

# Telstra Carrier Billing Audit Standards

Counterpart to Telstra Carrier Billing Code of Conduct Policy, v5

**Rev 3.00**

**3 December 2017**

# Telstra Carrier Billing Audit Standards

## Version History

Revision	Effective Date	Description
1.00	25 September 2014	Telstra introduced audit standards addressing advertising, message flow, and helpline for all carrier billing programmes.
1.01	3 October 2014	One action required displaying "content provider" was amended to display "merchant" instead.
1.02	31 October 2014	The action required for "cancel" or "back" button size was changed from 10% of total screen size to a clearly displayed button or hyperlink.
1.03	16 January 2015	The reference point for pricing and subscription disclosure size was changed from the size of the purchase button to the size of the call-to-action or purchase button text.
1.04	23 March 2015	<ul style="list-style-type: none"> <li>▪ Audit standards were added for the following new message flow categories: <ul style="list-style-type: none"> <li>○ Subscription Billing Confirmation;</li> <li>○ Single Purchase Billing Confirmation; and</li> <li>○ Unsubscribe Confirmation Message.</li> </ul> </li> <li>▪ Additional audit standards were added for the following existing message flow categories: <ul style="list-style-type: none"> <li>○ Subscription \$30 Expenditure Update;</li> <li>○ Single Purchase \$30 Expenditure Update; and</li> <li>○ 30-Day Reminder [subscription only].</li> </ul> </li> <li>▪ WMC Global created a supplementary document with notification message examples to assist in communicating the changes in revision 1.04.</li> </ul>
1.05	15 December 2015	<p>Updated requirements for service messages included the following.</p> <ul style="list-style-type: none"> <li>▪ All service messages must begin with a "Hi" preface (previously "FreeMsg");</li> <li>▪ Three new message flow categories were added: Subscription Reminder Message, Subscription Renewal Confirmation Message, and Insufficient Credit Notification Message;</li> <li>▪ Category names were modified to combine subscription and single purchase audit standards;</li> <li>▪ Audit standards were added to the Billing Confirmation Message, 30-Day Reminder Message, and Unsubscribe Confirmation Message categories; and</li> <li>▪ Minor language updates were made to infringements and actions required in the Billing Confirmation Message, \$30 Expenditure Update Message, 30-Day Reminder Message, and Unsubscribe Confirmation Message categories.</li> </ul>
1.06	1 February 2016	<ul style="list-style-type: none"> <li>▪ Reference numbers were added to all infringements to coincide with major updates to the Telstra Carrier Billing Code of Conduct Policy structure.</li> <li>▪ Audit standards regarding product or service disclosure, pricing, and terms and conditions were added to the Merchant Advertising Screen category.</li> <li>▪ Infringement "complete pricing displayed only in hyperlinked T&amp;Cs" was added to the Payment Confirmation Screen category.</li> <li>▪ Other minor language updates were made to infringements and actions required in the Pricing Notification Screen, Payment Confirmation Screen, and Payment Failure Screen categories.</li> </ul>

► **Yellow highlights** indicate all changes and additions since the previous revision.

