

VHA Premium Direct Carrier Billing Audit Standards			
Infringements		Severity	Actions Required
<b>Advertising: Payment Method Screen<sup>1</sup></b>			
Programme	No Content Provider or partner brand or logo 15.1	1	Display Content Provider or partner brand or logo
	No payment method options 15.1	1	Provide payment method options
	No Continue button 15.1	1	Display Continue button, and require customer to take action to proceed with payment
	Failure to display 'Pay with Vodafone' logo 15.1	1	Display 'Pay with Vodafone' logo in approved format
	Incorrect 'Pay with Vodafone' logo 15.1	1	Display correct 'Pay with Vodafone' logo in approved format
<b>Advertising: Review Order Screen</b>			
Programme	Contains restricted content 7.1	1	Discontinue offer immediately
	Contains unacceptable content 7.2	1	Discontinue offer immediately
	Contains trade promotion 7.3	1	Discontinue offer immediately
	Employs non-Aggregator hosted Review Order Screen <sup>2</sup> 10	1	Ensure all payment screens are hosted by Aggregator
	No Content Provider or partner brand or logo 7.5; 15.2; 16.2	1	Display Content Provider or partner brand or logo
	No product name, service name, or brief service description 7.5; 15.2; 16.2	1	Disclose accurately product name, service name, or brief service description
	Incorrect call-to-action on Purchase button 7.5; 15.2; 16.2	1	Display Purchase button featuring approved call-to-action text (e.g., 'Pay' or 'Subscribe') to initiate a charge <sup>3</sup>
	Customer purchase or subscription completed without clicking Purchase button 7.5	1	Restrict customer purchase or subscription to clicking Purchase button only <sup>4</sup>
	Purchase button too large 7.5	1	Decrease Purchase button size to no more than 25% of total screen size
	No 'Cancel' or 'Back' option 7.5; 15.2; 16.2	1	Provide option for customers to decline purchase and to return to Aggregator's homepage or other relevant page
	No Change button 7.5	1	Implement Change button when more than one payment method is available
	No helpline number 7.5	1	Display local-charge or free-call helpline number
	Failure to display 'Pay with Vodafone' logo 7.5	1	Display 'Pay with Vodafone' logo in approved format
	Incorrect 'Pay with Vodafone' logo 7.5	1	Display 'Pay with Vodafone' logo in approved format
	Multiple carrier billing options displayed 7.5	1	Display only Vodafone carrier billing option to Vodafone customers
	No marketing disclosure 7.5; 8.1; .8.2; 15.2	1	Disclose to customers that ticking box will opt them into marketing promotions
	Pre-ticked marketing tickbox 7.5; 8.1; 8.2	1	Display unticked marketing tickbox, requiring customers to take positive action to opt-in
Contains third-party advertising 7.5	1	Discontinue third-party advertising immediately	
Misrepresentation of product offering 7.5	2	Display references to product type accurately and consistently on Review Order Screen and in hyperlinked T&Cs	

<sup>1</sup> Should multiple payment methods be available to customers, the customers must be presented with a Payment Method Screen to select their payment method. Serving the Payment Method Screen is optional when only one payment method is available.

<sup>2</sup> Aggregators must host Review Order Screens on behalf of their Content Providers. Any exception to this must be authorised by Vodafone.

<sup>3</sup> Acceptable text on the Purchase button can include 'Pay', 'Pay Now', 'Purchase', 'Subscribe', or 'Buy'. Other text must be approved by Vodafone on a case-by-case basis.

<sup>4</sup> Code the button so that customers may click only the visible portion of the button. Customers should be unable to click a Purchase button inadvertently while scrolling on the screen.

