

Telstra MPS Advertising Audit Standards

Rev 4.00

13 December 2018

Telstra MPS Advertising Audit Standards

Version History

| Revision ¹ | Effective Date | Details |
|-----------------------|------------------|---|
| 1.06 | 1 June 2012 | <p>Audit standards were revised to reflect changes to the Mobile Premium Services Code. Changes included the following:</p> <ul style="list-style-type: none"> Subscription disclosure must be adjacent to the call-to-action or MSISDN-submit field Pricing and subscription disclosure must be adjacent to each other Text in print ads must be at least 6 point Reverse charge billing services must clearly identify the content provider and disclose that data fees might apply <p>Code references were updated throughout for the majority of infringements.</p> |
| 1.07 | 5 November 2012 | <p>Three new audit standards were added in addition to requirements in the MPS Code:</p> <ul style="list-style-type: none"> Failure to disclose that subscription purchase offers only chance of winning competition or receiving prize; Failure to display subscription disclosure within most prominent competition or prize tagline; and Pricing point size, subscription disclosure point size, or both too small. |
| 1.08 | 24 March 2014 | <p>Telstra prohibited the use of competition incentives to promote subscription services.</p> |
| 1.09 | 5 September 2016 | <p>The severity of audit standards indicative of consumer risk was increased, including</p> <ul style="list-style-type: none"> Prohibited or unauthorised products or services; Misleading or deceptive advertising or sign-up processes; Inadequate or missing pricing information; and Inadequate or missing unsubscribe information. |
| 2.00 | 1 April 2017 | <p>The audit standards document was revised to include a cover page and version history, and the style was updated.</p> <p>Glamour content with any rating and adult content with a rating of MA15+ or higher are now prohibited. An audit standard was updated and footnotes added.</p> |
| 3.00 | 3 December 2017 | <p>From 3 December 2017, aggregators and content providers are prohibited from advertising subscription services and from acquiring new subscription customers on the Telstra network.</p> <p>Audit standards regarding subscriptions have been removed or edited, and new infringement “unauthorised subscription service” has been added.</p> |
| 4.00 | 13 December 2018 | <p>From 13 December 2018, mobile premium services that are not authorised by Telstra, that fail to comply with the aggregator’s relevant agreement with Telstra, or both will be considered to be breaching the audit standards.</p> |

¹ Revisions before the Mobile Premium Services Industry Code (C637:2011) are not included in the version history.

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

Telstra MPS Advertising Audit Standards

| Programme | | |
|---|----------|--|
| Infringements | Severity | Actions Required |
| Unauthorised mobile premium service ² Telstra rule | 0 | Discontinue offer immediately |
| Unauthorised adult ³ or glamour service ⁴ * Telstra rule | 0 | Discontinue offer immediately |
| Unauthorised charity service* Telstra rule | 0 | Discontinue offer immediately |
| Product associated with incentive to purchase* Telstra rule | 0 | Discontinue product association with incentive to purchase |
| Offer constitutes a scam* 3.1.19 | 0 | Discontinue offer immediately |
| Offer confusing, misleading, or deceptive with respect to target audience* 3.1.2 | 0 | Clarify offer's principal elements in language target audience likely will understand |
| No age limit for restricted services Telstra rule | 1 | Disclose that users must be age 18 or older to access restricted services |
| No product or service disclosure 4.1.3; 4.1.4 | 1 | Disclose accurately, above fold in main body of ad, nature of product or service on offer |
| Product or service disclosure illegible 4.1.3; 4.1.4 | 1 | Increase point size, alter colour scheme to improve contrast, or both |
| Product or service disclosure displayed inside graphic 4.1.3; 4.1.4 | 1 | Display product or service disclosure above fold in main body of ad and unobscured by graphic |
| Product or service disclosure displayed below fold [online @ 1024 x 768] 4.1.3; 4.1.4 | 1 | Display product or service disclosure above fold in main body of ad |
| Product or service disclosure displayed only in summary T&Cs 4.1.3; 4.1.4 | 1 | Disclose accurately, above fold in main body of ad, nature of product or service on offer |
| Disclaimer displayed only in summary T&Cs, disclaimer unlinked to offer by asterisk or other symbol, or both 3.1.8 | 1 | Display disclaimer in main body of ad adjacent to associated offer, or link disclaimer clearly to offer by asterisk or other symbol |
| Disclaimer inconsistent with offer's principal message 3.1.9 | 1 | Remove inconsistent disclaimer and conditions it imposes |
| Message quantity displayed only in summary T&Cs 3.1.3 | 1 | Display accurately, above fold in main body of ad, actual message quantity for which customer can expect to be billed per charge period |
| Unapproved Telstra endorsement or use of Telstra name 3.1.21 | 1 | Remove Telstra endorsement or Telstra name |
| Misrepresentation of product offering 3.1.2 | 2 | Display references to product type accurately, consistently, among main body of ad, call-to-action, and summary T&Cs |
| Misrepresentation of product quantity 3.1.2 | 2 | Display only actual product quantity (e.g., 15 ringtones) |
| Advertising to children 3.1.20 | 2 | Discontinue advertisement in any medium or format that targets minors specifically |
| Insufficient details regarding limited offer 3.1.10 | 2 | Disclose clearly limited time period, limited quantity, and limited class of customers, as appropriate |
| Insufficient details regarding special offer 3.1.11 | 2 | Disclose special offer's principal elements, conditions and limitations [e.g., limited time period when discount applies], and start and end dates |
| Failure to display shortcode for at least 10 uninterrupted seconds [TV] 3.1.5 | 2 | Display shortcode for at least 10 uninterrupted seconds in main body of ad |

² Mobile premium services that are not authorised by Telstra, that fail to comply with the aggregator's relevant agreement with Telstra, or both are subject to immediate escalation to Telstra.

