CANADIAN COMMON SHORT CODE APPLICATION GUIDELINES

Version 2.2

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Document Version History

VERSION NO.	DATE MODIFIED	DESCRIPTION OF MODIFICATION
1.1	13/07/2010	II.7, II.9: Adjustments made to reflect applicable GST/HST IV.1.2.10: Added details to requirements for summary terms and conditions IV.2: Added details to requirements for mandatory keyword STOP
2.0	23/09/2011	Overview and I: Status of Vidéotron, Mobilicity and WIND Mobile as participating WSP networks supporting CSCs I: Added definition for term "Contest Element", "Premium SMS", "Premium SMS Subscription Services" and "Stacked Marketing" II.7: Added pricing model regarding leases for Premium SMS Subscription Services with a contest element & details to clarify when the deposit is applied II.9 Added GST/HST breakdown for Long Codes III.1: Added requirement for a media contact for Short Code programs III.2 Added details regarding lease period for Premium SMS subscription services III.4: Added details regarding lease renewal period for Premium SMS Subscription Services III.7: Added details that WSPs may prohibit a Content Provider from submitting an application for a specific period of time and leasing Short Codes in the future in cases of infractions III.8: New section - added details regarding Scrubbing Process for Deactivated/Ported MINs IV.1.1: Added details regarding monthly spending cap for Premium SMS Subscription Services + message cap for voting IV.1.2.6: New section - added details to CTA requirements for enhanced messaging IV.1.2.12: Added requirements on disclosures for mobile web IV.1.2.13: Added Terms and Conditions checkbox requirements for Premium SMS Subscription Services + monthly total cost disclosure IV.1.2: Added details regarding marketing incentives in exchange for SMS services, stacked marketing practices and that Short Code programs must not be obscured by unrelated material IV.2: Added details to requirements for mandatory keyword HELP & STOP IV.3: Added requirements for manually entered/spoken opt-in IV.6.1: Added acceptable keyword responses for handset verifier IV.6.2: Specified acceptable response keywords for double opt-in message and prescribed language for within double opt-in message IV.6.2: Removed PIN validation option for PSMS subscription programs IV.6.3: Added customer service contact information as a requirement for the monthly reminder message IV.11: Added general requirements for programs with a contest element
2.1	04/11/2011	IV.2: Added wording to state that STOP ALL should be supported and function the same way as STOP IV.3: Added requirement that YES can only be advertised to the consumer in the double opt-in message IV.10.1: Corrected error from "minimum" to "maximum" IV.11.d: Omitted standard and free rated programs from the minimum prize value requirement of $500 per month of the contest term IV.11: Added requirement that Content Providers must disclose their intent to advertise in Québec and must provide the appropriate statements from the RACJ

2.2	09/08/2012	Overview and I: Status of Public Mobile as a participating WSP network supporting CSCs
		I: Eliminated definition for "Common Programs" and added definition for "Common Short Code"
		I: Added definition for term "Cramming"
		I: Added definition for term "Spam"
		III.7: Revised timeframe for performing required modifications and added precision about possible penalties
		IV.1.1: Added that premium MTs must be delivered to the consumer evenly over the course of the month
		IV.1.2.1: Added that the term "subscription" must be disclosed for ongoing premium services
		IV.1.2: Clarified the requirements applicable to the mobile web
		IV.1.2.13: Added guidelines for pop-up window in lieu of a Ts&Cs checkbox for the mobile web only
		IV.4: Added wording that spamming and cramming is not permitted
		IV.10.1: Revised wording to differentiate m-Payment spending cap from Premium SMS Subscriptions spending cap
		IV.11: Added that CTAs must not convey a false guarantee of prize or reward
		IV.11: Specified that requirements for contests running in Québec are only applicable to Premium SMS contests
		IV.14: Adding wording that Charitable Donation Programs must adhere to all Canadian Common Short Code Application Guidelines
		V.2: Changed wording to reflect that STOP must be supported, rather than preferred
		V.7: Changed wording to reflect that HELP & INFO must be supported, rather than preferred

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OVERVIEW

In July 2003 Canada's Wireless Service Providers (WSPs) came together with the Canadian Wireless Telecommunications Association (CWTA) to offer Common Short Codes (CSCs) which may (subject to approval) be activated across WSPs' networks. The CWTA has been assigned the role of administrator of the CSC registry on behalf of the industry.

CSCs are numbers to which a text message can be sent and are typically much shorter than a 10-digit mobile phone number. They are easy to remember and take less time to type than 10-digit numbers. CSCs can be used for a number of mobile messaging applications. These include contests, promotions, mobile coupons, subscriptions and on-demand content.

CSCs are codes that have been activated on all or most mobile phone networks for the same application or service. In Canada, the industry makes available 5- and 6-digit codes. CSCs are normally obtained by Content Providers who wish to offer unique programs to mobile phone consumers. These Content Providers access mobile phone consumers via a connection directly or indirectly with the WPSs' text messaging networks.

In Canada, content developers, application service providers and marketers are able to obtain CSCs from the CWTA that will be activated across participating WSPs' networks which currently includes any or all of the following: Bell, Fido, Koodo Mobile, Mobilicity, MTS Allstream (currently operating as MTS), Public Mobile, Rogers Communications Inc., SaskTel, Solo, TELUS (including Mike), Vidéotron , Virgin Mobile Canada and WIND Mobile. It is anticipated that EastLink and TBayTel will participate in this initiative as they begin to launch CSCs.

Connectivity with a WSP is established either using SMPP or other agreed methods of connectivity, dependent upon the individual WSP. Aggregators are required to adhere to technical specifications and procedures that have been outlined by the WSP; these tend to vary from provider to provider.

This document describes the guideline associated with the provisioning and operation of CSCs, and may be updated from time to time. Readers should visit Canada's Text Messaging Resource Website (www.txt.ca), in order to obtain the current version of this document.

Canadian anti-spam legislation has been introduced by the Government of Canada. This new anti-spam law was passed in December 2010 and will enter into force once the final regulations are published. When this law is in force, it is anticipated that there will be implications for the Canadian Common Short Code Application Guidelines. Revisions to these guidelines may be required in order for all Canadian Common Short Codes to be in adherence with the CASL.

For more information, please refer to http://fightspam.gc.ca/eic/site/030.nsf/eng/home

I.   DEFINITIONS

In this document, unless the context otherwise requires:

"Administrator" means the CWTA.

"Aggregator" means a third-party who would connect via SMPP directly to the WSP in order to offer services to consumers on behalf of Content Providers.

"ASP" means Application Service Provider, an organization that offers network based software solutions "applications", or downloadable applications that enable the business logic behind mobile marketing initiatives.

"Common Short Code (CSC)" is a Short Code supported by two or more competing WSPs that agree to participate in by allowing access by the Content Provider or Aggregator to their consumers.

"Consumer" means any individual who obtains mobile phone services from a WSP.

"Content Providers" means third-parties who wish to offer services to consumers.

"Contest Element" means programs where either the content is a contest or the content is promoted as part of a contest. Content Providers running contests are encouraged to refer to the section 74.06 of the Competition Act (http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/01279.html) and section 206 of the Criminal Code of Canada (http://www.agco.on.ca/en/whatwedo/criminalcode.aspx).

"Cramming" means the fraudulent adding of unauthorized charges to a consumer's phone bill.

"CSC Code of Conduct" has the meaning set forth in Part V.

