

# **Compliance Webinar: Unapproved and Restricted Content**

**December 11, 2013**

# Agenda

- Unapproved Content
- Unapproved Content Violation and Action Required
- Severity Levels
- Severity 0 Program Violation Notice Example
- Inappropriate Content
- Sweepstakes
- Special Programs

# Unapproved Content




- From September through November 2013, CTIA distributed eight Severity 0 Program Violation Notices for inappropriate content discovered in standard rate programs
- According to the CTIA Mobile Commerce Compliance Handbook (CTIA Handbook), programs associated with carrier brands or programs operating on carrier networks are prohibited from promoting unapproved or illicit content, including the following:
  - Depictions or endorsements of violence
  - Inappropriate or adult content
  - Profanity or hate speech
  - Endorsement of illegal or illicit drugs

# Unapproved Content Violation and Action Required

- When unapproved or illicit content is discovered in market, a Violation Notice is distributed containing the following Severity 0 violation:  
“Contains or promotes inappropriate, illicit, or adult content”
- Severity 0 violations, requiring immediate resolution, may be distributed outside of the standard notification cycle
- Should service providers fail to bring a program into compliance before the assigned cure date, the following penalties might be dispensed:
  - Escalate the program to the carrier
  - Suspend the short code
  - Terminate the short code
  - Terminate the program

# Severity Levels

Appearing in the CTIA Handbook, the table defines severities, outlines cure dates, and describes penalties

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

# Severity 0 Program Violation Notice Example

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**URGENT: Immediate Response Required** **No:** [REDACTED]

**SMS Program Monitoring**  
Program Violation Notice

<b>Shortcode:</b> [REDACTED] <b>Content Provider:</b> [REDACTED] <b>Aggregator:</b> [REDACTED] <b>Total Intercepts:</b> 1 <b>Total Uniques:</b> 1	<b>Notice Date:</b> 11/15/2013 <b>Cure Date:</b> 11/15/2013
<b>Overall Violation Severity:</b> 0	

The aggregator assumes responsibility for ensuring content provider compliance with program violation notices. Failure to comply might result in deactivation of shortcodes or termination of all content provider access to the carrier network.

Violations	Severity	Actions Required
Contains or promotes inappropriate, illicit, or adult content	0	Remove references to inappropriate violent or adult content
No link to comprehensive T&Cs	1	Display link to comprehensive T&Cs
No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy
No mention that message and data rates may apply	2	Disclose that message and data rates may apply

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**No:** [REDACTED] **SEARCH**

Group 1

Advertisement image

► Click on the thumbnail to view a list of specific violations on the associated creative captured in market.

# Inappropriate Content

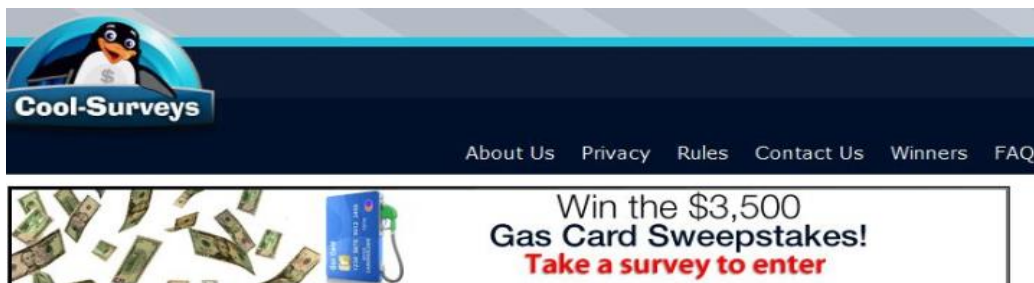
CTIA content guidelines are applied industry-wide, but individual carriers reserve the right to classify any material as inappropriate, which might include the following:

- Inappropriate Language
  - Crude words or profanity
  - Explicit sexual language
  - Hate speech
  - Attempts to obscure crude words or profanity that continue to leave a clear image of the profanity
- Inappropriate Depictions or Actions
  - Violence
  - Sexual content
  - Impersonation
  - Illegal gambling
  - Vandalism

Sweepstakes programs and other contests might be subject to additional review on a carrier-by-carrier basis; however, the CTIA Handbook outlines general guidelines for such programs, including the following:

- Service providers must receive explicit approval before launching sweepstakes programs
- All sweepstakes programs must support a no-cost entry method, other than SMS
- Service providers are advised to seek legal guidance and consult individual carriers for specific requirements

## Banner Promoting Sweepstakes Example





# Special Programs

Service providers are advised to consult individual carriers to learn about specific requirements when onboarding campaigns that provide content and services designated as special programs, for example:

- **Chat and Networking Programs**

Depending on the carrier, certain age restrictions and specific abuse reporting requirements might apply

- **Standard Rate Video Services**

Download sizes might be limited to a certain number of megabytes

# Contact Us

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To access the CTIA Mobile Commerce Compliance Playbook, please go to:  
<http://www.wmcglobal.com/assets/ctia-mobile-commerce-compliance-handbook-v1-2.pdf>