VHA Premium Direct Carrier Billing Audit Standards			
Infringements		Severity	Actions Required
<b>Advertising: Review Order Screen</b> <i>continued</i>			
<b>Pricing</b>	No pricing 7.5; 15.2	1	Display pricing accurately and consistently in prescribed format \$XX.XX, above and below Purchase button
	Pricing illegible 7.5; 15.2	1	Increase point size, alter colour scheme to improve contrast, or both
	Signup fee associated with purchase 7.5	1	Remove signup fee associated with purchase
	No line break above and below pricing 7.5	1	Implement line break above and below pricing, ensuring pricing is displayed clearly and prominently
	Pricing displayed only once 7.5; 15.2; 16.2	1	Display pricing accurately and consistently in prescribed format \$XX.XX, above and below Purchase button
	Unclear pricing 7.5; 15.2	1	Display full and correct pricing in prescribed format \$XX.XX
	Conflicting pricing 7.5; 15.2	2	Display pricing accurately and consistently in prescribed format \$XX.XX, above and below Purchase button
	No mention of billing method 7.5; 15.2	2	Disclose that charges will be applied to customer's mobile phone bill or will be deducted from his or her prepaid balance
<b>Subscription</b> <i>[subscription services only]</i>	Charge period illegible 7.5; 15.2	1	Increase point size, alter colour scheme to improve contrast, or both
	No charge period 7.5; 15.2	1	Display charge period
	No subscription disclosure 7.5; 15.2	1	Disclose subscription nature of offer by displaying word 'Subscribe Now' on Purchase button or the word 'subscribe' or 'subscription' within three line breaks of Purchase button
	Subscription disclosure displayed within insufficient proximity to Purchase button 7.5; 15.2	1	Display subscription disclosure within three line breaks of Purchase button, directly above, below, or to either side, with no intervening text or graphics
	Subscription disclosure illegible 7.5; 15.2	1	Increase point size, alter colour scheme to improve contrast, or both
	Unclear charge period 7.5; 15.2	2	Display charge period accurately and consistently on Review Order Screen and in hyperlinked T&Cs
	Misrepresentation of product quantity 7.5; 15.2	2	Display only actual product quantity per charge period (e.g., 15 ringtones/month)
<b>T&amp;Cs</b>	No hyperlink to comprehensive T&Cs 7.5; 15.2	1	Display hyperlink to comprehensive T&Cs
<b>Advertising: Comprehensive Terms and Conditions Summary Screen</b>			
<b>Programme</b>	T&Cs illegible 7.5	1	Increase point size, alter colour scheme to improve contrast, or both
	No payment and service terms and conditions 7.5	1	Display payment and service terms and conditions
	No helpline number 7.5	1	Display local-charge or free-call helpline number
	No carriage fee disclosure 7.5	2	Disclose that carriage fees might apply
	No mention of billing method 7.5	2	Disclose that charges will be applied to customer's mobile phone bill or will be deducted from his or her prepaid balance
	No option allowing customers to return to previous screen 7.5	2	Display option, e.g., hyperlink or back button, allowing customers to return to previous screen
<b>Advertising: Purchase Confirmation Screen</b>			
<b>Programme</b>	No Purchase Confirmation Screen	1	Display Purchase Confirmation Screen
	Failure to confirm purchase or subscription successful 15.3; 16.3	1	Display Purchase Confirmation Screen verifying that purchase or subscription was successful
	No Content Provider or partner brand or logo 15.3; 16.3	1	Display Content Provider or partner brand or logo

