

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of the Petition of)	
)	
Public Knowledge <i>et al.</i>)	RM-_____
)	
for Declaratory Ruling Stating that Text Messaging and Short)	WT Docket No. 08-7
Codes are Title II Services or are Title I Services Subject to)	
Section 202 Nondiscrimination Rules)	

**REPLY COMMENTS
OF
PUBLIC KNOWLEDGE, FREE PRESS,
CONSUMER FEDERATION OF AMERICA, CONSUMERS UNION, EDUCAUSE,
MEDIA ACCESS PROJECT, NEW AMERICA FOUNDATION, U.S. PIRG,
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Summary

There is a real and ongoing problem in the U.S. communications network today. Those who control the entry points into the communications system want to be able to control who can speak to the public and what can be spoken about through the rapidly-growing medium of text messaging. Wireless carriers are currently openly engaging in discrimination against potential competitors, and claim the right to exercise editorial control over what their customers read and who they can communicate with. In response to this problem, Public Knowledge and a coalition of concerned public interest organizations, short code service providers, and legislators filed a petition asking the Commission to declare that text messaging services, including the provisioning and delivery of text messages addressed by short code, are subject to Title II nondiscrimination rules.

The Commission has recognized the importance of this issue and has sought the public's comments. Since then, parties including communications companies, political campaigns, commercial text message service providers, public interest and advocacy organizations, and hundreds of individual citizens have filed comments supporting the petition and asking the Commission to protect text messaging.

In their own comments, the mobile carriers have tried to convince the Commission that there is no longer a problem, that the public is best served when carriers exert editorial control over the content that consumers receive, that the Commission lacks the authority to regulate text messaging services, and that the carriers' First Amendment rights will be harmed if text messaging services must be provided in a nondiscriminatory way. These arguments are incorrect as a matter of law and policy.

First, the problem is real and current; carriers are discriminating against competitors and claiming the right to exert broad editorial control over text messages, especially those addressed to or from short codes. Second, as has been demonstrated with new communications media in the past, empowering consumers and ensuring the inability of the carriers to discriminate based on content is the best way to protect users both from unwanted communications and from the control of a small set of corporate interests. Third, as the Communications Act and case law demonstrate, the Commission is required by the law to apply the non-discrimination provisions of Title II to these services. Finally, it is the First Amendment rights of the users, not of the carriers, which should determine the direction in which our communications networks are developed.

The Commission should not accept the proposition that common carriers are allowed to decide what speech travels over the networks they operate. The FCC should recognize that text messaging services, including those addressed via short code, are offered openly to the public on standard terms, and are therefore nondiscriminatory common carrier services. The Commission should also recognize that these services qualify as interconnected mobile services, which are likewise subject to section 202 nondiscrimination rules. Finally, should the Commission decline to find that text messaging is a Title II service, it should use its Title I ancillary jurisdiction to apply those nondiscrimination rules to text messaging services.

REPLY COMMENTS OF PUBLIC KNOWLEDGE *ET AL.*

Public Knowledge *et al.* hereby submit these reply comments in the above-referenced docket.¹ These reply comments largely respond to the comments of wireless carriers arguing that the problem has already been solved, that nondiscrimination will prevent carriers from protecting consumers from unwanted speech, that the Commission does not have the power to ensure that text messaging services are nondiscriminatory, and that a nondiscrimination requirement will restrict carrier speech. For the reasons set out below, the Commission can and must act on this real, current problem and protect the rights of consumers by ensuring that text messages are not blocked and are subject to nondiscrimination rules.

Introduction

Public Knowledge *et al.* have petitioned the FCC to ensure that speech in a new communications system remains as free as the First Amendment promises and that competition is as robust as the FCC assures.² Public interest groups, communications companies, political campaigns, text message service providers, and over 200 individual citizens have submitted comments in support of the proposition that the owners of the onramps to modern communications systems should not have the right to choose who uses those systems and for what purpose. These comments also make it clear that the problems cause by carrier

¹ See Public Knowledge, Free Press, Consumer Federation of America, Consumers Union, EDUCAUSE, Media Access Project, New America Foundation, U.S. PIRG, Petition for Declaratory Ruling, WT Docket No. 08-7, Dec. 11, 2007, available at <http://www.publicknowledge.org/pdf/text-message-petition-20071211.pdf> [hereinafter *Petition*]. See also Public Knowledge *et al.*, WT Docket No. 08-7, Mar. 14, 2008, available at <http://www.publicknowledge.org/pdf/pk-et-al-comments-20080314.pdf> [hereinafter *PK Comments*]. These reply comments incorporate by reference the *Petition*, *PK Comments*, and all of the arguments and facts therein. For a description of the parties, see *Petition* at 1-2; Addendum to Petition, Dec. 21, 2007, available at <http://www.publicknowledge.org/pdf/text-message-addendum-20071221.pdf>; Second Addendum to Petition, January 31, 2008, available at <http://www.publicknowledge.org/pdf/text-message-addendum-20080131.pdf>.

² See *Petition*.

discrimination and raised in the petition are real and ongoing because carriers are still blocking services and claiming the right to block more.

The carriers would prefer that the Commission ignore the issue, arguing that because NARAL received its short code, there is no longer any problem. But this is simply untrue. Rebtel, an independent company which offers cost-effective VoIP³-based voice calling, continues to be unable to reach customers for those legal, opt-in, pro-consumer services. Carriers continue to assert that they should have the discretion to decide who can use short codes to address communications, including the ability to do so to further their own, individual corporate goals. The problem is ongoing, and the damage will continue to accrue until the Commission makes it clear that carriers cannot discriminate in providing these services.

In our petition, we pointed out that text messages, including those text messages that are addressed to or from short codes, are Commercial Mobile Radio Services (“CMRS”) subject to all Title II regulations including section 202’s prohibition against “unjust and unreasonable discrimination.”⁴ We also argued that, should the Commission determine that text messages or short codes were Title I services instead, the public interest called for the application of those same nondiscrimination rules.⁵ Finally, in our comments, we clarified that because carriers, through the Common Short Code Administration (“CSCA”), offer short codes to the public at large, text messaging addressed via short codes is a common carrier service which is subject to all of Title II’s regulations.⁶

Several incumbent carriers and a single ally of the carriers have raised concerns with the petition. All of these are unfounded, inaccurate, or solvable. None of them justifies giving

³ Voice over Internet Protocol.

⁴ *Petition* at 7-13.

⁵ *Id.* at 16-24.

⁶ *PK Comments* at 3-5.

carriers the right to refuse to serve individual parties or to arbitrarily censor text messages, be they sent to or from 10-digit numbers from cell phones or to or from a short code campaign. In these reply comments, we will make several points responding directly to comments filed in this docket: First, discrimination in text messaging services is a continuing problem, with carriers openly engaging in anticompetitive blocking of services and claiming the right to refuse to serve others. Second, consumers will still be protected from unwanted messages in a nondiscriminatory system. Third, the law requires and empowers the Commission to apply nondiscrimination to text messages, including those using Common Short Codes (“CSCs”). And finally, allowing discrimination in text messages is a far greater First Amendment concern for citizens than it is for carriers.

I. UNDERSTANDING TEXT MESSAGES AND SHORT CODES

Essential to understanding the petition and comments is both a technical understanding and a real-world understanding of the services at issue. While some commenters criticize the petition for overlooking technical differences between Short Message Services (“SMS”) and short code services, in fact those commenters’ description of the technology confirm that the petition was exactly correct.⁷ To clarify matters, we will describe the terminology used including the differences between the services which are discussed in this docket, and highlight the actual, varied uses that citizens are making of text messages in the marketplace.

A. Short Codes Are a Type of Address Used to Send Text Messages

Text messaging, or SMS, is the overarching service by which short, 160-character messages are sent from one point to another. SMS can also be used to send binary data,

⁷ *Petition* at 2-3; *Comments of CTIA – The Wireless Association* at 5-6, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867094 [hereinafter *CTIA Comments*]; *Comments of Verizon Wireless* at 8-9, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519866994 [hereinafter *VZW Comments*].

including pictures and ringtones. SMS messages can be sent to or from traditional 10-digit North American Numbering Plan (“NANP”) phone numbers, but can also be addressed using shorter numbers or “short codes.” The 5- and 6-digit variations of these short codes are called “Common Short Codes” and are rented to the public by the Common Short Code Administration. Short codes generally are not used to deliver messages from one phone to another, but to send messages between a phone and a network-based service like NARAL’s.

Some parties have attempted to confuse the Commission with technological explanations that are not relevant to the legal characterization of the service provided to the consumer. For instance, the providers attempt to distinguish between text messaging and common short codes as two separate services.⁸ They try to explain that SMS involves the storing and forwarding of messages, while common short codes are used to route messages and to provide billing and collection for those messages.⁹ The providers’ efforts to separate these activities into two “services” is analogous to saying that carrying a voice phone call is a totally separate service from the provision of telephone numbers. In the context of voice telephone services, a telephone number is used to route a voice phone call to its intended destination, and it is also used to provide billing and collection. Even though there are technically several functions involved in providing telephone services, these functions are all part and parcel of providing voice common carriage service. Just like telephone numbers and voice calls, short codes are used to route and bill for the provision of text messages. These functions work together to provide the customer the experience of receiving a message sent from one user to another and to ensure that the

⁸ See, e.g. *Verizon Comments* at 2.