"CTA" means call-to-action.

"MIN" means Mobile Identification Number, more commonly referred to as a wireless phone number which uniquely identifies a wireless device within a WSPs network.

"MMS" means Multi Media Service, which is a standard for telephony messaging systems that enable the sending of messages between mobile devices that include multimedia objects (images, audio, video). It is also possible for MMS messages to simply include normal text.

"MO" means Mobile Originating is a message that is sent by consumer.

"MT" means Mobile Terminating is a message sent to the consumer.

"Premium SMS" means a Short Messaging Service that carries a premium price point that is charged to the consumer. A premium price point is considered anything a consumer is charged that differs from the cost charged by their WSP to send a regular standard rate text message.

"Premium SMS Subscription Service" means a Short Code program at a premium price point where text messages are delivered to the consumer on an ongoing basis. These services are opt-in and consumers can opt-out at any time. The frequency of messaging and cost depend on the service.

"Private Codes" are Short Codes that are not available for use by common programs.

"Program" means a program proposed by a Content Provider relating to the use of a Short Code resulting in the transmission of text messages to and from the WSP with the involvement of an Aggregator and consumers.

"Short Code Council" ("SCC" or "Council"), is a committee of the CWTA comprised of one voting representative from each of the participating WSPs.

"Short Codes" means 5 and 6-digit Short Codes, the use of which will result in consumers sending and/or receiving an SMS or MMS message in order to experience an automated application.

"SMPP" means Short Message Peer-to-Peer Protocol.

"SMS" means Short Message Service, which is a standard for telephony messaging systems that enable the sending of text-based messages between mobile devices.

"Spam" is defined by Industry Canada as "any electronic commercial message sent without the express consent of the recipient(s)." The Short Code Council reserves the right, for the purpose of these guidelines, to determine what is considered spam in administering these guidelines.

"Stacked Marketing" means a deceptive form of advertising, referring to a cross-selling of several PSMS promotions from the same or different sponsors, sometimes on multiple different short codes, within the same online user flow, whereby a customer is shown a series of offers in close succession, often with his or her mobile phone number pre-populated in subsequent pages. A website's initial pitch might solicit the consumer's number by offering "free" MP3s or ringtones, then cycle the customer through the series of offers before he or she can claim the free content.

"Wireless Service Provider (WSP)" means the wireless operators represented by Bell, Fido, Koodo Mobile, Mobilicity, MTS Allstream (currently operating as MTS), Public Mobile, Rogers Communications Inc., SaskTel, Solo, TELUS (including Mike), Vidéotron, Virgin Mobile Canada and WIND Mobile. It is anticipated that EastLink and TBayTel will participate in this initiative as they begin to launch CSCs.

II.   SCOPE OF THE GUIDELINES

1. Who manages Common Short Codes (CSCs)?

The CWTA administers the CSCs in cooperation with the Wireless Service Providers (WSPs). The CWTA has created a Short Code Council, comprised of at least one representative from each WSP to oversee the administration of CSCs.

The role of the Short Code Council is to agree to policy and guidelines with respect to the use of Common Short Codes. The Short Code Council reviews all applications for Common Short Codes.

The CWTA hosts information about the Common Short Code Application Guidelines on Canada's Text Messaging Resource Centre at www.txt.ca. Interested parties are requested to frequently visit the website for updates, which includes estimated provisioning dates for new code requests, updates to industry guidelines and other pertinent announcements.

The CWTA makes CSCs available on behalf of the WSPs, maintains a current registry of all in-use and available CSCs, and is the principal point of contact to parties interested in obtaining a CSC. For further information please email shortcodes@cwta.ca or call 613-233-4888 and ask to speak to a member of the CWTA Short Code Team.

2. What are the requirements to obtain a Common Short Code?

a) You will need to establish SMPP connectivity with the WSP either directly or indirectly. SMPP is a protocol that defines the language by which servers that host SMS applications and the operators' Short Message Service Centres (SMSC) speak to enable two-way SMS. The CWTA has contact information for numerous Aggregators with connections to the WSPs' networks available on www.txt.ca. In general, the options to gain connectivity are:
   i.   Connect directly to the WSPs,
   ii. Connect or partner with an existing Aggregator(s), or
   iii. A hybrid of the above.

b) You must gain acceptance by two or more competing WSPs that they agree to participate in your program or application.

c) For the CSC to be provisioned on a wireless network, you must have established a satisfactory, bilateral commercial agreement with the WSP directly or indirectly through an Aggregator.

d) A deposit equal to the first three months of lease fees is required at the beginning of the application process. Cost details are explained in part II, sections 7 and 9 of this document.

e) You must adhere to the industry's CSC Code of Conduct and other guidelines as outlined in this document.

3. **How are applications for Common Short Codes administered?**

    Applications are received and reviewed by the CWTA. The application form can be downloaded from www.txt.ca. For more detailed information regarding the administrative process please refer to part III of this document.

4. **How long does it take to have an application considered?**

    The CWTA reviews applications to ensure they meet the requirements outlined in these guidelines. Once an application is considered fully detailed it will normally be considered within 7 days.

5. **What are the standard lead times for the launching of new programs?**

    It is recommended that applications involving Aggregators that already have direct connectivity to the WSPs normally allow a minimum of 30-45 days from the time the application is approved until launch of the program.

    The foregoing is dependent on the volume of requests. Announcements of more current planning times are available at www.txt.ca.

    Requested launch dates will be targeted on a best-efforts level by each WSP.

6. **What Short Codes are available?**

    Five and 6- digit Short Codes are used as part of this inter-carrier initiative. Please note that Short Codes beginning with a "4" and a "0" are not available as part of this initiative. CWTA maintains the registry of available codes as follows:

5 DIGITS	
10000 – 39999	Common Short Codes
40000 – 49999	Private Short Codes
50000 – 99999	Common Short Codes
6 DIGITS	
100000 – 399999	Common Short Codes
400000 – 499999	Private Short Codes
500000 – 999999	Common Short Codes

7. **How much do Common Short Codes cost?**

    7.1 Free, Standard, Premium and Premium SMS subscription services with no contest element

    The CWTA leases Short Codes for a monthly fee of $500 for the first 3 months of assignment (refer to section II.7.2 for costs associated with Premium SMS subscription services with a

contest element). A non-refundable fee equal to the first 3 months ($1,500 + GST/HST) in Canadian funds is required at the time of application.

For these programs continuing in length past the deposit period, monthly fees will be reduced to $350 starting in month 4 of the lease term. GST/HST will be charged depending on your province/country of residence and will apply as follows:

PROVINCE	HST	GST	Tax	Total
Ontario, Newfoundland, New Brunswick	13%		$195	$1,695
Nova Scotia, International (Non-Resident)	15%		$225	$1,725
British Columbia	12%		$180	$1,680
PEI, Alberta, Quebec, Saskatchewan, Manitoba, NWT, Yukon, Nunavut		5%	$75	$1,575

7.2 Premium SMS subscription services with a contest element

The CWTA leases Short Codes that can be used for Premium SMS subscription services with a contest element, where either (a) the content is a contest or (b) the content is promoted as part of a contest, for a monthly fee of $1,000 for the first 3 months of assignment, with a non-refundable fee equal to the first 3 months ($3,000 + GST/HST) in Canadian funds required at the time of application.

