, URL or HELP program name/description | Double opt-in MT must display: program sponsor contact details - phone, URL or HELP program name/description ACTION: Send keyword to shortcode; check double opt-in MT. | 4 |
| 14 | DOUBLE OPT-IN | Double opt-in MT must display price | Double opt-in MT must display price ACTION: Check double opt-in MT. | 3 |

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| 15 | DOUBLE OPT-IN | Pricing must be presented in terms of "Daily" or "Monthly" (not weekly and NTE \$10 monthly or \$0.32 DAILY) | Pricing must be presented in terms of "Daily" or "Monthly" (not weekly) amounts NOT TO EXCEED \$10 monthly or \$0.32 DAILY. ACTION: Active test on phone. | 4 |
| 16 | DOUBLE OPT-IN | Opt-in message must include "Msg & DATA RATES MAY APPLY" | Opt-in message must include "MSG&Data Rates May Apply" ACTION: Check double opt-in MT. As of OCT 1,2009 "Msg&Data Rates May Apply" | 4 |
| 17 | DOUBLE OPT-IN | Double opt-in process must display notice that charges will appear on their wireless bill, or be deducted from the prepaid balance for web opt in only | Double opt-in process must display notice that charges will appear on their wireless bill, or be deducted from the prepaid balance for web opt in only ACTION: Active test on web only | 4 |
| 18 | CONTESTS | If the offering is a contest - must be based upon skill not chance, prize must be something of value other than unauthorized prizes such as alcohol and tobacco. | Contest = game of skill with a prize - not based on chance. Premium charge to enter is acceptable. If the offering is a contest than something of value must be offered to the subscriber other than unauthorized prizes such as alcohol and tobacco. ACTION: | 2 |
| 19 | WEB SIGN-UP | Program description accurate during any interactions of opt-in process | Program description accurate during any interactions of opt-in process ACTION: Check website. | 3 |
| 20 | WEB SIGN-UP | When entering phone number or PIN/password, user is conspicuously informed that by entering code user is agreeing to T&Cs | When phone number or PIN/password, user is conspicuously informed that by entering code user is agreeing to T&Cs ACTION: Check website. | 3 |
| 21 | WEB SIGN-UP | Web based opt-in must specify charges, duration of subscription details (daily or monthly only), opt-out details, charged to cell phone | Web based opt-in must specify correct pricing, duration of subscription details (daily or monthly only), opt-out details and info that offering will be charged to cell phone bill ACTION: Check website. | 3 |
| 22 | WEB SIGN-UP | Identity of program sponsor must be clearly stated during web opt-in | Identity of program sponsor must be clearly stated during web opt-in ACTION: Check website. | 4 |
| 23 | WEB SIGN-UP | PIN/password entry on website must not require multiple attempts while program is being advertised | PIN/password entry on website must not require multiple attempts while program is being advertised ACTION: Check website. | 4 |

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| 24 | WEB SIGN-UP | Confirmation MT sent to user and must include: program sponsor program name/description contact info/HELP price opt-out info subscription duration (if applicable) | Confirmation MT received & must include all info: program sponsor program name/description contact info/HELP price opt-out info Msg&Data Rates May Apply subscription duration (if applicable) ACTION: Check phone. | 3 |
| 25 | WEB SIGN-UP | The PIN or "reply Yes" type text must be listed after the price. PIN message must include: program sponsor program name/desc contact info/HELP price subscription duration (if applicable) | The PIN or "reply Yes" type text must be listed after the price. The PIN message must include all info: program sponsor program name/desc contact info/HELP price subscription duration (if applicable) ACTION: Check phone. | 4 |
| 26 | PRIVACY | No credit card or financial information is required or requested for PSMS offerings | No credit card or financial information is required or requested for PSMS offerings ACTION: Check phone and website. | 2 |
| 27 | HELP | Services must provide help info to subscribers who send a text message containing the word HELP | BEFORE AND AFTER signing up for an offering, services must provide help info to subscribers who send a text message containing the word HELP. If a service employs multiple keywords, help should pertain to the service the subscriber has subscribed to or a menu should be presented ACTION: Send HELP to shortcode before and after opt-in. | 3 |
| 28 | HELP | HELP info must provide: sponsor name contact info - phone and/or URL program description pricing terms opt out info | HELP info must provide: sponsor name contact info - phone and/or URL program description pricing terms opt out info Msg&Data Rates May Apply. If multiple programs are running on the code the subscriber can be directed to a web or wap site or a toll free number to obtain assistance as long as basic info such as pricing is in the help message. ACTION: Send HELP to shortcode after opt-in; check phone. | 4 |
| 29 | HELP | HELP must be available from phone contact number or website listed in HELP message | HELP must be available from phone contact number or website listed in HELP MT ACTION: Call number provided; check website. | 4 |
| 30 | CHAT | Chat service must not contain any adult oriented chat/sex service unless it is rated M18+ | Chat service must not contain any adult oriented chat/sex service unless it is rated M18+ ACTION: Active test on phone/website. | 2 |

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| 31 | CHAT | For matching services in which match messages are billed at premium rates, an additional opt-in (beyond the double opt-in) is required before match messages may be sent to the subscriber | For matching services in which match messages are billed at premium rates, an additional opt-in (beyond the double opt-in) is required before match messages may be sent to the subscriber ACTION: Active test on phone. | 3 |
| 33 | CHAT | Chat members must have the ability to block and report participation by members who are abusive, threatening, etc- NOT APPLICABLE FOR EXPERT/OPERATOR SERVICES | Chat members must have the ability to block and report participation by members who are abusive, threatening, etc. (not applicable if the service is an expert service where an operator is the only person the customer interacts with - e.g. love coach, fortune teller, etc.) ACTION: Check website. | 4 |
| 34 | CONTINUATION | Following every \$25 in premium charges within a single month of service, subscribers must renew their opt-in before the service can continue | Following every \$25 in premium charges within a single month of service, subscribers must renew their opt-in before the service can continue (MORE, CONTINUE and other program keywords are considered affirmative responses) until a \$100 monthly max is reached ACTION: Active test on phone. | 3 |
| 35 | CONTINUATION | The continuation message must state the exact cumulative dollar amount charged so far in the month of service (it is not sufficient to state the number of messages only) | The continuation message must state the exact cumulative dollar amount charged so far in the month of service (it is not sufficient to state the number of messages only) ACTION: Check phone. | 4 |
| 36 | CONTINUATION | HELP and STOP info must appear in the continuation message | HELP and STOP info must appear in the continuation message ACTION: Check continuation message on phone. | 4 |
| 37 | CONTINUATION | If a subscriber has not performed an opt-in renewal (paused status), no additional premium charges must be applied to the subscriber | If a subscriber has not performed an opt-in renewal (paused status), no additional premium charges must be applied to the subscriber ACTION: Passive test on phone. | 3 |
| 38 | CHAT | Matching services must not send more than 2 premium match messages or 5 standard messages to a subscriber within 24 hours | Matching services must not send more than 2 premium match messages or 5 standard messages to a subscriber within 24 hours ACTION: Active test on phone. | 3 |

