

	manage off portal subscription campaigns in the case an AT&T customer calls in about the off portal service. Aggregators and content providers should be discouraged in pushing through 'item' charges on a recurring basis to get around the subscription policy.	
<b>Subscription Periods</b>	Subscription programs must be monthly (not daily, weekly, quarterly, annually), <u>unless mutually agreed by AT&amp;T and the Content Provider.</u>	ATT-46
	◇ AT&T does not support daily subscriptions. Daily messages must be prepaid in predefined bundles or charged one monthly fee.	ATT-47
	◇ Program offering daily premium messages must be bought in prepaid buckets or in one monthly subscription.	ATT-48
	◇ The result of a single sign-on process is one single subscription service, and rules apply for each single subscription service	ATT-49
	◇ There must be no minimum subscription period associated to programs. Pro-ration is not required if properly disclosed in content providers terms and conditions.	ATT-50
	◇ Programs offering trial periods must not charge any premium charges until after the trial period has completed and the subscriber has been informed of subscription pricing terms.	ATT-51
	◇ The billing period begins on the day in which the subscriber enrolled. If the AT&T subscriber enrolled on the 17 <sup>th</sup> of a given month, their renewal period will be on the 17 <sup>th</sup> of subsequent months.	ATT-52
	◇ <b>Service flow and information must not be misleading in any way.</b>	ATT-53
<b>Termination of Subscription Services</b>	◇ When AT&T provides a phone number that has been removed from service, the content provider must remove this number from all subscriptions and phone number must not incur any more premium charges.	ATT-54
	◇ When a campaign has been designated as 'Completed' any existing customers or subscriptions need to be concluded immediately. Completed campaigns will be prohibited from maintaining an active customer base.	ATT-55
	From time to time AT&T may supply a list of mobile numbers that have been deemed 'deactivated' to the aggregators. This list will be encrypted for security. It will be the responsibility of the aggregator to sort that deactivation list accordingly as to send only the numbers effected per content provider to be removed from any existing subscription services. The aggregator (if able) can also remove these numbers from their systems ahead of the content provider. It is strongly recommended that mobile numbers on this deactivation list are sorted as such that only numbers that are assigned to services per content provider are sent to that respective content provider. Aggregators should NOT be either blindly sending the entire list out to all of their content provider or sending lists of mobile numbers that do not apply to content providers that don't have those mobile numbers included in their subscriptions.	ATT-56
<b>General Advertising Policy for AT&amp;T</b>	All material terms and conditions of the program are clearly communicated.	ATT-57
	<b>All requirements for terms and conditions should be located within the T&amp;C's link or the Terms of Service link.</b>	ATT-57.5
	A Billed to Business (free to end user message) must include the words "free message" within the text of the message and also state standard data (kbs) charges still apply when End Users click on a link in the message or End Users browse from their mobile devices.	ATT-58

	◇ Service Pricing information is clearly and conspicuously indicated.	ATT-59
	◇ All advertising, promotional material, and service Help message clearly display the opt-out information.	ATT-60
	The service is not promoted as “free”, “complimentary”, “no charge”, “without charge”, or any other term that reasonably leads the customer to believe that he or she may receive something of value, entirely or in part without a requirement of compensation in any form, or that tends to convey the impression to the customer that the service/plan is “free” when premium fees are associated with the service that the subscriber will pay with a reasonable level of participation in the program. IF the service/plan or any merchandise is included within a plan/service/subscription, then it must be clearly and conspicuously initially represented to the customer pursuant to his or her authorization of billing for a paid subscription plan, the price of the plan, and its term. For example, a free ringtone offer requiring a customer to subscribe to a monthly subscription plan at a cost of \$9.99 per month shall say, “Free ringtone with paid monthly subscription of \$9.99/month.”	ATT-61
	Subscription term and billing interval is specified/disclosed to customer.	ATT-62
	Pricing in advertisements must be summarized to an estimated total monthly cost. (i.e. “\$1/day equals \$30/mth”)	ATT-63
	Notice that the charge will be billed on the customer’s wireless phone bill or deducted from their prepaid balance.	ATT-64
	Program advertising or its placement must not be deceiving about the functionality, features, or content of the underlying service.	ATT-65
	Any promotions of ads of any kind must include participating carrier id’s and information on handset compatibility. <ul style="list-style-type: none"> <li>○ Programs offering trial periods must make subscriber aware of total cost after trial period in advertisements.</li> <li>○ Description of charges must be clear. Must be as prominent as promotional font and must be in close proximity to promo details.</li> </ul>	ATT-66
	Pricing must be clear for each medium the program is promoted: <ul style="list-style-type: none"> <li>○ TV: Must include pricing, terms &amp; conditions and opt-out information with font size as large as promotional font. On air call to action pricing and terms need to be clearly stated, inclusive of both visual and verbal – text size (10 font minimum), placement (prominent), and length of time on air (10 seconds).</li> <li>○ Radio: On air call to action pricing and terms need to be clearly stated verbally.</li> <li>○ WEB: Must include explicit pricing details, terms s &amp; conditions location and opt-out information on the same page and in close proximity to promotional details. The user must not be required to scroll or click to another page. <i>This information must be in addition to any terms and conditions provided as a link on the website.</i></li> <li>○ WAP: Must include pricing, terms s &amp; conditions and opt-out information on the WAP same page as promotional details. The user must not be required to scroll or click to another page. <i>This information must be in addition to any terms and conditions provided as a link on the website.</i></li> <li>○ PRINT: Must include sponsor identification, explicit pricing details, terms s &amp; conditions location and opt-out information on the same page and in close proximity to</li> </ul>	ATT-67

	<p>promotional details. <i>This information must available in the Advertisement.</i></p> <ul style="list-style-type: none"> <li>o SMS: As previously indicated, all pricing, terms s &amp; conditions and opt-out information must be included in the first and all subsequent service messages.</li> </ul>	
<b>Chat and Social Networks Policy for AT&amp;T</b>	Additional advertising requirements apply specifically for chat services.	ATT-68
	Advertising for chat programs must not imply unapproved content.	ATT-69
	For operator-assisted chat, appropriate disclosure must be made in the advertising and terms and conditions of the program. <ul style="list-style-type: none"> <li>o Example disclosure wording: This service employs operators who are paid to participate in chat.</li> </ul>	ATT-70
	All social networking and chat applications or games which allow communication between users will be responsible for all of the safety tools below. AT&T shall provide all best efforts to ensure that content providers are adhering to the following safety guidelines by conducting ongoing audits of social networking and chat applications or games.	ATT-71
	All social networking and chat applications or games are required to have the following:	
	An age acknowledgement tool at registration that successfully determines if the user's age is appropriate, and blocks access if he or she does not meet the set age requirement <ul style="list-style-type: none"> <li>o A minimum age of 13 is required for all non-romance themed games and applications</li> <li>o A minimum age of 18 is required for all romance and dating themed games and applications</li> </ul>	ATT-72
	A 'Report Abuse' function must be made easily accessible to the user with clear action provisions outlining how complaints will be responded to	ATT-73
<b>Subscription Services Advertising Policy for AT&amp;T</b>	Additional advertising requirements apply specifically for subscription services.	ATT-74
	<ul style="list-style-type: none"> <li>◇ Promotional material for subscription services must clearly indicate that the service is subscription based. These words must be prominent and highly visible to readers. <ul style="list-style-type: none"> <li>o Must be as prominent as promotional font and must be in close proximity to promo details.</li> <li>o Subscription services terms of use (i.e. whole cost pricing, opt-out) information must be clearly visible.</li> <li>o Advertisements promoting "FREE" content will receive special attention to ensure subscribers fully understand terms and conditions of service and must adhere to AT&amp;T's general advertising policy.</li> </ul> </li> </ul>	ATT-75
	◇ Terms of subscription (Price, duration, opt-out process, etc.) must be listed FIRST in Ts & Cs section online as well as any other printed material. Price and frequency of subscription must not be buried in Ts & Cs.	ATT-76
	◇ Opt-out information must be clearly displayed in all advertising and promotion material. Where stop instructions are displayed, the information provided must advertise a generic STOP	ATT-77