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Revision	Effective Date	Description
1.07	8 June 2016	<ul style="list-style-type: none"> <li>▪ Telstra introduced the new tickbox requirement in v4.0 of the Telstra Carrier Billing Code of Conduct Policy. Tickbox audit standards were added to the Pricing Notification Screen category.</li> <li>▪ Audit standards for affiliate advertisements were added.</li> <li>▪ All service messages must be sent from the opt-out shortcode and appropriate audit standards were added to all message flow categories.</li> <li>▪ The action required for displaying unsubscribe information was modified to include the option “reply STOP to [unsub, opt-out, quit].”</li> <li>▪ Category Other Service Messages was added.</li> </ul>
1.08	<i>Distributed internally only (no Partners)</i>	The category name “Affiliate Advertisement” was amended to “Advertisement” and included in revision 1.09.
1.09	5 September 2016	<p>Severities were increased for audit standards indicative of consumer risk, including</p> <ul style="list-style-type: none"> <li>▪ Misleading or deceptive advertising or sign-up processes;</li> <li>▪ Inadequate or missing pricing information;</li> <li>▪ Customer request processing delays for unsubscribing, nonfunctional unsubscription mechanisms, or both; and</li> <li>▪ Missing, insufficiently sized (too small), or nonfunctional cancel or back options.</li> </ul> <p>As a result, some Severity 1 infringements were reclassified as Severity 0, and some Severity 2 infringements were reclassified as Severity 1.</p>
2.00	16 January 2017	<ul style="list-style-type: none"> <li>▪ The audit standards document was revised to include a cover page and a version history.</li> <li>▪ Adult and glamour content rated MA15+ and higher is now prohibited. Advertising infringements were updated.</li> <li>▪ Additional changes to audit standards in the Advertisement category included the following: <ul style="list-style-type: none"> <li>○ Option of using a logo in place of a service name was added to product or service name audit standards;</li> <li>○ Subscription disclosure infringements were removed;</li> <li>○ Fees disclosure audit standards were added; and</li> <li>○ Conditions were added to subscription period infringements.</li> </ul> </li> <li>▪ Changes to audit standards in the Helpline category included the following: <ul style="list-style-type: none"> <li>○ Action required regarding caller wait time was modified;</li> <li>○ Infringement regarding caller wait time was removed; and</li> <li>○ New audit standard to provide a recurring option to leave a voicemail message while holding was added.</li> </ul> </li> </ul>
3.00	3 December 2017	<p>From 3 December 2017, Service Providers are prohibited from advertising subscription services and from acquiring new subscription customers on the Telstra network.</p> <p>Legacy subscription services may continue to operate as normal for customers acquired before 3 December 2017.</p> <p>Infringements regarding subscriptions have been removed or edited, and new infringements “unauthorised subscription service,” “unauthorised resubscription (previous customer),” and “unauthorised subscription service advertisement” have been added.</p> <p>Infringements in multiple categories have been reordered by severity and type.</p>

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## Advertisement

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service* 4 <sup>1</sup>	0	Discontinue offer immediately
Unauthorised adult or glamour services* 5.4	0	Discontinue offer immediately
Advertising to children 5.4	0	Discontinue ad in any medium or format that targets children specifically
Offer confusing, misleading, or deceptive with respect to target audience 5.4	0	Clarify offer's principal elements in language target audience likely will understand
No service name or logo 5.4	1	Disclose service name or logo on screen
Service name or logo illegible 5.4	1	Increase point size, alter colour scheme to improve contrast, or both
No close button [popup or full-screen ads only] 5.4	1	Display clearly button to close popup or full-screen ad
Close button inactive [popup or full-screen ads only] 5.4	1	Display clearly active button to close popup or full-screen ad
Unclear close button [popup or full-screen ads only] 5.4	2	Display clearly button to close popup or full-screen ad
Pricing		
Infringement	Severity	Actions Required
No pricing 5.4	0	Display complete pricing on ad
Pricing illegible 5.4	0	Increase point size, alter colour scheme to improve contrast, or both
Unclear pricing 5.4	0	Display full and correct pricing in prescribed format: \$XX.XX
Conflicting pricing 5.4	0	Display pricing accurately and consistently in prescribed format: \$XX.XX
No fees disclosure [where pricing differs for Telstra customers] 5.4	0	Display "fees apply" clearly and prominently on ad
Fees disclosure illegible [where pricing differs for Telstra customers] 5.4	0	Display "fees apply" clearly and prominently on ad

\*Subject to immediate escalation to Telstra

<sup>1</sup> Pink reference numbers correlate to sections in the Telstra Carrier Billing Code of Conduct Policy.

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## Merchant Advertising Screen

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service* 4; 10.1	0	Discontinue offer immediately
Unauthorised adult or glamour services* 5.1; 10.1	0	Discontinue offer immediately
Unauthorised donation services* 10.1	0	Discontinue offer immediately
Product associated with incentive to purchase* 5.3; 10.1	0	Discontinue product association with incentive to purchase
No product or service disclosure 10.1	1	Disclose accurately nature of product or service on screen
Product or service constitutes physical goods or content 5.2; 10.1	1	Discontinue offer immediately
Unapproved Telstra endorsement or use of Telstra name 10.1	1	Remove Telstra endorsement or Telstra name
Misrepresentation of product offering 10.1	2	Display references to product type accurately and consistently on screen and in hyperlinked T&Cs
Misrepresentation of product quantity 10.1	2	Display only actual product quantity per charge period (e.g., 15 ringtones/month)
Pricing		
Infringement	Severity	Actions Required
Complete pricing displayed only in hyperlinked T&Cs 10.1	0	Display complete pricing on screen
No pricing 10.1	0	Display complete pricing on screen
Pricing illegible 10.1	0	Increase point size, alter colour scheme to improve contrast, or both
Unclear pricing 10.1	0	Display full and correct pricing in prescribed format: \$XX.XX
Conflicting pricing 10.1	0	Display pricing accurately and consistently in prescribed format: \$XX.XX
Pricing point size too small 10.1	1	Increase pricing point size to at least 75% as large as point size of call-to-action text or purchase button text
T&Cs		
Infringement	Severity	Actions Required
No summary T&Cs 10.1	1	Display summary T&Cs on screen
Summary T&Cs illegible 10.1	1	Increase point size and alter colour scheme to improve contrast
No hyperlink to comprehensive T&Cs 10.1	1	Display hyperlink to comprehensive T&Cs