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

VHA Premium Direct Carrier Billing Audit Standards			
	Infringements	Severity	Actions Required
<b>Advertising: Purchase Confirmation Screen</b> <i>continued</i>			
<i>Programme continued</i>	No product name, no service name, or brief service description 15.3; 16.3	1	Disclose accurately product name, service name, or brief service description
	No 'Cancel' or 'Back' button 15.3; 16.3	1	Provide option for customers to return to Aggregator homepage when payment is successful
	No helpline number 15.3; 16.3	1	Display local-charge or free-call helpline number on Purchase Confirmation Screen
<i>Pricing</i>	No pricing 15.3; 16.3	1	Display pricing accurately and consistently in prescribed format \$XX.XX, above and below Purchase button
	Pricing illegible 15.3; 16.3	1	Increase point size, alter colour scheme to improve contrast, or both
	Conflicting pricing 15.3; 16.3	2	Display pricing accurately and consistently in prescribed format \$XX.XX, above and below Purchase button
<i>Subscription</i> [subscription services only]	Charge period illegible 16.3	1	Increase point size, alter colour scheme to improve contrast, or both
	No charge period 16.3	1	Display charge period
	No expiry or renewal date 16.3	1	Display expiry or renewal date as 'dd/mm/yy'
	Failure to disclose maximum charge to be applied during specified period 16.3	2	Disclose maximum charge to be applied during specified period
	Unclear charge period 16.3	2	Display charge period accurately and consistently on Purchase Confirmation Screen and in hyperlinked T&Cs
	Misrepresentation of product quantity 16.3	2	Display only actual product quantity per charge period (e.g., 15 ringtones/month)
<i>T&amp;Cs</i>	No hyperlink to unsubscribe information 16.3	1	Display hyperlink to unsubscribe information
	No Terms and Conditions hyperlink to comprehensive T&Cs 16.3	1	Display Terms and Conditions hyperlink to comprehensive T&Cs
	No Contact Support hyperlink <sup>5</sup> 16.3	1	Display Contact Support hyperlink that does not link to Vodafone
	Contact Support hyperlink links to Vodafone 16.3	1	Display Contact Support hyperlink to contact support that does not link to Vodafone
	No instructions for opting out of marketing, prompt, or inducement message [where customer has been opted into marketing service with purchase] 15.3	1	Articulate clearly on screen or display clearly labelled 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] 15.3	2	Articulate clearly on screen or display clearly labelled hyperlink to instructions detailing how to opt out of marketing, prompt, or inducement messages
	<b>Message Flow: Subscription Purchase Confirmation Message</b>		
<i>Programme</i>	Failure to send Purchase Confirmation Message within one business day of customer purchase 9.1	1	Send Purchase Confirmation Message within one business day of customer purchase
	Misrepresentation of product offering 9.1	1	Display references to product type accurately and consistently, among all messages and ad
	Failure to preface Purchase Confirmation Message with 'FreeMsg' 9.1	2	Preface all Purchase Confirmation Messages with 'FreeMsg'
	Contains marketing elements 9.1	2	Remove marketing elements
	Failure to identify service or Content Provider 9.1	2	Display service name or Content Provider name in message body or header

<sup>5</sup> A Contact Support hyperlink is required only when Partners fail to include a helpline and a contact email address on the Purchase Confirmation Screen.

VHA Premium Direct Carrier Billing Audit Standards			
	Infringements	Severity	Actions Required
<b>Message Flow: Subscription Purchase Confirmation Message <i>continued</i></b>			
<i>Programme continued</i>	Failure to identify service or Content Provider clearly 9.1	3	Display service name or Content Provider name clearly and consistently in message body or header and among all messages and ad
<i>Pricing</i>	No pricing 9.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
	Unclear pricing 9.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
	Conflicting pricing 9.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
<i>Subscription</i>	No subscription disclosure 9.1	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i>
	No subscription charge period 9.1	2	Display charge period
	Unclear subscription charge period 9.1	2	Express subscription charge period per time interval (e.g., day, week, month)
<i>T&amp;Cs</i>	No local-charge or free-call helpline number 9.1	1	Display local-charge or free-call helpline number
	No unsubscribe information 9.1	1	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]' or 'until u unsubscribe at [website URL]'
	Unclear unsubscribe information 9.1	2	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]' or 'until u unsubscribe at [website URL]'
	Incorrect unsubscribe information <sup>6</sup> 9.1	2	Display <i>STOP</i> as unsubscribe command
<b>Message Flow: Single Purchase Confirmation Message<sup>7</sup></b>			
<i>Programme</i>	Failure to send Purchase Confirmation Message within one business day of customer purchase 9.1	1	Send Purchase Confirmation Message within one business day of customer purchase
	Misrepresentation of product offering 9.1	1	Display references to product type accurately and consistently, among all messages and ad
	Failure to preface Purchase Confirmation Message with 'FreeMsg' 9.1	2	Preface all Purchase Confirmation Messages with 'FreeMsg'
	Contains marketing elements 9.1	2	Remove marketing elements
	Failure to identify service or Content Provider 9.1	2	Display service name or Content Provider name in message body or header
	Failure to identify service or Content Provider clearly 9.1	3	Display service name or Content Provider name clearly and consistently in message body or header and among all messages and ad
<i>Pricing</i>	No pricing 9.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
	Unclear pricing 9.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
	Conflicting pricing 9.1	1	Display full, accurate pricing in prescribed format: \$XX.XX
<i>T&amp;Cs</i>	No local-charge or free-call helpline number 9.1	1	Display local-charge or free-call helpline number