	command, and additionally service specific stop commands – for example “stop polytones” may also be advertised.	
<b>Program Change Approvals</b>	Campaigns are approved and provisioned based on specific parameters that were presented to the aggregator and AT&T. If the content provider wishes to run additional programs on a given shortcode, then each additional program will require approval from AT&T. All notifications to AT&T must be provided 10 business days notice prior to change rollout in order for AT&T to properly approve the change request.	ATT-78
	The following changes require aggregators to submit a request to AT&T:	
	Campaign name or content provider brand changes	ATT-79
	Campaign products line up changes (i.e. additional alert programs instituted other than those provisioned)	ATT-80
	New and / or alternative hosts begin offering campaign (i.e. launch of new website offering similar and / or dissimilar products and services on existing campaign or short code.	ATT-81
	Customer care information changes	ATT-82
	Early termination of campaign	ATT-83
	Program changes affecting consumers rights to privacy	ATT-84
	The aggregator is required to summarize the changes and update any changes in the provisioning tool. The campaign can not implement the requested change until approval is granted.	ATT-85
<b>Inappropriate Content</b>	The use of inappropriate content in SMS campaigns is not permitted. Below describes AT&T’s position on inappropriate content. Campaigns that offer inappropriate content may be terminated. <i>AT&amp;T Reserves the right to classify any material as inappropriate.</i>	ATT-86
	<b>Wireless Content Guidelines Classification Criteria</b> Mobile content will be classified as Restricted Carrier Content or Generally Accessible Carrier Content based on existing criteria used to rate movies, television shows, music and games.  Content is generally considered “Restricted” if it contains any of the following restricted content identifiers:	ATT-87
	<b>Restricted Carrier Content</b> <ul style="list-style-type: none"> <li>• Intense Profanity</li> <li>• Intense violence</li> <li>• Graphic depiction of sexual activity or sexual behaviors &gt; Nudity</li> <li>• Hate speech</li> <li>• Graphic depiction of illegal drug use</li> </ul> Any content that has not been classified as “Restricted Carrier Content” will be considered “Generally Accessible Carrier Content” and will be subject to be available to all consumers.	ATT-88
<b>Profanity</b>	Use of profanity in products that can be exchanged through the use of SMS technology is strictly prohibited. Lyrics, Wallpapers, Song Titles, SMS alerts, and moderated SMS interactive communications containing profanity must be removed. <i>If a particular piece of content is incomplete without using a profane word, it is permissible to offer this product only after the word have been altered to be less profane (i.e. Sh*t)</i>	ATT-89
<b>Drug Use</b>	Any reference to the abuse of alcohol, drugs, tobacco or other	ATT-90

	controlled substances is strictly prohibited. This includes verbal and non verbal actions in which a person could conclude that promotion of drug use is intended.	
<b>Sexual Conduct</b>	Content of adult nature is not allowed. Adult nature includes sexual explicit images and textual communications that are sexual graphic.	ATT-91
	<u>Sexual Explicit Images:</u> <ul style="list-style-type: none"> <li>- No exposed breast or genitalia either cartoon or real, is permitted to be offered.</li> <li>- No images meant to insight sexual activity may be offered. This includes images depicting any sexual act.</li> </ul>	ATT-92
	<u>Textual Communications</u> <ul style="list-style-type: none"> <li>- Any controlled communications between a campaign and subscriber must not contain content that could be considered sexually explicit. Content directed at encouraging sexual acts or to excite a subscriber in a sexual way is not allowed through SMS premium services.</li> </ul>	ATT-93

<b>AT&amp;T Naming Conventions and Product Descriptions (DCBO)</b>	All current AT&T naming conventions and product descriptions can be referenced at the following link:	
	<a href="http://developer.att.com/developer/index.jsp?page=goToMarketDetail&amp;id=6.3_v1_5200118">http://developer.att.com/developer/index.jsp?page=goToMarketDetail&amp;id=6.3_v1_5200118</a>	ATT-94
	ALL transactions are now required to be DCBO compliant.	ATT-95
	To ensure compliancy for DCBO: <ul style="list-style-type: none"> <li>• Description field should no longer include Short Code/Campaign ID/Merchant Name</li> <li>• Price points are <u>not</u> to be contained in description field</li> <li>• Description field provides clear, concise, customer-friendly descriptions for Off-Portal Mobile Purchases &amp; Downloads transactions</li> <li>• Product descriptions should <u>not</u> duplicate a merchant name</li> <li>• Product Descriptions should <u>not</u> be acronyms that are not immediately recognizable (i.e. as BET or MTV would be)</li> <li>• Merchant names should be listed with the merchant's URL whenever possible (i.e. magmic.com)</li> </ul>	ATT-96
	DCBO is a vital effort to help give customers a better understanding of what they purchased by providing more accurate details about the services they purchased on their bills. This effort will go along way to help avoid refunds and also aid AT&T customer service in identifying third party services.	ATT-97
	See ATT-EG-01 at end of Provisioning Section	ATT-98
	As a reminder, here is an example of the proper DCBO format for item purchases AND subscription services:	ATT-99
	AT&T does not allow unique short codes to be live under two different binds or connected partners.	ATT-100
	For each Aggregator, AT&T will enable an option that requires each Aggregator to submit valid values for Merchant Name, Short Code and Campaign ID for every purchase. These fields will be required for purchases submitted via the Purchase Web Service (API) and those submitted via Buy Link. – See ATT-EG-02 below	ATT-101

### AT&T-EG-01

CONTENT_PROVIDER_NAME	PRODUCT_DESCRIPTION	MERCHANT_NAME	PERIODICITY	PRICE	SHORT_CODE	CAMPAIGN_ID
(aggregator name)	Baseball Tone	Mobisports.com	onetime	0.99	12345	98765
(aggregator name)	Weather Alerts	Jims weather.com	Monthly	9.99	98765	12345

**ATT-EG-02**

Field Name	Data Type	Num. Chars. Allowed by Qpass	Num. Chars. Displayed on Bill	Description	Default Value	Sample Value
merchantName QMERCHANTNAME	ASCII String, cannot be blank	50 chars	First 20 chars	The merchant name presented during advice-of-charge, in purchase history and on the AT&T customer bill.	None	BET TV
shortCode QSHORTCODE	Positive Integer, cannot be blank	16 digits	First 6 digits	The SMS short code for the product being purchased.	None	12345
campaignid QCAMPAIGNID	Positive Integer, cannot be blank	16 digits	First 5 digits	The AT&T assigned campaign ID for the product being purchased.	None	1234

## AT&T Certification & Audits

Section	Standard	MMA Id
<b>Frequency</b>	The AT&T Audit and Monitoring team periodically will perform audits on SMS/MMS/WAP campaigns. Unless information is required for audit of the campaign, the audited companies will not be informed that an audit is taking place.	ATT-102
	Depending of the audit score severity of feedback, the content provider may be given results and custom feedback as an outcome of the audit. Content responsiveness to feedback requests will vary based on score results. <i>For more information see the 'Content Provider Responsiveness' section.</i>	ATT-103
<b>Audit Process</b>	AT&T has an independent division responsible for proactively monitoring existing campaign's content, applications, billing and advertising techniques to ensure that campaigns are in compliance with both the Mobile Marketing Association's Best Practices and the AT&T Customer Experience Policy. Campaigns are critiqued and feedback is provided to aggregators to better the customer experience	ATT-104
	Periodically, AT&T will request campaign specifics from the campaign aggregator. A two day turnaround has been allotted for this information request to be filled out and returned to AT&T in entirety. Completed data requests are used by the AT&T audit and monitoring team for record keeping and to execute audits.	ATT-105
	An audit will take less than one day to execute and compile feedback for the campaign. An audit will typically test only one campaign at a time. The script associated with the audit will test the majority of functionality offered by a campaign. <i>For more information see the 'Audit Script Details' section.</i>	ATT-106
	AT&T will provide the feedback on the audited campaign to the aggregator. AT&T expects changes to be made in response to the feedback. If AT&T feels that by not making changes, the end customer is at risk, the campaign will be terminated after the allotted change request deadline. Content providers are encouraged to follow up on feedback items if they feel strongly opposed to the change request. Content provider questions specific to items on the feedback must be sent through campaign's aggregator to AT&T.	ATT-107
	After the AT&T and aggregator proposed change deadline, a follow up validation audit will be executed. The audit and monitoring team will look to assess each element on the initial feedback report as well as perform another scripted audit. If the campaign passes with an acceptable score then no further action is required.	ATT-108
	Any new items will be addressed in the next scheduled audit. If the campaign still does not meet AT&T's requirements, AT&T will work with the aggregator to understand the delays, will escalate as necessary, and ultimately may choose to terminate the service.	ATT-109
<b>Audit Triggers</b>	The AT&T Audit and Monitoring team will execute audits periodically. Trigger criteria for audits are: <ul style="list-style-type: none"> <li>◇ Audits will be completed on new SMS/MMS/WAP campaigns offered to AT&amp;T subscribers</li> <li>◇ Ongoing internally scheduled audits will be performed. The frequency of these audits varies on past scores and status criteria of campaign. Each content provider will be audited at least once per month. Some will be audited more frequently based on their</li> </ul>	ATT-110