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| 39 | OPT-OUT | A subscriber immediately terminates a service and all future messages from the service by sending text message containing the word STOP (not case sensitive) | A subscriber immediately terminates a service and all future messages from the service by sending text message containing the word STOP (not case sensitive) ACTION: Send STOP to shortcode; check phone. | 2 |
| 40 | OPT-OUT | Messages with STOP followed by a space and non-keyword text (typical of auto signatures) must not prevent opt-out from occurring | Messages with STOP followed by a space and non-keyword text (typical of auto signatures) must not prevent opt-out from occurring ACTION: Send STOP plus non-keyword text to shortcode; check phone. | 2 |
| 41 | OPT-OUT | Services must treat the following words as identical to STOP: END, CANCEL, UNSUBSCRIBE, QUIT | Services must treat the following words as identical to STOP: END, CANCEL, UNSUBSCRIBE, QUIT ACTION: Send END, CANCEL, UNSUBSCRIBE or QUIT to shortcode; check phone. | 3 |
| 42 | OPT-OUT | A subscriber must immediately terminate ALL services associated with a shortcode when the word ALL follows STOP (or a STOP alternative word) | A subscriber must immediately terminate ALL services associated with a shortcode when the word ALL follows STOP (or a STOP alternative word) ACTION: Active phone test (STOP ALL, END ALL, QUIT ALL, UNSUBSCRIBE ALL). | 3 |
| 43 | OPT-OUT | If a service employs multiple keywords, STOP must pertain to the subscriber's most recently used service, all services, or a menu must be presented | If a service employs multiple keywords, texting STOP must result in stopping either the subscriber's most recently used service or all services subscribed to on that code. Alternatively, a menu may be presented listing subscribed to service so user may select which to cancel. ACTION: Active phone test (STOP keyword). | 2 |
| 44 | OPT-OUT | The service must send a STOP acknowledgement message to the subscriber indicating the specific service that has been stopped | The service must send a STOP acknowledgement message to the subscriber indicating the specific service that has been stopped ACTION: Check phone. | 2 |
| 45 | OPT-OUT | User must not receive premium rate messages after opt-out confirmation | User must not receive premium rate messages after opt-out confirmation ACTION: Passive monitoring on phone. | 2 |
| 58 | CONTINUATION | At the time of subscription renewal (but at least once per month), a renewal message must be sent to the subscriber | At the time of subscription renewal (but at least once per month), a renewal message must be sent to the subscriber (may be included in program-specific messaging, but must coincide with the subscription anniversary) | 2 |

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| 59 | CONTINUATION | The periodic reminder must identify the program sponsor | The periodic reminder must identify the program name, short description of program, pricing, billing frequency of content, opt-out and help/contact info | 3 |
| 60 | BILLING | The periodic reminder must state that the service is a recurring subscription. | The periodic reminder must state that the service is a recurring subscription. ACTION: Passive monitoring on phone (you must receive a text message at the end of the subscription period that asks if you want to renew & that states that the service is a recurring subscription) | 3 |
| 61 | BILLING | The periodic reminder must indicate the billing interval and fee structure | The periodic reminder must indicate the billing interval and fee structure ACTION: Passive monitoring on phone. | 3 |
| 62 | BILLING | The periodic reminder must provide opt-out instructions | The periodic reminder must provide opt-out instructions ACTION: Passive monitoring on phone. | 3 |
| 63 | BILLING | Billing intervals must not exceed one month (only daily and monthly intervals are permitted) | Billing intervals must not exceed one month (only daily and monthly intervals are permitted) ACTION: Active test on phone (HELP); check website. | 4 |
| 64 | BILLING | There is no minimum period for any subscription service (subscriptions may be canceled at any time); pro-ration not required. | There is no minimum period for any subscription service (subscriptions may be canceled at any time); pro-ration not required. ACTION: Passive monitoring on phone; website check; monthly statement check. | 4 |
| 65 | BILLING | Charges on bill must match bill face description for approved program. Support numbers must not be listed on bill face. | Charges on bill must match bill face in PMP. Support numbers must not be listed on bill face. ACTION: Verify on billing statement the following month. | 3 |
| 66 | BILLING | Charges must be listed separately for each transaction that content was successfully delivered | Charges must be listed separately for each transaction that content was successfully delivered ACTION: Verify on billing statement the following month. | 3 |
| 67 | BILLING | There must be no charges for content that is not delivered | There must be no charges for content that is not delivered ACTION: Verify on billing statement the following month. | 2 |
| 68 | BILLING | There must be no premium charges for administrative type messages such as setting up a subscriber profile, help or opt out | There must be no premium charges for administrative type messages such as setting up a subscriber profile, help or opt out ACTION: Verify on billing statement the following month. | 2 |

