

Telstra MPS Message Flow Audit Standards

Rev 3.00

3 December 2017

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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"> ▪ New infringements addressing poor customer experience were added to the Subscription Request and Subscription Confirmation categories; ▪ Service names can now be displayed in the message body or header; ▪ The service name must be identified clearly in all paid messages; ▪ The service name must be identified clearly in chat warning and chat welcome messages for subscription services; ▪ The Single Purchase and Reverse Charge categories were added with infringements and actions required; and ▪ Code references were updated for the majority of infringements.
1.07	9 September 2013	The WAP Push Message category was added with infringements and actions required.
1.08	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	The audit standards document was revised to include a cover page and version history, and the style was updated. No audit standards were changed from the previous revision.
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>All infringements for the Subscription Request and Subscription Confirmation categories have been replaced with the new infringements “unauthorised subscription service” and “unauthorised resubscription (previous customer).”</p> <p>New infringement “unauthorised subscription service advertisement” has been added to the Marketing category.</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.

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Subscription Request

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service* Telstra rule	0	Discontinue offer immediately
Unauthorised resubscription (previous customer)* Telstra rule	0	Discontinue subscription immediately

*Subject to immediate escalation to Telstra

Subscription Confirmation

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service* Telstra rule	0	Discontinue offer immediately
Unauthorised resubscription (previous customer)* Telstra rule	0	Discontinue subscription immediately

*Subject to immediate escalation to Telstra

Non-subscription WAP Purchase Confirmation

Programme		
Infringement	Severity	Actions Required
Failure to send purchase confirmation message 4.3.2	1	Send purchase confirmation message, instructing customer to send MO message to shortcode
Unapproved Telstra endorsement or use of Telstra name 4.3.2	1	Remove Telstra endorsement or Telstra name
Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from purchase confirmation message
Failure to preface purchase confirmation message with "FreeMsg" 4.3.2	2	Preface all purchase confirmation messages with "FreeMsg"
Failure to identify service 4.3.2	2	Display service name
Failure to identify service clearly 4.3.2	3	Display service name consistently in all messages and ad
Multiple purchase confirmation messages 4.3.2	3	Refrain from sending more than one purchase confirmation message per customer request
Pricing		
Infringement	Severity	Actions Required
No pricing 4.3.2	0	Display full, accurate pricing in prescribed format: \$XX.XX
Unclear pricing 4.3.2	0	Display full, accurate pricing in prescribed format: \$XX.XX
Conflicting pricing 4.3.2	0	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
Use of the term <i>free</i> , implying product comes without charge 3.1.14	0	Remove the term <i>free</i>
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call Helpline number 4.3.2	1	Display local-charge or free-call Helpline number
Alphanumeric Helpline number 4.3.2	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)

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\$30 Expenditure Update

Programme		
Infringement	Severity	Actions Required
Failure to send \$30 expenditure update 4.3.4; 4.4.11	1	Send expenditure update each time customer incurs \$30 in mobile content fees during single calendar month
\$30 expenditure update sent as WAP push 4.3.4; 4.4.11	1	Send \$30 expenditure updates as standard SMS message only
Unapproved Telstra endorsement or use of Telstra name 4.3.5; 4.4.12	1	Remove Telstra endorsement or Telstra name
Failure to preface expenditure update with "FreeMsg" 4.3.5; 4.4.12	2	Preface all expenditure updates with "FreeMsg"
Contains marketing elements Telstra rule	2	Remove marketing elements from all reminders and updates
Failure to identify service 4.3.5; 4.4.12; 4.4.9	3	Display service name or shortcode in message body or header
Failure to identify service clearly 4.3.5; 4.4.12; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
Subscription		
Infringement	Severity	Actions Required
No subscription disclosure 4.4.12	1	Disclose subscription nature of offer
T&Cs		
Infringement	Severity	Actions Required
No local-charge or toll-free Helpline number [subscription services only] 4.4.12	1	Display local-charge or toll-free Helpline number
Alphanumeric Helpline number [subscription services only] 4.4.12	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
No unsubscribe information [subscription services only] 4.4.12	0	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Unclear unsubscribe information [subscription services only] 4.4.12	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Incorrect unsubscribe information [subscription services only] 4.4.12	1	Display STOP as unsubscribe command