⁹ *Comments of Sprint Nextel Corporation* at ii, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867022 [hereinafter *Sprint Nextel Comments*].

appropriate party is billed for this service. There is nothing to distinguish the combination of SMS and CSCs from the prototypical voice common carrier service.¹⁰

Messages passing in either direction between phones utilizing NANP numbers and systems using short codes are all common carrier SMS services. Our petition has addressed text messages addressed to both NANP numbers (phone-to-phone text messages) and short codes, and has asked that the Commission clarify that both are subject to nondiscrimination rules.¹¹

It appears that carriers are already complying with the nondiscrimination rules regarding phone-to-phone text messages. MetroPCS agrees with petitioners that “the Commission should now clarify that [non-short-code] SMS services are CMRS services for all regulatory purposes.”¹² CTIA asserts that carriers do not block any such messages, suggesting that a nondiscrimination rule would not change the status quo significantly.¹³ Verizon states that “Carriers Do Not Block SMS Between Two Wireless Consumers.”¹⁴ In other words, carriers are already acting as common carriers for these services. Since they are already providing nondiscriminatory phone-to-phone text messaging services, there is little reason not to recognize

¹⁰ “Common Short Codes (CSCs) are phone numbers, usually four to six digits, that mobile phone users utilize to send Short Message Service (SMS) messages to in order to receive information, sports scores, weather alerts, or to participate in contests and receive electronic coupons.” Mobile Marketing Association, *Common Short Code Primer* at (<http://www.mmaglobal.com/shortcodeprimer.pdf>) (available through the CSCA web site).

¹¹ For brevity, petitioners use the term “short code messages” to describe SMS messages sent to or from short codes and to the related process of provisioning short codes for SMS services; this in no way implies that they are not SMS-based services. Likewise, the terms “text messaging” and “SMS” are used, as they are by the industry and general public, interchangeably; as discussed above, with current technology, text messages can contain more than text-based speech. Finally, when petitioners describe as text messages being sent “via short codes,” it is referring to the fact that the messages in question are addressed to or from a short code.

¹² *Comments of MetroPCS Communications, Inc.* at 8, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519866969 [hereinafter *MetroPCS Comments*].

¹³ *CTIA Comments* at 9.

¹⁴ *Verizon Comments* at 8. Verizon, however, goes on to clarify that this is true “[s]o long as an individual customer does not send so many identical text message that they trigger the carrier’s spam filter.” *Id.* at 9.

their Title II common carrier status.¹⁵ For this reason, our reply comments will concentrate on the arguments surrounding text messages sent via the common short codes which are offered to the public, rather than phone-to-phone SMS.

We do, however, wish to make clear the distinction between standard rate text messages and premium short text messages—two separate services whose differences have sometimes been blurred by the carriers when convenient. When a standard rate message is sent to a customer, that customer pays only the normal amount (if any) that he or she pays when receiving a text message from any source. When a message is sent with premium content, the consumer is charged an additional amount, either as a subscription fee or a one-time charge.¹⁶ Some of the premium fee is paid to the carrier, and some is paid to the content provider; the billing for these premium charges is handled by the carrier.¹⁷

Because premium short codes were not involved in the NARAL incident or the ongoing Rebtel situation, the petition is primarily concerned with standard rate short codes. Similar legal and policy arguments do apply to short codes offering premium services, which are also protected speech (though commercial in nature), and so, if necessary, the issue of premium short codes could be addressed in a future proceeding. Many of the counterarguments put forth by the carriers, such as those regarding unwanted charges, are relevant only to premium short codes, and should be considered in that light.¹⁸

¹⁵ Notably, the Commission's CMRS Competition Report includes data and analysis about the text messaging market, although it is unclear whether this report includes text messages sent to or from short codes. See Federal Communications Commission, *Twelfth Annual Report and Analysis of Competitive Market Conditions With Respect to Commercial Mobile Services*, WT Docket No. 07-71, FCC 08-28 (Feb. 4, 2008) [hereinafter *2008 CMRS Competition Report*], available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-08-28A1.pdf.

¹⁶ *Verizon Comments* at 13-14, *Comments of Rebtel, Inc.* at 3-4, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867012 [hereinafter *Rebtel Comments*].

¹⁷ *Verizon Comments* at 13-14.

¹⁸ See, e.g., *Verizon Comments* at 15; *AT&T Comments* at 19.

B. Americans Use Short Codes for Widely Diverse of Political, Religious, Governmental, Educational, and Commercial Purposes

To understand fully the petition and the comments filed in this docket, it is necessary to understand how text messages, and specifically Common Short Codes, are being used today. All parties agree that there is extremely rapid growth in the use of text messaging in the United States.¹⁹ The types of communications which are carried over short codes are as varied as speech itself. In our petition, we described how short codes are being used to distribute health information, communicate questions to political candidates, gather petition signatures on issues of public concern, provide consumers with information on corporations' environmental impact, and enable citizens to contact their legislators on important political issues.²⁰ In our comments, we observed that organizations of all sizes and from across the political spectrum, from the Republican National Committee to the Democratic Congressional Campaign Committee and from Focus on the Family to the Human Rights Campaign, use text messaging addressed via short codes to keep in touch with their supporters.²¹

The list of ways people are using short codes continues to grow. Mobile Verses will send a Bible verse to your phone daily.²² The National Association of Realtors, which filed comments in this proceeding, relies on short codes to provide services both to Realtors and to real estate consumers.²³ Short codes can be used for direct, person-to-person communication as well. Users of the AOL Instant Messenger service can both send messages to and receive messages

¹⁹ See, e.g., *Petition* at 19-20; *Verizon Comments* at 7; *MetroPCS Comments* at 2, *CTIA Comments* at 51.

²⁰ *Petition* at 20, 23-24.

²¹ *PK Comments* at 9.

²² *Mobile Verses*, at <http://www.mobileverses.com/pin/pages/1.php?p=MV&r=menu>. While Mobile Verses is a premium short code service, it still demonstrates the breadth of uses to which short codes are put.

²³ *Comments of National Association of Realtors*, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519854987.

from phones via a short code.²⁴ Any Twitter user can keep in touch with friends by texting personal up-to-the-minute updates to Twitter; those updates are retransmitted to all their interested friends, who can receive them on their phones—all using Twitter’s short code.²⁵

Public safety is also making extensive use of text messaging via short codes. Numerous educational institutions and local governments offer text-based security alerts through short codes.²⁶ The FCC recently issued an order approving a plan to make a nationwide emergency alert system, to be delivered via text messages.²⁷ And the nationwide AMBER Alert system for reporting child abductions already utilizes short codes for subscribing to and transmitting AMBER alerts to local concerned citizens.²⁸

These comments cannot possibly list all of the uses which Americans make of short codes, and so we have attached the list of short code campaigns which is publicly available from the CSCA’s web site.²⁹ Note that the 522 services listed in Attachment A—which include the political parties, newspapers, candidates, religious groups, governmental bodies, social networking services, sports teams, radio stations, hobbyist organizations, and more—are just the campaigns that have affirmatively taken action to be listed: they represent only “a subset of those registered with the Common Short Code Administration.”³⁰ Finally, the carriers’ attempts to

²⁴ See America Online, *AOL Introduces New AIM Version 6.5*, at http://corp.aol.com/press_releases/2007/10/aol-introduces-new-aim-version-65 (Oct. 3, 2007).

²⁵ See Twitter, *Twitter Phone FAQ*, at <http://help.twitter.com/index.php?pg=kb.page&id=102>.

²⁶ See Roam Secure, *Customer Profiles*, at <http://www.roamsecure.net/customerprofiles.php>.

²⁷ See San Francisco Chronicle, *FCC Plan Will Use Texting For National Alert System* (Apr. 10, 2008), available at <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2008/04/09/BUQ1102SJK.DTL>; Federal Communications Commission, *Commercial Mobile Alert System First Report and Order*, F.C.C. 08-99 (Apr. 9, 2008). We note that is not clear at this juncture what addressing system CMAS will use for its SMS messages.

²⁸ See *Wireless Amber Alerts*, at <http://wirelessamberalerts.adcouncil.org/howwirelessamberalertswork.htm>.

²⁹ See Attachment A; *CSCA Directory*, at

<https://www.usshortcodes.com/csc/directory/directoryList.do?method=showDirectory&group=all>. For current information about how people are making new uses for text messaging and short codes, see <http://www.textually.org/>.