³ Aggregators and content providers are prohibited from allowing services to display content with a rating of MA15+ or higher.

⁴ Glamour content includes, but is not limited to, nudity (full, partial, or obscured); implied sexual activity, including the use of objects; and sexual or suggestive video, audio, poses, language, or graphics. Aggregators and content providers should ensure service names and associated URLs avoid implying that adult or glamour content might be available.

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| Programme <i>continued</i> | | |
|---|----------|---|
| Infringements | Severity | Actions Required |
| Text point size too small [print] 3.1.3 | 2 | Increase point size to at least 6 |
| Unclear product quantity 3.1.2 | 2 | Disclose actual product quantity (per credit, if appropriate) |
| No product quantity 3.1.2 | 2 | Disclose product quantity |
| No product quantity for Telstra customers 4.1.3 | 3 | Disclose product quantity for Telstra customers |
| Insufficient details regarding prize draw date 4.1.3 | 3 | Display prize draw date |
| Offer or elements of offer expired [e.g., competitions, voting services] 3.1.16 | 3 | Remove outdated material |

| Pricing | | |
|--|----------|--|
| Infringements | Severity | Actions Required |
| No pricing 3.1.3; 3.1.5; 3.1.6; 3.1.7; 4.1.4 | 0 | Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics |
| No Telstra pricing 3.1.3; 3.1.5; 3.1.6; 3.1.7; 4.1.4 | 0 | Display Telstra pricing in main body of ad |
| No pricing (voiceover) [TV, services exceeding \$2.00] Telstra rule | 0 | Convey pricing in voiceover as well as displaying in video |
| Pricing illegible 3.1.3; 4.1.4; Telstra rule | 0 | Increase point size, alter colour scheme to improve contrast, or both |
| Unclear pricing 3.1.3; 4.1.4 | 0 | Display full and correct pricing in prescribed format: \$XX.XX |
| Unclear Telstra pricing 3.1.3; 3.1.5; 3.1.6; 3.1.7; 4.1.4 | 0 | Specify Telstra pricing individually |
| Conflicting pricing 3.1.3; 4.1.4 | 0 | Display pricing accurately, consistently, in prescribed format throughout ad: \$XX.XX |
| Use of <i>free</i> , <i>complimentary</i> , or similar term implying product that comes with purchase is without charge 3.1.14 | 0 | Remove <i>free</i> , <i>complimentary</i> , or other such term |
| Pricing displayed only in summary T&Cs 3.1.3; 3.1.5; 3.1.6; 3.1.7; 4.1.4 | 1 | Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics |
| Pricing displayed at improper attitude 3.1.3; 4.1.4 | 1 | Display pricing in same orientation and direction as shortcode or primary purchase mechanism |
| Complete pricing displayed only in summary T&Cs 3.1.3; 4.1.4 | 1 | Display complete pricing in main body of ad |
| Pricing displayed within insufficient proximity to call-to-action or MSISDN-submit field 3.1.3; 3.1.4 | 1 | Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics |
| Incomplete pricing 3.1.3; 3.2.3 | 1 | Disclose complete MO and MT pricing |
| Pricing point size too small [print] 3.1.6 | 1 | [shortcode point size is 24 to 48] Increase pricing point size to at least 25% as large as shortcode point size [shortcode point size is larger than 48] Increase pricing point size to at least 12 |
| Pricing point size too small [online and TV] 3.1.5; 3.1.7 | 1 | Increase pricing point size to at least 50% as large as shortcode point size |
| Pricing display time too brief [TV] 3.1.3; 3.1.5 | 2 | Display pricing for at least 10 uninterrupted seconds or for as long as shortcode is displayed, whichever is longer |
| Pricing displayed below fold [online @ 1024 x 768] 3.1.3; 3.1.7 | 2 | Display pricing above fold in main body of ad |
| Telstra pricing displayed only in summary T&Cs 3.1.3; 3.1.5; 3.1.6; 3.1.7; 4.1.4 | 2 | Display Telstra pricing in main body of ad |

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| T&Cs | | |
|--|----------|--|
| Infringements | Severity | Actions Required |
| Summary T&Cs illegible 3.1.3; 3.2.3; 4.1.4 | 1 | Increase point size and alter colour scheme to improve contrast |
| No local-charge or free-call Helpline number 3.1.3; 4.1.7; 6.1.2; 4.1.4 | 1 | Display local-charge or free-call Helpline number |
| Alphanumeric Helpline number 3.1.3; 4.1.7; 6.1.2; 4.1.4 | 1 | Display local-charge or free-call Helpline number entirely in numerals (no letters) |
| Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] Telstra rule | 2 | State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion |
| No instructions for opting out of marketing, prompt, or inducement messages 3.1.23 | 2 | Display instructions or link for opting out of marketing, prompt, or inducement messages |
| Unclear instructions for opting out of marketing, prompt, or inducement messages 3.1.23 | 2 | Articulate instructions clearly or display link labeled clearly for opting out of marketing, prompt, or inducement messages |
| No account holder authorisation disclosure [under age 18] 3.1.20 | 2 | Disclose clearly that customers under age 18 must have account holder's permission |
| Failure to identify content provider [reverse charge billing services only] 4.1.4 | 2 | Identify content provider by name |
| No end date [e.g., competitions and voting services] 4.1.3 | 3 | Display end date |
| No refund arrangements [e.g., competitions and voting services] 4.1.3 | 3 | Display refund arrangements |

| Charges and Billing | | |
|---|----------|-------------------------------------|
| Infringements | Severity | Actions Required |
| No mention that data fees might apply [content downloads and reverse charge billing services only] 4.1.3; 4.1.4 | 2 | Disclose that data fees might apply |

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