	<p>previous performance.</p> <ul style="list-style-type: none"> <li>◇ External requests for audits, such as those wanting to be involved in AT&amp;T's Preferred Provider Program. <i>See the 'Audit Request' section of this document to understand how to request an audit</i></li> <li>◇ Internal requests for audits, such as those resulting from internal inquires about a content providers performance</li> <li>◇ Complaints related to a content provider's customer experience and/or their products appropriateness.</li> </ul>	
<b>Audit Script Overview</b>	Existing campaign's content, applications, billing and advertising techniques are audited with a repeatable script to ensure that campaigns are in compliance with both the MMA's Best Practices and AT&T's Customer Experience Policy. Campaigns will be critiqued and feedback will be provided to aggregator to better the customer experience.	ATT-111
	The script provides an irrefutable, objective scoring mechanism judging 3rd party content providers. Each functional area in the script begins with a 100 point total. Each functional area has a list of requirements derived from the MMA's Best Practice Guidelines and AT&T's Customer Experience Policy which must be met. If a campaign does not fulfill a requirement, a deduction is made to the point total for that functional area.	ATT-112
	<p>The script focuses on the following functional areas:</p> <ul style="list-style-type: none"> <li>◇ <b>Website Functionality:</b> The script will analyze the Content Provider's website for functionality that must be available to the AT&amp;T customer.</li> <li>◇ <b>Messaging:</b> The script will audit a sampling of the messaging content to make sure it follows the guidelines set by the AT&amp;T Customer Experience Policy.</li> <li>◇ <b>Advertising:</b> The script will analyze advertising content and presentation that a 3rd party content provider uses to reach AT&amp;T customers.</li> <li>◇ <b>Research:</b> The script looks into billing detail and presentation as well as terms and condition context.</li> <li>◇ <b>Products Offered:</b> Details pertaining to the type of content that is being offered are gathered in this section. No feedback is generated from this section on audits.</li> </ul>	ATT-113
<b>Score Range</b>	Each functional area is scored independently. Each functional area falls into a risk range with the exception of the Products functional area which is used for record keeping only. The lower the audit score the higher the perceived risk of that campaign to AT&T customers. <i>See ATT-EG-03 following this section</i>	ATT-114
<b>Content Provider Responsiveness</b>	The following table depicts AT&T's expectation for content provider responsiveness: <i>See ATT-EG-04 following this section</i>	ATT-115
<b>Audit Issues</b>	The following items have been found to pose a risk to the SMS industry and AT&T's subscriber base. If they are found in a campaign, the campaign may be terminated at AT&T's discretion.	ATT-116
	<p><i>High Priority Issues that may result in campaign termination:</i></p> <ul style="list-style-type: none"> <li>◇ Unsolicited messages sent to AT&amp;T subscribers</li> <li>◇ Failure to comply with Double Opt in procedures and/or bare minimum message requirements</li> <li>◇ Opt Out procedures that do not work properly</li> <li>◇ Campaign pricing that is a violation of AT&amp;T's Customer Experience policy (i.e. subscription that charges AT&amp;T subscribers weekly)</li> <li>◇ An intent to deceive AT&amp;T Subscribers</li> </ul>	ATT-117

	<ul style="list-style-type: none"> <li>◇ Advertising that is intentionally deceptive</li> <li>◇ Failure to follow up with AT&amp;T with regards to Audit feedback within prescribed timelines</li> <li>◇ Excessive inappropriate content (Chat content, Images, Text)</li> <li>◇ Inappropriate and / or inaccurate billing</li> <li>◇ Failure to comply with parental controls and / or age validation when warranted</li> </ul> <p><i>AT&amp;T reserves the right to classify any unresolved issue as a high priority item</i></p>	
	Medium issues do not necessitate that a campaign be terminated or suspended but they must be addressed by a content provider prior to another round of audits. Several medium priority issues could put the campaign at risk of being terminated.	ATT-118
	<p><i>Medium Priority Issues:</i></p> <ul style="list-style-type: none"> <li>◇ Functionality that satisfies the Code of Conduct requirements but is not considered destructive to the AT&amp;T / subscriber relationship</li> <li>◇ Minimal amount of inappropriate content found in catalog</li> </ul>	ATT-119
	<p>The following items will be may be commented and addressed in audits. Several low priority issues could put the campaign at risk of being terminated.</p> <p><i>Low Priority Issues:</i></p> <ul style="list-style-type: none"> <li>◇ Minor functionality errors</li> <li>◇ Messaging enhancements requiring only minor alterations</li> </ul>	ATT-120
<b>AT&amp;T Branding</b>	AT&T restricts the use of it registered trademarks and branding. All aggregators and content providers that offer services to AT&T customers are to reference available services on their sites, promotional entities as: "AT&T" in plain text. "AT&T" can be presented as such, but no use of logos and or AT&T trademarks are to be used for off-portal services.	ATT-121
	Off-Portal promotion of your products should make it clear that your company is the provider. No reference to AT&T should imply that AT&T is the provider of the product. You may only promote that your products can be purchased by AT&T subscribers.	ATT-122
<b>Certification</b>	The AT&T SMS Campaign Certification process is in place to certify campaign compliancy and functionality prior to launching the service into a production environment.	ATT-123
	Aggregators will not promote traffic to new short codes until they receive notification from the AT&T Certification team that the short code is certified and ready for customer use. Failure to comply could result in de-provisioning or other penalties. Provider submitted Billed-to-Business (free to end user) Short Codes cannot be used at the same time for Standard Rate and/or Premium campaigns.	ATT-124
	After a short code is provisioned on the Network, and tables are updated by Billing, the Certification team will send a letter to Aggregators letting them know that the short code is available. The Certification team will not begin testing at this point. Instead, it is expected that aggregators and content providers will conduct internal testing of the short code, and will let the Certification team know when the short code is ready for Certification.	ATT-125
	After aggregators receive notice that the short code is available, they will have sixty days to inform the AT&T Certification team via email that the short code is ready for Certification. If no response is received within 60 days, then the short code will be de-provisioned.	ATT-126
	Once the Certification team receives notification that a short code is ready for testing, they will conduct a Certification test that is identical	ATT-127

	to the regular audit.	
	A minimum score of 80 is required to pass the Certification test.	ATT-128
	If a short code receives a score above 80, the Certification team will notify aggregators via email once a week on the Friday following the test. At this point, the short code will be considered certified and ready for consumer use.	ATT-129
	If a short code receives a score below 80, the Certification team will notify aggregators via email once a week on the Friday following the test. The email will include detailed instructions on what needs to be fixed to obtain a passing score.	ATT-130
	After the Certification team sends a failure notification, aggregators have five business days to fix the problems. Additionally, aggregators must notify the Certification team via email that the problems have been fixed. Notification must be received from aggregators within five business days, or the short code will be de-provisioned.	ATT-131
	If notification is received from Aggregators within five business days, then the Certification team will re-test failed short codes.	ATT-132
	If the short code receives a score above 80, the Certification team will notify aggregators via email once a week on the Friday following the test. At this point, the short code will be considered certified and ready for consumer use.	ATT-133
	If the short code receives a score below 80, the Certification team will notify aggregators via email once a week on the Monday following the test, and the Certification team will de-provision the short code.	ATT-134

**ATT-EG-03**

Range	Score	Priority
<b>90-100</b>	Only minor changes requested. Consistent scoring in Green category will result in qualifying for AT&T's Preferred Provider Program (discussed later).	Low
<b>80-90</b>	Several minor enhancements or functionality need to be made.	Medium
<b>60-80</b>	Changes to functionality, advertising, or customer experience required to continue to operate as an AT&T content provider. PLEASE NOTE ANY SCORE BELOW AN 80 IS CONSIDERED 'FAILED'.	High
<b>&lt;60</b>	Have one or many issues that AT&T feels pose a risk the AT&T Subscriber base. Campaigns will be terminated depending on risk assessment.	Escalated - High

**ATT-EG-04**

	High Score (90-100)	Medium Score (80-90)	Low Score (60-80)	Escalated Issues (<60 or Other Notification)
<b>Initial Response to Feedback</b>	Less than 7 days to prevent termination of campaign	Less than 7 days to prevent termination of campaign	Less than 48 hours to prevent termination of campaign	NA – Service Terminated
<b>Functionality Changed to Production</b>	Address all high priority feedback items within 21 days of initial feedback to prevent potential termination of campaign	Address all high priority feedback items within 7 days of initial feedback to prevent potential termination of campaign	Address all high priority feedback items within 48 hours days of initial feedback to prevent potential termination of campaign	NA – All concerns must be resolved before campaign can be turned back on.



The Mobile Marketing Association is the premier global organization that strives to stimulate the growth of mobile marketing and its associated technologies. The MMA is a global organization with over 700 members representing over forty countries. MMA members include agencies, brands, content providers, hand held manufacturers, operators, technology enablers, market research firms, as well as any company focused on the potential of marketing via mobile devices.