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30-Day Reminder²

Programme		
Infringement	Severity	Actions Required
Failure to send 30-day reminder 4.4.13	1	Send 30-day reminder to subscription customers who have not had occasion to receive \$30 expenditure update during single calendar month
30-day reminder sent as WAP push 4.4.13	1	Send 30-day reminders as standard SMS message only
Unapproved Telstra endorsement or use of Telstra name 4.4.14	1	Remove Telstra endorsement or Telstra name
Failure to preface reminder with "FreeMsg" 4.4.14	2	Preface all reminders with "FreeMsg"
Contains marketing elements Telstra rule	2	Remove marketing elements from all reminders and updates
Failure to identify service 4.4.14; 4.4.9	2	Display service name or shortcode in message body or header
Failure to identify service clearly 4.4.14; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
Pricing		
Infringement	Severity	Actions Required
No pricing 4.4.14	0	Display full, accurate pricing in prescribed format: \$XX.XX
Conflicting pricing 4.4.14	0	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
Unclear pricing 4.4.14	0	Display full, accurate pricing in prescribed format: \$XX.XX
Use of the term <i>free</i> , implying product comes without charge 3.1.14	0	Remove the term <i>free</i>
Subscription		
Infringement	Severity	Actions Required
No subscription disclosure 4.4.14	1	Disclose subscription nature of offer
No subscription charge period 4.4.14	1	Display subscription charge period
Unclear subscription charge period 4.4.14	2	Express subscription charge period per time interval such as day, week, or month
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call Helpline number 4.4.14	1	Display local-charge or free-call Helpline number
Alphanumeric Helpline number 4.4.14	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
No unsubscribe information 4.4.14	0	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Unclear unsubscribe information 4.4.14	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Incorrect unsubscribe information 4.4.14	1	Display <i>STOP</i> as unsubscribe command

² Infringements and actions required in this section apply only to subscription services.

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Chat Warning

Programme		
Infringement	Severity	Actions Required
Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from chat warning message
Failure to identify service [subscription services only] 3.1.2; 4.4.9; Telstra rule	2	Display service name in message body or header
Failure to send chat service warning message 4.1.8	3	Send chat service warning message alerting customer to potential dangers of disclosing personal details via chat
Failure to preface chat service warning message with "FreeMsg" Telstra rule	3	Preface all chat service warning messages with "FreeMsg"
Failure to alert customer to potential dangers of disclosing personal details via chat 4.1.8	3	Express in chat warning message potential dangers of disclosing personal details via chat
Failure to identify service clearly [subscription services only] 3.1.2; 4.4.9; Telstra rule	3	Display service name in message body or header and consistently in all messages and ad

Chat Welcome

Programme		
Infringement	Severity	Actions Required
Failure to send chat service welcome message 4.3.6	1	Send chat service welcome message
Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from chat welcome message
Misrepresentation of product offering 3.1.2	1	Display references to product type accurately, consistently, among all messages and ad
Misrepresentation of message quantity 3.1.2	1	Display actual message quantity for which customer will be billed per charge period
Failure to identify service 4.3.6	2	Display service name
Failure to identify service clearly 4.3.6	3	Display service name consistently in all messages and ad
Failure to preface chat service welcome message with "FreeMsg" 4.3.6	3	Preface all chat service welcome messages with "FreeMsg"
Pricing		
Infringement	Severity	Actions Required
No pricing 4.3.6	0	Display full, accurate pricing in prescribed format: \$XX.XX
Unclear pricing 4.3.6	0	Display full, accurate pricing in prescribed format: \$XX.XX
Conflicting pricing 4.3.6	0	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
Use of the term <i>free</i> , implying product comes without charge 3.1.14	0	Remove the term <i>free</i>
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call Helpline number 4.3.6	1	Display local-charge or free-call Helpline number
Alphanumeric Helpline number 4.3.6	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
No charge period 4.3.6	3	Display charge period
Unclear charge period 4.3.6	3	Express charge period per message or per message pair

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Paid [including chat]

Programme		
Infringement	Severity	Actions Required
Failure to preface paid message with "\$Msg" 5.2.8	1	Preface all paid messages with "\$Msg"
Failure to identify service [subscription services only] 4.4.9	2	Display service name in message body or header
Failure to identify service clearly [subscription services only] 4.4.9	3	Display service name in message body or header and consistently among all messages and ad

WAP Push Message

Programme		
Infringement	Severity	Actions Required
Failure to preface paid message with "\$Msg" [paid messages only] 5.2.8	1	Require customer to send MO message to shortcode before sending billed MT
No local-charge or free-call Helpline number or shortcode 5.1.8	1	Display local-charge or free-call Helpline number or shortcode
Local-charge or free-call Helpline number or shortcode positioned incorrectly 5.1.8	2	Display local-charge or free-call Helpline number or shortcode <i>before</i> WAP Website URL
Failure to identify service [paid message subscription services only] 4.4.9	2	Display service name in message body or header
Failure to identify service clearly [paid message subscription services only] 4.4.9	3	Display service name consistently among all messages (in both message body and header) and ad

Single Purchase Paid

Programme		
Infringement	Severity	Actions Required
Failure to require customer opt-in 5.1.2	1	Require customer to send MO message to shortcode before sending billed MT
Failure to preface paid message with "\$Msg" 5.2.8	1	Preface all paid messages with "\$Msg"
Misrepresentation of billed message quantity 3.1.2	1	Ensure billed message quantity in message flow reflects billed message quantity in ad

Reverse Charge Paid

Programme		
Infringement	Severity	Actions Required
Failure to require customer opt-in [MO-initiated services only] 5.1.2	1	Require customer to send MO message to shortcode before sending billed MT
Failure to preface paid message with "\$Msg" 5.2.8	1	Preface all paid messages with "\$Msg"
Multiple MT messages triggered by single charge 5.2.3	1	Send single MT message per charge to customer