³⁰ *CSCA Directory*, at

<https://www.usshortcodes.com/csc/directory/directoryList.do?method=showDirectory&group=all>.

pigeonhole short codes as commercial advertising services are belied by their own description of just how varied those services are; Verizon's comments point out that those offering short code services include political candidates, weather alerts, directory services, and issue advocacy campaigns.³¹

II. BLOCKING OF TEXT MESSAGES IS A REAL AND ONGOING PROBLEM

The carriers have suggested that because Verizon provisioned NARAL's short code, and because Rebtel is a competitor, that there is no longer a problem, and a nondiscrimination rule is unnecessary. The facts, however, do not support this conclusion. Verizon has never released its new or old discrimination policies, and still wants to reserve the right to block the next speaker that does not fit Verizon's unstated policies as long as there is not enough public outcry to make it an unsound financial choice. At least three carriers are still openly blocking Rebtel solely because they do not want to carry the communications of a competitor. There is no competition to restrain this behavior in the relevant short code provisioning markets, and the competition in the consumer market is simply insufficient to do so. These problems are still alive, and will remain so until the Commission declares that discrimination is unlawful and unacceptable.

A. Carriers are Still Openly Discriminating

In their comments responding to the petition, the carriers largely glossed over the continuing refusal of several carriers to connect Rebtel to their customers.³² The U.S. Chamber of Commerce, for example, says that the "NARAL incident was actually a case of the market working," and fails to mention the blocking of Rebtel entirely.³³ T-Mobile is similarly "confident that the market will force providers to respond to their customers' wishes, just as

³¹ *Verizon Comments* at 10-11.

³² *See Rebtel Comments*.

³³ *Comments of Chamber of Commerce* at 4, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867071.

Verizon Wireless did in response to the NARAL incident,” again ignoring the evidence of market failure and anticompetitive behavior by carriers.³⁴

MetroPCS’s only response to the issue is not to contest the nature of the problem, but to make the irrelevant point that “no VoIP service provider that was the alleged target of such a practice is a party to the Petition.” And while it is true that Rebtel is not a party to the petition, there is no requirement that it become one; petitioners believe that Rebtel’s filing of extensive comments supporting the petition and detailing their treatment by the carriers speaks for itself.³⁵

Verizon suggests that Rebtel is attempting to advertise to their customers, and therefore carriers are entitled to discriminate against Rebtel.³⁶ This argument fails both factually and legally. First, Rebtel is *not* advertising; as Rebtel describes in detail in its comments,³⁷ it is actually offering a service which is enabled through a text message which informs the user how to connect to the person attempting to call them. It is no more advertising than it would be for one person to text a friend asking the friend to call them on a given phone number. Second, and perhaps more importantly, as a common carrier Verizon is obligated to carry all speech, even if that speech is commercial advertising for a competitor. If AT&T makes a legal phone call to a Verizon customer to advertise AT&T’s service, Verizon cannot block that call,³⁸ the same is and should be true in text messages, regardless of how those messages are addressed.

Finally, AT&T has suggested that somehow Congress’s decision to not force wireless carriers to provide customers with “equal access” (*i.e.*, nondiscriminatory access) to other long distance providers, as wireline operators must, demonstrates that wireless providers should not

³⁴ *Comments of T-Mobile USA, Inc.* at 7, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867018 [hereinafter *T-Mobile Comments*].

³⁵ *Rebtel Comments*.

³⁶ *Verizon Comments* at 22.

³⁷ *Rebtel Comments* at 6.

³⁸ Of course, the consumer can opt to have that marketing call blocked through the do-not-call registry.

be bound by any nondiscrimination rules.³⁹ This is a non-sequitur. Forcing local carriers to provide their customers with access to *other* toll carriers—which is what section 332 exempts commercial mobile service providers from—is completely different from the duty to serve consumers and competitors as a common carrier.

B. Allowing NARAL to Speak Did Not Solve a Systemic Discrimination Problem

The carriers comments suggest that the market is working and that there is no longer a problem because they responded quickly to a front-page *New York Times* article. Companies such as Rebtel, which offers opt-in, pro-consumer international calling services, and which are still blocked by carriers, disagree because their businesses are currently and openly being stifled by carriers' anticompetitive behavior.⁴⁰ But even if Rebtel were to be provisioned tomorrow, the problem would not be solved.

Verizon and the other carriers still have not made public any policies they use to decide who may or may not use their networks. And even were they to do so, individual carrier policies can be changed. Carriers continue to vigorously assert their right to continue to discriminate in the future, restricted only by the extent to which those who are discriminated against can hurt the carriers' public image.

Here we have a problem which is clearly real and current, and which demonstrates that existing competition and public oversight are insufficient to solve it. This is a situation which has repeated itself throughout the development of our nation's communications networks: a new communications medium is rising, and those who own the medium are attempting to maintain control of the message. The Commission's response should once more be to ensure that the

³⁹ See *Comments of AT&T, Inc.* at 20, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867003 [hereinafter *AT&T Comments*]; 47 U.S.C. § 332(c)(8) (exempting commercial mobile services from "equal access").

⁴⁰ *Rebtel Comments*.

medium is open, to declare that a common carrier cannot discriminate against speakers, and to let democratic processes rather than gatekeeper corporations solve any difficulties which arise.

C. There is Insufficient Competition to Protect Consumers from Abuse

Carriers argue that the competition in the wireless market is sufficient to prevent abusive discrimination, but experience demonstrates otherwise. And while it is easy to conflate them, there are three distinct markets at issue, none of which solves the problem: the market for renting short codes has no competition at all; the market for provisioning a short code so that a campaign can reach a given consumer is a monopoly as well; and the consumer market has insufficient choice to curb abuses.

1. There is No Competition in the Market for Renting Short Codes

The market as viewed by short code service providers is a market of one. They can only rent a Common Short Code from the CSCA, which is a part of the trade group belonging to all of the major wireless carriers.⁴¹ There is nowhere else for a service provider to go: if it cannot rent a short code from the CSCA, it cannot rent one from anyone in the United States. And 10-digit phone numbers are not a substitute for CSC services because service providers lose the benefits of ease-of-use of a shorter number, cannot compete with those services (such as the carriers own) which are not blocked, and because long codes lack the technical and billing requirements offered by short codes.⁴²

2. There is a Termination Monopoly for Reaching Consumers

Even if a group or individual seeking to provide short code-based services successfully rents one from the CSCA, each individual carrier can restrict the possessor of that short code

⁴¹ See CTIA, *Current Members*, at http://www.ctia.org/membership/ctia_members/ (including AT&T Mobility, Verizon Wireless, T-Mobile USA, and Sprint Nextel Corporation).

⁴² See *Rebtel Comments* at 6.

from communicating with that carrier's customers by refusing to provision that code. Arguments that there is competition between carriers at the provision level are unavailing—to reach a particular customer, a short code service has only one option: that customer's carrier. Each carrier has a termination monopoly on its customers, with the largest two carriers covering half the market.⁴³ Should that carrier refuse, there is no alternate route, and therefore no meaningful competition.

3. There is Insufficient Competition in the Consumer Market to Prevent Unjust and Unreasonable Discrimination

The competition that exists in the consumer market is insufficient to curb any abuses. As the Open Internet Coalition pointed out in its comments, Competition has actually shrunk in the wireless market.⁴⁴ In measuring market concentration, the Department of Justice describes a Herfindahl-Hirschman Index ("HHI") of above 1800 as "highly concentrated;"⁴⁵ according to the Commission, as of 2006, the average weighted HHI value in the wireless industry was 2674.⁴⁶ Two carriers now account for over half of wireless customers, and these same carriers provide not just text services, but voice services, video, Internet, and a host of other options which provide incentives to keep communications channels to customers as free from competition as possible.

Further, where, as here, all "competitors" in a market share similar goals, a choice of several carriers will not be enough to restrain anticompetitive behavior. There need be no stronger demonstration of this failure of an oligopoly to curb abuses than Rebtel. Because most

⁴³ *Comments of the Open Internet Coalition* at 7, available at http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6519867015. See also

⁴⁴ *Id.* at 7.

⁴⁵ United States Department of Justice, *Horizontal Merger Guidelines* § 1.51, available at http://www.usdoj.gov/atr/public/guidelines/horiz_book/15.html. See also Janice Obuchowski, *A Broadband Pipe, or a \$12 Billion Pipe Dream?* at 6, available at <http://www.newamerica.net/files/ObuchowskiPresentationSlides.pdf> (detailing concentration of wireless market from 199 to 2004).

⁴⁶ *2008 CMRS Competition Report* ¶ 52.

carriers have the same interest in preventing consumer access to alternative, cost-effective telecommunications services, they have the incentive to collectively stifle competition rather than allow it. This is exemplified by the fact that Rebtel is still blocked by three major carriers.

Unfortunately, there are often not enough competitors and not enough informed consumers to constrain this collective behavior. While a national non-profit organization like NARAL may be able to get a front-page *New York Times* article in order to force a carrier's hand when it starts restricting speech, smaller speakers like Rebtel with less political clout and fewer connections cannot. The fact that someone who wants to make legal use of a communications network is unable to get large numbers of people to switch carriers in a market with so few competitors does not make their speech any less important or deserving of protection. Yet these speakers currently lack a clear statement that they are so protected. Because the existence of some minimal competition is insufficient to protect speech to the extent necessary, the Commission must act to do so.

III. NONDISCRIMINATION REQUIREMENTS FOR CARRIERS WILL PROTECT CONSUMERS

In their comments, carriers argued that consumers benefit from the carriers' policing of their networks to restrict access to legal content because they are less likely to receive pornography or unsolicited advertisements. They further argue that, should the FCC find that nondiscrimination rules apply to text messages and CSCs, that users will be flooded with unwanted messages, and that there will be no way to remedy the situation. Finally, they argue that despite their deliberate restriction of speech, there is no problem, and that competition between carriers will be sufficient to curtail any abuses. The evidence, however, demonstrates that all three assertions are incorrect.