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## Pricing Notification Screen

Programme	Severity	Actions Required
<b>Infringement</b>		
Unauthorised subscription service* 4; 10.2	0	Discontinue offer immediately
Unauthorised adult or glamour services* 5.1; 10.2	0	Discontinue offer immediately
Unauthorised donation services* 10.2	0	Discontinue offer immediately
Product associated with incentive to purchase* 5.3; 10.2	0	Discontinue product association with incentive to purchase
Customer purchase completed without clicking purchase button 10.2	0	Restrict customer purchase to clicking purchase button only
No "cancel" or "back" option 10.2	0	Provide option for customers to decline purchase and to return to merchant homepage or other relevant page
Cancel or back option (e.g., button) too small 10.2	0	Display clearly "cancel" or "back" option in form of button or hyperlink on screen
Unapproved Telstra endorsement or use of Telstra name 10.2	1	Remove Telstra endorsement or Telstra name
No product or service disclosure 10.2	1	Disclose accurately nature of product or service on screen
Product or service constitutes physical goods or content 5.2; 10.2	1	Discontinue offer immediately
Product or service disclosure displayed only in hyperlinked T&Cs 10.2	1	Disclose accurately nature of product or service on screen
Product or service disclosure illegible 10.2	1	Increase point size, alter colour scheme to improve contrast, or both
No local-charge or free-call helpline number 10.2	1	Display local-charge or free-call helpline number
Alphanumeric helpline number 10.2	1	Display local-charge or free-call helpline number entirely in numerals (no letters)
No marketing disclosure 10.2	1	Disclose that customers will be opted into marketing services unless they opt out on subsequent screen
Marketing disclosure displayed within insufficient proximity to purchase button 10.2	1	Display marketing disclosure within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
Employs merchant-hosted pricing notification screen 10.2	1	Ensure all payment screens are hosted by Telstra service provider
No file size 10.2	1	Display file size in KB or MB when data are required for download
Purchase button too large 10.2	1	Decrease purchase button size to no more than 25% of total screen size
Misrepresentation of product offering 10.2	2	Display references to product type accurately and consistently on screen and in hyperlinked T&Cs
Misrepresentation of product quantity 10.2	2	Display only actual product quantity (e.g., 15 ringtones)
No product quantity 10.2	2	Disclose product quantity
Unclear product quantity 10.2	2	Disclose actual product quantity (per credit, if appropriate)

\*Subject to immediate escalation to Telstra

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Pricing Notification Screen *continued*

Pricing		
Infringement	Severity	Actions Required
Complete pricing displayed only in hyperlinked T&Cs 10.2	0	Display complete pricing on screen
No pricing 10.2	0	Display pricing within three line breaks of purchase button or directly above, with no intervening text or graphics
Pricing illegible 10.2	0	Increase point size, alter colour scheme to improve contrast, or both
Unclear pricing 10.2	0	Display full and correct pricing in prescribed format: \$XX.XX
Conflicting pricing 10.2	0	Display pricing accurately and consistently in prescribed format: \$XX.XX
Pricing point size too small 10.2	1	Increase pricing point size to at least 75% as large as point size of call-to-action text or purchase button text
Pricing displayed within insufficient proximity to purchase button 10.2	1	Display pricing within three line breaks of purchase button or directly above, with no intervening text or graphics
T&Cs		
Infringement	Severity	Actions Required
No unsubscribe information 10.2	0	Display on screen, or hyperlink to, instructions detailing how to unsubscribe from service
No hyperlink to comprehensive T&Cs 10.2	1	Display hyperlink to comprehensive T&Cs
Summary T&Cs illegible 10.2	1	Increase point size and alter colour scheme to improve contrast
No mention that data fees might apply 10.2	2	Disclose that data fees might apply