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| 69 | BILLING | There must be no premium charge for opt-out acknowledgement message | There must be no premium charge for opt-out acknowledgement message ACTION: Verify on billing statement the following month. | 2 |
| 70 | BILLING | The program is exempt from double opt in requirements (PASS MEANS PROGRAM IS EXPEMPT FROM DOUBLE OPT IN) | The program is exempt from double opt in requirements (PASS MEANS PROGRAM IS EXPEMPT FROM DOUBLE OPT IN)ACTION: | 4 |
| 86 | GENERAL CONDUCT | Content Standards - Illegal Content | Illegal Content | 1 |
| 87 | GENERAL CONDUCT | Content Standards - Content Rating M18+ | Inclusion of M18+ Content | 2 |
| 88 | GENERAL CONDUCT | Content Standards - Non-classification | Inclusion of other excluded content or inappropriate content or as detailed in Verizon Wireless' General, User Generated or Short-Code Messaging Content Guidelines | 2 |
| 89 | GENERAL CONDUCT | Content Rating - Other | Inaccurately rated C7+, T13+, or YA 17+ content. | 3 |
| 92 | GENERAL CONDUCT | Confirmation MT sent to user and must include: program sponsor program name/description sponsor contact info/help price opt-out info subscription duration (if applicable) | Confirmation MT received and must include: program sponsor program name/description sponsor contact info/help price opt-out info subscription duration (if applicable) ACTION: Check phone. | 3 |
| 99 | GENERAL CONDUCT | Missing Letter of Assurance | Missing Letter of Assurance | 2 |
| 101 | PRIVACY | Mobile billing must only be used for purchasing premium content for wireless devices. It must not be used for purchasing online goods or virtual goods (VZW does not allow micropayments) | Mobile billing must only be used for purchasing premium content for wireless devices. It must not be used for purchasing online goods or virtual goods (VZW does not allow micropayments) ACTION: Check website. | 2 |
| 102 | CONTINUATI ON | If subscribed to multiple services, each service must provide its own renewal message | If customer is subscribed to multiple services, each service must provide its own renewal message | 3 |
| 103 | CONTINUATI ON | A Reminder MT must be sent to the participating subscriber's handset, 3-5 days prior to renewal message. | A Reminder MT must be sent to the participating subscriber's handset, 3-5 days prior to Renewal message. | 2 |

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|-----|-----------------|--|---|---|
| 110 | GENERAL CONDUCT | Only approved campaigns can be offered to Verizon Wireless subscribers | Only programs that are approved can be offered to Verizon Wireless subscribers. Opt-in must not be enabled for programs that are NOT in Ready to Launch status. | 3 |
| 113 | GENERAL CONDUCT | Repeat Offender Campaign prevents new VZW subscribers from opt-in. | VZW subscribers should not be able to opt-into Repeat Offender campaigns. | 2 |
| 114 | GENERAL CONDUCT | IVR phone number is operational | IVR phone number must be operational ACTION: Dial phone number | 3 |

VZW Advertising Audit Standards

| id | category | name | description | severity |
|----|-------------|---|--|----------|
| 46 | ADVERTISING | All ads and promos must clearly state that a service is a recurring subscription and the subscription term must be clearly stated (daily or monthly only) | Website/ads must clearly state that a service is a recurring subscription, if applicable, and the subscription term must be clearly stated (daily or monthly only) ACTION: Check website. | 3 |
| 47 | ADVERTISING | All ads and promo must provide a clear explanation between multiple services on single short code and/or clear delineation between said services | All ads and promo, and the website must provide a clear explanation between multiple services on single short code and/or clear delineation between said services ACTION: Ad/website check. | 4 |
| 48 | ADVERTISING | Advertising material must not misrepresent VZW's participation in a program or misuses VZW logos (must be VerizonWireless not Verizon) | Advertising material must not misrepresent VZW's participation in a program or misuses VZW logos (must be VerizonWireless not Verizon) ACTION: Ad/website check. | 3 |
| 49 | ADVERTISING | Mention that Std/other charges may apply (New language effective 1/1/2010: "Msg&Data Rates May Apply.") | Mention that Standard/other charges may apply. Okay to have in T&Cs. (New language effective 1/1/2010: Must say "Msg&Data Rates May Apply." Other acceptable forms: Message and Data Rates May Apply, Msg&data rates may apply, Msg&data rates may apply.) ACTION: Ad/website check. | 4 |

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| 50 | ADVERTISING | All terms and conditions must be clearly communicated | The terms and conditions must include pricing disclosures, subscription disclosures, instructions on how to opt-out of/cancel the program, get Help, describe the billing method description (charges will appear on their wireless bill or be deducted from their prepaid balance on your cellphone account), billing frequency, and disclose that Msg & Data Rates May Apply. (The word "Cancel" does not need to be specifically mentioned in T&C's). | 4 |
| 51 | | | | |
| 52 | ADVERTISING | Opt-out info must be clearly displayed in all ad, promo and help material; the word "Stop" must appear in advertising and promo materials | Opt-out info must be clearly displayed in all ad, promo, website and help material; the word "Stop" must appear in advertising and promo materials. Okay to be in T&Cs, but must be on same page and not on a link to T&Cs. ACTION: Ad/website check. | 3 |
| 53 | ADVERTISING | Services must not be presented as free if reasonable usage incurs premium fees | Services must not be presented as free if reasonable usage incurs premium fees ACTION: Ad/website check. | 2 |
| 55 | ADVERTISING | Subscribers must be informed that charges will appear on their wireless bill, or be deducted from their prepaid balance | Okay for this information to be in T&Cs, but must be on same page as offer and not on link to T&Cs. Subscribers must be informed that charges will appear on their wireless bill, or be deducted from their prepaid balance ACTION: Ad/website check. | 4 |
| 56 | ADVERTISING | Website/Advertising and placement must not be deceptive about functions, features or content. The CTA must not suggest that content is available, if no such content is available through the program. | Website/Advertising and placement must not be deceptive about functions, features or content. The CTA must not suggest that content is available, if no such content is available through the program. ACTION: Ad/website check. | 2 |
| 57 | ADVERTISING | Ads must not imply that unapproved content will be available | Ads must not imply that unapproved content will be available ACTION: Ad/website check. | 2 |
| 71 | ADVERTISING | The service must disclose if human operators are employed to participate in chat | The service must disclose if human operators are employed to participate in chat Action: Ad/website check. | 2 |
| 72 | | | | |
| 73 | | | | |

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| 74 | ADVERTISING | The ad must not include an option to also buy from a credit card | The ad must not include an option to also buy from a credit card ACTION: Ad/website check. | 2 |
| 75 | | | | |
| 76 | ADVERTISING | T&Cs not prechecked | Consumer must indicate their acknowledgement of T&Cs by manual selection of the T&Cs. Okay to have on the phone number entry page or the PIN page. | 3 |
| 77 | ADVERTISING | Service availability on carrier by carrier basis must be fully disclosed | Supported carriers must be listed. | 4 |
| 78 | ADVERTISING | MKTG TO CHILDREN: The language used in ads clearly communicates the program offer in a manner likely to be understood by the target market | The language used in ads clearly communicates the program offer in a manner likely to be understood by the target market | 3 |
| 79 | ADVERTISING | MKTG TO CHILDREN: All ads, when applicable, disclose clearly in the audio and visual that the program incurs a premium charge, the actual charge, and the fact that standard messaging fees also apply | All ads, when applicable, disclose clearly in the audio and visual that the program incurs a premium charge, the actual charge, and the fact that standard messaging fees also apply | 3 |
| 80 | ADVERTISING | MKTG TO CHILDREN: The term "Free" is used only when no fees are associated with the program. | The term "Free" is used only when no fees are associated with the program. | 3 |
| 81 | ADVERTISING | MKTG TO CHILDREN: All ads disclose clearly in the audio and visual that the subscriber must be age 18 or older or have a parent's permission to participate | All ads disclose clearly in the audio and visual that the subscriber must be age 18 or older or have a parent's permission to participate | 3 |
| 82 | ADVERTISING | MKTG TO CHILDREN: All ads disclose clearly the subscription term, billing interval, and billing method (i.e., wireless phone bill or prepaid balance deduction). | All ads disclose clearly the subscription term, billing interval, and billing method (i.e., wireless phone bill or prepaid balance deduction). | 3 |