<sup>6</sup> This infringement applies only to SMS-based unsubscribe instructions.

<sup>7</sup> Vodafone recommends that Aggregators send Purchase Confirmation Messages for single purchases; however, they are optional. Where an Aggregator chooses to send a Purchase Confirmation Message, it must comply with the applicable audit standards.

VHA Premium Direct Carrier Billing Audit Standards			
Infringements		Severity	Actions Required
<b>Message Flow: \$30 Spend Reminder Message<sup>8</sup></b>			
<b>Programme</b>	Failure to send \$30 Spend Reminder Message 9.2	1	Send \$30 Spend Reminder Message each time customer incurs \$30 in mobile content fees during single calendar month
	Contains marketing elements 9.2	2	Remove marketing elements
	Failure to preface \$30 Spend Reminder Message with 'FreeMsg' 9.2	2	Preface all \$30 Spend Reminder Messages with 'FreeMsg'
<b>Subscription</b> [subscription services only]	No unsubscribe information 9.2	1	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]' or 'until u unsubscribe at [website URL]'
	Unclear unsubscribe information 9.2	2	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]' or 'until u unsubscribe at [website URL]'
	Incorrect unsubscribe information <sup>9</sup> 9.2	2	Display <i>STOP</i> as unsubscribe command
<b>T&amp;Cs</b>	No local-charge or free-call helpline number 9.2	1	Display local-charge or free-call helpline number
	Message sender not identified 9.2	1	Identify message sender <sup>10</sup> clearly and accurately
<b>Message Flow: \$100 Spend Limit Confirmation Message<sup>11</sup></b>			
<b>Programme</b>	Failure to send \$100 Spend Limit Confirmation Message 9.3	1	Send Spend Limit Confirmation Message each time customer incurs \$100 in mobile content fees during single calendar month
	Contains marketing elements 9.3	2	Remove marketing elements
	Failure to preface \$100 Spend Limit Confirmation message with 'FreeMsg' 9.3	2	Preface all \$100 Spend Limit Confirmation Messages with 'FreeMsg'
<b>T&amp;Cs</b>	No local-charge or free-call helpline number 9.3	1	Display local-charge or free-call helpline number
	No website URL 9.3	2	Display website URL in message body (e.g., 'View this service at [website URL]')
<b>Message Flow: Subscription Renewal Confirmation Message</b>			
<b>Programme</b>	Failure to send Subscription Renewal Confirmation Message within one business day of customer purchase 9.4	1	Send Subscription Renewal Confirmation Message within one business day of customer purchase
	Failure to preface Subscription Renewal Confirmation Message with 'FreeMsg' 9.4	2	Preface all Subscription Renewal Confirmation Messages with 'FreeMsg'
	Contains marketing elements 9.4	2	Remove marketing elements
	Failure to identify service 9.4	2	Display service name in message body or header
	Failure to identify service clearly 9.4	3	Display service name clearly and consistently in message body or header and among all messages and ad
<b>Pricing</b>	No pricing 9.4	1	Display full, accurate pricing in prescribed format: \$XX.XX
	Unclear pricing 9.4	1	Display full, accurate pricing in prescribed format: \$XX.XX
	Conflicting pricing 9.4	1	Display full, accurate pricing in prescribed format: \$XX.XX
<b>Subscription</b>	No subscription disclosure 9.4	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i>
	No subscription charge period 9.4	2	Display charge period
	Unclear subscription charge period 9.4	2	Express subscription charge period per time interval (e.g., day, week, month)