For these programs continuing in length past the deposit period, monthly fees will be reduced to $700 starting in month 4 of the lease term. GST/HST will be charged depending on your province/country of residence and will apply as follows:

PROVINCE	HST	GST	Tax	Total
Ontario, Newfoundland, New Brunswick	13%		$390	$3,390
Nova Scotia, International (Non-Resident)	15%		$450	$3,450
British Columbia	12%		$360	$3,360
PEI, Alberta, Quebec, Saskatchewan, Manitoba, NWT, Yukon, Nunavut		5%	$150	$3,150

All submitted applications will not be considered until the deposit is received. The fees apply once the code has been activated on the networks. The deposit will be applied and effective on the launch date indicated on the Letter of Approval.

Short Code programs that are identified by the CWTA as a Premium SMS subscription with a contest element will be billed the fees outlined in this section regardless of whether there is a current contest element aspect to the program. If the marketing of the program at anytime has used or will use in the future a contest element, the fees in this section will be applied for the duration of the lease.

8. Common Long Codes (8-digits)

The WSPs have established a common pool of 8-digit Long Codes. These codes are available on a case-by-case basis as part of the Canadian Common Short Code Application Guidelines.

Upon request the Long Codes may be made available for codes to be used with text messaging programs, where a CSC is not required. It is anticipated that the Long Codes would be used in

situations where the consumer is not required to enter (type) the code into their wireless device in order to participate in the text messaging program.

The WSPs have assigned the following range of Long Codes to the Administrator (CWTA) for lease as part of the Common Short Code Application Guidelines. The range of Long Codes is: **30000001** to **30000999**. Interested parties may apply for a Long Code using the same procedure as that which is used to apply for Short Codes. However, specific Long Codes may not be requested. The Administrator will assign Long Codes sequentially.

9. **How much do Common Long Codes cost?**

The CWTA leases Long Codes at a lower overall lease rate than Short Codes because Long Codes are perceived to have lesser value than Short Codes. A non-refundable fee of $500 per month for the first 3 months ($1,500 + GST/HST) in Canadian funds will still be charged. However, the monthly fee will be reduced to $250 starting in month 4 of the lease term. As with Short Codes, the deposit fees apply once the codes have been activated on the networks. GST/HST will be charged depending on your province/country of residence and will apply as follows:

PROVINCE	HST	GST	Tax	Total
Ontario, Newfoundland, New Brunswick	13%		$195	$1,695
Nova Scotia, International (Non-Resident)	15%		$225	$1,725
British Columbia	12%		$180	$1,680
PEI, Alberta, Quebec, Saskatchewan, Manitoba, NWT, Yukon, Nunavut		5%	$75	$1,575

III. THE PROCESS

The process is administered by CWTA with direction from the Short Code Council.
Prior to submitting a CSC application, applicants will need to establish SMPP connectivity with the WSPs either directly or indirectly.

1. **Submitting a Common Short Code Application**

Applications are submitted via email to shortcodes@cwta.ca. In the instance wherein the applicant submits an application through an Aggregator, that Aggregator must review the application in question prior to submission, and be copied on the electronic submission. Likewise, should the third party Aggregator submit the application, the client must review the application prior to submission and be copied on the electronic submission. Applications will be reviewed by CWTA. Fully detailed Short Code applications will be sent to the Short Code Council. Short Code applications are normally considered every Tuesday. In order to have your application considered on a particular Tuesday, it must be submitted before 1:00 PM (Eastern) on Thursday of the preceding week. A deposit equal to the first three month lease fee is required at the beginning of the application process.

Short Codes are assigned to a specific program type(s). Applicants must provide detailed information on the program type(s) that they wish to offer to mobile phone consumers, the specific number of Short Codes required for the program, and the desired pricing of the program.

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The WSPs retain the right to not participate in any particular program. The application form is available at www.txt.ca.

Customer support must be provided for all Short Code programs. At a minimum, this must include a web based support page and/or email address and/or phone number. Should a phone number be the only available means of obtaining customer support, then it must be a toll-free number. Also, the name and contact information for a media contact that represents the Short Code program must be listed in the application form for all Short Code programs. This media contact must be an individual who can respond directly to media inquiries.

2. **Approvals**

Applications that meet the criteria established in this document are forwarded to the WSPs with a recommendation that the WSPs participate in the program.

WSPs independently indicate to CWTA whether they wish to participate in the program. Two or more competing WSPs must agree to participate in your program in order for it to be approved. CWTA will inform applicants whether the WSPs have agreed to participate in the program. The Letter of Approval will be copied to the WSPs and, if applicable other parties involved with establishing connectivity to the WSPs.

Approvals will be contingent on a number of factors including:
  i.   Adherence to the CSC Code of Conduct and other guidelines as outlined in this document.
  ii. Payment of a deposit equal to the first three month (minimum) Short Code lease fee to CWTA.

The Short Code will be assigned for the duration of the program proposed, up to a maximum of 12 months. Premium SMS subscription services will only be assigned up to maximum of 6 months.

3. **Common Short Code Testing and Validation Procedure Prior to Activation**

All Aggregators with direct connections to WSPs are responsible for notifying the CWTA when they and/or their clients are prepared for the WSPs to commence testing on a new Short Code activation. The READY FOR TESTING document, available at www.txt.ca, should be sent to shortcodes@cwta.ca with the subject heading containing the words: 'READY FOR TESTING'. The CWTA is responsible for communicating all notices to the WSPs.

The READY FOR TESTING document signifies that the Short Code program has been validated by the direct connect Aggregator and is successfully working in accordance with the Mandatory Keywords and functions approved in its CWTA Common Short Code application. Emailing this document to the CWTA is required in order for participating WSPs to commence testing of the Mandatory Keywords and functions of the Short Code program. The READY FOR TESTING document must be received by the CWTA at least 10 business days prior to the activation date stated in the corresponding Short Code Letter of Approval. Failure to notify the CWTA will result in the Short Code not being tested by the WSPs and will delay the activation date. This process prevents valuable time from being lost as Short Codes that are not yet functional are not tested prematurely.

4. **Lease Renewals**

Prior to the expiration of the lease and assuming the CSC program and account are in good standing, the CWTA will offer the leaseholder the opportunity to renew the lease for a maximum of 12 months. Renewals for Premium SMS subscription services will be offered up to a maximum of 6 months and are subject to review by the CWTA Short Code Council.

5. **Cancellation of a Common Short Code Lease**

A leaseholder may cancel a lease at any time by sending an email to shortcodes@cwta.ca with the request to cancel. Please note that under certain circumstances, the Short Code Team may need to validate the cancellation with a confirmation from the consumer facing brand identified in the Short Code application.

6. **Revisions to a Common Short Code Program**

Leaseholders are able to request changes to an approved CSC application at any time. Simply revise the Short Code application to include the requested changes and submit to shortcodes@cwta.ca. In the instance wherein the leaseholder submits a revised application through a third party Aggregator, that Aggregator must review the application in question prior to submission, and be copied on the electronic submission. Likewise, should the third party Aggregator submit a revised application, the client must review the application prior to submission and be copied on the electronic submission. All necessary updates should be made in the application form to reflect any new requirements that have been implemented since the program was last approved. In some cases, a new deposit may be required for revised applications.

Short Code applications are normally considered every Tuesday. In order to have your application considered, it must be submitted before 1:00 PM (Eastern) on Thursday of the preceding week.