As a threshold matter, arguments about the quality of the editorial control used by carriers put the cart before the horse: the ability to exert editorial control is a consequence of not being a common carrier, not the source of the ability to evade common carrier requirements. Because, as described in our petition and comments, providers of text messaging and short code services are common carriers, they are not allowed to engage in value judgments about content, regardless of how well or badly their values comport with the values of their consumers. Only users are allowed to do so. And to the extent that the quality of editorial control exercised and the ability of the market to control it are relevant to the Commission's inquiry into where the public interest lies, the evidence demonstrates that carrier control is a poor substitute for actual free speech.

A. Nondiscrimination Requirements With Consumer Control Will Protect Users from Third-Party Abuses

Carriers attempt to scare the Commission away from applying nondiscrimination rules to text messages with warnings of unrestrained spam, pornography, and fraud.⁴⁷ The reality is that users can still be protected from unwanted messages by enabling those users to make the final decision about what speech to hear.

Section 202 of the Communications Act restricts only “unjust and unreasonable discrimination.”⁴⁸ Enabling customers' ability to determine which messages they do and do not receive does not fall within this prohibition, and so carriers should ensure that consumers have the final say in what speech they receive. The First Amendment guarantees the right to speak, but allows others to choose whether to listen or not listen to certain speech. Thus, carriers could

⁴⁷ See, e.g., *Verizon Comments* at 3-4, 24; *CTIA Comments* at 8; *AT&T Comments* at 19.

⁴⁸ 47 U.S.C. § 202.

implement ways for users to determine themselves what speech they do and do not want, rather than letting the carriers decide for them.

If consumers wish not to receive certain messages, there are numerous ways to achieve that goal without giving carriers complete control. Phones can employ software that allows wireless customers to block unwanted messages. Users could opt-in to message blocking services which disallow certain types of messages, or specifically request not to receive messages from some sources. Although the service is not described in detail, Verizon suggests that carriers already perform this function, as it claims not to block message to its subscribers “except for those text messages that are captured by its spam filters, or those messages for which the subscriber has imposed an affirmative text message block.”⁴⁹ Sprint also explains that they will block or filter messages when “the customer requests such blocking or filtering.”⁵⁰ Customer-requested blocking is already a part of carriers’ networks, and does not require carriers to engage in unreasonable discrimination. Third parties are already offering software for phones which will allow parents to block text messages with unwanted keywords from reaching their children.⁵¹ And as discussed below, regulations could require that users opt in to short code services before they are contacted.

T-Mobile suggests in its comments that to the extent that the Commission decides to apply section 202 to text messages, it should consider explicitly declaring *ex ante* that certain kinds of discrimination would be just and reasonable.⁵² This should be unnecessary: if carriers empower consumers to have the final say in what is received, and do not block messages based

⁴⁹ *Verizon Comments* at 7.

⁵⁰ *Sprint Nextel Comments* at 16.

⁵¹ See *Mobile Phone Use Restricted During School and While Driving; Text Messages Monitored for Words; Cyber Bullying Protection*, Fox Business (Apr. 9, 2008), available at http://www.foxbusiness.com/article/mobile-phone-use-restricted-school-driving-text-messages-monitored-words-cyber_555638_1.html.

⁵² *T-Mobile Comments* at 9 n.14.

on their own value judgments, then there will be no need for the Commission to make individualized determinations of reasonableness before a problem arises.

B. Nondiscrimination Will Protect Consumers from Carrier Abuses

Speech on all of the nation's communications networks should be as free as the law allows. Mobile carriers which filed comments have explained that they want to restrict legal, even consumer-requested speech.⁵³ The key contention appears to be that only carriers are properly equipped to safeguard consumers from what the carriers believe are unwanted or undesirable messages, including—as defined by those same carriers—short code campaigns which were “embarrassing,” or “counter to the brand image of the mobile network on which the campaign appears.”⁵⁴ Said another way, only Verizon can protect consumers from free speech; without that protection, consumers might see something Verizon did not like. This is exactly the type of behavior that this petition seeks to prevent.

The implications of this kind of carrier discretion are staggering. For instance, consistent with the goals quoted above, Verizon could block a consumer watchdog group critical of Verizon's text messaging policies, or AT&T could fail to deliver a *New York Post* article which criticized its censorship of a concert broadcast on its Internet services.⁵⁵ Citizens are already using short codes for important purposes that are unlikely to comport with the interest of carriers. For instance, the Communications Workers of America and ver.di, Germany's largest union, recently started a campaign to support T-Mobile employees who sought collective bargaining rights in the U.S., complete with a short code campaign to provide information to interested

⁵³ See, e.g., *Verizon Comments* at 24; *T-Mobile Comments* at 19.

⁵⁴ *Verizon Comments* at 24.

⁵⁵ See Los Angeles Times Blog, *AT&T Drops Pearl Jam's Ball* (Aug. 8, 2007), at <http://opinion.latimes.com/bitplayer/2007/08/att-drops-pearl.html>.

parties.⁵⁶ Would it be acceptable for T-Mobile to refuse to provision this short code to its customers? Carriers should not be allowed to determine what speech is acceptable and what is not, especially when they explicitly wish to use that power to curb speech which might be critical of or against their political interests.

As discussed above, there are numerous ways for the consumer to retain control of what messages they receive. But when carriers make the decisions regarding what speech to carry, consumers lose the ability to choose what legal speech they will receive.⁵⁷

C. Common Carrier Regulations Protect Users Beyond Nondiscrimination

Although our petition and comments concentrate primarily on the role of nondiscrimination in a common carrier network, it is important to recognize that common carrier status includes other measures designed to protect consumers and improve citizens' access to our communications infrastructure. For instance, as described in the reply comments of the American Foundation for the Blind ("AFB"),⁵⁸ section 255 of the Communications Act requires that "[a] provider of telecommunications service shall ensure that the service is accessible to and usable by individuals with disabilities, if readily achievable."⁵⁹ This provision protects users who would otherwise be entirely denied access to this new, rapidly growing medium. Petitioners endorse the reply comments to be filed by the AFB, which will demonstrate another way in which recognition of the common carrier status of text messaging providers will protect consumers.

⁵⁶ See Communications Workers of America, *CWA and German Union Ver.di Form New 'T Union'*, at <http://www.cwa-union.org/news/cwa-and-german-union-ver-di-form-new-t-union.html>.

⁵⁷ We note that even when common carriers wish to block allegedly illegal activities, there are procedures which they must follow. See *Humane Society v. Western Union, Inc.*, 30 F.C.C.2d. 711 (1971). To the extent that carriers want to be able to block illegal speech, the Commission should look to these procedures for an example of how to regulate this ability.

⁵⁸ See *Reply Comments of American Federation for the Blind*, WT Docket No. 08-7.

⁵⁹ 47 U.S.C. § 255.

D. If Further Consumer Protection is Necessary, it is the Role of the Commission to Provide It

Some carriers have argued that the FCC does not have the ability or the power to formulate rules that will pass First Amendment muster and still protect consumers without a congressional mandate. Carriers suggest that existing regulations are insufficient to protect consumers from unwanted messages, and that the Commission and Congress will be unable to meet the challenge of doing so. History tells us differently.

Cases cited by CTIA demonstrate only that the FCC is constrained by the First Amendment, not that it is unable to effectively regulate within those constraints.⁶⁰ For instance, as CTIA notes, the Second Circuit's entire discussion of the FCC's indecency test was dicta, and the case was decided on "arbitrary and capricious" grounds.⁶¹ The discussion was not of the FCC's authority on the whole, but of one specific new regulation which represented a significant departure from previous rules.⁶² Also, the case has since been taken up by the U.S. Supreme Court, casting doubt on its value.⁶³ And as the CTIA recognizes, the Supreme Court has held that the Commission may regulate otherwise legal, non-obscene speech without running afoul of the First Amendment.⁶⁴

As discussed below, courts have consistently upheld the Commission's and Congress ability to "assure that the widest possible diversity of information sources are made available to the public"⁶⁵ by ensuring that network providers such as cable operators carry local broadcasts, public, educational, and government channels, and channels owned by unaffiliated commercial

⁶⁰ See *CTIA Comments* at 28.

⁶¹ *CTIA Comments* at 28; *Fox Television Stations, Inc. v. FCC*, 489 F.3d 444, 447 (2d Cir. 2007) (*cert. granted*).

⁶² *Fox*, 489 F.3d at 461.

⁶³ See *FCC v. Fox Television Stations, Inc.*, 2008 WL 695624 (Mar. 17, 2007) (*granting cert.*).

⁶⁴ *CTIA Comments* at 28; *F.C.C. v. Pacifica Foundation*, 438 U.S. 726 (1978) (regulating in the context of radio broadcasting).