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## Payment Confirmation Screen

Programme		
Infringement	Severity	Actions Required
Product associated with incentive to purchase* 5.3; 10.3	0	Discontinue product association with incentive to purchase
No content access button 10.3	0	Display button allowing customer to access purchased content
Failure to confirm purchase successful 10.3	1	Display screen confirming that purchase was successful
Employs merchant website URL 10.3	1	Ensure URL differs from merchant website URL
No product or service disclosure 10.3	1	Disclose accurately nature of product or service on screen
Product or service disclosure illegible 10.3	1	Increase point size, alter colour scheme to improve contrast, or both
Product or service disclosure displayed only in hyperlinked T&Cs 10.3	1	Disclose accurately nature of product or service on screen
Product or service constitutes physical goods or content 5.2; 10.3	1	Discontinue offer immediately
Unapproved Telstra endorsement or use of Telstra name 10.3	1	Remove Telstra endorsement or Telstra name
No local-charge or free-call helpline number 10.3	1	Display local-charge or free-call helpline number
Alphanumeric helpline number 10.3	1	Display local-charge or free-call helpline number entirely in numerals (no letters)
Misrepresentation of product offering 10.3	2	Display references to product type accurately and consistently on screen and in hyperlinked T&Cs
Pricing		
Infringement	Severity	Actions Required
Complete pricing displayed only in hyperlinked T&Cs 10.3	0	Display complete pricing on screen
No pricing 10.3	0	Display complete pricing on screen
Pricing illegible 10.3	0	Increase point size, alter colour scheme to improve contrast, or both
Unclear pricing 10.3	0	Display full and correct pricing in prescribed format: \$XX.XX
Conflicting pricing 10.3	0	Display pricing accurately and consistently in prescribed format: \$XX.XX
T&Cs		
Infringement	Severity	Actions Required
No hyperlink to comprehensive T&Cs 10.3	1	Display hyperlink to comprehensive T&Cs
Summary T&Cs illegible 10.3	1	Increase point size and alter colour scheme to improve contrast
No instructions for opting out of marketing, prompt, or inducement message [where customer has been opted into marketing service with purchase] 10.3	2	Display on screen or hyperlink to instructions detailing how to opt out of marketing, prompt, or inducement messages
Unclear instructions for opting out of marketing, prompt, or inducement messages [where customer has been opted into marketing service with purchase] 10.3	2	Articulate clearly on screen or display clearly labelled hyperlink to instructions detailing how to opt out of marketing, prompt, or inducement messages

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## Payment Failure Screen

Programme		
Infringement	Severity	Actions Required
Product associated with incentive to purchase* 5.3; 10.4	0	Discontinue product association with incentive to purchase
Employs merchant website URL 10.4	1	Ensure URL differs from merchant website URL
Failure to confirm customers not charged 10.4	1	Confirm customers have not been charged for failed payment
Failure to confirm transaction failure 10.4	1	Display language verifying that purchase has failed
No "back" option 10.4	1	Provide "back" option or hyperlink that allows customer to return to merchant homepage or other relevant page
No product or service disclosure 10.4	1	Disclose accurately nature of product or service on screen
Product or service constitutes physical goods or content 5.2; 10.4	1	Discontinue offer immediately
Product or service disclosure displayed only in hyperlinked T&Cs 10.4	1	Disclose accurately nature of product or service on screen
Product or service disclosure illegible 10.4	1	Increase point size, alter colour scheme to improve contrast, or both
Unapproved Telstra endorsement or use of Telstra name 10.4	1	Remove Telstra endorsement or Telstra name
Misrepresentation of product offering 10.4	2	Display references to product type accurately and consistently on screen and in hyperlinked T&Cs
Failure to confirm transaction failure reason 10.4	2	Display reason for transaction failure; e.g., "You have insufficient credit"
T&Cs		
Infringement	Severity	Actions Required
No hyperlink to comprehensive T&Cs 10.4	1	Display hyperlink to comprehensive T&Cs
Summary T&Cs illegible 10.4	1	Increase point size and alter colour scheme to improve contrast

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## Billing Confirmation Message