The requested changes must be approved by the Short Code Council. Once approved, a revised Letter of Approval will be emailed to the leaseholder. Please note that some revisions, for example a change in price point or Aggregator, may require a new provisioning date which can take up to 30 to 45 days from the time the revised application is approved.

To update billing information please send an email to the CWTA billing department at: billing@cwta.ca.

7. **Regular Common Short Code Compliance Testing**

As administrator, the CWTA will perform ongoing compliance testing to ensure that all CSC programs adhere to the CSC Code of Conduct and other guidelines as outlined in this document. The results of these tests will be reported to the WSPs. All Content Providers, Application Service Providers and Aggregators must comply with all inquiries and requests for information.

Upon receiving the compliance test results, it is the Aggregator's responsibility to ensure that all required modifications are made within the defined timelines. Depending on the level of severity

of the infraction, new and revised applications submitted by the respective Aggregator will not be reviewed by the Short Code Council until all required changes have been completed. Based on the severity of an infraction, WSPs may also prohibit a Content Provider from submitting an application for a specific period of time.

Higher level severity issues will result in various penalties, including suspension of the Short Code. In the most severe cases, the lease will be revoked and the Short Code will be deactivated; the Content Provider may be prohibited from leasing Short Codes in the future.

For more information please email sc_audit@cwta.ca.

8. Scrubbing Process for Deactivated/Ported MINs

The scrubbing process, for the purpose of the Common Short Code Application Guidelines, is defined as the deletion of deactivated/ported MINs from the Aggregator's program database.

Each individual WSP has its own specific process for reporting and submitting delete lists to the Aggregators. If any WSP submits a list of deactivated/ported MINs directly to the Aggregators, the WSPs expect that it be acted upon by the Aggregators within 5 business days to ensure a positive consumer experience and to avoid any customer service issues.

WSPs may require Aggregators to act upon delete lists on shorter timelines under certain circumstances.

The Canadian Wireless Number Portability (WNP) Guidelines note that the Old Service Provider (OSP) is responsible for developing a procedure to ensure proper deactivation of all services and features related to the number porting out; this also applies to any Short Code service. A subscription cannot be ported from one carrier to another. For more information on the WNP Guidelines, please contact wnp@cwta.ca.

In addition, Aggregators are to delete any MINs in cases where text messages have been undeliverable for a period of 30 consecutive days where it can be determined that the unsuccessful deliveries are due to the MIN being inactive on the network.

IV. <u>COMMON SHORT CODE PROGRAM REQUIREMENTS</u>

All Mandatory Keywords (STOP, ARRET, HELP, AIDE, INFO) in this document that apply to SMS must also be supported by MMS programs.

1. Program Pricing, Promotion and Advertising

1.1 Consumer Pricing

The price of the content will be determined by the Content Provider subject to the ability of the WSPs to charge the requested price.

In addition to the individual WSP standard text messaging rates, the WSPs have programmed several additional premium price points to facilitate a more rapid launch of programs. Applicants should consider choosing from the following price points:

> $0.00, $0.15, $0.25, $0.50, $0.75, $1.00, $1.25,
> $1.50, $1.75, $2.00, $3.00, $4.00, $5.00 and
> $10.00

While applicants are free to propose consumer facing prices that differ from these suggested price points, some WSPs may require additional lead-time to accommodate different price points. The applicant must inform the WSPs of the consumer pricing at the time the request is made.

For Premium SMS subscription services, the Content Provider is required to implement a $40 monthly spending cap per consumer per Short Code. Premium MTs must be delivered to the consumer evenly over the course of the month so that charges incurred by the consumer are evenly distributed during the month. Front-loading of MTs is not allowed. In the event that there are multiple services running on a single Short Code, the spending cap remains unaffected at $40. Please note that some carriers may enforce the $40 monthly spending cap across all Premium Short Code services.

Due to the viral nature of premium and standard voting programs, the WSPs require that Content Providers propose a reasonable spending cap to ensure a positive consumer experience.

1.2 Promotion and Advertising

When promoting a Short Code program, Content Providers should ensure that the advertising is clear and conspicuous regarding all terms and conditions associated with participating in the program. At all times, the holder of the Short Code must inform consumers of the cost of sending and/or receiving a text message to the Short Code. No program should be promoted as being free unless it can genuinely be acquired for free by any consumer.

At a minimum the following information must be disclosed in all forms of advertised calls-to-action (CTA):

1.2.1 For premium services, the billing period and applicable cost must be disclosed using a dollar sign "$". For example: "$2/msg" and "$0.50/msg" are acceptable pricing disclosures; however "2/msg" is not acceptable. Additionally, the term "subscription" and the frequency of message delivery must be disclosed if it is an ongoing service.

1.2.2 If a service costs the consumer a standard rate message fee, then it is acceptable to disclose that standard rates apply using "Std rates may apply". Alternatively Content Providers who choose to utilize "Std msg & Data rates may apply" will be considered acceptable.

1.2.3 In cases where the consumer receives an MT containing a clickable link to a site accessible on the consumer's mobile phone, messaging must additionally state that "Data rates may apply." Content Providers who choose to use "Std msg & data rates may apply" will be considered acceptable.

1.2.4   It should be noted that any MT message containing a subsequent CTA should fully disclose the incremental cost for further participation.

1.2.5   Content Providers/Aggregators are encouraged to use less text savvy language when disclosing the pricing terms, message frequency and opt-out information. This is applicable to all CTA disclosures, the abbreviated Terms and Conditions of participation in the service and the double opt-in message (for more information regarding the double opt-in message please refer to part IV, section 6.2).

1.2.6   Content Providers/Aggregators should be aware that content that they control within text messages may appear as emoticons on handsets that support enhanced messaging. (e.g. if a message contains ":S", ":STOP" may appear as "😟TOP")

When advertising online (including the mobile web), at a minimum, the following information must also be disclosed:

1.2.7   If the signup process requires the consumer to visit multiple web pages, the cost for participating in the program must be clearly included on all pages throughout the signup process (from first contact page to last contact page including pages in between that are not requesting consumer registration information).

1.2.8   CTAs should not contain language or utilize tools (e.g. a countdown clock) that convey a sense of urgency about an offer or service.

1.2.9   The consumer's MIN cannot be pre-populated in data entry fields.

1.2.10 The Content Provider must own and control the MIN entry page for all premium subscription online registrations.

1.2.11 Summary terms and conditions must be completely visible (above the fold at screen resolution 1024x768 for Internet Explorer 8) and not automatically pre-checked in cases where a consumer is asked to accept the terms (applicable to CTAs meant for computers only).

1.2.12 Pricing terms on CTAs meant for the mobile web must be disclosed above the "Buy" (Accept, Purchase, Subscribe, etc.) button.

1.2.13 CTAs for Premium SMS Subscription Services must include a Terms and Conditions checkbox directly below the MIN entry box that discloses the billing period, applicable cost, frequency, that the service is a subscription and total monthly cost for participating in the program (e.g. This is a subscription service where you receive 3 messages per week at $5.00 per week = $20 per month. Please check to accept). This checkbox cannot be automatically pre-checked and the text must be entirely visible to the consumer (e.g. black text on white background). In instances where the monthly cost equation is not valid (e.g. 5 weekly billable messages in a month), the Content Provider must disclose in the abbreviated Terms and Conditions what the cost for participating will be for these months. Due to the screen size of some mobile phones, it is permissible for Content Providers to include a pop-up window in lieu of a checkbox for CTAs meant for the mobile web. This pop-up window must appear after the consumer enters their MIN and proceeds to the next page. The pop-up window must contain the exact same information that is required next to the Terms and Conditions checkbox. The pop-up window must also contain an Accept button and a Decline button.