<sup>8</sup> Aggregators must resend the \$30 Spend Reminder Message for each increment of \$30 incurred by a customer with a single billing Content Provider (e.g., when \$60 and \$90 is reached in a calendar month).

<sup>9</sup> This infringement applies only to SMS-based unsubscribe instructions.

<sup>10</sup> Identify Content Providers by name.

<sup>11</sup> The maximum charge from a single billing Content Provider is \$100, including GST, per calendar month. Where the maximum monthly charge is exceeded, the payment must be declined, and Aggregators must send customers the \$100 Spend Limit Reminder Message.

VHA Premium Direct Carrier Billing Audit Standards			
	Infringements	Severity	Actions Required
<b>Message Flow: Subscription Renewal Confirmation Message</b> <i>continued</i>			
<b>T&amp;Cs</b>	No local-charge or free-call helpline number 9.4	1	Display local-charge or free-call helpline number
	No unsubscribe information 9.4	1	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]' or 'until u unsubscribe at [website URL]'
	Unclear unsubscribe information 9.4	2	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]' or 'until u unsubscribe at [website URL]'
	Incorrect unsubscribe information <sup>12</sup> 9.4	2	Display <i>STOP</i> as unsubscribe command
<b>Message Flow: Refund Confirmation Message</b>			
<b>Programme</b>	Failure to send Refund Confirmation Message 9.5	1	Send Refund Confirmation Message
	Message sender not identified 9.5	1	Identify message sender <sup>13</sup> clearly and accurately
	Failure to preface Refund Confirmation Message with 'FreeMsg' 9.5	2	Preface all Refund Confirmation Messages with 'FreeMsg'
	Failure to confirm that refund has been processed 9.5	2	Inform customer that refund has been processed (e.g., 'You will receive a refund for \$XX.XX')
	Failure to include unique transaction ID 9.5	2	Display unique transaction ID (e.g., Transaction ID XXXXX)
	Failure to include refund processing time 9.5	2	Display refund processing time (e.g., 'Processing the refund could take up to 14 business days')
<b>T&amp;Cs</b>	Failure to identify service 9.5	2	Display service name in message body or header
	Failure to identify service clearly 9.5	3	Display service name clearly and consistently in message body or header and among all messages and ad
<b>Message Flow: Marketing Message</b>			
<b>Programme</b>	Unauthorised marketing message 8.4	1	Refrain from sending marketing messages to customers who decline option or opt out
	Marketing message delivered via shortcode 8.4	1	Deliver all marketing messages via long code
	Marketing message received after unsubscribing from service 8.4	1	Discontinue all marketing messages when a subscription is terminated, and purge MSISDN from all marketing databases
	Message sender not identified 8.4	1	Identify message sender <sup>14</sup> clearly and accurately
	Failure to preface marketing message with 'FreeMsg' 8.4	2	Preface all Marketing Messages with 'FreeMsg'
	Multiple marketing messages sent per day 8.4	2	Refrain from sending more than one marketing message per day
<b>T&amp;Cs</b>	No local-charge or free-call helpline number 8.4	1	Display local-charge or free-call helpline number
	No unsubscribe information 8.4	1	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]'
	Unclear unsubscribe information 8.4	2	Display unsubscribe information as '[Text, Send, SMS, or Reply] STOP to [shortcode]'
	Incorrect unsubscribe information 8.4	2	Display <i>STOP</i> as unsubscribe command
	No website URL 8.4	2	Display website URL in message body
	Failure to identify service 8.4	2	Display service name in message body or header
	Failure to identify service clearly 8.4	3	Display service name clearly and consistently in message body or header and among all messages and ad

<sup>12</sup> This infringement applies only to SMS-based unsubscribe instructions.