⁶⁵ 47 U.S.C. § 532(a)

entities.⁶⁶ Like cable operators, mobile carriers deliver information from diverse sources and independent providers of information. The cable experience demonstrates that the Commission may regulate in a way that forces network operators—even those like cable, who are not common carriers—to deliver information from competing sources, precisely because of the possibility that they “might deny access to programmers if the operators disapproved the programmer's social or political viewpoint, or if the programmers' offerings competed with those the operators were providing.”⁶⁷ That is exactly what mobile carriers are doing here, and what they argue that the First Amendment protects their ability to do. Fortunately for consumers, the law confirms the Commission’s ability to prevent this behavior.

We do not deny that regulating in the area of speech is difficult, and should be approached with care. This is for good reason – protecting citizens’ speech rights is important, and must be done in a manner which is as minimally invasive as possible; indeed, case law requires the government, even in the presence of a compelling state interest, to employ the least restrictive means possible to protect that interest if it restricts indecent speech.⁶⁸ However, giving carriers unfettered discretion is no substitute for careful regulation by those who have a constitutional mandate rather than an uncertain market to constrain them.

And while CTIA’s description of the history of regulating 900 numbers⁶⁹ is informative, and highlights the admitted complexity in regulating speech over commercial communications systems, it also highlights the fact that both the Commission and Congress do not leave the decision as to what speech should be allowed in the hands of the carriers. Further, to the extent that the Commission should take anything from their decision not to require carriers to provide

⁶⁶ See *infra notes* 102-104.

⁶⁷ *Time Warner Entertainment Co. v. FCC*, 93 F.3d 957, 968 (D.C. Cir. 1996).

⁶⁸ See, e.g., *Fox*, 489 F.3d 444, 463 and cases cited therein.

⁶⁹ *CTIA Comments* at 16-27.

billing and collection services to 900 numbers,⁷⁰ it is that those carriers were *still* required to provide a phone number and route calls to those services.⁷¹

To the extent that there are messages that could pose problems for consumers, it is the role of Commission, as empowered by Congress, to seek remedies. It is important to recognize that *none* of the existing consumer protection regimes gives communications carriers the discretion to choose what types of speech are allowed on the networks: all speech must be carried unless the law provides otherwise.⁷² There is no good reason to treat text messages or short codes as qualitatively different than other communications media. The default is always that speech is free and as unfettered as possible, and that lawmakers step in only when this freedom becomes actually—not theoretically—problematic for consumers. As CTIA has recognized, short codes, much like 900 numbers, are “merely an address.”⁷³ Billing and collection services are only an issue for premium short codes which are a better (though not perfect) analogy for 900 numbers; as described above, premium short codes are not addressed by the petition.

IV. THE LAW EMPOWERS AND REQUIRES THE FCC TO APPLY NONDISCRIMINATION TO TEXT MESSAGES

In an attempt to deflect attention from the underlying fact that short codes are offered to the public, the carriers argue that delivering text messages addressed via short codes is an information service rather than a telecommunications service, that SMS is not an interconnected service, and that the Commission does not have the authority to enforce a nondiscrimination rule.

⁷⁰ See *CTIA Comments* at 13-14.

⁷¹ See *CTIA Comments* at 16 (recognizing a “duty to deal”).

⁷² See, e.g., Telephone Consumer Protection Act of 1991, Pub. L. 102-243, *codified at* 47 U.S.C. § 227 (regulating telephone marketers and unsolicited faxes); Do-Not-Call Implementation Act, Pub. L. 108-10 (2003), *regulations implemented at* 47 C.F.R. § 64.1200(c)(2) (creating national do-not-call list); CAN-SPAM Act of 2003, Pub. L. 108-187, *codified at* 15 U.S.C. § 7701 *et seq.* (regulating email marketing).

⁷³ *CTIA Comments* at 6.

As a threshold matter, SMS is a common carrier service because it is offered for a fee directly to the public, and thus meets the definitions of both a “telecommunications service” and a “common carrier” service under the Communications Act. As a result, the nondiscrimination provisions of section 202 apply.

The carriers’ arguments against the Commission’s application of section 202 fail. First, SMS delivery performs no user-visible transformations that might justify classification as an information service. Second, as the Commission has recognized, SMS is interconnected. Third, as licensees, wireless carriers are obligated to act in the public interest. And finally, the Commission has the authority to enforce a nondiscrimination rule through Title I.⁷⁴

A. Common Short Codes are a Telecommunications Service, not an Information Service

The carriers have argued both that the minimal amount of technological transformation performed on text messages removes them from classification as a telecommunications service, and that they are not sufficiently interconnected to qualify as a “commercial mobile service” under section 332 of the Communications Act. This claim does not hold up. Text messaging services are interconnected services which perform no relevant transformations, and are therefore subject to Title II regulations.⁷⁵

⁷⁴ Despite the carriers’ attempts to suggest otherwise, petitioners also agree that the Broadband Policy Statement does not currently apply to text messages, either through short codes or traditional telephone numbers. *See Verizon Comments* at 39-40. We do, however, reiterate our assertion that “[a]lthough text messaging does not provide Internet access, the *reasoning behind* the Commission’s four consumer principles in its Broadband Policy Statement apply to SMS as well.” *Petition* at 19 (emphasis added); Federal Communications Commission, *Policy Statement*, Aug. 5, 2005, at http://fjallfoss.fcc.gov/edocs_public/attachmatch/FCC-05-151A1.pdf. The Commission’s goal is to “promote the vibrant and open character” of all of our communications networks, not just the Internet. *Broadband Policy Statement* at 4. Therefore, customers of text messaging services, like those of Internet services, should be allowed to access the lawful content of their choice and the applications and services of their choice, on the device of their choice, from the provider of their choice. *See id.* at 4. The key is that the choice must lie with the consumer, not the carrier.

⁷⁵ *See Petition* at 7.

1. Minimal Transformation Does Not Turn Telecommunications Services Into Information Services

The carriers have asserted that because SMS is stored by the carrier until the user's mobile phone is on or in range, it is indistinguishable from email, which has been classified as an information service. The two, however, are far from identical. In support of its proposition, AT&T cites the Commission's report to Congress on universal service, which points out that email (like text messages), "utilizes data storage as a key feature of the service offering."⁷⁶ The story does not end there, however; in the same paragraph, the Commission states:

The fact that an electronic mail message is stored on an Internet service provider's computers in digital form offers the subscriber extensive capabilities for manipulation of the underlying data. [After the message is delivered to the recipient's service provider, the] recipient may then use the Internet service provider's facilities to continue to store all or part of the original message, to rewrite it, to forward all or part of it to third parties, or otherwise to process its contents—for example, by retrieving World Wide Web pages that were hyperlinked in the message. The service thus provides more than a simple transmission path; it offers users the "capability for ... acquiring, storing, transforming, processing, retrieving, utilizing, or making available information through telecommunications."⁷⁷

Rather than demonstrating text messages' similarity to email, the Commission has effectively distinguished the two. Recipients of text messages have *no* capabilities for "manipulation of the underlying data." After an SMS is delivered to the recipient, it is removed from the carrier's system,⁷⁸ and the recipient cannot store it, rewrite it, forward it (except as their phone supports forwarding off-network), or otherwise process it. Text services provide *nothing* "more than a simple transmission path," and the fact that that path involves a temporary, one-time storage for a message is irrelevant.

⁷⁶ *AT&T Comments* at 3; *In re Federal-State Joint Board on Universal Service*, 13 F.C.C.R. 11501, ¶ 78 (1998) [hereinafter *Universal Service Report*].

⁷⁷ *Universal Service Report* ¶ 78.

⁷⁸ A text message may remain briefly on a carrier's system for law enforcement purposes; however, the consumer will no longer have access to it. *See Verizon Comments* at 33.

The same reasoning applies to the *Broadband Order*, in which the Commission held that because ISPs “‘offer’ the information ‘capabilities’ of ‘email, newsgroups, the ability to create a web page . . . and the DNS (domain name service),” they were offering an information service, even though customers might choose not to use those services.⁷⁹ Wireless carriers offer nothing of the sort here; there are no carrier-based services offered on top of text messaging; it is simply a way to get 160 characters of text from a source to a destination, regardless of whether the source or destination is a phone or a short code service provider.

Additionally, the carriers’ recognition of the fact that a user can store a text message in his or her handset⁸⁰ after receipt as evidence that text messaging services involve storage is misleading at best. The fact that *after* the communications has occurred, a user can retain it on his or her handset—which does not belong to the carrier, and likely was not manufactured by the carrier—is irrelevant as to whether the communications itself was an information service. The service is no longer involved by the time the user accesses a stored text message. The fact that it is possible to record and store a telephone conversation on a consumer’s handset⁸¹ does not take voice communications out of the common carrier classification, and it should not do so for text communications either.

Some of the alleged “transformations” are similarly misleading because they are capabilities of the phone rather than the service. As described above, the ability to forward a text message falls into that category; when a consumer forwards a text message, it is effectively the same as that consumer sending a new text message: the content originates from his or her phone,

⁷⁹ See *AT&T Comments* at 14; *Appropriate Regulatory Treatment for Broadband Access to the Internet Over Cable Facilities*, 17 F.C.C.R. 4798 ¶ 39 (2002).

⁸⁰ *AT&T Comments* at 10.