SMS services must not be associated with, or used to entice users to access content that is associated with any illegal practices such as copyright violations or piracy.

Should SMS services be offered to customers in exchange for or in advance of getting to other content, such as in the case of legitimate marketing incentives, it should be clear to the consumer on the MIN entry pages what they are signing up for and at what costs, as specified in part IV, section 1.2 above. The legitimate marketing incentive must be presented fairly and must not be misconstrued as being something other than what it is (e.g. a licensed movie trailer instead of a movie). It is not permitted to advertise a marketing incentive as free unless it is truly free to the customer. This should also be made clear to the customer signing up for the Short Code program.

Should SMS services be offered to customers in exchange for or in advance of getting to other content, it must be specifically stated in the application form and be approved by the carriers. Content Providers must be able to provide proof that they are licensed to offer the marketing incentive upon request.

The actual nature of Short Code programs must not be obscured by unrelated material. For instance, a premium charge program that provides a 'joke of the day' subscription should not be advertised, positioned or promoted as something else. The advertising, positioning and promotion of Premium SMS programs, including all affiliate advertising and any associated web sites, must clearly and conspicuously highlight the content that the subscriber will be receiving on an ongoing basis and the terms of that subscription distinctly from the marketing activity or incentive that encourages the consumer to subscribe to the service.

SMS services must not be associated with stacked marketing practices, which is a deceptive form of advertising, referring to a cross-selling of several PSMS promotions from the same or different sponsors, sometimes on multiple different short codes, within the same online user flow, whereby a customer is shown a series of offers in close succession, often with his or her mobile phone number pre-populated in subsequent pages. A website's initial pitch might solicit the consumer's number by offering "free" MP3s or ringtones, then cycle the customer through the series of offers before he or she can claim the free content.

The TVB (Television Bureau of Canada www.tvb.ca) Telecaster guidelines provide advertisers and agencies with an outline of standards and requirements which must be adhered to when producing commercials, infomercials and/or public service announcements for television. All Short Code applicants should refer to the appropriate Telecaster guidelines as a minimum when advertising their services on TV.

Participation TV is defined for the purposes of this document as the use of mobile interaction to allow viewers of a TV broadcast to engage in various ways with the broadcast content. These interactions can include having an impact (e.g. voting) or expressing an opinion (e.g. text to screen). Participation TV visual CTAs should use a minimum of 22 or 23 scan lines or font size of 12 in order to ensure the details are legible in the CTA and when used in conjunction with a verbal CTA be onscreen for 3 seconds for the first line of text and 1 second for each additional line. A minimum of 23 scan lines should be used when the CTA does not include a voiceover.

2. **Mandatory Keywords**

    STOP, **ARRET**, **HELP**, **AIDE** and **INFO** are five (5) Mandatory Keywords that must be implemented on all CSC programs in order to give consumers a more consistent experience. Regardless of price point, intended audience, message frequency or commercial availability, all CSC programs must support these Mandatory Keywords to ensure a universal consumer experience. Please note that keywords shall not be case sensitive.

    2.1 These Mandatory Keywords must be available in all programs without exception; whether the consumer is subscribed to the program or not;

    2.2 These Mandatory Keywords must be written in CAPITAL LETTERS at all times in messaging and all advertising to emphasize their importance;

    2.3 They must also be available in both English and French regardless of the intended audience. However, if a program is solely promoted in one language, it is acceptable that the messaging for all five Mandatory Keywords be in the language in which the program is promoted;

    2.4 All Mandatory Keyword messages should be delivered free of charge where possible as they are administrative in nature;

    2.5 In the event that a single Short Code is running services for multiple clients, it is the Content Provider's responsibility to provide details for the **<INFO>, <HELP> and <AIDE>** keywords.

    <HELP>: The following information must be included by the Content Provider in one (1) MT message:
      - Customer service contact information (email and/or URL and/or phone). NOTE: if the phone number is the exclusive method of contact, then it must be toll-free;
      - Cost and message frequency of the program;
      - Opt-out information using <STOP>;
      - Identity of the program sponsor by name or company name (a program sponsor is defined as the company promoting the service) and a short description of the program;
      - The HELP message may also include a list of common keywords and a description on how to use the service.

    <AIDE>: This keyword will return the same information as **<HELP>** but the one (1) MT response should be in French.

    <INFO>: The following information must be included by the Content Provider in one (1) MT message:
      - The Content Provider (or Aggregator's) company name and customer service contact information (email, URL and/or phone);
      - Applicants may refer to the HELP/AIDE and STOP/ARRET keywords. Applicants can also include various opt-out methods (e.g. ALERTS STOP).

    <STOP>: Whenever STOP is sent as a keyword in an MO message, the Content Provider must:
      - For subscription services, send one (1) MT message stating that the consumer will no longer receive messages in connection to all services running on the Short Code;
      - For non-subscription services (one-time use), send one (1) MT message stating that the service is not a subscription and;

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- Stop sending messages of any kind to that consumer until/unless the consumer initiates the service again.

Additionally, the <**STOP**> keyword:

- Must apply to all programs including one-time use programs.
- Must opt-out the consumer immediately. Therefore please note that a response containing a "Stop Menu" of programs is not permitted. The subscriber must be unsubscribed to all programs once the keyword <**STOP>** is sent to the Short Code. The program can support other opt-out keywords such as <**ALERTS STOP**> or <**SPORTS STOP**> however the specific <**STOP>** function must be available to stop all contact in any manner. This is to avoid subscriber confusion around the use of the <**STOP**> command.
- The keyword <**STOP ALL>** although not a Canadian mandatory keyword should be active and function exactly the same as <**STOP>** on all programs.
- Must always be available regardless of whether the program is commercially available or not. An error message is not to be sent back to the subscriber.

<**ARRET>:** This keyword will return the same information and have the same effect as <STOP> but the one (1) MT response should be in French.

3. **Opt-In**

Content Providers must obtain approval from consumers before sending SMS and MMS messages. Consumers must maintain the ability to stop participating and receiving messages from a Short Code program when desired. Content must not be delivered until after the consumer has confirmed their desire to participate in a Short Code program.

Consumers can initiate opt-in in response to a CTA by:

- Sending a Mobile Originated (MO) message from their handset,
- Signing up via a WAP interface,
- Signing up online,
- Signing up via a manually entered opt-in (Content Provider manually enters MIN provided by consumer; e.g. MIN provided on paper application),
- Signing up via spoken opt-in (e.g. MIN provided to a call centre representative).

All web-based opt-ins require a handset verifier, regardless of price point and message frequency. The handset verifier allows the Content Provider to positively confirm that the authorized account holder of the handset is acknowledging the opt-in. This can be done by the consumer inputting a PIN online that is sent to the MIN via MT or by the consumer replying to the MT message with a specific keyword. This PIN or keyword message must include the program pricing and terms.