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service* 4	0	Discontinue offer immediately
Unauthorised resubscription (previous customer)* 4	0	Discontinue subscription immediately
Failure to send billing confirmation message within one business day of customer purchase or billing transaction 11	1	Send billing confirmation message within one business day of customer purchase or billing transaction
Failure to send billing confirmation message from opt-out shortcode 6	1	Send all service messages from opt-out shortcode
Misrepresentation of product offering 11	1	Display references to product type accurately and consistently, among all messages and ad
Failure to preface billing confirmation message with "Hi" 11	2	Preface billing confirmation message with "Hi"
Contains marketing elements 11	2	Remove marketing elements from all billing confirmation messages
Failure to identify product or service 11	2	Display product or service name in message body or header
Failure to identify product or service clearly 11	3	Display product or service name consistently in message body or header and among all messages and ad
Pricing		
Infringement	Severity	Actions Required
No pricing 11	0	Display full, accurate pricing in prescribed format: \$XX.XX
Unclear pricing 11	0	Display full, accurate pricing in prescribed format: \$XX.XX
Conflicting pricing 11	0	Display full, accurate pricing in prescribed format: \$XX.XX
T&Cs		
Infringement	Severity	Actions Required
No product URL 11	1	Display product URL
No local-charge or free-call helpline number 11	1	Display local-charge or free-call helpline number
No mention of billing method 11	2	Disclose that charges will be applied to customer's mobile phone bill or will be deducted from prepaid balance

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Subscription Reminder Message<sup>2</sup>

Programme		
Infringement	Severity	Actions Required
Failure to send subscription reminder message one business day after billing confirmation message 11	1	Send subscription reminder message one business day after billing confirmation message
Failure to send subscription reminder message from opt-out shortcode 6	1	Send all service messages from opt-out shortcode
Failure to preface billing confirmation message with "Hi" 11	2	Preface billing confirmation message with "Hi"
Contains marketing elements 11	2	Remove marketing elements from all billing confirmation messages
Failure to identify product or service 11	2	Display product or service name in message body or header
Failure to identify product or service clearly 11	3	Display product or service name consistently in message body or header and among all messages and ad
Subscription		
Infringement	Severity	Actions Required
No subscription disclosure 11	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in subscription reminder message
T&Cs		
Infringement	Severity	Actions Required
No unsubscribe information 11	0	Display unsubscribe information as "[Text, Send, SMS, or Reply] STOP to [shortcode] or [helpline]" or "Reply STOP to [unsub, opt-out, quit]"
Unclear unsubscribe information 11	1	Display unsubscribe information as "[Text, Send, SMS, or Reply] STOP to [shortcode] or [helpline]" or "Reply STOP to [unsub, opt-out, quit]"
Incorrect unsubscribe information 11	1	Display <i>STOP</i> as unsubscribe command
No local-charge or free-call helpline number 11	1	Display local-charge or free-call helpline number
No URL to third-party charge information 11	1	Display URL to third-party charge information

<sup>2</sup> Send subscription reminder messages only to subscription service subscribers.

► **Yellow highlights** indicate all changes and additions since the previous revision.

Subscription Renewal Confirmation Message<sup>3</sup>

Programme		
Infringement	Severity	Actions Required
Failure to send subscription renewal confirmation message within one business day of billing transaction <b>11</b>	1	Send subscription renewal confirmation message within one business day of billing transaction
Failure to send subscription renewal confirmation message from opt-out shortcode <b>6</b>	1	Send all service messages from opt-out shortcode
Misrepresentation of product offering <b>11</b>	1	Display references to product type accurately and consistently, among all messages and ad
Failure to preface billing confirmation message with "Hi" <b>11</b>	2	Preface billing confirmation message with "Hi"
Contains marketing elements <b>11</b>	2	Remove marketing elements from all billing confirmation messages
Failure to identify product or service <b>11</b>	2	Display product or service name in message body or header
Failure to identify product or service clearly <b>11</b>	3	Display product or service name consistently in message body or header and among all messages and ad
Pricing		
Infringement	Severity	Actions Required
No pricing <b>11</b>	0	Display full, accurate pricing in prescribed format: \$XX.XX
Unclear pricing <b>11</b>	0	Display full, accurate pricing in prescribed format: \$XX.XX
Conflicting pricing <b>11</b>	0	Display full, accurate pricing in prescribed format: \$XX.XX
Subscription <sup>4</sup>		
Infringement	Severity	Actions Required
No subscription disclosure <b>11</b>	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in billing confirmation message
No subscription charge period <b>11</b>	2	Display subscription charge period
Unclear subscription charge period <b>11</b>	2	Express subscription charge period per time interval such as day, week, or month
T&Cs		
Infringement	Severity	Actions Required
No unsubscribe information <b>11</b>	0	Display unsubscribe information as "[Text, Send, SMS, or Reply] STOP to [shortcode] or [helpline]" or "Reply STOP to [unsub, opt-out, quit]"
Unclear unsubscribe information <b>11</b>	1	Display unsubscribe information as "[Text, Send, SMS, or Reply] STOP to [shortcode] or [helpline]" or "Reply STOP to [unsub, opt-out, quit]"
Incorrect unsubscribe information <b>11</b>	1	Display <i>STOP</i> as unsubscribe command
No local-charge or free-call helpline number <b>11</b>	1	Display local-charge or free-call helpline number
No mention of billing method <b>11</b>	2	Disclose that charges will be applied to customer's mobile phone bill or will be deducted from prepaid balance