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Free Period

Programme		
Infringement	Severity	Actions Required
Failure to send message that “free” period is over 3.1.14	1	Send message notifying customer that “free” period is over and charges will commence
Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from “free” period message
Failure to preface “free” period message with “FreeMsg” 3.1.14	2	Preface all “free” period messages with “FreeMsg”
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call Helpline number 3.1.14	1	Display local-charge or free-call Helpline number
Alphanumeric Helpline number 3.1.14	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
No unsubscribe information 3.1.14	0	Display unsubscribe information as “Text [Send, SMS, or Reply] STOP to [shortcode]”
Unclear unsubscribe information 3.1.14	1	Display unsubscribe information as “Text [Send, SMS, or Reply] STOP to [shortcode]”
Incorrect unsubscribe information 3.1.14	1	Display <i>STOP</i> as unsubscribe command
Failure to disclose clearly duration of “free” period 3.1.14	3	State clearly duration of period during which service is delivered free of charge
Charges and Billing		
Infringement	Severity	Actions Required
No mention of impending charges 3.1.14	2	Remind customer to expect impending charges and the amount in prescribed format: \$XX.XX
Unclear impending charges 3.1.14	3	State amount of impending charges clearly in prescribed format: \$XX.XX
Conflicting impending charges 3.1.14	3	Display impending charges accurately, consistently, in prescribed format: \$XX.XX

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Telstra MPS Message Flow Audit Standards

Marketing

Programme		
Infringement	Severity	Actions Required
Unauthorised subscription service advertisement* Telstra rule	0	Discontinue offer immediately
Unauthorised marketing message or messages 3.1.23	1	Refrain from sending marketing messages to customers who decline option or opt out
Message sender not identified 3.1.17	1	Identify message sender clearly and accurately in all marketing messages (identify content provider by name)
Unclear or inaccurate identification of message sender 3.1.17	1	Identify message sender clearly and accurately in all marketing messages (identify content provider by name)
Unapproved Telstra endorsement or use of Telstra name 3.1.2	1	Remove Telstra endorsement or Telstra name
Contains adult-related language or concepts 3.1.17	1	Remove adult-related language or concepts from all marketing messages
Failure to preface marketing message with "FreeMsg" 3.1.17	2	Preface all marketing messages with "FreeMsg"
Implies message is personal or suggests false imperative 3.1.17	2	Refrain from implying marketing message is personal or suggesting false imperative
Multiple marketing messages sent per week 3.1.18	2	Refrain from sending more than one marketing message per week without customer consent
Pricing		
Infringement	Severity	Actions Required
No pricing 3.1.22	1	Display full, accurate pricing in prescribed format: \$XX.XX
Use of the term <i>free</i> , implying product comes without charge 3.1.14	2	Remove the term <i>free</i>
T&Cs		
Infringement	Severity	Actions Required
No unsubscribe information 3.1.17	0	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Unclear unsubscribe information 3.1.17	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Incorrect unsubscribe information 3.1.17	1	Display <i>STOP</i> as unsubscribe command

*Subject to immediate escalation to Telstra

Error Message

Programme		
Infringement	Severity	Actions Required
Failure to send error message 5.1.9; 5.1.10	1	Send message promptly informing customer that message has not been recognised
Failure to preface error message with "FreeMsg" 5.1.9; 5.1.10	2	Preface all error messages with "FreeMsg"
Failure to confirm error 5.1.9; 5.1.10	2	Inform customer message has not been recognised
Failure to identify service clearly 5.1.9; 5.1.10	3	Display service name consistently in all messages and ad
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call Helpline number 5.1.9; 5.1.10	1	Display local-charge or free-call Helpline number

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Unsubscribe Confirmation Message³

Programme		
Infringement	Severity	Actions Required
Failure to respond within one business day to customer message to STOP service 7.2.5	0	Send message promptly informing customer that service has been terminated and that no more messages will be sent
Customer STOP message not recognised 7.2.4	0	Treat as STOP request any message containing the word "stop" or command to terminate service
Unapproved Telstra endorsement or use of Telstra name 3.1.2; Telstra rule	1	Remove Telstra endorsement or Telstra name
Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from unsubscribe confirmation message
Failure to preface unsubscribe confirmation message with "FreeMsg" 7.2.6	2	Preface cancellation confirmation message with "FreeMsg"
Failure to confirm service termination 7.2.5	2	Inform customer that service has been terminated
Failure to identify service 4.4.9; Telstra rule	2	Display service name in message body or header
Failure to identify service clearly 4.4.9; Telstra rule	3	Display service name in message body or header and consistently in all messages and ad
T&Cs		
Infringement	Severity	Actions Required
No local-charge or free-call Helpline number Telstra rule	3	Display local-charge or free-call Helpline number
Alphanumeric Helpline number Telstra rule	3	Display local-charge or free-call Helpline number entirely in numerals (no letters)

³ Infringements and actions required in this section apply only to subscription services.

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