⁸¹ *mVoice Product Information*, at <http://software.palminfocenter.com/product.asp?id=779&n=mVoice>; *CallRec Product Information*, at <http://software.palminfocenter.com/product.asp?id=1962>.

not from the carrier, who has already discarded the received message. Likewise, the features like the addition of a sender's nickname⁸² are generally done by a consumer's telephone, not by Verizon, who does not even possess that information.

The ability to perform protocol conversions on some text messages does not render the service as a whole an information service. In the proceeding cited by AT&T, the Commission pointed out that "certain protocol processing services that result in no net protocol conversion *to the end user* are classified as basic services" and are therefore telecommunications services.⁸³ The situations are roughly analogous, but the result is different than AT&T suggests. The technology at issue in that proceeding was phone-to-phone Internet Protocol ("IP") telephone services. To the user, these services appeared identical to traditional service, while behind the scenes, the transmission was converted to IP data and later converted back to circuit-switched service before delivery. About this, the Commission stated: "The protocol processing that takes place incident to phone-to-phone IP telephony does not affect the service's classification, under the Commission's current approach, because it results in no net protocol conversion to the end user."⁸⁴ This is the case here; while AT&T and Verizon may perform behind-the-scenes conversions in order to get text messages from one network to another, one end user sends text, and another receives that same text, free of any visible difference and unaware that any transformation might have taken place.

That text messages are temporarily stored or technically transformed while in transit does not render them information services. The fact remains that the carrier's basic purpose in

⁸² *Verizon Comments* at 35.

⁸³ *In re Federal-State Joint Board on Universal Service*, 13 F.C.C.R. 11830 ¶ 50 (1998).

⁸⁴ *Id.* ¶ 52.

delivering an SMS is to send unaltered text from point A to point B, and then to cease involvement with the message. This is the hallmark of a telecommunications service.

2. Text Messages, Including Those Utilizing Short Codes, Are Sufficiently Interconnected to Meet the Communications Act's Requirements

AT&T also suggests that because not every user of the public switched network can connect to every other user using SMS, it is not “interconnected” within the FCC’s understanding of the term.⁸⁵ They go on to argue that the Roaming Order does not suggest that text messaging is a Title II service, but that “regardless of what the Commission may have said,” it is not a commercial mobile service.

First, we recognize that the Commission has noted that SMS is “an interconnected feature[] or service[] in some instances, but non-interconnected in others.”⁸⁶ Importantly, in that order, SMS was discussed in a separate section than the one addressing “non-interconnected features and services,” suggesting that SMS does not fall within the category of “non-interconnected features.”⁸⁷ Thus, to the extent that SMS is interconnected, it is indeed a CMRS. For instance, Sprint notes that its SMS service can provide a wireless customer the ability to send a text message to a wireline customer, demonstrating that Sprint’s wireless SMS is interconnected with the public switched telephone network.⁸⁸

More importantly, as noted in our comments and reiterated here, section 332 provides only one route by which a communications service can be classified as a Title II service.⁸⁹ The FCC’s description and regulation of SMS in the Roaming Order demonstrates that even should the Commission decline to find that SMS services are interconnected, it still can regulate text

⁸⁵ *AT&T Comments* at 12.

⁸⁶ *AT&T Comments* at 13 (citing *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, 22 F.C.C.R. 15817 ¶ 55 (2007) [hereinafter *Roaming Order*]).

⁸⁷ *Cf. Roaming Order* ¶¶ 55, 56.

⁸⁸ *Sprint Comments* at 11-12.

⁸⁹ *PK Comments* 3-5.

messaging through its Title I authority. Further, as discussed in our comments, interconnection is only one route through which text messaging qualifies as a common carrier service subject to all of Title II's regulations: it also meets the basic definition of a common carrier because it is offered to the public at large, and is therefore a common carrier regardless of whether or not it is interconnected.⁹⁰

B. The Commission Can Protect Users Through Title I

As described in our petition and comments, even if the Commission determines that text messaging via CSCs is an information service, it has demonstrated that it can and will ensure that the interests of consumers are protected by enforcing other regulations as long as they are “reasonably ancillary” to a stated purpose under the Act.⁹¹ Promoting competition and protecting the ability of Americans to exercise their First Amendment rights and have access to modern communications media—without being subject to the carriers’ judgment about what is or is not acceptable speech—is inherent in the Commission’s mandate. The Commission may therefore apply whatever rules necessary to accomplish this under Title I.

Further, Verizon’s contention that the provisioning of short codes falls entirely outside the purview of the Communications Act because “the decision to enable a short code does not itself create a transmission of information over the wireless operator’s network”⁹² is specious. Deciding to give a phone number to a customer likewise does not involve any actual communications, and yet carriers cannot engage in unjust and unreasonable discrimination in doing so. It is not the provisioning of a service which must be communications, but the service

⁹⁰ *Id.*

⁹¹ See *Petition* at 17. See, e.g., *In re IP-Enabled Services Implementation of Sections 255 and 251(A)(2) of the Communications Act of 1934*, 22 F.C.C.R. 11275, 11286 (2007) (quoting *United States v. Southwestern Cable Co.*, 392 U.S. 157, 177-78 (1968)).

⁹² *Verizon Comments* at 38.

itself. And there can be no doubt that SMS messages addressed to or from a short code are anything but transmission of information.

C. Wireless Licensees Must Serve the Public Interest

As the Commission observed in the wireless declaratory ruling, licensees remain subject to the public interest standard.⁹³ For nearly 75 years, the Commission has had an obligation to regulate licensees in the public interest,⁹⁴ and licensees have held their licenses as trustees for the communities they serve.⁹⁵ This fiduciary duty exists with regard to any spectrum license.⁹⁶ If the Commission finds that it would serve the public interest for licensees to offer particular services in particular ways, up to and including acting as common carriers for the messages of others, the Commission has such authority.⁹⁷

D. The Commission Can Decide This Matter through a Declaratory Ruling or Through a Rulemaking Proceeding

Finally, in its comments, Verizon has argued that a declaratory ruling is only meant to “clarify the *existing* state of the law.”⁹⁸ We agree. However, they then suggest that the petition is actually an attempt to change the state of the law.⁹⁹ We disagree with that characterization. The existing state of the law is that text messages, including those sent to and from common short codes, qualify as Title II services, both directly under the definition of a common carrier and through section 332 of the Communications Act. No rulemaking proceeding is necessary

⁹³ Federal Communications Commission, *Declaratory Ruling on Appropriate Regulatory Treatment for Broadband Access to the Internet Over Wireless Networks* ¶ 35, WT Docket No. 07-53, FCC 07-30 (Mar. 23, 2007), available at http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-07-30A1.pdf.

⁹⁴ See *NBC v. United States*, 319 U.S. 190 (1943).

⁹⁵ See 47 U.S.C. 309(a) (conditioning granting of a license on “whether the public interest, convenience, and necessity will be served . . .”); *United Church of Christ v. FCC*, 359 F.2d 994, 1003 (1966).

⁹⁶ See, e.g., *Time Warner v. FCC*, 93 F.3d 957, 973-77 (D.C. Cir. 1996).

⁹⁷ *Red Lion Broadcasting v. FCC*, 395 U.S. 367, 390-391 (1969) (“Rather than confer frequency monopolies on a relatively small number of licensees...the Government could surely have decreed that each frequency should be shared among all or some of those who wish to use it.”). See also *FCC v. National Citizens Committee for Broadcasting*, 436 U.S. 775 (1978) (upholding post-grant divestitures in the public interest).

⁹⁸ *Verizon Comments* at 41.

⁹⁹ See *id.*

when the Commission is simply recognizing that an existing service falls within an existing, mandatory statutory definition. However, to the extent that the FCC feels it necessary to implement new rules to ensure nondiscrimination in this particular communications medium, then there are ample opportunities to do so, either through a new proceeding, or an existing related proceeding such as WT 05-265, in which the *Roaming Order* was filed. The Commission should therefore take whatever procedural steps are necessary to ensure that speech remains free in mobile text services.

V. BLOCKING TEXT MESSAGES VIOLATES THE FREE SPEECH RIGHTS OF USERS

The carriers' responses to the petition evince either a misapprehension of or misplaced goals for the role of mobile carriers in communications. They argue that nondiscrimination harms the carriers' First Amendment interests, while ignoring the speech interests of citizens. In truth, nondiscrimination implicates the First Amendment interests of carriers much less than those of citizens, and carriers' rights are still amply protected under a nondiscriminatory rule.

Opponents' arguments also assume that commercial mobile services are and should be providers of information who exercise editorial control over what their users hear and read. But carriers are not newspaper editors or television stations. While citizens expect the *New York Times* to report the news as it sees fit, they do not expect AT&T to pick and choose between who is allowed to speak to whom. The difference is critical. Text messages of all forms contain direct, point-to-point, citizen speech, and the carriers of that speech are just that: carriers. Their role is to carry the speech from point A to point B, and not to select which speech is to be carried.

A. Nondiscrimination Favors First Amendment Rights for Consumers

In their comments, carriers have largely ignored the First Amendment rights of citizens and potential short code users, attempting to portray the carriers' as the only entities whose free speech rights are at issue. However, the speech rights of those who use the communications network are heavily burdened by carrier discrimination.