<sup>3</sup> Send subscription renewal confirmation messages only to subscription service subscribers.

<sup>4</sup> Infringements and actions required in this section apply only to subscription services.

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## \$30 Expenditure Update Message

Programme		
Infringement	Severity	Actions Required
Failure to send \$30 expenditure update message <b>11</b>	1	Send \$30 expenditure update message each time customer incurs \$30 in mobile content fees during single calendar month
Failure to send \$30 expenditure update message from opt-out shortcode <b>6</b>	1	Send all service messages from opt-out shortcode
Contains marketing elements <b>11</b>	2	Remove marketing elements from all \$30 expenditure update messages
Failure to preface \$30 expenditure update message with "Hi" <b>11</b>	2	Preface \$30 expenditure update message with "Hi"
Failure to identify product or service <b>11</b>	2	Display product or service name in message body or header
Failure to identify product or service clearly <b>11</b>	3	Display product or service name consistently in message body or header and among all messages and ad
Subscription <sup>5</sup>		
Infringement	Severity	Actions Required
No subscription disclosure <b>11</b>	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in \$30 expenditure update message
T&Cs		
Infringement	Severity	Actions Required
No unsubscribe information <sup>6</sup> <b>11</b>	0	Display unsubscribe information as "[Text, Send, SMS, or Reply] STOP to [shortcode] or [helpline]" or "Reply STOP to [unsub, opt-out, quit]"
Unclear unsubscribe information <sup>7</sup> <b>11</b>	1	Display unsubscribe information as "[Text, Send, SMS, or Reply] STOP to [shortcode] or [helpline]" or "Reply STOP to [unsub, opt-out, quit]"
Incorrect unsubscribe information <sup>8</sup> <b>11</b>	1	Display <i>STOP</i> as unsubscribe command
No local-charge or free-call helpline number <b>11</b>	1	Display local-charge or free-call helpline number
No mention of billing method <b>11</b>	2	Disclose that charges will be applied to customer's mobile phone bill or will be deducted from prepaid balance

<sup>5</sup> Infringements and actions required in this section apply only to subscription services.

<sup>6</sup> This infringement and action required applies only to subscription services.

<sup>7</sup> This infringement and action required applies only to subscription services.

<sup>8</sup> This infringement and action required applies only to subscription services.

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## Insufficient Credit Notification Message

Programme		
Infringement	Severity	Actions Required
Failure to send insufficient credit notification message within one business day of failed customer purchase or billing transaction 11	1	Send insufficient credit notification message within one business day of failed customer purchase or billing transaction
Failure to send insufficient credit notification message from opt-out shortcode 6	1	Send all service messages from opt-out shortcode
Failure to preface insufficient credit notification message with "Hi" 11	2	Preface insufficient credit notification message with "Hi"
Contains marketing elements 11	2	Remove marketing elements from insufficient credit notification message
Failure to identify product or service 11	2	Display product or service name in message body or header
Failure to identify product or service clearly 11	3	Display product or service name consistently in message body or header and among all messages and ad
Subscription <sup>9</sup>		
Infringement	Severity	Actions Required
No subscription disclosure 11	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in insufficient credit notification message
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call helpline number 11	1	Display local-charge or free-call helpline number
No failure reason 11	2	Display failure reason
No recharge request 11	2	Display recharge request

## Other Service Messages

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service advertisement* 4	0	Discontinue offer immediately
Failure to send service message from opt-out shortcode 6	1	Send all service messages from opt-out shortcode
Failure to preface service message with "Hi" 6	2	Preface service message with "Hi"
Contains marketing elements 6	2	Remove marketing elements from all service messages

\*Subject to immediate escalation to Telstra

<sup>9</sup> The infringement and action required in this section applies only to subscription services.