All opt-ins to Premium SMS subscription services must be obtained by the consumer replying to an MT message with a prescribed keyword and phrase. This prescribed keyword and language surrounding it is, "To accept reply YES". A double opt-in method using a PIN is not permitted for Premium SMS subscription services. It is not permissible to advertise to the consumer that they may send the word YES to the Short Code number anywhere but in the double opt-in message sent to the device. The intent is that the consumer must read the double opt-in message and reply to it with the keyword YES to accept the terms of the service. All Content Providers must take care to ensure that

their platforms do not permit any acceptance of a YES command from a consumer prior to the double opt-in message being successfully delivered to the consumer's device.

In addition, for manually entered opt-ins and spoken opt-ins, it is expected that there may be a time delay from the time the consumer provides their MIN to the Content Provider, to the time the consumer receives the mandatory handset verifier. It is recommended that this time delay does not exceed 30 days.

The consumer must consent to receive text messages via a Short Code from the Content Provider. If a consumer opts out of a service, no further messages of any kind may be sent to the consumer for the Short Code program in question.

4. Opt-Out

Consumers must maintain the ability to stop participating and receiving messages from a Short Code program when desired.

The consumer can stop participating in any program by texting the word **<STOP>.** When a subscriber opts-out of a program, no further charges should be submitted by that program for that subscriber.

No text messages of any kind may be sent to a consumer who has opted out of the service. Content Providers must not engage in spamming or cramming. Appropriate penalties will be applied should spamming or cramming activities be identified.

5. Mandatory Dormant Code Message

It is understood that from time to time a Short Code might not be promoted for a short period of time as the program or campaign transitions into a new phase. Indeed there may be times when there is not an "active" program attached to the Short Code. During such periods, Aggregators are required to implement a customer service message that will be returned to the mobile phone in the event a consumer attempts to send a message to the Short Code. Ideally, this message will indicate the status of the program, such as that a campaign has recently concluded, or that the Short Code is not currently in use. Secondly, this message will provide customer service information such as a dedicated website or email address where consumers may contact a knowledgeable source. All dormant code messages should be delivered free of charge where possible as they are administrative in nature.

English txt example:
This program is over. Please check www.abcde.ca for more details. Thx 4 ur txt.

French txt example:
Programme terminé. Voir www.abcde.ca pour plus d'info. Merci.

Bilingual txt example:
This program is over. Programme terminé. Check/Voir www.abcde.ca for details/pour plus d'info. Thx/merci.

6. Subscription Programs

A subscription service is any program which begins with a voluntary opt-in process whereby standard rate or premium charges are incurred by the consumer for messages received from the subscription service over time. Content Providers must obtain approval from subscribers before sending commercial SMS and MMS messages.

    a) Free to consumer subscription programs require a single opt-in.
    b) Standard rate subscription programs require a single opt-in.
    c) Premium rate subscriptions require a double-opt in.

6.1 Mandatory Handset Verifier

A handset verifier is required for non-premium subscription programs with a web-based opt-in, regardless of price point and message frequency. The handset verifier allows the Content Provider to positively confirm that the authorized subscriber is acknowledging the opt-in. This can be done by the consumer inputting online a PIN sent via MT to their mobile phone number or by the consumer replying to an MT message with a specific keyword. This PIN or keyword message must include the program pricing and terms. Please note that the handset verifier is not required to deliver the same content as what is required in the mandatory double opt-in for premium subscriptions.

Acceptable responses for a handset verifier include, but are not limited to: Yes, Y, Go, Okay, OK, K, O.K., Sure, Yep, Yeah.

6.2 Mandatory Double Opt-In for Premium Subscriptions

When a consumer initiates participation in any Premium SMS Common Short Code subscription service, they must be required to double opt-in to the service. This double opt-in must be in the form of an affirmative action by a new consumer to acknowledge the terms of the subscription service.

Regardless of the opt-in method from which the consumer subscribes, they must double opt-in to verify acceptance of the program conditions.

All opt-in messages should be free of charge, where possible, as they are administrative in nature. The double opt-in is applicable the first time a consumer subscribes to a specific service on a Short Code. Separate programs offered on the same Short Code require a separate double opt-in. The mandatory double opt-in is applicable regardless of the message frequency. Management of subscriber opt-in information is the responsibility of the Aggregator who is maintaining the direct connection to the WSP networks, regardless of any other parties involved.

During the course of subscribing to any subscription program, the following information must be noted in the double opt-in message:

    6.2.1 Identifying that the service is a subscription.
    6.2.2 Pricing terms, message frequency and billing interval.
    6.2.3 Description of the program type (chat, vote, alert, etc.).

6.2.4   Contact details for the program sponsor including a phone number and/or website URL and/or email address at a minimum. NOTE: if the phone number is the exclusive method of contact, then it must be toll-free.

6.2.5   How to stop the service using the <STOP> command (at a minimum).

6.2.6   The exact instructions, "To accept reply YES"

The Content Provider must positively confirm that the authorized subscriber is acknowledging the opt-in. The only acceptable double opt-in method is by the consumer replying to an MT message with a prescribed keyword. This prescribed keyword and language surrounding it is "To accept reply YES". The keywords YES or OUI are the only acceptable MO responses to the double opt-in message. A double opt-in method using a PIN is not permitted for Premium SMS subscription services (please refer to example 1 below).

Regardless of the opt-in method from which the consumer subscribes, the MO keyword placement must be such that it is after the pricing terms in the double opt-in message (please refer to examples 1 and 2 below)

Example 1: Web based opt-in

	Sample Text	**Charge**
CTA	Consumer is asked to enter the MIN online to subscribe to a premium alerts program. Consumer enters MIN, checks terms and conditions, and clicks 'subscribe' to opt-in to the program.	
Double Opt-in MT	Astro ABC subscription service $1.00/msg, 2 msgs/week. To accept reply YES. To end txt STOP. Help 1-800-123-4567	Free
MO	YES	Non-Premium
MT	Thx! U've now been subscribed to receive 2 msgs/week at $1.00/msg. U will receive ur 1st msg shortly. To stop txt STOP	Free
MT	First delivery of premium subscription content	Premium

Example 2: MO Keyword opt-in

	Sample Text	**Charge**
CTA	Print, web, radio promotion of Short Code opt-in by MO keyword: "Text ASTRO to 23456, $1.00 /msg, 2 alerts/week. Msg&Data Rates may apply"	
MO	ASTRO	Non-Premium
Double opt-in MT	Astro subscription service $1.00/msg, 2 alerts/week. To accept reply YES. To end txt STOP. Help 1-800-123-4567	Free
MO	YES	Non-Premium
MT	Thx! U'r subscribed to receive 2 alerts/week at $1.00/msg. U will receive ur 1st alert shortly. To stop txt STOP	Free
MT	First delivery of premium subscription content	Premium

6.3 Mandatory Monthly Subscription Reminder Message

A monthly reminder message is a notice of continuation of the subscription service. This monthly reminder applies to both standard rate and premium rate subscription services**.**

The monthly subscription reminder message must contain:

> 6.3.1 The name of the service;
> 6.3.2 That the service is a subscription service;
> 6.3.3 Billing period and advice of charge of the program and;
> 6.3.4 Instructions on how to stop the service using the <STOP> keyword (at a minimum);
> 6.3.5 Customer service contact information (email and/or URL and/or phone). NOTE: if the phone number is the exclusive method of contact, then it must be toll-free.