Mobile carriers should not have editorial control over text messages sent to and from short codes any more than they have editorial control over a phone call between two individuals or an individual and a company. As detailed in section I, there are innumerable uses to which text messages, and CSCs in particular, are being put. When Mobile Verses sends a Bible verse to a subscriber, its message should not be subject to Verizon's value judgment whether religious messages are allowed. When one citizen sends a message via short code to his friend through AOL's instant messaging service, its content should not be subject to AT&T's editorial discretion. When Rebtel wants to contact customers who opt in to their text-based services, T-Mobile should not get to decide if it is allowed to do so. The reason is simple: all of these examples are speech, and when this speech is discriminated against, it is the speakers who suffer the harm, not the carriers. The ability of citizens to speak freely over the nation's communications network and to fully realize the goals of the First Amendment is far better served by a rule of a nondiscrimination than a rule of total carrier discretion.

B. Nondiscrimination Does Not Present a Significant First Amendment Burden for Carriers

The wireless industry has attempted to portray its refusal to provision CSCs as “no different than a broadcaster’s, cable company’s, or newspaper’s refusal to run commercial advertisements or advocacy pieces.”¹⁰⁰ This analogy fails in several key ways.

First, all three of these mediums primarily involve one-way broadcast transmission. Common short codes are not a broadcast medium, but a way to address and route two-way communications.¹⁰¹ They are not broadcast – individual messages are sent from one location to another. The fact that a campaign may choose to send the same message to multiple people does not change the fundamental fact that they can and do choose *not* to, much as sending the same fax to numerous people does not change the sender or the phone company into a radio television broadcaster.

Second, despite the suggestion that “cable companies” can exert editorial control over programming, that control they have is circumscribed for the benefit of diverse speech. There are several classes of programming that cable operators must carry, and which those carriers cannot censor or alter, regardless of what types of information (including “commercial advertisements or advocacy pieces”) those stations are transmitting. These include local broadcast channels,¹⁰² public, educational, and government channels,¹⁰³ and leased access

¹⁰⁰ *CTIA Comments* at 54; *AT&T Comments* at 22; *Verizon Comments* at 46.

¹⁰¹ *See Verizon Comments* at 8.

¹⁰² *See* 47 U.S.C. §§ 534, 535; *Turner Broadcasting System, Inc. v. F.C.C.*, 520 U.S. 180 (1997) (upholding constitutionality of must-carry legislation, citing its promotion of competition and a variety of information sources).

¹⁰³ *See* 47 U.S.C. § 531(b); *Time Warner Entertainment Co. v. FCC*, 93 F.3d 957, 971-73 (D.C. Cir. 1996) (upholding statute granting local franchising authorities power to require local cable franchises to carry public, educational, and government channels).

channels.¹⁰⁴ All of these stations must be carried by cable operators, and are not subject to those operators' editorial discretion. Even the dissent in *Turner I* recognized that acknowledged that cable operators could be regulated as common carriers.¹⁰⁵

The Commission has also held that multipoint distribution system (MDS) common carriers must offer their services to the public without regard to content, and may *only* refuse to transmit content which is illegal.¹⁰⁶ The Commission has also established procedures for determining whether such content would be illegal before blocking it.¹⁰⁷ Common carriers have anything but unfettered editorial control, while the Commission has significant power to promote speech and competition by limiting that control. The ability to assert editorial control is a consequence of being a non-common carrier—not the other way around.

Third, the carriers' suggestion that CSCs are merely a form of advertising, "simply a marketing tool,"¹⁰⁸ some kind of digital billboard rental,¹⁰⁹ or merely a "billing and collection service"¹¹⁰ denies the truth of how they are being offered and used. As described above, they are actually being used for political purposes, individual communications, corporate contact, health services, governmental services, and more, by everyone from the Republican Party to individuals who want to stay in touch.¹¹¹ And, as described in our comments, they are being offered broadly

¹⁰⁴ See 47 U.S.C. § 532(b)(1); *Time Warner*, 93 F.3d at 967-71 (upholding law requiring cable operators to set aside a portion of their channels "for commercial use by persons unaffiliated with the operator," citing government goal of "bringing about 'the widest possible diversity of information sources for cable subscribers'").

¹⁰⁵ See *Turners Broadcasting System, Inc. v. F.C.C.*, 512 U.S. 622, 684 (1994) (O'Connor, dissenting) ("[I]t stands to reason that if Congress may demand that telephone companies operate as common carriers, it can ask the same of cable companies.")

¹⁰⁶ *In re Enforcement of Prohibitions Against the Use of Common Carriers for the Transmission of Obscene Materials*, 2 F.C.C.R. 2819 ¶ 5 (1987).

¹⁰⁷ See *Humane Society v. Western Union International, Inc.*, 30 F.C.C.2d 711 (1971).

¹⁰⁸ See *CTIA Comments* at 52.

¹⁰⁹ *Verizon Comments* at 9.

¹¹⁰ *CTIA Comments* at 14.

¹¹¹ For more specific examples, see Section I.B on page 7, as well as the extensive, but non-exhaustive list in Attachment A.

to the public on standard terms.¹¹² The fact is that CSCs are not just a marketing tool, but a speech tool – a fact which is recognized when carriers attempt to argue for their own First Amendment rights but forgotten when they are attempting to evade common carrier status.

To the extent that broadcasters and publishers have discretion as to what content they provide, their role is very different from that of carriers. Consumers have the choice of hundreds of channels and newspapers, and if they believe that one is not providing the information they desire, they can easily switch to another. Even taking the most optimistic view of carrier competition, there are only a few choices for consumers. Further, television stations and newspapers are *sources* of information which produce their own stories, and consumers view them as such. Wireless carriers, however, are viewed as *carriers* of information, and rightly so. This distinction can be seen very simply: *The Washington Post* offers everyone breaking news, politics, and local news alerts over SMS by sending a simple request to their short code; the carriers' role is invisible, involving only delivery from the *Post* to the consumer.¹¹³ In fact, the discretion that the carriers wish to have is appropriate only for those doing the communicating. The situation as the carriers would have it would be equivalent to a newspaper delivery service cutting out articles from someone else's newspaper, or a cable channel blanking out a single television show on a channel they otherwise carry.

C. The Fact that Carriers Carry Their Own Speech is Irrelevant

Verizon has pointed to the fact that it, like other wireless operators, “engages in protected speech over its text messaging system and in its own short code campaigns” as evidence that

¹¹² *PK Comments* at 4-5.

¹¹³ See *Mobile News and Text Alerts from washingtonpostmobile*, at <http://www.washingtonpost.com/wp-srv/contents/devices.htm>.

nondiscrimination will harm their First Amendment interests.¹¹⁴ It is unclear, however, how a nondiscrimination rule burdens a carrier's free speech rights. To the extent that carriers use their own networks to directly contact their customers or run their own short code campaigns,¹¹⁵ it would be equally free to do so in a nondiscriminatory system. Likewise, if a carrier must add headers to a message indicating the sender and date of transmission,¹¹⁶ a rule requiring nondiscriminatory access to the service would not be a barrier. In short, the carriers' First Amendment rights would survive a nondiscrimination rule unaltered and unburdened.

¹¹⁴ *Verizon Comments* at 50-51.

¹¹⁵ *See id.* at 50.

¹¹⁶ *See id.* at 35.

Conclusion

For the above reasons and the reasons described in the petition, the Commission should declare that mobile carriers are prohibited from engaging in unjust and unreasonable discrimination in providing text messaging services, including services utilizing short codes.

Respectfully Submitted,

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Free Press
Consumer Federation of America
Consumers Union
EDUCAUSE
Media Access Project
New America Foundation
U.S. PIRG
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April 14, 2008