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Unsubscribe Confirmation Message<sup>10</sup>

Programme		
Infringement	Severity	Actions Required
Failure to respond within one business day to customer message to STOP service 11	0	Send message promptly informing customer that service has been terminated and that no more messages will be sent
Customer STOP message not recognised 11	0	Treat as STOP request any message containing the word "stop" as command to terminate service
Failure to send unsubscribe confirmation message from opt-out shortcode 6	1	Send all service messages from opt-out shortcode
Contains marketing elements 11	1	Remove marketing elements from unsubscribe confirmation message
Failure to preface unsubscribe confirmation message with "Hi" 11	2	Preface unsubscribe confirmation message with "Hi"
Failure to confirm unsubscription 11	2	Inform customer that subscription has ended
T&Cs		
Infringement	Severity	Actions Required
No final charge date 11	1	Display date that final charges will apply
Unclear final charge date 11	2	Format date that final charges will apply as [DD/MM/YY]
No mention of billing method 11	2	Disclose that charges will be applied to customer's mobile phone bill or will be deducted from prepaid balance
Failure to confirm service termination 11	2	Inform customer that service has been terminated
Failure to identify product or service 11	2	Display product or service name in message body or header
Failure to identify product or service clearly 11	3	Display product or service name consistently in message body or header and among all messages and ad
No local-charge or free-call helpline number 11	3	Display local-charge or free-call helpline number

<sup>10</sup> Send unsubscribe confirmation messages only to subscription service subscribers.

► **Yellow highlights** indicate all changes and additions since the previous revision.

## Helpline

Infringement	Severity	Actions Required
Helpline number nonfunctional 9	1	Operate fully functional helpline 24 hours/day, 7 days/week
Helpline number not associated with genuine source of assistance 9	1	Ensure helpline number connects to genuine source of assistance

## IVR System

Infringement	Severity	Actions Required
Attempt to unsubscribe from service via IVR system unsuccessful 9	0	Ensure callers can unsubscribe via IVR system
Call not returned within one business day 9	1	Respond to all calls within one business day
Caller attempt to leave voicemail message during normal business hours unsuccessful 9	1	Ensure callers can leave message 24 hours/day, 7 days/week
Caller attempt to leave voicemail message outside normal business hours unsuccessful 9	1	Ensure callers can leave message 24 hours/day, 7 days/week
IVR system unavailable during normal business hours 9	1	Operate IVR system or staff helpline with live agent from 9:00 A.M. to 5:00 P.M. AEST or ADST, business days
IVR system unavailable outside normal business hours 9	1	Operate IVR system or staff helpline with live agent from 5:00 P.M. to 9:00 A.M. AEST or ADST, business days, and 24 hours/day, Saturday, Sunday, and public holidays
No mention that caller can leave voicemail message 9	1	Inform queuing callers they can leave message that will be returned
No option to unsubscribe by entering mobile number or leaving voicemail message via IVR system 9	1	Allow callers to unsubscribe by entering mobile number or leaving voicemail message via IVR system

## Live Agent

Infringement	Severity	Actions Required
Attempt to unsubscribe from subscription service via live agent unsuccessful 9	0	Ensure callers can unsubscribe via live agent
Caller unable to reach live agent or leave voicemail message 9	1	Answer all calls or provide option to leave voicemail message within 2 minutes, 30 seconds
No recurring option to leave voicemail message or to continue holding for live agent 9	1	Provide option to leave voicemail message or to continue holding for live agent at 2-minute, 30-second intervals while caller is holding to speak to live agent
No live agent available 9	1	Staff helpline from 9:00 A.M. to 5:00 P.M. AEST or ADST, business days
Opt-out from marketing messages via live agent unsuccessful 9	1	Ensure callers can opt out of marketing messages via live agent

► **Yellow highlights** indicate all changes and additions since the previous revision.