The subscription reminder must occur at least once on a monthly basis. These subscription reminders do not require an affirmative action by a subscriber to confirm renewal. All monthly subscription reminder messages should be delivered free of charge where possible as they are administrative in nature. This information may be supplied in other program-related messaging but should coincide with the subscription anniversary.

7. **General Use Short Codes**

Permission to use a Short Code for multiple program types and multiple campaigns may be provided subject to certain qualifications. The Short Code Council may permit the assignment of a General Use Short Code at a single price point, premium or standard rated, to a client who has previously operated multiple successful Short Code campaigns and where the requested program falls under one of the following two scenarios:

> 7.1. The Short Code is tied to a single brand offering different program types or,
> 7.2. The Short Code is tied to a single Aggregator/Content Provider who may choose to operate a single program type (for example, contests, or alerts, or voting, etc.) for several different brands. In this model, the Aggregator/Content Provider is responsible for customer service at all times, the consumer interaction may not differ from that which was originally approved, and finally, the WSP call centre scripts provided by the Aggregator/Content Provider must at all times remain valid.

Moreover, once the application requesting a General Use Code has been approved, neither the WSPs nor the Administrator require advance notification of the timing of when the code is to be used, assuming said usage is consistent with the type and timing of usage identified in the approved application form. Any material change in the operation of an approved General Use Short Code program requires the submission of a revised application form and the written approval of the CWTA Short Code Council.

Modifications that are not permitted without the Council's written approval include but are not limited to changes;

7.3. That add an alternate program type(s);
7.4. In the scope of the program;
7.5. That render a current WSP's customer care help script invalid.

The normal conditions of use, such as adherence to the industry CSC Code of Conduct, continue to apply. Additional conditions are detailed below:

7.6 Each code will be provisioned for only one (1) price point and all programs utilizing a specific code must have the same price point.
7.7 The Content Provider/Aggregator must provide a general consumer script for use in the WSP call centres that must include only one point of contact for customer support. The WSPs will use the one point of contact with their customers for all enquiries about any of the programs running on the General Use Code. In 7.1 listed above, the single brand is responsible for customer service. In 7.2 listed above, it is the program Aggregator's responsibility.
7.8 Connectivity with the WSPs as well as business terms (contract) must be arranged as per normal.
7.9 Unless specifically approved by the Short Code Council, no General Use Short Code is permitted to be used for:

    7.9.1 The ordering and/or delivery of Rich Content;
    7.9.2 Mobile billing in the form of m-Commerce;
    7.9.3 Programs with an explicit or implicit guarantee that a text message will be delivered;
    7.9.4 Programs involving charities (includes programs where full or partial donations are solicited);
    7.9.5 The promotion of any individual WSP without written authorization from the CWTA;
    7.9.6 Services involving alcohol, tobacco and gaming; and
    7.9.7 Adult oriented content.

Any violation of the guidelines governing General Use Codes will result in penalties that may include the placing of restrictions which remove the General Use program authorization or the immediate termination of the lease at the applicant's expense.

8. Demo Codes

Demo Short Code programs will not be provisioned in the production environment since there is an opportunity to lease General Use Codes, which could be used to demo applications in addition to running commercially live programs.

It is expected that General Use Codes activated, but only used for, demo purposes will respect all mandatory program requirements such as the Mandatory Keywords (STOP, ARRET, HELP, AIDE, INFO) and if applicable, monthly reminder messages.

9. Rich Content

For more information regarding the use of Short Codes as a means for consumers to purchase content downloadable to mobile phones such as ringtones, images, graphics or games; please refer to the Description of Canadian Rich Content Storefront Application Process found at www.txt.ca.

9.1. Complimentary Promotional Content:

Complimentary Promotional Content may be offered through a Short Code program. The Guidelines for Complimentary Promotional Content document provides information concerning the application process for these types of programs. To apply, the Complimentary Promotional Content Application Form must be used. These documents are available on www.txt.ca

10. Mobile Commerce

10.1 m-Payments:

m-Payment allows consumers to pay for goods and services using their mobile handset; payments appear directly on their phone bill or prepaid account, via SMS or a carrier billing transaction. Goods and services that are purchased using m-Payments are different from Premium SMS and Premium SMS Subscriptions in that content is not delivered directly to the mobile device (as is the case with a text message or application).
The Common Short Code Application Guidelines may support the use of Short Codes solely as a means for an ASP to use a WSP to bill on behalf of the applicant for a sale of the applicant's service or content, where said service or content goes beyond information contained in a basic text message.

A maximum $20 monthly spending cap per consumer per Short Code must be implemented. Any increase to the spending cap must be requested by the Content Provider in advance of its implementation and may be granted at the sole discretion of each WSP on a case-by-case basis. Lease terms for these programs are limited to a maximum of 6 months, and may be renewed pending Short Code Council approval.

Note: where m-Payment programs have a subscription element associated with the program all applicable rules in IV.6 will apply.

10.2 m-Banking:

m-Banking allows financial institutions to offer the mobile services to their consumers such as:
a) Alerts for account activity and transfers,
b) Transaction verifications and notifications,
c) Customer service information requests such as branch locations for example.

10.3 m-Offers:

m-Offers are vouchers or coupons that are typically sent to the consumer by the Content Provider/Aggregator. Presenting an m-Coupon at the point of sale (retailer for example) allows the consumer to receive the same benefits as another consumer who has a paper

coupon/voucher. These coupons or vouchers can be sent via SMS, as a WAP link or MMS (such as a barcode).

10.4 m-Ticketing:

m-Tickets allow consumers to obtain tickets from any location and at any time using mobile phones. m-Tickets are typically delivered to the consumer via SMS, as a WAP link or MMS (such as a barcode). Consumers are then able to use their tickets immediately by presenting their mobile phones at the venue.

11. Contests

In addition to adhering to the Canadian Common Short Code Application Guidelines, Content Providers running contests are encouraged to refer to the following governmental guidelines:

- Competition Bureau Enforcement Guidelines for Promotional Contests; http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/03126.html,
- Québec Régie des alcools, des courses et des jeux; http://www.racj.gouv.qc.ca/index.php?id=88&L=1

The following information must be included in the Short Code application for all contesting programs:

a) There must be a "No Purchase Necessary" method of participating in the contest.
b) Full contest Rules and Regulation, which abide by all applicable local, provincial, territorial and federal laws, must be available upon request by any individual WSP prior to the program launching. The applicant must provide the contact information for the WSPs to use should they require access to the contest Rules and Regulations. Notwithstanding CWTA and WSP guidelines within this document, nothing contained herein confirms any legal compliance. Compliance with all applicable laws is the sole responsibility of the Content Provider.
c) The details regarding prizing offered to contest winners, draw dates, defined contest period, number of prizes, any regional allocation of prizes and chances of winning must be included in the application form for all programs with a contest element.
d) For all Premium SMS, there must be a minimum prize value of $500 per month of the contest term (e.g. a 6 month contest term must offer a prize with a minimum value of $3000). This guideline does not apply to free or standard rate Short Codes.

 When advertising a contest, the following requirements are to be adhered to (at a minimum):

e) Disclosure should be made in a reasonably conspicuous manner prior to the potential entrant being inconvenienced in some way or committed to the Content Provider's product or to the contest.
f) Contest winners are to be selected or prizes are to be distributed on the basis of skill or on a random basis.
g) CTAs must not use wording that convey a false guarantee of prize or reward (e.g. "already a winner", "today's winner", "selected to win", "must enter phone number to claim prize")

Examples of SMS contests include but are not limited to: answering trivia/skill questions, ballot draw entries and reverse auctions.