**EXHIBIT**

**B**



## **Common Short Code Primer**

Revision number: 1.0



## Common Short Code Primer

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## Common Short Code Primer

### Overview

The Mobile Marketing Association's (MMA) Short Code Working Group developed this primer to provide an overview of the process that a brand, content provider, agency or technology provider should follow when considering launching a short-code-based marketing campaign or initiative.

#### *About the Mobile Marketing Association (MMA)*

The Mobile Marketing Association (MMA) is the premier global association which strives to stimulate the growth of mobile marketing. The MMA is an action-oriented association designed to clear obstacles to market development, to establish standards and best practices for sustainable growth, and to evangelize the mobile channel for use by brands and third party content providers. MMA members include agencies, advertisers, hand held device manufacturers, wireless operators and service providers, retailers, as well as any company focused on the potential of marketing via the mobile channel. The Mobile Marketing Association's global headquarters are located in the United States. For more information, please visit [www.mmaglobal.com](http://www.mmaglobal.com)

#### *Short Code Working Group*

The MMA created the Short Code Working Group, chaired by Mobile Accord and Twelve Horses, to establish administrative and technology guidelines for short-code utilization. In a future phase, this group will reconvene to evaluate the feasibility and market demand for short codes that will work in both Canada and the United States.

The Short Code Working Group developed this primer in collaboration with representatives from ipsh!, Mobile Accord, NeuStar Inc., Sprint Nextel, Syniverse Technologies and Twelve Horses.



## Common Short Code Primer

### Executive Summary

Common Short Codes (CSCs) are phone numbers, usually four to six digits, that mobile phone users utilize to send Short Message Service (SMS) messages to in order to receive information, sports scores, weather alerts, or to participate in contests and receive electronic coupons. By making it fast and convenient for mobile users to select and receive information, CSCs greatly increase consumer response to advertising and marketing promotions.

CSCs also put consumers in control because they can customize the information that they receive. That ability is important because under most rate plans, users pay for incoming SMS messages. By giving users a way to specify exactly what they want to receive, CSCs improve the chances that they'll participate in SMS-based campaigns.

CSCs are provided and managed by an ecosystem of companies, including the Common Short Code Administration (CSCA), participating wireless carriers, Mobile Application Service Providers (MASP) and Aggregators. Any company can use a CSC, but it must be obtained from this ecosystem through a series of steps, which include applying for a CSC and submitting the CSC-based campaign to wireless carriers for review and testing.

This primer provides an overview of CSCs, including the available types and how they are currently used in advertising and marketing promotions. This primer also describes the roles of each of the ecosystem's members and their relationship with the company conducting the CSC-based campaign. Finally, this primer provides step-by-step instructions for successfully developing, applying for and executing a CSC-based campaign.

## Common Short Code Primer

### Background & Ecosystem Definition

The Common Short Code Primer was created to help brands, content providers, agencies and technology providers better understand what's involved in implementing Short Messaging Service (SMS) campaigns using Common Short Codes (CSCs).

Since their creation in 2003, CSC-based campaigns have evolved in terms of acceptable use and business requirements. The CSC ecosystem is still evolving, so it's recommended that new entrants work with companies that have experience in the implementation of CSCs. This primer documents the process and expectations for registering and provisioning a CSC in the United States.

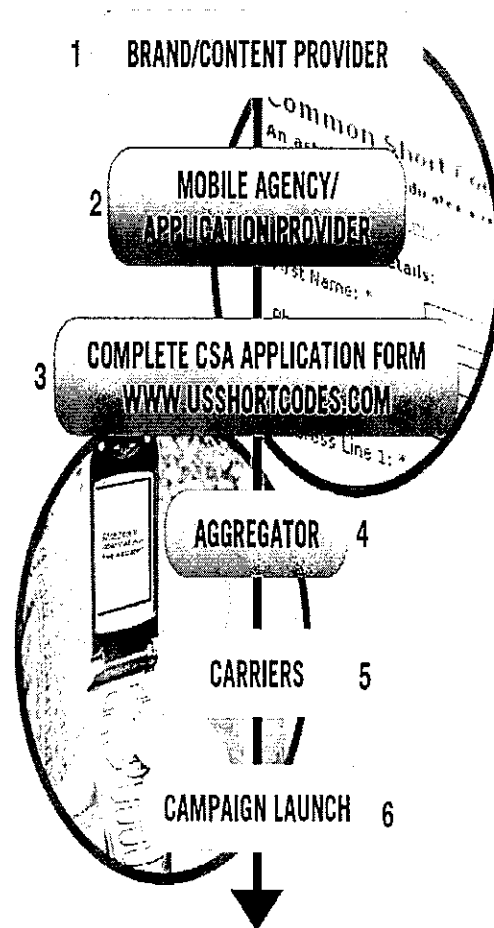
The following section provides an overview of the CSC ecosystem, the companies involved and the process of developing and executing a CSC-based campaign.

#### General CSC Ecosystem and Processes

1. A wide variety of companies use CSCs to build their brand and generate product awareness. One way to launch a successful CSC is to work with a Mobile Application Service Provider (MASP), which is a partner that provides guidance for understanding CSCs and adjunct wireless technologies. Although this primer provides a basic overview of CSCs, working with a MASP is recommended in order to address the nuances and complexities of a mobile campaign.

Depending on your in-house resources and capabilities, you may choose to either completely outsource to a MASP, or work with the individual provider partners in the eco-system. MASPs have a varying level of capabilities and services, so it's important to pick one that meets your needs. For a list of MASPs, visit the MMA membership directory at <http://mmaglobal.com/modules/content/index.php?id=8>.

2. MASPs typically – but don't always – complete a CSC application form for leasing a short code. If they complete the application, it will then be reviewed according to wireless carrier guidelines and approved pending payment with the Common Short Code Administration (CSCA). Although companies may submit an application without the



## Common Short Code Primer

help of a MASP or an aggregator, their assistance is highly recommended. The MASP's assistance with the application improves the chances that the campaign will be accepted the first time, although it's not a guarantee. Once payment is approved, your CSC is assigned as a random code or a vanity code. A CSC can be ordered either on your behalf or directly by your company. CSCs are required by the CSCA registry to be registered on behalf of the content provider, which is the legal owner of the CSC and thus responsible for any disputes or changes.

3. It's important to clearly outline your campaign before submitting the application for a CSC lease with the CSCA. For tips on submitting applications, see the Best Practices section at [www.mmaglobal.com/bestpractices.pdf](http://www.mmaglobal.com/bestpractices.pdf). A later section of this primer provides more details about the application.

Once the CSC application is accepted, the next phase is carrier provisioning and certification

4. When working with MASPs, you will seldom, if ever, have to work directly with an aggregator. Many aggregators have the capability to be the application provider; however, the capability varies from aggregator to aggregator. If you decide not to work with a MASP, make sure that you review the aggregators' capabilities and functions to assure that they meet your needs. Some aggregators won't work directly with a brand or a content provider. Not all aggregators will submit your CSC application for you; however, it's important to note that this often assures acceptance of the campaign the first time. For a list of aggregators, see [http://www.usshortcodes.com/csc\\_find\\_con\\_agg.htm](http://www.usshortcodes.com/csc_find_con_agg.htm).

Aggregators will typically work with a MASP, wireless carriers and/or you to provision your CSC within the carrier network(s). Provisioning is the process of establishing and opening the connection between the aggregator and each carrier's network to allow for testing by the MASP and prepare the application/campaign for certification. Aggregators are the first point of wireless network connectivity. Carriers rarely allow brands or content providers to connect directly to their networks.

5. Carriers have the right to accept or deny any campaign, hence the importance of clearly defining your campaign in detail. If it's not clearly defined and doesn't follow the MMA Best Practices Guidelines, it will be rejected, delaying your campaign. The application is reviewed for legal risks to the carrier because they're responsible for delivery to their customers. Depending on your campaign goals, you may need to provision your CSC on multiple wireless carriers.

While the provisioning of a CSC does permit the delivery of the content or campaign to any of the carriers' subscribers, handset type, wireless plan, preferences, credit class and other variables will limit your actual addressable base of subscribers delivered to the carrier's or carriers' entire customer base(s). Instead, it often means that content can be delivered only to phone numbers that have been white listed or pre-approved by the carrier(s). Provisioning is an interim step that allows for testing and certification to occur. Once that's complete, the campaign must be certified. Certification is a process that includes testing the application, reviewing your campaign to verify that it's functioning and delivering content as outlined within your CSC application.

## Common Short Code Primer

6. Once testing and certification are complete, you can launch your campaign. If you decide to change the type of campaign, eco-system providers or its message flow, a CSC modification request must be made to the CSC help desk which will then inform the carrier(s) and affected ecosystem partners. Failure to submit this request will result in termination of the campaign.

### CSC Types and Categories

All CSCs are five-digit numbers available in two different versions: random and vanity. Random CSCs are numbers that the CSCA assigns to you following approval of your application. Vanity CSCs are numbers that you select from a database of available CSCs. Before submitting an application for a campaign that includes a vanity CSC, you must search the CSCA's on-line database to determine its availability.