<sup>13</sup> Identify Content Providers by name.

<sup>14</sup> Identify Content Providers by name.

VHA Premium Direct Carrier Billing Audit Standards			
	Infringements	Severity	Actions Required
<b>Message Flow: Unsubscription Confirmation Message</b>			
<b>Programme</b>	Failure to respond within one business day to customer message to STOP service 9.7	1	Send message promptly informing customer that service has been terminated and that no more messages will be sent
	Customer unsubscribe request not recognised 9.7	1	Treat as STOP request any message containing word 'stop' or attempt to unsubscribe via service website as command to terminate service
	Contains marketing elements 9.7	1	Remove marketing elements
	Failure to preface Unsubscription Confirmation Message with 'FreeMsg' 9.7	2	Preface all Unsubscription Confirmation Messages with "FreeMsg"
<b>T&amp;Cs</b>	Failure to confirm service termination 9.7	2	Inform customer that service has been terminated and that no further charges will apply
	Failure to identify service 9.7	2	Display service name in message body or header
	Failure to identify service clearly 9.7	3	Display service name clearly and consistently in message body or header and among all messages and ad
	No local-charge or free-call helpline number 9.7	3	Display local-charge or free-call helpline number
<b>Helpline: Helpline</b>			
<b>Helpline</b>	Helpline number nonfunctional VHA rule	1	Operate fully functional helpline 24 hours/day, 7 days/week
	Helpline number not associated with genuine source of assistance VHA rule	1	Ensure helpline number connects to genuine source of assistance
<b>Helpline: IVR System</b>			
<b>IVR System</b>	Attempt to unsubscribe from service via IVR system unsuccessful VHA rule	1	Ensure callers can unsubscribe via IVR system
	Call not returned within one business day VHA rule	1	Respond to all calls within one business day
	Caller attempt to leave voicemail message during normal business hours unsuccessful VHA rule	1	Ensure callers can leave message 24 hours/day, 7 days/week
	Caller attempt to leave voicemail message outside normal business hours unsuccessful VHA rule	1	Ensure callers can leave message 24 hours/day, 7 days/week
	IVR system unavailable during normal business hours VHA rule	1	Operate IVR system or staff helpline with live agent from 9:00 A.M. to 5:00 P.M. AEST or AEDST, business days
	IVR system unavailable outside normal business hours VHA rule	1	Operate IVR system or staff helpline with live agent from 5:00 P.M. to 9:00 A.M. AEST or AEDST, business days, and 24 hours/day, Saturday, Sunday, and public holidays
	No mention that caller can leave voicemail message VHA rule	1	Inform queuing callers that they can leave message that will be returned
	No option to unsubscribe by entering mobile number or leaving voicemail message via IVR system VHA rule	1	Allow callers to unsubscribe by entering mobile number or leaving voicemail message via IVR system
<b>Helpline: Live Agent</b>			
<b>Live Agent</b>	Attempt to unsubscribe from subscription service via live agent unsuccessful VHA rule	1	Ensure callers can unsubscribe via live agent
	Caller unable to reach live agent or leave voicemail message VHA rule	1	Answer all calls within 2 minutes, 30 seconds
	Caller wait for live agent exceeds 2 minutes, 30 seconds VHA rule	1	Answer all calls within 2 minutes, 30 seconds
	No live agent available VHA rule	1	Staff helpline from 9:00 A.M. to 5:00 P.M. AEST or AEDST, business days
	Opt-out from marketing messages via live agent unsuccessful VHA rule	1	Ensure callers can opt out of marketing messages via live agent