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|-----|-------------|--|--|---|
| 83 | ADVERTISING | MKTG TO CHILDREN: All ads disclose clearly the method for canceling the program and advise subscribers that they may cancel anytime | All ads disclose clearly the method for canceling the program and advise subscribers that they may cancel anytime | 3 |
| 84 | ADVERTISING | MKTG TO CHILDREN: All ads cite a resource, such as a website or a toll-free number, where users can reference the program T&Cs | All ads cite a resource, such as a website or a toll-free number, where users can reference the program T&Cs | 3 |
| 85 | ADVERTISING | MIN/PIN entry pages must only be provided/hosted by content provider and be specific to their content. | If entry of MIN or PIN information is required to purchase content - this must only be available from the content provider site. It must never be allowed on an Affiliate Marketing website. | 2 |
| 104 | ADVERTISING | The MIN/PIN entry page should include at least one pricing and billing disclosure of 12 font or larger. | The MIN/PIN entry page should include at least one pricing and billing disclosure of 12 font or larger. | 2 |
| 105 | ADVERTISING | The MIN/PIN entry page should include at least one pricing and billing disclosure with a minimum color contrast value of 125 (using the WC3 brightness formula). | The MIN/PIN entry page should include at least one pricing and billing disclosure with a minimum color contrast value of 125 (using the WC3 brightness formula). | 2 |
| 106 | ADVERTISING | The pricing and billing disclosure placement must be within 125 pixels above or below or to the right or left of the CTA (MIN/PIN submit fields). | The pricing and billing disclosure placement must be within 125 pixels above or below or to the right or left of the CTA (MIN/PIN submit fields). | 2 |
| 107 | ADVERTISING | Pricing must be in numerical format with a \$ sign. (Example \$9.99) | Pricing must be in numerical format with a \$ sign. (Example \$9.99) | 2 |

| | | | | |
|-----|-------------|---|---|---|
| 108 | ADVERTISING | Substitute program disclosure must be no further than 20 pixels from Primary offer description. (FLAG) | Substitute program disclosure must be no further than 20 pixels from Primary offer description. (FLAG) | 2 |
| 109 | ADVERTISING | Substitute program disclosure must be no smaller than one half the font size of the Primary offer description. (FLAG) | Substitute program disclosure must be no smaller than one half the font size of the Primary offer description. Ex: "Get 10 Ringtones [50 pt font] or a Cool Text Service. [minimum 25 pt font] (FLAG) | 2 |
| 111 | ADVERTISING | The summary or full text of the terms and conditions must be displayed with a minimum of three lines of text above the fold on the MIN/PIN page. A link only is not acceptable on the MIN/PIN page. | The summary or full text of the terms and conditions must be displayed with a minimum of three lines of text above the fold on the MIN/PIN page. A link only is not acceptable on the MIN/PIN page. | 2 |
| 112 | ADVERTISING | Ads must not be displayed using "Stacked Marketing" techniques | Stacked marketing is multiple ads for PSMS content, back to back, with no obvious method to skip ad. It is also multiple PSMS ads popping up when you click on a link, or try to close a page. | 2 |

Sprint/Nextel

Provisioning

Supported Campaign Matrix

| | Sprint | Nextel | Boost |
|---|---|---|----------------------------|
| SMS | | | |
| Content - Ringer, Screensaver, Games | All Aggregators | Only specific aggregators who have been certified for downloadable binary delivery via Motorola | Not supported |
| Video downloads | All Aggregators - file limitations less than 200kb | Not supported at this time | Not supported at this time |
| Video Streaming | Not supported at this time | Not supported at this time | Not supported at this time |
| Chat | All Aggregators | All Aggregators | All Aggregators |
| Alert | All Aggregators | All Aggregators | All Aggregators |
| Vote | All Aggregators | All Aggregators | All Aggregators |
| Info | All Aggregators | All Aggregators | All Aggregators |
| MMS | Only specific aggregators who have been certified for MMS connectivity thru PMG | Not supported at this time | Not supported at this time |
| WAP | Aggregators if MDN is customer provided and not passed by carrier systems otherwise only Bango - due to encryption libraries & secure MDN exposure to approved CPs. | Not supported at this time | Not supported at this time |
| IVR | Abbreviated Dialing Codes - thru Verisign with SingleTouch | Not supported at this time | Not supported at this time |
| Full Track Downloads | Trialing soon | Not supported at this time | Not supported at this time |

| Section | Standard | MMA Id |
|--------------------------------------|--|--------|
| Short Code Enablement Process | <p>New short code campaigns – Sprint, Nextel &/or Boost:</p> <ul style="list-style-type: none"> • All new campaigns must have formal, complete program brief for review. • Identify if the intent of the campaign is political or controversial in nature. • WAP is not a currently supported functionality for any new or existing short code campaigns. Sprint is in a trial with 1 aggregator only. If/when this changes Sprint will advise. • Website and print collateral should be validated by the aggregator to be MMA compliant prior to submission. Sprint Nextel Boost logos should not be included on websites prior to approval of the campaign • Opt in use case needs to be specific – if keyword – define what the keyword(s) are, if website opt in, identify the website within the use case. • Submission of a campaign to Sprint Nextel does not constitute or guarantee approval of the campaign. <p>Additional campaigns on existing short codes - Sprint, Nextel &/or Boost:</p> <p>All campaigns must have formal, complete program brief for review. Email changes using the template identifying the additional attributes to be included with the brief.</p> | SPR-01 |
| | <p>Migrations – Sprint, Nextel &/or Boost</p> <p>Requests to migrate a short code from 1 aggregator to another require:</p> <ol style="list-style-type: none"> 1) transfer letter from the content provider. 2) Sprint will expire the current campaign and communicate expiration date to current aggregator 3) Sprint will provide start date to the new aggregator. 4) Upon receipt of start date, new aggregator should process as NEW campaign submission. <p>Sprint is not responsible to ensure the New aggregator has completed their submission process prior to provisioning cycle deadline. The short code will remain with the Current aggregator until the New aggregator has met all submission requirements.</p> <p>CSCA deactivations – Sprint, Nextel &/or Boost</p> <ul style="list-style-type: none"> • Sprint receives weekly notification of short codes which have not been renewed at www.usshortcodes.com • Sprint will notify the aggregator partner of the intent to expire the short code on Sprint Nextel Boost networks and provide a renew by date. • Sprint will check CSCA the day after the renew by date. If paid, we will remove the short code from the expiration file, if not paid, the short code will be submitted to Sprint Nextel Boost networks | SPR-02 |