There are two types of CSCs: Standard SMS, where there's no charge for the content, and Premium SMS (PSMS), where there is a charge. The way you use the CSC in an SMS campaign determines the CSC type. For example, if you use a CSC to send messages that aren't billed to the end user by the carrier, then a Standard CSC applies. (However, keep in mind that depending on their rate plan, users still may be charged for each SMS.) With a PSMS, the user is charged a fee for the content in addition to any basic messaging charges that apply under their rate plan.

CSCs also can be grouped into use-case categories. Although agencies, application providers and carriers may use different titles and definitions, the basic categories include:

- iTV
- iRadio
- In-venue
- Ringtones and graphics
- Contest
- Consumer packaged goods
- Movie promo
- Information & Entertainment
- Alerts
- Chat
- M-commerce
- Coupons/advertising

#### SMS Information and Alerts

This is a "pull"-based method to deliver information, statistics and schedules about a certain topic or event. Users text a keyword to a CSC and receive or "pull" instant news and information. Users can also sign up to receive alerts on any topic – also known as "permission-based" services. Examples include weather alerts, store openings, the winner of a baseball game and medical alerts.

#### Interactive Media

CSCs enable users to interact with mobile marketing campaigns. As a result, they're a way for traditional media channels – such as TV networks – to provide a new form of content interaction with current or

## Common Short Code Primer

potential customers. For example, a radio station could use CSCs so that listeners can receive alerts when their favorite songs are about to be played. CSCs can also give traditional media channels more options for attracting new audiences and creating additional revenue streams. One example is promotional games, which are a fun, interactive way to increase brand loyalty and awareness.

### **Tones and Images**

Most cell phones sold over the past two years support ringtones and wallpapers. This content is ideal for promoting a brand. For example, a record company could promote a new album by creating a CSC-based campaign that distributes wallpaper photos of the artist and ringtones based on the album's first single.

### **Mobile Tickets and Coupons**

Using cell phones to purchase products such as songs and movie tickets is common, particularly among younger demographics. Known as mobile commerce, or simply m-commerce, this approach includes secure payments and delivery of the product – such as a song – directly to the handset. M-commerce is extremely cost-effective and an excellent opportunity for cross-promotions and sponsorships. Examples include tickets for sporting events, movies, hotels and transportation, as well as coupons.

## Common Short Code Primer

### Tips for a Successful CSC Application

The first step in launching a CSC-based campaign is to register with the CSCA and then submit an application documenting your program. The application-review process takes less than two business days. Payment is due upon approval of the campaign, and a random CSC is not assigned until payment is received.

Regardless of whether the application is submitted by an application provider, agency and/or aggregator, it should be as detailed as possible. Insufficient detail, including not answering all of the questions in an application, is the most common reason for rejection.

The application submitted to the CSCA differs from the Campaign Brief Application that will be submitted to the wireless carriers via the MASP and/or aggregator. Every application provider, agency and aggregator has its own format, and every wireless carrier has its own submission process. As a result, approval at one stage doesn't guarantee approval at other stages. The industry is working to streamline this process and combining the application process. Until the new procedures are in place, it's important to work closely with your application provider, agency or aggregator because they have a greater understanding of what the CSCA and wireless carriers will accept.

If you choose to select and contract with an MASP to work with you, you can expect the following:

- The aggregator will assist in creating a campaign brief for submission to the carrier(s). The brief is based upon the application submitted to the CSCA and the information obtained from the MASP.
- The aggregator will submit the program to the requested wireless carrier(s).
- The aggregator's account manager will track the program submission, provide updates and monitor launch process. They will also provide detailed reporting following launch at a pre-determined interval as described in the contract.

If a wireless carrier rejects a program, you may be able to modify it to meet the carrier's requirements. Once the changes have been made, the program can be resubmitted to the carrier. However, resubmissions aren't prioritized ahead of first-time applications, so companies should be aware the second review may result in delays for launching the campaign.

The campaign must follow the program brief that was approved, as well as the MMA Consumer Best Practices guidelines. The carrier will test each aspect of the program, including billing. Once this testing is complete, the program is considered "launched" and "live" on the network. The entire process can take anywhere from one to over eight weeks, depending on the number of participating carriers and the campaign's use-case category.

Campaigns that have a detailed marketing campaign with an associated and committed ad support are likely to be approved faster than those without a plan.



## Common Short Code Primer

### MMA Best Practices

The aggregator submits the campaign to the carrier's messaging organization, which reviews it for both content and complexity. The submission is first checked for compliance with the MMA Consumer Best Practices guidelines, and those that don't meet the guidelines typically are rejected immediately.

For more information about the guidelines, see [www.mmaglobal.com/bestpractices.pdf](http://www.mmaglobal.com/bestpractices.pdf).

### Carrier Content Standard Guidelines

Content is considered restricted if it contains any of the following:

1. Intense profanity
2. Intense violence
3. Graphic depiction of sexual activity
4. Nudity
5. Hate speech
6. Graphic depiction of illegal drug use
7. Any activities that are restricted by law to those 18 years of age and older, such as gambling and lotteries

Campaigns that include restricted content or that violate individual carrier standards will be rejected immediately. If the carrier's department determines that a campaign may be in violation, it may ask other members of the department to review it or send it to the carrier's legal department for a formal review. These additional review steps can delay approval.

### Large-Volume CSC Campaigns

Some campaigns are referred to as "spike-inducing", suggesting that they could produce sudden increases in messaging volumes. One example is a CSC that TV viewers use to vote for a contestant on a show. Within the hour or half-hour that the show airs, messaging traffic can increase suddenly and significantly. Wireless carriers must be prepared for such spikes in order to ensure that messages aren't lost or delayed. Companies conducting CSC-based contests have a vested interest in helping carriers anticipate and accommodate traffic spikes: For example, if the contest awards a prize to first 100 people who send a message to a CSC, participants whose messages are lost or delayed are unfairly penalized.

Each carrier has different spike thresholds. Companies should be aware that if a particular campaign adversely impacts the network, it may be rejected. When a spike-inducing campaign is submitted, the carrier's messaging department will work with its colleagues in other business units, such as engineering and network operations, to determine if there will be problems once the campaign is underway. The process of working with multiple departments may create delays in CSC approval.



## Common Short Code Primer

### Billing & Network Provisioning

After a campaign is reviewed for MMA Guideline compliance, content and network impact, it may be subject to another review for billing, such as if it involves a new price point for premium campaigns. This is especially true for campaigns that require aggregator involvement for supporting either a new billing procedure, price point(s) or billing system. This additional step varies by carrier and may delay the CSC approval process.

After the billing components are approved, the carrier follows procedures – which vary throughout the industry – for provisioning the campaign on its network. Carriers often work with the aggregators for notification of network readiness and end-to-end testing of the campaign, all the way out to the handsets.

### Business Issue

The Aggregator model is the current business model for CSC campaigns.

Broadly speaking, under the Aggregator Model, carriers will not have a contract with you directly. Instead, each carrier has a master agreement with each of their connected aggregators/MASPs, which will in turn have a contract with you. As a result, the carrier does not have to contract individually with each of the thousands of content and application providers seeking to have their campaign accessed via a CSC.

If you have not already chosen a connection aggregator/MASP, you should check with them to see how they provide access to the carriers and geographic areas that you wish to market to. For more information, visit the Connection Aggregator Information site at [www.usshortcodes.com/csc\\_find\\_con\\_agg.htm](http://www.usshortcodes.com/csc_find_con_agg.htm).

Depending upon the type of campaign you're running, the type of messages involved (Standard or Premium) and your agreement with your connection aggregator/MASP, you may be able to participate in revenue sharing. The revenue share from the carrier to your connection aggregator/MASP is included in their contract. That contracted share percentage will also vary by each carrier.

## Common Short Code Primer

### Testing

Once the carrier messaging point of contact is made aware that the campaign is available on the network (which may entail provisioning on multiple network elements), testing can begin. Testing ensures that the language and content are suitable, program flow is logical, handset rendering (display) is proper, keywords (including opt-out and help) work and the billing is functional.

The aggregator will be notified of any deviations or errors at this point. These may cause further delays in the campaign's launch. A program that passes testing is ready for launch, and the aggregator is notified.

### Common Mistakes to Avoid

Below is a list of issues and mistakes that can result in the delay or denial of a CSC campaign:

- Deviation from MMA Consumer Best Practice Guidelines
- Violation, or questionable conformity, with Carrier Content Standard Guidelines
- Spike-inducing or massive-volume programs
- Unusual billing requirements
- Network-provisioning considerations
- Testing issues
- Lack of forward planning or consultation of experienced partners
- Technical aspects of your campaign are not in place well before the intended launch date.