Contests Running in Québec:

Where Québec residents are ineligible to participate in a Premium SMS contest, the Content Provider must (at a minimum) block Québec area codes from participating in the contest. In the event that a Premium SMS contest is only used to promote the content (where the contest is not the content), it must be made clear to customers with province of Québec area codes that they are ineligible for the advertised prize before they choose to proceed with confirming their opt-in. Should the consumer abandon the registration process, all communication is stopped. If they agree to continue the subsequent registration steps must carry out the required opt-in process in full.

At the time of application, the Content Provider must disclose their intent to offer their Premium SMS contest to Quebec residents or their intention to block Québec area codes. If the Content Provider intends to offer Québec residents the opportunity to participate, they must include a statement that confirms the Premium SMS contest is currently registered with the Québec Régie des alcools, des courses et des jeux (RACJ). In the event that the contest is not required to be registered with the RACJ, a letter from the RACJ must be submitted with the Short Code application form confirming this fact.

Additional Chances to win:

During the course of a Premium SMS contest, the Content Provider may wish to offer the consumer an additional chance to win. This aspect of the program must be stated in the CSC application when submitted and approved by the Short Code Council.

Once the consumer enters the contest, the confirmation MT they receive may include a CTA for an additional chance to win. This message must include the additional pricing terms and opt-out information. Prior to incurring any additional premium costs, the consumer must reply to this message indicating that they wish to play again.

Example 3: Additional chance to win for a premium contest programs:

	Sample Text	**Charge**
MO	Consumer's entry in response to a CTA	Non-Premium
MT	Congratulations u'r entered in the draw! Want 1 more chance to win? $2 per entry reply YES to play again! To end txt STOP	Premium
MO	YES	Non-Premium
MT	Additional chance to win in the form of a ballot or question	Premium

12. Chat Programs

There are two types of chat programs:

12.1 Peer to Peer – Where the interaction is between two individuals, neither of whom are a paid "chat professional." Peer to Peer chat programs charged on a per message basis should be charged on the MO to limit the possibility of one consumer sending large amounts of unwanted messages to another consumer. Consumers should have the ability to 'block' unwanted contact from a specific consumer. This 'block' function should be reversible.

12.2 Operator Assisted – Interaction with an operator assisted chat must be limited to a 1:1 message ratio unless otherwise approved by the Short Code Council. The paid "chat professional" is expected to conform with their own industry best practices to ensure an ideal consumer experience.

Administrative messages associated with opting-in to the program and setting up profiles should not incur premium charges where possible. The call-to-action must disclose if premium charges are incurred in the registration process.

If any aspect of a chat program includes a subscription element, all subscription program guidelines must be observed. These include the double opt-in for premium subscriptions, and monthly reminder message for all subscription programs. Chat-specific subscription elements can include: A match or profile notification subscription service offered at a premium above and beyond the initial agreed terms, which must require an additional opt-in to be obtained from the subscriber for this service.

Each WSP may, on a case-by-case basis, request that a spend cap be implemented for a chat program. Chat Program Operators should contact their Aggregator for specific information related to each WSP.

All chat programs should include an age verification process to ensure the content of the chat is appropriate to the consumer's age. The age verification process must require the consumer to actively confirm their age, either by providing their birth date, age or by replying in the affirmative that they are past a certain age.

13. Programs Requiring Special Consideration

The Common Short Code Application Guidelines do not typically support programs involving alcohol, tobacco, gaming or adult oriented content; nor do they typically support programs used for the promotion of any individual WSP. For further information on these types of programs, please email shortcodes@cwta.ca or call 613-233-4888 and ask to speak with a member of the Short Code Team.

Common Short Code Application Guidelines at this time do not support programs that require, explicitly or implicitly, a guarantee that a text message will be delivered. Two specific categories of these alerts are further explained below:

13.1 Campus Alerts:

CSC applications requesting to offer campus alerts by SMS to students may be approved by the Short Code Council on a case-by-case basis. Campus-wide alerts such as school closures due to weather, class cancellations, and exam schedule changes are the anticipated alert content. It is not anticipated that these alerts will be used for urgent, time

sensitive communications as a sole means of alerting consumers. For further information please contact the CWTA.

13.2   Health Alerts:

CSC applications requesting to offer SMS alert subscriptions whose message content pertains to health alerts or medication reminders may be considered by the Short Code Council on a case-by-case basis. Consumers must be aware that message delivery cannot be guaranteed. For further information please contact the CWTA.

14. Charitable Donation Programs

The Mobile Giving Foundation Canada (MGF-C) allows registered charities the opportunity to have mobile phone consumers donate money to participating charities by texting a keyword to a Short Code. Application Service Providers wishing to run charitable donation programs should contact the MGF-C for more information about running these types of programs in Canada. General information is also available by visiting the Mobile Giving Foundation Canada website at www.mobilegiving.ca.

All charitable donation programs that use a Common Short Code must be fully compliant with the Canadian Common Short Code Application Guidelines.

V. <u>**CSC Code of Conduct**</u>

The following items are to be complied with by, or are the obligations of, the leaseholder of record and/or the Aggregator:

1. The Aggregator must ensure that consumers "opt-in" or volunteer to participate in a Program. Unsolicited text messages shall not be sent to consumers.

2. The Aggregator must provide an "opt-out" process. This process must include the ability for a consumer to simply send the message "STOP" to the Short Code in order to opt-out of the program.

3. The Aggregator can only use an approved Short Code for each Program and may not alter the approved Program without obtaining permission from the Administrator.

4. The Aggregator, in conjunction with the Application Service Provider and Content Provider, will use commercially reasonable efforts to promote the Short Code program.

5. The Aggregator shall not assign or resell the Short Code.

6. The Aggregator must ensure that consumers are informed of the price of sending a text message to the Short Code, every time the Short Code is promoted to the public.

7. Customer support must be provided for the program. At a minimum, this must include a web based support page and/or email address and/or phone number. Should a phone number be the only available means of obtaining customer support, then it must be a toll-free number The customer support process must include the ability of a consumer to send the message "HELP" to the Short Code in order to obtain information about how to participate in the program. It is also required that consumers be able to send a message to "INFO" in order to obtain contact information for the Program.

8. All messages sent to a consumer must identify the Short Code from which the message was sent.

9. If a message sent to a consumer solicits the consumer to contact the Program by means other than text messaging (e.g. phone, web, etc.), the price of the means of contact must be stipulated in the text message.

10. For applications involving information services, such as news, stock, event or sports score updates, the date and time the information was produced must be included in text message.

11. Unless otherwise agreed to by the Administrator, the length of text messages sent to consumers must not exceed 136 characters.

12. The Aggregator must ensure that the Program is not misleading and, in the case where the Short Code is promoted as brand name or trade mark (for example CWTA instead of 2982), the Program Aggregator must guarantee that it has the right to use said brand name or trade mark.

13. For services or programs involving, but not limited to, alcohol, tobacco and adult oriented content, the Aggregator must verify that each consumer is of legal age in his/her Province or Territory of residence, prior to allowing the consumer to participate in the program or receive a text message from the Program. These programs should not be marketed to individuals under the legal age.

     In the event that the Program Aggregator does not comply with this CSC Code of Conduct, the Administrator may revoke the Short Code.