| Section | Standard | MMA Id |
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| | <p>for termination from the network during network CMC event.</p> <ul style="list-style-type: none"> If the short code is allowed to expire, proof of payment is required prior to submission as NEW short code campaign within standard provisioning cycle timelines. | |

Sprint/Nextel Certification

Sprint/Nextel does not require certification for off-deck programs.

Sprint/Nextel Audit

| Section | Standard | MMA Id |
|--|--|--------|
| Compliance Reporting and Audits | <p>MMA Consumer Best Practices compliance is the expectation for all short code campaigns. Non-compliant short code campaigns should expect consequences up to and including termination from Sprint Nextel Boost networks.</p> <p>Areas of compliance monitoring:</p> <ul style="list-style-type: none"> Collateral Industry MDN Recycling Messaging errors destined to invalid or blocked Sprint mdn's >25% failure rate Billing errors destined to invalid or blocked Sprint mdn's >25% failure rate Billing/refund incidents | SPR-03 |
| Campaign Violations | | SPR-04 |
| Content Policy | <p>All Campaigns follow MMA CBP guidelines and Code of Content. The following are additional Content Policy guidelines that Sprint enforces for 3rd Party Mobile Marketing campaigns:</p> <p>PORNOGRAPHY AND OBSCENITY: Pornography and Obscenity: We do not allow images and video content that contains nudity, sexually graphic material, or material that is otherwise deemed explicit by Sprint. Pedophilia, Incest and Bestiality: Users may not publish written, image or video content that promotes pedophilia, incest and bestiality. Commercial Pornography: We do not allow content that exists for the primary purpose of monetizing porn content or driving traffic to a monetized pornography site. Child Pornography: Sprint has a zero-tolerance policy against child pornography, and we will terminate and report to the appropriate authorities any aggregator who attempts to publish or distribute child pornography. HATEFUL CONTENT: Users may not publish material that promotes hate toward groups based on race or ethnic origin, religion, disability, gender, age, veteran status, and sexual orientation/gender identity. VIOLENT CONTENT: Users may not publish direct threats of violence</p> | SPR-05 |

| Section | Standard | MMA Id |
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| | <p>against any person or group of people.</p> <p>COPYRIGHT: It is Sprint's policy to respond to clear notices of alleged copyright infringement.</p> <p>PRIVATE AND CONFIDENTIAL INFORMATION: Sprint does not allow the unauthorized publishing of people's private and confidential information, such as credit card numbers, Social Security Numbers, and driver's and other license numbers.</p> <p>IMPERSONATION: Sprint does not allow impersonation of others through our services in a manner that is intended to or does mislead or confuse others.</p> <p>UNLAWFUL USE OF SERVICES: Sprint's products and services should not be used for unlawful purposes or for promotion of dangerous and illegal activities. Your campaign will be terminated and you will be reported to the appropriate authorities.</p> <p>SPAM, MALICIOUS CODES AND VIRUSES: Sprint does not allow spamming or transmitting malware and viruses.</p> | |
| <p>MDN Recycling Enforcement</p> | <p>Three areas will continue to be the areas of focus and require written explanation:</p> <p>Repeat violations to the same MDN (day after day)</p> <p>Per Day – double digit violations for one MDN</p> <p>Multiple MDN occurrences (non voting campaigns) – mid-high double-digit per day, per content provider, per aggregator range</p> | <p>SPR-06</p> |
| <p>Compliance Monitoring and Enforcement on the Sprint Network</p> | <p>Compliance Monitoring and Enforcement on the Sprint Network</p> | <p>SPR-07</p> |
| | <p>As an integral part of initial program approval, before launch of a shortcode on its network, Sprint requires the aggregator to submit to support@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@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@psmsindustrymonitor.com and compliance@psmsindustrymonitor.com must be white listed.</p> | <p>SPR-08</p> |
| <p>Compliance Monitoring Process</p> | <p>Compliance Monitoring Process</p> <p>Every week, the Sprint Compliance Team evaluates programs operating on the Sprint network against audit standards published as the:</p> <ul style="list-style-type: none"> ▪ Sprint In-Market Shortcode Violations and Actions Required, ▪ Sprint Standard Rate Shortcode Violations and Actions | <p>SPR-09</p> |