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### CSC Requirements Checklist

The following items must be completed/ implemented in order for a campaign to be approved by carriers:

1. **Terms and Conditions (T&Cs):** All campaigns must have associated T&Cs. These can be added to the message text. The most basic acceptable T&Cs must include billing rate, help instructions and opt-out instructions. An alternative to using limited text messaging characters to define the T&Cs is to include a URL in the message to a Web site that includes the T&Cs. If the campaign is a sweepstakes, this is highly recommended because certain carriers require an alternative way to enter the sweepstakes other than using the CSC.
  - a. It is recommended that if you choose to set up a Web site that you provide the T&Cs, as well as information about the campaign, the HELP access procedure and opt-out information.
  - b. Include help and opt-out verbiage. All campaign messages must include the methods to get help or opt out.
  - c. Help verbiage must include a phone number to get help, as well as an e-mail address. If there's a Web site established for the campaign that includes help information, that site's URL should be included.
2. **Opt-out verbiage:** Reply STOP to opt out must be included in all messages. If a user opt outs, an opt-out confirmation must sent to the user and include help verbiage.
  - a. **Opt-in All Contacts:** All contacts must receive an opt-in message and be required to reply with specified opt-in text in order to be added to the contact list for the campaign. Sending messages to contacts that have not opted in is considered Spam. Spam will not be tolerated and will result in immediate termination of the campaign.
3. **Define the message flow:** For all campaign applications, you must define the flow of all messages, including opt-in, confirmations, help and opt-out verbiage.
4. **Help and opt-out functionality:** Help and opt-out functionality must work for anyone, including those not opted-in to the campaign.
5. **CSC receipt:** If you choose to procure a CSC on your own, you will be required to submit a copy of that receipt to the MASP.

## Common Short Code Primer

### Acceptable Campaigns

The following is a list of acceptable campaigns:

1. Sweepstakes: Examples include giving away an item at a booth at a convention by routing sign-ups through a CSC campaign and notification of the drawing time.
2. Voting applications: Examples include voting for your favorite booth at a convention or for a favorite sports player.
3. Information alerts such as weather and road conditions
4. Downloads such as ringtones, music and graphics
5. iTV/iRadio, such as streaming audio/video and Podcasts.
6. In-venue
7. Movie promo
8. Coupons and advertisements
9. Chat

### Unacceptable Campaigns

The following campaigns are not acceptable unless on a restricted content carrier that has implemented the appropriate access controls:

1. Those that promote the use of illegal drugs.
2. Offering sexually explicit images, pornographic content.
3. Any content that facilitates or promotes illegal activity.
4. Prejudicial comments, communications and/or content that facilitates or promotes unlawful violence, and/or discrimination based upon gender, ancestry, race, sexual orientation, religion, marital status, age, disability, national origin, veteran status, creed or color.

## Common Short Code Primer

### Information required for CSC Application

There are several components to a CSC application, and each serves a purpose through the ecosystem. Hence the importance of providing as much detail as possible. One of the biggest frustrations is successfully leasing a short code from the CSCA and then having the application rejected by a carrier because insufficient detail was provided.

Below are the general categories that you'll be expected to complete for a CSC lease.

**Applicant details** – This section of an application form lists the contact information for any questions that the CSCA may have with the initial CSC application. The applicant also pays the CSC registration, either for themselves or on behalf of the content provider.

**Content provider details** – This is contact information for the entity providing the content that will be delivered to the handset. This information is used by the carrier to allow them to put the end user in contact with the entity providing the content in order to allow resolution of billing or problems such as opt-out and delivery failures.

In the event of any dispute, the CSCA looks to the Content Provider as the ultimate responsible and decision-making party.

**Application provider details** -- This is contact information for the entity that will be providing the application infrastructure to deliver the messages to the aggregator for delivery to the carriers. This information is important for carriers and aggregators because it tells them whom to contact if there are problems with the campaign, such as messages not being delivered properly.

**Connection aggregator details** – This is the contact information for the entity doing the connectivity/bind with the carriers. Carriers use this information when there are problems with a campaign. As noted earlier, carriers don't work directly with companies or content providers. Instead, they work with aggregators, so this information needs to contain your primary contact at your aggregator. If you are working with a MASP, you'll need to get this information from them if you lease the CSC directly from the CSCA.

**Payment method** – This information specifies how you will pay for your lease. Payment is expected upon approval of your campaign application.

**Term** – This is how long you will be leasing the CSC. There are three options for the lease length. You must stay current on you lease payment or the campaign will be shut down and you will have to start the whole ecosystem over again. Failure to stay current on your payment will also put the CSC number back into the number pool and could mean that you lose that number for further use.

**Requested CSC** – This section describes the kind of CSC you want to register. If you choose a vanity CSC, you must verify that the number is available before requesting it.

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**Application type** – In this section, you must provide information about the campaign's category type. For example, you'll need to select Contest if you are running a contest. This information is provided to make it easy to identify and track the various types of campaign requested and used.

**Duration** – You will need to determine ahead of time how long you will be conducting your campaign. This information helps carriers and the CSCA determine when a CSC will be available for re-use. You will need to provide a start and an end date; however, it's possible to select ongoing if you do not have an end date determined.

**Time of day/day of week** – You will be expected to provide information on the day and week the program will be available or unavailable. This information helps the carriers and aggregators to better understand traffic/volume models of the campaign so that they can properly plan and scale their networks for capacity needs.

**Campaign advertising/marketing** – When completing the CSC application, you must provide information about how you plan to advertise the campaign. You will need to provide information such as where it will be available for use, the distribution reach of your advertising and how you'll be promoting the campaign, such as in magazines or on TV. You also must provide details about when these materials will be issued. This information helps aggregators and carriers better understand the needs of the campaign in order to scale their networks to assure availability and deliverability.

**Traffic volumes** – It's important to have an understanding of the expected traffic volumes the campaign is going to create. It's better to overestimate traffic volumes than to underestimate them. You also must explain how you estimated the traffic volumes. For example, 5% of the print readership is expected to participate, and the circulation of the printed material is 1,000 people, so it is expected there will be 50 people participating in the campaign. Of those 50 people, you will need to define how many of them are going to be participating from each carrier.

**Step-by-step message flow** – Before you will be able to lease a short code, you must fully develop your campaign. To do that, you must think about every step the end user will go through as they participate. Common practice is to use the terms MO (Mobile Origination) and MT (Mobile Termination). Both terms define where the message starts from. An MO is a message that was generated by the end user from their handset and is delivered to the application. An MT is a message that is generated by an application and is sent to the end user. You also should provide a contextual description of the campaign. This information is necessary for carriers to be able to understand the campaign and determine if it meets the best practices guidelines.

**Message rate** – You will be expected to define the type of CSC you are planning to run: a Premium SMS or a Standard Rate SMS. This information helps carriers and aggregators in handling billing for the content delivery.

**Help** – You must provide information about how end users will be able to get help. If the end user experiences problems, you are expected to provide resolution. You must provide information about how they get this information within the campaign, as well as through a Web site and a toll-free number. This information is required so that the carriers can point the end user to you if there is a problem.

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**Opt-out** – You will need to define the text for the opt-out message, which must include the help information and a confirmation that the user has been opted out. Opt-out functionality must work for the following keywords at a minimum: stop, quit and end.

**Short description** – You should provide a short description of a campaign within the application. This short description is give to customer support within the carriers to better answer end user questions when a customer calls requesting information.

### Definitions

- **Aggregator:** Aggregators are the first point of wireless network connectivity. Aggregators work with carriers to implement the functionality of a CSC.
- **Carrier:** Wireless carriers that provide cellular service to their users.
- **Campaign:** the series of messages and marketing activities that comprise a CSC campaign.
- **CSC:** Common Short Code
- **CSCA:** Common Short Code Administration
- **MASP:** Mobile Application Service Provider
- **MO:** Mobile Origination is a message that was generated by the end user from their handset and is delivered to the application
- **MT:** Mobile Termination is a message that is generated by an application and is sent to the end user.
- **MMA:** Mobile Marketing Association
- **Opt-Out:** The means by which the wireless subscriber takes action to withdraw permission.
- **Opt-In:** The process that requires the wireless user to grant permission to the party that wants to send it information.
- **PSMS:** Premium Short Messaging Service require billing to the end user's account by the carrier.
- **SMS:** Short Messaging Service

## Common Short Code Primer

### FAQ

Q: How long will it take to launch a program?

A: This timeline depends on the application type and number of participating carriers. Assuming a fully developed, ready-to-run program/application, it may be six to eight weeks (or more) from carrier acceptance. If the program is rejected during this process for any reason, the timeline obviously can increase.

Q: Once the program is submitted to the wireless carriers, how long will it take for an initial response?

A: All wireless carriers have their own review processes, but typically a response with an approval or rejection will be within five to 10 business days.