| Section | Standard | MMA Id |
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| | <p>Required,</p> <ul style="list-style-type: none"> ▪ Sprint WAP Billing Violations and Actions Required, ▪ Sprint Message Flow Shortcode Violations and Actions Required, and ▪ Sprint Standard Rate Message Flow Shortcode Violations and Actions Required lists. <p>Known collectively as the Sprint audit standards, these lists appear in appendices A through E. Appendix F contains a sample compliant message flow and approved abbreviations for use in SMS messages.</p> | |
| | <p>The violations and actions required on the Sprint In-Market Shortcode Violations and Actions Required and the Sprint Standard Rate Shortcode Violations and Actions Required lists apply to landing pages, defined as Web pages having a text-in command or MIN-entry 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 PSMS call-to-action or quiz environment resulting in a PSMS offer to include all of the required disclosures on every page served to the customer. Moreover, the disclosures must appear in print, TV, and radio ads as well as on WAP sites and other sources of PSMS calls-to-action. The violations and actions required on the Sprint WAP Billing Violations and Actions Required list applies to the page in the WAP Billing application with the "Pay on my phone bill" button.</p> <p>The violations and actions required on the Sprint Message Flow Shortcode Violations and Actions Required and Sprint Standard Rate Message Flow Shortcode Violations and Actions Required lists apply to five SMS message types: PIN/Opt-In, Confirmation, Help, Renewal, and Opt-Out. Violations, with their actions required, are organized in <i>all</i> the Sprint audit standards in five categories: Program, Pricing, Subscription, T&Cs, Charges and Billing.</p> <p>Elements within program advertising creative and related message flows that violate these standards are classified as Severity 1, Severity 2, or Severity 3, based on the seriousness of the infraction, with Severity 1 the most egregious. Each shortcode associated with these advertisements and message flows is then grouped by media type (e.g., online, print, TV) and designated either "Pass" or "Fail," with failures assigned the highest severity level as reflected in the audit. Compliance monitoring is ongoing, throughout 52 weeks of the year. Consequently, noncompliant advertisements intercepted in market at any time result in the related shortcode being cited, even if a previously open audit on that shortcode has just been closed. The descriptor "closed audit" simply means that the message flow or the advertisement or advertisements on that audit have been brought into compliance or are no longer in market; nevertheless, all violations cited on that audit still incur the prescribed penalty (e.g., loss of revenue share).</p> | <p>SPR-10</p> |

| Section | Standard | MMA Id |
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| | <p>The Sprint audit standards are updated regularly, and before the revisions take effect, the lists are distributed to the aggregators and content providers whose programs operate through the Sprint gateway. These updates are released at least 30 days before implementation. Please note that in some instances, and depending on the severity and risk level, immediate compliance might be mandated.</p> <p>Program Violation Notices</p> <p>To help content providers manage and correct violations cited on their advertising creative, Sprint distributes color-coded Program Violation Notices, or failure forms, each week. At the top of a failure form for an advertising audit is a unique audit number and the shortcode, content provider, aggregator, number of total interceptions, and number of total unique interceptions as well as the notice date and the cure date. A red failure form indicates that the most serious violations committed on that shortcode are categorized as Severity 1. An orange failure form indicates that the most serious violations on the shortcode are categorized as Severity 2. And, a yellow failure form indicates all violations on the shortcode are categorized as Severity 3.</p> <p>Content providers and aggregators should consult the failure form for a complete list of violations committed on that shortcode and to learn what to do to bring the advertising into compliance with Sprint audit standards and Mobile Marketing Association (MMA) Consumer Best Practices (CBP). Below the list of violations and actions required are thumbnail images of each unique piece of advertising creative on that shortcode captured during the review period. For convenience, unique creative are organized and numbered in Groups with their duplicates. Therefore, the number of unique creative will correspond directly with the number of groups.</p> <p>Clicking on any thumbnail allows the user to view an itemized list of the specific violations on that individual unique creative and related duplicates, with severity levels and actions required to correct the violations. Clicking on the thumbnail just above the itemized list takes the user to a full-size screenshot or video clip of the creative as it appeared in market on the capture date. For online advertisements, the Intercept Location link leads to the actual Web site where the creative was intercepted. The URLs below the itemized list lead to related duplicate creative. In the event that the unique creative is an affiliate marketer's advertisement, the URLs titled "Page Links To" lead to the content provider's advertisements to which the affiliate advertisement is related.</p> <p>Message flow failure forms are similar to advertising failure forms, with an image of the advertisement from which the flow was generated followed by the messages subject to audit. The user can access the related advertisement by clicking on this image and following the link. Below each message in the flow is an itemized list of the violations committed in that message with corresponding</p> | |

| Section | Standard | MMA Id |
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| | <p>severity levels and actions required to correct the violations.</p> <p>Accessing Program Violation Notices Where WMC Global detects violations of the Sprint audit standards, both the content provider and the relevant aggregator receive a compliance notification via email containing a URL link or links to their Program Violation Notices. Although the PSMS Industry Monitor ticketing system sends URLs directly to content providers, all aggregators still retain responsibility for working with the content providers they manage to resolve violations.</p> <p>Aggregators can log into the PSMS Industry Monitor In-Market Monitoring Portal (IMM Portal) directly and view all violations on shortcodes associated with the content providers they manage. Content providers also can log into the IMM Portal but only to view their own audit information. They access the details of their shortcode violations by clicking the URL link or links in the compliance notification email, entering their unique username and password when prompted, and clicking on the appropriate thumbnail images and links in the violation notice, which will take them to the relevant section of the portal or to the Internet. Both aggregators and content providers can access the IMM Portal at http://www1.psmsindustrymonitor.com/user/login.</p> <p>Content provider and aggregator staff who misplace their credentials or experience technical difficulties may reset their login credentials at http://www1.psmsindustrymonitor.com/user/requestReset or contact support@psmsindustrymonitor.com for assistance.</p> | |
| Enforcement Process | <p>Enforcement Process The term <i>enforcement</i> simply refers to the process by which the Sprint Compliance Team works with aggregators and content providers to help them resolve outstanding audits by the noted cure date.</p> | SPR-11 |
| | <p>Within 48 hours of issue of a Program Violation Notice, the aggregator or content provider must confirm via the Sprint compliance email address (compliance@psmsindustrymonitor.com) that all violations have been resolved.</p> | SPR-12 |
| Q&A Process | <p>Q&A Process On receipt of a Program Violation Notice, or failure form, content providers who have questions should read this "Compliance Monitoring and Enforcement on the Sprint Network" document thoroughly; the answers, in most cases, will be found here. They can also refer to Appendix G, which contains an advertisement for ringtones, wallpapers, videos, and games that complies with all Sprint audit standards, including displaying pricing and subscription disclosure adjacent to the cell-submit field. In the unlikely event that uncertainty remains, good faith questions may be submitted to compliance@psmsindustrymonitor.com by replying to the ticket. The reply, which must preserve the ticket subject field, should pose <i>specific</i> questions or outline issues relating to the cited violations (noting failure form number and shortcode).</p> | SPR-13 |

| Section | Standard | MMA Id |
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| | <p>Aggregators and content providers should appreciate that Q&A is a courtesy extended to them solely for the purpose of entertaining good faith questions and helping them understand how they may bring their advertising into compliance. The PSMS Industry Monitor ticketing system and support email are not a venue for arguing about the MMA CBP or Sprint audit standards or for winding down the clock. Therefore, users of the ticketing system should refrain from pasting sections of the MMA CBP into, or attaching documents to, email.</p> | |
| | <p>The Sprint Compliance Team responds to content provider concerns based strictly on the published actions that Sprint requires to correct any given published violation. The Compliance Team is unable to address creative design issues, for example, or offer advice on how to lay out a Web page so it would meet requirements for placement of critical information such as pricing and subscription disclosure. Nor will the carrier or the Team review and approve revised advertising creative. Asking about the number or status of a content provider's violations monthly count also is inappropriate; therefore, questions of this nature will not be addressed. As often as not, careful reading of this <i>entire</i> document, including the relevant Sprint audit standards in the appendices, should suffice.</p> | SPR-14 |
| | <p>The Compliance Team responds promptly to all Q&A messages. Generally, except in extreme circumstances, no extension is given on time to bring failed creative into compliance, regardless of Q&A status.</p> | SPR-15 |
| Retests | <p>Retests</p> <p>Responsibility for advising the Sprint Compliance Team when either the requisite changes have been made or the offending advertisement or message flow has been removed from market resides with the content provider. After 48 hours have passed and the Compliance Team has received no such advice, one proactive retest is performed on the advertisement or message flow. If all advertisements or messages on a failure form have been brought into compliance on or before the designated cure date, the Sprint Compliance Team closes the audit and updates the audit status from Open to Closed in the IMM Portal. If the Compliance Team fails to receive confirmation, regardless of cause, and the content provider fails to take the actions required, the shortcode is subject to further action—up to and including loss of revenue share and deprovisioning from the Sprint network. In this case, the audit status is changed to Escalated.</p> <p>In the case of TV or print advertisements with longer production cycles, content providers may submit a retest request for a future release date. Or content providers who have been unsuccessful in their attempts to correct their other types of advertising or their message flows might require an additional retest or retests. Retest requests must be made in good faith, with a clear explanation of the changes implemented. Audits at this status are categorized as Pending Retest. Depending on the results of this retest, the audit status is updated to Closed or Retest Failed. Audits that remain in the Retest Failed state beyond the cure date will be reported along with Escalated audits for carrier action.</p> | SPR-15.5 |
| Appeals Process | <p>Appeals Process</p> <p>Content providers who feel they have a legitimate claim may</p> | SPR-16 |

| Section | Standard | MMA Id |
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| | <p>challenge an audit by responding appropriately to compliance@psmsindustrymonitor.com within 48 hours of receiving a Program Violation Notice. The email message should state explicitly why the content provider deems the audit incorrect and should include proof to validate this claim. Appeals must be directed at the application of violations to the specific audit in question; the legitimacy of the audit standards themselves is not open for debate. Although content providers are encouraged to include all details relevant to the appeal, this presentation should be a straightforward account of the facts with evidence. A multiple-page thesis is not the appropriate format in which to couch an appeal.</p> <p>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 who are dissatisfied with the outcome of their appeal may choose to 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 seven days of the appeal denial.</p> | |
| Penalties | <p>Penalties</p> <p>For purposes of determining penalties involving revenue share, at the end of every calendar month, the Sprint Compliance Team counts and categorizes all failed creative intercepted during that month. The Compliance Team reviews individually the screenshot of every piece of creative that failed an audit, assessing it subjectively and grouping it by visual similarities with other failed creative. In this way, multiple similar creative, necessarily cited for the same violations, are categorized as one failure even when their URLs might differ. This categorization produces results similar to the groups of duplicates that appear on failure forms, except the revenue share penalty is assessed over the entire month rather than weekly. For this calculation, message flows contain up to five distinct groups, one for each message type. A running tally of violations is kept for a given shortcode while reviewing relevant creative across all severity levels.</p> <p>Please note that Sprint neither considers nor accepts violation counts that aggregators suggest. In other words, Sprint determines all violation counts, which the carrier considers <i>final</i>.</p> | SPR-17 |
| Compliance Timelines and Accountability | <p>Compliance Timelines and Accountability</p> <p>The Sprint audit standards express the violations encountered in advertising creative, message flows, WAP billing applications, and other sources of PSMS calls-to-action and among shortcodes operating through the Sprint gateway. These violations, which contravene Sprint policies and MMA CBP, are assigned a severity level—1, 2, or 3—corresponding to the seriousness of the violation.</p> | SPR-21 |

| Section | Standard | MMA Id |
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| | <p>Each violation is also associated with an action that Sprint requires for the advertising campaign's continued operation. Sprint expects content providers to respond to Program Violation Notices promptly:</p> <ul style="list-style-type: none"> ▪ Violations pertaining to adult content (Severity 1) must be resolved immediately on notification from Sprint. Content providers must remove from the Sprint network, without delay, creative that advertises adult content or implies availability of adult content for download to the mobile handset or to any other device or equipment. ▪ All other Severity 1 violations as well as Severity 2 and Severity 3 violations must be resolved within 48 hours of distribution of URLs to Program Violation Notices to the aggregators and content providers. Content providers must take the specific actions required that are associated with their violations listed on the Program Violation Notices. | |
| | <p>Please note that in the case of online advertisements these violations and actions required apply to all forms of jump and quiz pages as well as to traditional landing pages. Moreover, although content providers need not own or manage the pages representing their offers, they nevertheless assume full responsibility for ensuring that their affiliate partners market their offers in a manner consistent with these documented standards.</p> | SPR-22 |
| | <p>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. Failure to take corrective action within 48 hours of final notice from Sprint will result in shortcode suspension. Suspended shortcodes will remain suspended until all overdue tickets are brought into compliance.</p> <p>Consequences of repeated noncompliance include the following:</p> <ul style="list-style-type: none"> ▪ Aggregators will face financial penalties for failure to manage their content providers within these documented standards. ▪ Content providers' noncompliance with the action required for any violation, regardless of severity level, will result in suspension of approval for new programs until the violating program is brought into compliance. ▪ Content providers' repeated noncompliance, or even obvious efforts to skirt the spirit of these documented standards, might result in temporary or permanent suspension of the shortcodes in question. | SPR-23 |
| | <p>Sprint monitors creative in market, and this document is updated regularly to address new violations as soon as they arise. With each update, the carrier expects content providers to ensure that all of their creative, current in addition to new, meets the most recent standards. In the absence of content provider action, aggregators, ultimately, assume full responsibility for resolving all compliance issues.</p> | SPR-24 |