Q: How are programs tracked?

A: The MASP/Aggregator account manager will track all steps during the process of approval and provisioning and is responsible for sharing this information with you in a timely basis as determined during initial consultation. Most wireless carriers are utilizing online submission applications which are accessible by the carrier operations staff at the aggregator. The program submission may be viewed along with its status and forwarded to your account manager for tracking.

Q: Can I get updated information on my submission at any time?

A: Typically the first week following submission there is little or no information to share regarding a program. After the first week the account manager should have a status update on the whether or not it has been reviewed.

Q: What is acceptable content and what is not?

A: Each wireless carrier has their own specifications regarding content. Your MASP/aggregator knows these specifications and is alerted by the carrier when changes are made. The account manager will be able to share this information with you. Some examples of what is not acceptable by some carriers are pornography, the use of firearms and tobacco and some religious content.

Q: What types of information must I provide in addition to the program brief description given to the CSCA?

A: The wireless carriers have individual requirements that must be fulfilled in order to launch a program. The application for the CSCA may not provide the necessary level of detail to submit to the wireless carriers but serves as a starting point for describing the program's highlights and what it is designed to accomplish.

Q: At what point in time does my program development need to be finalized?

A: This date must be prior to the planned test date.

Q: Why does my marketing plan need to follow the launch dates assigned by the aggregator?

A: If the launch process is delayed due to requested changes in the program by the wireless carrier, or backlog in the aggregator or carrier's internal organizations, the marketing release date may lapse prior to launch. If a major ad buy is involved, the provider will need to have a clear understanding of the launch dates in order to submit program applications with ample lead time to meet ad dates.





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Working with the account manager to identify solid release dates will alleviate many of these concerns.

Q: How long does it take to completely implement the provisioning process?

A: After a program has been approved and submitted to an aggregator, the provisioning process phase will begin with the selected wireless carriers. Depending on each carrier's provisioning cycle and backlog, it can take anywhere from one to over eight weeks to be provisioned and certified.

Q: Where can I locate the Mobile Marketing Association guidelines?

A: Visit [www.mmaglobal.com/bestpractices.pdf](http://www.mmaglobal.com/bestpractices.pdf) for the consumer best practices.

### Resources

CSCA (Common Short Code Administration), [www.USshortcodes.com](http://www.USshortcodes.com)

CSCA (Connection aggregator list), [http://www.usshortcodes.com/csc\\_aggregators.html](http://www.usshortcodes.com/csc_aggregators.html)

Mobile Marketing Association (MMA), <http://www.mmaglobal.com/>

Mobile Marketing Ecosystem, <http://mmaglobal.com/modules/content/index.php?id=53>

MMA Code of Conduct, <http://mmaglobal.com/modules/content/index.php?id=5>

MMA Consumer Best Practices, <http://www.mmaglobal.com/bestpractices.pdf>

**EXHIBIT**

**C**

# View Program Brief

---

**Company:** OpenMarket

**Submittal Date**

07/20/09 10:45

**Last Update Date**

03/24/10 14:34

**Service Name**

Ez Texting

**Short Code(s):**

313131

**New Short Code**



Yes



No

**Services:**

Alerts/Trivia

**If distributing games/applications (non-networked/networked), have they been certified via T-Mobile's third party application certifier?**

No

**If not, have they been submitted for certification to T-mobile's third party application certifier?**

No

**Chat Type (If Applicable):**

**Download Type (If Applicable):**

**Subscription Type (If Applicable):**

**Est. Start Date**

08/20/09

**Est. End Date**

Ongoing

**Content Provider Name (appears on the bill)**

4INFO, Inc

**Specific Content Description (appears on the bill)**

313131 Ez Texting

**Message Rating**

Standard

**Premium Billed Rate**

**Premium Frequency**

**Is Credit Card billing required?**

If yes, we require specific CoGa services to be used for this traffic.

Yes  
 No

**Enable WAP billing?**

If yes, we require specific CoGa services to be used for this traffic.

Yes  
 No

**Binary SMS Required**

Yes  
 No

**Concatenated Messaging Required**

Yes  
 No

**For Affiliate or White Label Use**

Yes  
 No

**WAP Address for Content Delivery**

**WEB and WAP Address**

<http://www.texthype.com>.

**Program Overview**

Ez Texting Alerts is a cross carrier alerts service (10 msgs per month) designed to update consumers on events and happens at clubs and bars. It will be a national campaign that will be advertised via the web at <http://www.texthype.com>.

**Application Details**

This is a transfer involving live traffic

**Messaging Flow**

MO: JOIN

MT: EzTexting.com Alerts. mx 2msgs/wk. TnCs at <http://texthype.com>. Need help? Txt HELP. To stop, txt STOP. Std msg charges apply. Reply Y to subscribe

MO: Y

MT: You have confirmed your subscription to EzTexting Alerts. To opt out reply STOP. HELP at [support@eztexting.com](mailto:support@eztexting.com). Std msg charges apply

**Sample Alert MT**

MT: EzTexting Alerts: DJ Cat on the turntables at Ez NYC tonite. 231 6th Ave NYC. Text HELP for help. To stop, txt STOP

To out-out, the user texts STOP, Unsubscribe, Cancel, or Quit to 313131

MO: STOP

MT: You have discontinued from EzTexting alerts. You will no longer receive messages or charges for

this service. Questions call (800) 753-5732  
Users can text HELP or INFO to 313131 to receive our support email and phone number.  
Email: support@eztexting.com  
Call: 212-255-4663  
Users can also contact us online at <http://www.eztexting.com/ticketing-contact.php>.

MO: HELP

MT: If you have a problem w/ EzTexting alerts, (max 16 msg/mth) call (800) 753-5732. To stop, txt STOP. Std msg chrgs apply.

#### Text Message Interaction - Deprecated Field

##### Forecasts

Total Target Audience: 500,000  
Projected Take Rate: 3%  
## of FTEU Messages Per Participant: 0  
## of MO Messages Per Participant: 2  
## of MT Messages Per Participant: 2  
Total Number of Messages: 4  
Peak Traffic Per Second: 3 SMS/sec

##### Marketing Tactics

Provide information on various marketing tactics taking place, schedule, call to action, and other information as applicable.  
web

##### Advertising:

Yes  
 No

##### Advertising Frequency:

Ad-hoc

##### Projected Advertising Spend:

\$0 - \$50,000

##### Advertising Medium:

Web

##### Geographical Reach:

National

##### End-User Customer Support

Exact Help Message text:

MO: HELP MT: If you have a problem w/ EzTexting alerts, (max 16 msg/mth) call (800) 753-5732. To stop, txt STOP. Std msg chrgs apply.

E-mail Support Address: support@eztexting.com

Specific URL for Support: <http://www.eztexting.com/ticketing-contact.php>

Additional Support Options: 212-255-4663

##### Content Supplier Information

Content Supplier: 4INFO, Inc

Business Address: 177 Bovee Road San Mateo, CA 94402

Main Contact Phone #: 650 814-5269

#### T-Mobile Review Area

##### Approval Status

Certified

Saved

**New** 07/20/09  
**In Progress** 07/23/09  
**Approved** 07/23/09  
**Rejected**  
**Resubmitted**  
**Expired** 03/23/10  
**Testing**  
**Certified** 03/24/10  
**Comments**

### **Certification Area**

**Certification Request Made:**

**Certification Reply Email:**

**Certification CC Email:**

**Special Notes:**

**Test Plan:**

### **T-Mobile - Transfer Brief Area**

This section shows the partner that created this program brief originally.

**Current Partner**

OpenMarket

**Moved Date**

**Old Partner**

OpenMarket

**Comments**

EXHIBIT

D

Need a medical marijuana card or renewal?