| Section | Standard | MMA Id |
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| | <p>Please keep in mind that . . .</p> <ul style="list-style-type: none"> ▪ Landing pages must identify the content provider (by shortcode) and the service provider; display the pricing and subscription disclosure, when applicable, in the main offer; and spell out the offer terms and conditions, including billing method, other charges, and opt-out information. In addition, landing pages must comply fully with all other Sprint policies and MMA CBP. ▪ A jump page is defined as any advertisement that “jumps” a customer between offers for programs on more than one shortcode. Jump pages often are controlled by affiliate marketers but also might jump between different shortcodes belonging to the same content provider. Examples of jump pages include traditional “Select-your-carrier” button bars or dropdown menus as well as MIN-entry “host ‘n’ post” pages that direct customers to different PIN-entry pages based on handset information. ▪ Jump pages may not serve as a collection site for phone numbers and PINs; this information may be entered only on landing pages controlled by content providers themselves. ▪ Select-your-carrier jump pages containing information in addition to carrier logos must comply fully with Sprint policies and MMA CBP. ▪ Use of the term <i>free</i> is prohibited in advertising creative for PSMS offers, and 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 (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 customer will receive something without charge. The term <i>free</i> in gibberish text also is prohibited. ▪ The “cell-submit field” in PSMS advertisements is the box designated for entry of the customer’s mobile phone number; it is <i>not</i> the Submit button that the customer must click after entering his or her phone number in the cell-submit field. The action required “Display pricing [or subscription disclosure] within one line break of the cell-submit field” means the pricing and subscription disclosure (e.g., \$9.99/month) must appear immediately adjacent to (i.e., above or below) the cell-submit field and must not be displayed in a graphic, such as a starburst or bubble. One line break refers to one <i>physical line break the point size of the pricing and subscription disclosure</i> rather than to an HTML line break. In other words, the space between the pricing and subscription disclosure and the cell-submit field should be insufficient in which to display another line of text. See appendix E for an example of an advertisement in which pricing and subscription disclosure are displayed adjacent to the cell-submit field. ▪ The descriptor “stacked marketing,” a deceptive form of advertising, refers to cross-selling of several PSMS promotions from the same or different sponsors, sometimes on multiple different shortcodes, within the same online user flow, whereby a customer is shown a series of offers in close succession, | <p>SPR-25</p> |

| Section | Standard | MMA Id |
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| | <p>often with his or her mobile phone number pre-populated in subsequent pages. A Web site's initial pitch might solicit the customer's number by offering "free" MP3s or ringtones, then cycle the customer through the series of offers before he or she can claim the free content.</p> <ul style="list-style-type: none"> ▪ Screenshots are taken on a screen size of 1024x768 pixels using the default configuration on a major Web browser, including Internet Explorer, Safari, Firefox, and Chrome. ▪ The PSMS offer and all terms and conditions must be clear and visible using only the default browser scroll bar. Disclosures may not be truncated or obscured by frames or secondary scroll boxes, and the terms and conditions may not be contained within a scroll-box. | |

Appendix A: In-Market Shortcode Violations & Actions Required

| Sprint In-Market Shortcode Violations and Actions Required | | | |
|--|---|---|--|
| | <i>Violations</i> | <i>Severity</i> | <i>Actions Required</i> |
| Program | Contains unapproved or adult content | 1 | Remove unapproved or adult content |
| | Implies unapproved or adult content | 1 | Remove implied unapproved or adult content |
| | 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 |
| | Contains profanity | 1 | Remove profanity |
| | Contains reference to abuse of controlled substance (e.g., alcohol, drugs, tobacco) | 1 | Remove reference to abuse of any controlled substance |
| | Promotes alcohol consumption | 1 | Remove promotion for alcohol consumption |
| | No product or service disclosure | 1 | Disclose product or service in main offer |
| | No product quantity | 1 | Display product quantity in main offer |
| | Unclear product quantity for Sprint customers | 1 | Disclose actual product quantity for Sprint customers |
| | Binary unavailable to Nextel customers | 1 | Disclose Nextel participation in main offer |
| | Substitute program for Nextel customers | 1 | Disclose Nextel participation in main offer |
| | Misrepresentation of product offering | 1 | Reconcile, among main offer, CA, and T&Cs, all references to product type |
| | Misrepresentation of product quantity | 1 | Display only actual product quantity per subscription term (e.g., 15 ringtones/mo.) |
| | Product offering associated with stacked marketing | 1 | Remove offer from stacked marketing flow |
| | Customer mobile phone number pre-populated or saved | 1 | Require customer to enter full phone number for each offer |
| | Program sponsor not identified | 1 | Identify program sponsor by shortcode |
| | Unapproved carrier endorsement | 1 | Remove carrier endorsement |
| | Superimposed text | 1 | Remove superimposed text |
| | Unclear keyword | 1 | Reconcile, among audio and video, all references to keyword |
| | Cell-submit function located on affiliate-controlled (host 'n' post) page | 1 | Move cell-submit function to program sponsor-controlled page |
| Preselected radio button or checkbox | 1 | Leave all radio buttons or checkboxes empty for customer action | |
| Product or service disclosure hidden in T&Cs | 2 | Disclose product or service in main offer | |
| Product quantity hidden in T&Cs | 2 | Display product quantity in main offer | |
| Multiple program sponsors | 2 | Limit each offer to one program sponsor | |
| Pricing | No pricing | 1 | Display program pricing in main offer |
| | No Sprint pricing | 1 | Display Sprint pricing in main offer |
| | No Nextel pricing | 1 | Display Nextel pricing in main offer |
| | Pricing point size too small | 1 | Increase pricing point size to at least 50% as large as CA point size |
| | Pricing not displayed adjacent to cell-submit field | 1 | Display pricing within one line break of cell-submit field |
| | Pricing hidden in T&Cs | 1 | Display program pricing in main offer |
| | Sprint pricing hidden in T&Cs | 1 | Display Sprint pricing in main offer |
| | Nextel pricing hidden in T&Cs | 1 | Display Nextel pricing in main offer |
| | Conflicting pricing | 1 | Display correct pricing |
| | Pricing illegible | 1 | Increase point size and alter color scheme to improve contrast |
| | Per-message pricing for chat | 1 | Migrate to unlimited monthly subscription |
| | Use of the term <i>free</i> | 1 | Remove the term <i>free</i> |
| | Carrier-specific pricing unspecified | 1 | Specify pricing for each carrier individually |
| | Unclear Sprint pricing | 1 | Specify Sprint pricing individually |