Username

DISPENSARIES FEATURED CONNECT v COUPONS APP

Los Angeles Orange County San Diego Northern/Central CA Colorado Inland Empire Other States

**San Diego** dispensaries

SEARCH  Go!

delivery  pick up

**San Diego Sincere**  
 858-565-1053  
 4.7 with 87 reviews  
 13 indica 9 sativa 2 hybrid 15 edible 2 concentra  
 4 clone 1 seed

**Featured Dispensary**

**San Diego Holistic Healing\*\*\*HEAVY TUESDAY- 4 GRAM EIGHTHS (LIMIT 21 PATIENT)\*\*\***  
 Pacific Beach Dispensary 4.7 (1)

**Magnolia Wellness - Best in the foothills**  
 Elk Grove Dispensaries 4.5 (2)

**Inland Empire Patient Group**  
 Fontana/Bloomington/Colorado Dispensaries 4.0 (6)

**What R U Smoking On?**

randynash Sunlake OG from CCA. Easily a top ten strain. Sticky, smelly, tasty, STONY. Makes everything okay. ... [+]  
 9 minutes ago 0 comment

hurduffy Some tasty Obama OG ... [+]  
 23 minutes ago 0 comment

Lorijellybean Not rope, that's for sure! ... [+]  
 1 hours 14 minute ago 0 comment

CustomKUSH Tahoe OG !!! Its what set them Arabs off ! ... [+]  
 1 hours 32 minute ago 0 comment

d.ray.143 green crack lol! ... [+]  
 1 hours 52 minute ago 0 comment

columbo3 Fire og from Tri City is so good you could blow an 8th in a couple days! ... [+]  
 2 hours 2 minute ago 0 comment

**Community Activity Stream**

Today

Dadler22 reviewed Peace in Medicine healing Center.  
 11:18 PM

V AND G COLLECTIVE added a new item to their WeedMenu, Diablo Og super sticky stinky \$. . .  
 11:18 PM

budzee's listing BUDZEE DELIVERY. FREE FROM 11AM-11PM FREE EDIBLE FOR ALL NEW PATIENTS! CALL OR TEXT NOW 949.682.8393 has been updated by budzee.  
 11:17 PM

VandGCollective's listing V & G COLLECTIVE JUST IN \*\*\*NEW CLONES \*\*\* +\*\*CALI MIST\*\*\* has been updated by VandGCollective.  
 11:16 PM

Green Way Delivery added a new item to their WeedMenu, Strawberry JK \$20 60 120!  
 11:13 PM

**Just Added**

JUST IN OG X SOUR D, MASTER, & CHURCH \*\*4.0 1/8's to all new patients!! Call NOW (909) 255-1420  
 Upland/Montclair Dispensaries 0.0 (0)

Inland Empire Collective Association (IECA)  
 Fontana/Bloomington/Colorado Dispensaries 0.0 (0)

Amazon Green Go  
 San Bernardino Dispensaries

Show me the entire dispensary directory!

**Sign In!**

1  list services for FREE

2  discuss and review Dispensaries

Contact Twitter About Help

© WeedMap '10



# EXHIBIT

E



Username

LOGIN

Forgot Your Password? Or Username?  
Don't Have An Account? Register Now

CONTACT WHAT HOW WHO FEATURES PRICING FAQ SERVICES

Live Sales & Support



Live Chat Is Offline

(Monday to Friday, 9am - 7pm EST)

Information

- What Group Texting Is
- Why Use Ez Texting
- How Ez Texting Works
- Who Uses Ez Texting

- Case Studies
- Client Testimonials
- Mobile Marketing Guides
- Video Tour - Getting Started

Learn About Group SMS  
Sign Up For Our Webinar

- Advanced Features
- Affiliate & Reseller Programs
- Bluetooth Marketing
- Canadian Mobile Marketing
- Carrier Coverage
- Group SMS API
- Group SMS Pricing
- SMS Services
- Partners

- Contact
- FAQ
- Join Our Newsletter
- Mobile Marketing Blog
- Press

Anti-Spam Policy  
Report Spam



Certifications



## Who Uses Ez Texting Group SMS Software?



Hundreds of businesses, groups and individuals use Ez Texting's Group SMS software.

Our flexible Group Text Messaging software is used as both a communications tool and a mobile marketing platform.

**See Pricing Plans**  
Open A Free Trial Account

## Small Businesses

New to mobile marketing? We've got the resources to help you get started. Ez Texting was built for small businesses. We recently won a Hot Tech Demo Award at the 5th Annual Small Business Summit In New York City. *Want to see how your small business can leverage SMS marketing? Visit The Small Business Resource Center!*

## Religious Groups

Ez Texting is a powerful, affordable group text messaging solution for your church. Reminders, prayer requests, and youth group organization are some of the most common uses of group text messaging. Over 1,000 churches have already discovered the power of Ez Texting! *Want to learn more? Visit The Churches & Ministries Info Center!*

## Retail

The best relationships in retail are ones where you give back to your customers. Sending coupons, sneak preview sales, and exclusive offers directly to their cell phones is an inexpensive and trackable way to drive purchases! *Want to learn more? Read The ABC Red Top Case Study.*

## Nightlife - Bars & Nightclubs

Break through the clutter of nightlife promotions with a targeted message that cannot be ignored. Whether you are sending VIP passes, food & drink specials, comp admission or special prizes, customers can instantly respond to your offers! *Want to learn more? Visit The Nightlife Info Center!*

## Restaurants

SMS Marketing allows you to build loyalty, upsell your current customers and drive foot traffic on slow nights. Cold winter day? Offer a special on soup. *Want to reward repeat customers? Allow them to text in to receive special deals. Want to learn more? Visit The Restaurants Info Center!*

## Event Marketers

With hundreds (or even thousands) of people attending your events, Ez Texting gives you a better way to capture customer data. Give them the opportunity to sign up to be notified of upcoming events and promotions directly to their cell phones. And with our 2-way interactive software, the on-site promotion opportunities are endless. *Want to learn more? Read The ABC Red Top Case Study.*

## Traditional Media

Whether you are in Publishing, Broadcast Media or Outdoor, or software allows you to capitalize on your wide reach by building customer loyalty programs with targeted text messaging campaigns. By offering incentives, you quickly generate signups and can begin texting right away! This also presents an opportunity to create additional advertising revenue

streams. *Want to learn more? Read our case studies, or see our white papers.*

## Schools

Ez Texting's emergency messaging system allows your educational institutions to communicate with your entire student body in a matter of minutes.

## Social Groups

Directing communications amongst the members of a religious, non-profit or community based organization is far more difficult than it need to be. Snail mail is too slow when you need a rapid response and email gets lost in a sea of spam. SMS text messaging for social groups will solve your communications woes. *Want to learn more? Read The Water Is Basic Case Study or The Third Reform Case Study.*

## Real Estate

In today's busy world, people want immediate gratification. Give house hunters instant access to property listings using Ez Texting's keyword solution, and easily communicate with them to setup an appointment or request more information. *Want to learn more? Visit The SMS Marketing For Real Estate Info Center.*

## Software Developers

Leverage the power of Ez Texting's flexible SMS API to integrate text messaging into your own application. Whether you're an independent developer or you work on a team at Fortune 500 company, we're here to provide you with the right tools and the support you deserve. Ready to partner with us? *Visit The Developer Center.*

[See Plans & Pricing - Sign Up For A Free Trial](#)

[Anti-Spam Policy \(Report Spam\)](#) | [SMS API](#) | [Contact](#) | [Short Code Information](#) | [FAQ](#) | [Pricing](#) | [Privacy](#) | [Services](#) | [Terms](#) | [Press](#)  
Text Messaging Software by Club Texting Info: [Text Blasting Software](#) | [Carrier Lookup API](#) | [Group SMS For Ministries](#)  
\*Msg&data rates may apply in the US. Standard message and data rates apply in Canada.  
To opt-out of any Ez Texting<sup>®</sup> services, send STOP to 313131 (393939 in Canada).

# EXHIBIT

F

# Ez Texting Alerts

## TERMS OF USE OF Ez TEXTING, INC. ("Ez Texting Alerts"):

Ez Texting Alerts is brought to you by Ez Texting, Inc. Ez Texting Alerts is a cross carrier alerts service (10 messages per month) designed to update consumers and members on events and happening at various venues, schools, churches, etc.

### Fees:

Ez Texting Alerts does not charge mobile users a premium rate for receiving or replying a text messages. Msg&data rates may apply.

### Help and Support:

If you encounter any issues, concerns or questions with our service. You can use any of the following methods to contact us.

#### By Phone

Tel: (800) 753-5732

#### By Fax (Monday to Friday, 9am - 6pm)

Fax: (646) 417-6169

#### By Email

support@Eztexting.com

#### By SMS

Text **HELP** to 313131

#### Opt-In:

To Opt-In to a program you must text JOIN to 313131. By doing this you are agreeing to receive message from that content provider for that keyword only. Once you text *JOIN* to 313131, you will receive a confirmation message. You must reply *Y* to this message to confirm that you want to receive our alerts!

You are also agreeing to a monthly subscription. The frequency of messages shall not exceed 10 messages per month not including the initial Opt-In message.

#### Opt-Out:

To Opt-Out at any time you may text any of the following; '**STOP**', '**QUIT**', '**END**', '**CANCEL**', '**UNSUBSCRIBE**', '**STOP ALL**' , to 313131.

#### Carriers:

Ez Texting Alerts proudly supports the use of the following cell phone providers - Alltel, AT&T, Boost Mobile, Cellular One, Cellular South, Cincinnati Bell, Nextel, Sprint, T-Mobile, US Cellular, Verizon Wireless, Virgin Mobile.

#### SPAM and Privacy:

Ez Texting Alerts holds mobile user privacy in very high regard and would never sell/give/distribute your information to any company or customer without your consent.

[home](#) | [terms](#) | [privacy policy](#) | [support & contact](#)