Attachment A

Code	Brand	Description
70470	102.1 FM The Edge	Be an EDGEhead mobile Member! Listeners register to receive alerts on their phone about station info, events and chances to win! Members get more!
71755	103.3 FM ESPN	Heard about ESPN Mobile Insider on 103.3 FM ESPN? Exclusive sports news, offers & contests 2 ur mobile. Reply w/ word JOIN.
62401	103.5 Power FM	Want 2 join POWER LIVE + get alerts on ur phone? Reply with the word JOIN now! Txt STOP 2 optout anytime.
26088	105.9 The X	Text the word 'Join' to become a member of X Mobile. You will get offers + discounts on ur cell!
51737	106.1 Kiss FM	This is your one stop shop for staying in touch with everything big that's happening in DFW -- and it's sent right to your cell phone. Being a KISS Text member has it's perks, you get up to the minute updates on everything that is KISS FM - concert info, jock updates and details on how to win free stuff.
25535	106.7 JAMZ	Join the Jamz Text Nation now. To sign on txt the word 'JOIN' to 25535 and keep connected to Madtown's #1 for Hip Hop.106.7 Jamz
52584	360 Degree Mobile, Inc.	360° Mobile™ provides a complete messaging solution for superior marketing, customer communication, and integration with Microsoft Dynamics CRM®. Text 52584 now and see how 360° Mobile™ can enable your business with enhanced alerts, coupons, and mobile media.
43526	3JAM	3jam is a group text messaging service that makes it fun and easy to coordinate and connect with people from any mobile phone. Unlike regular text messaging, 3jam lets you send a text message to any number of friends at once, have everyone know who got the message and have replies go to everyone—all for the price of regular text messaging.
411767	411sms.com	Users can now use text messaging to get local listings utilizing the most accurate and user-friendly yellowpages search engine.
44636	4INFO	4INFO provides consumers with real-time access to sports scores, stock quotes, 411, movie times, weather updates, horoscopes and a variety of other information and entertainment services, all on their mobile phones. Simply send a text message query, such as “yankees” or “weather new york” to 4INFO (44636) and receive information back within seconds. The 4INFO Publishing Platform allows publishers to mobilize their content via the 4INFO short code, and the 4INFO Ad Marketplace offers marketers the opportunity to reach consumers via targeted SMS advertising. For more information or to set up text message alerts on-line, visit www.4info.net .
40705	710 ESPN Radio	Just rply ACCEPT now to get breaking sports news, scores and updates from 710espn.
757411	757411	Local Business Search in Hampton Roads, Virginia (Norfolk, Virginia Beach, etc. – 757 is the local area code). Users text queries like “Pizza Virginia Beach” or “Crab Norfolk” to 757411 and receive directory listings including addresses and phone numbers. The listings are formatted for SMS and are indexed to allow users to drill-down into listings for more information.
96000	9 SQUARED INC	We offer 16 credits for \$9.99/mo to download all the latest and hottest ringtones, wallpapers, flixtones, games and more.

Code	Brand	Description
42827	92.5 XTU	Ur in the 92.5 XTU Text Club! Want More? Customize alerts at wxtu.com! Txt STOP to optout anytime.
59393	93 XRT	WXRT utilizes the P1SMS interactive radio platform. P1SMS is an interactive radio application available to all radio stations nationwide. The platform delivers real-time song and artist information for songs being played, ringtone purchase options and interactive messaging capabilities. P1SMS supports real-time mobile music sales, artist alerts, polling and voting, contests, text club alerts and song requests.
49589	94.1 All Hit	Stay in touch All the time to 94.1 All Hit Music. Reply with the word JOIN to get alerts to your phone.
85183	94.1 JJO	Shut up and Rock... just txt the word JOIN to the number 85183 so you can keep rocking and get alerts to ur fone from with 94.1 JJO
29689	96.1 KISS FM	Station listeners can sign up for KISS Mobile + each month there are great prizes to be won!
56968	96.3 JACK FM	Get to know Jack! Reply with the word JOIN so Jack FM can hook you up with stuff to ur fone.
56979	979 KISS FM	Text your requests to the number 56979 now and learn how to become a KISS VIP! Visit 979KISSFM.COM and click KISS2GO!
56332	98 Rock	Want 98 rock alerts 2 ur phone? Rply 'ACCEPT' now, or go www.98rock.com 4 more info + options!
94525	99.5 The Wolf	Text the word 'join' to 94525 to be first to receive special offers and info from 99.5 The Wolf?
56121	99.9 KISS Country	Become a 99.9 KISS2GO member now for prizes and info from KISS Country! Send a TXT request to the number 56121
28982	ACCESS U2 SOLUTIONS INC	AccessU2 Global Solutions, Inc. is a Colorado based company using cell phone technology to deliver "instant info in the palm of your hand". We are the company providing some of the most advanced real-estate, information and security technology available today! Our products include: AccessU2 Global Property Info™; gives you access to interactive multimedia text messaging, to instantly receive a text description, pictures, and even a video tour of your property.
51340	AERVA, INC.	Launch a mobile campaign, scheduled for just one evening or a whole year, and created entirely via the web. With MoApp from Aerva, these possibilities are just the beginning.
30185	AERVA, INC.	Mobile applications, such as voting, polling, chat and other applications, provided by Aerva, Inc.
23246	AETN	Register now for your favorite mobile alerts! Text JOIN to AE2GO now and receive 1 weekly alert from your favorite show. Standard messaging rates apply.
724922	AGENCYGO	Text any stock symbol to 724922 to receive up to date stock information.
24453	AGILE COMMUNICATIONS GROUP	Support your mobile marketing campaign with a text messaging service that allows you to receive, send and count messages from individuals, businesses and consumers. The text messaging service can be local, national and international. For more details, text the word INFO to 24453. Our system provides an interface for clients to create groups, create auto

Code	Brand	Description
		responses, build a database of cellular numbers, and reach out for a better communications solution.
347437	AGILE COMMUNICATIONS GROUP	The FLorida Aquarium: A membership organization using text messaging to support volunteers, staff, and supporters in an effort to increase attendance and revenue.
37437	AGILE COMMUNICATIONS GROUP	Checkers/Rally's: A national restaurant corporation using text messaging to increase customer traffic, sales, and promotions to product lines and restaurants. Simply text any city to FRIES (37437) to get the address location(s) of every Checkers or Rally's in that city sent back to your cell phone instantly!
81024	AGILE COMMUNICATIONS GROUP	Museum of Science and Industry: A science and technology based museum, MOSI often uses text messaging to inform the general public of current and upcoming films, movie times, and specials for their IMAX Dome Theater.
50618	AGILE COMMUNICATIONS GROUP	Support your alert notification system and security plan with an online text messaging service that allows you to send messages to individuals, staff and emergency personnel. For more details, text the word ALERT to 50618 (example only). Our system provides an interface for our clients to create groups, create auto responses, build a database of cellular numbers, and reach out for a better communications solution.
82722	AGILE COMMUNICATIONS GROUP	Tampa Bay Performing Arts Center: A regional and national arts organization using text messaging for ticket sales, membership drives, customer satisfaction, also to annouce upcoming and current events/concerts, and ShowTime.
25735	AGILE COMMUNICATIONS GROUP	Crime Stoppers International: Citizens, community groups, and law enforcement agencies uses text messaging to report and prevent crime around the world.
246246	AIM (AOL Instant Messenger)	The AIM® Short Code service delivers AIM instant messaging functionality through the text messaging feature on a user's cell phone. Features include "send IM," "change status message," "view Buddy List," "add/delete buddy" and more. Users can send a text to the 'AIMAIM' short code (246246) to access the new service.
51945	AIRBORNE	Airborne Entertainment is a leader in the mobile marketplace with 7+ years of success as a marketing agency,content producer and solution provider. Airborne propelled Family Guy, MAXIM, ecko unltd, NHL, SPEED TV, Food Network and Taco Bell into the mobile marketplace. Airborne provides partners with TXT to Win,voting,trivia,reverse auctions and PIN redemption programs,and a mobile catalogue of text alerts,mobile video, games, apps + personalization products. For more, visit www.airborne-e.com.
27352	APE52	Ape52.com is the worlds first website designed for small businesses and individuals to interact directly with mobile phones by using two way text messaging and the internet. Ape52.com provides it's customers with innovative and easy to use technology enabling small businesses and individuals to set up and market their own products, services, and event information through the use of text marketing.

Code	Brand	Description
24455	APPLICATIONS AND WIRELESS LLC	AppsWireless provides customized mobile marketing and mobile Messaging based interactive marketing and promotional applications including SMS, MMS, Email, WAP and more.
22727	ASPCA	Pet Care Tips Each week, you'll receive tips from ASPCA experts on pet poison prevention, health care, foods to avoid and fun pet facts. Choose Dog Care Tips or Cat Care Tips. Advocacy Alerts; Sign up for our Advocacy Alerts and we will send you a text message whenever urgent action is required on pending humane legislation. www.asPCA.org;
288363	ATTENDIO, INC.	Attendio keeps you in the know about great events across music, nightlife, sports, the arts, family, social causes and more. Text in to 288363 (ATTEND) a category name like "music", or a day ("Saturday") or a venue ("@The Fillmore") and we'll text you back relevant events. To optimize your Attendio mobile experience go to www.attendio.com and set-up your profile today.
24800	AVANGUARD SOLUTIONS INC	AvanGuard Solutions provides the latest in mobile phone marketing, content and services. Enable your customers to download ringtones, wallpapers, play trivia, text to win, and more. We also specialize in creating new custom campaigns for clients.
87079	Advaliant	This alerts program offers the latest financial tips by partnering with websites offering financial solutions. The consumer will receive up to two financial tips per month.
64000	AgencyGo	The premier short code to share. What could be easier? Increase campaign effectiveness with our portfolio of useful applications and dynamic short code.
511511	Agent511	Agent511 is an interactive outdoor advertising and information-based customer care platform for a number of industries.
732589	Agile Communications Group	Realtors are using text messaging to advertise and sell condos, homes, and commercial properties to interested customers and buyers. Interested buyers can receive specifics such as pricing, a vivid description of the property, contact info, and more in one text! Realtors will receive an instant notification of a potential buyer's cell number and keyword once a message has been sent that allows them to make contact immediately.
752988	AirPlay PlayTV	Free trial downloads for AirPlay PlayTV game such as NFL AirPlay Live and NBA AirPlay Live. AirPlay lets users play along with live events such as NFL football games, NBA basketball games, and the Emmy Awards – as they watch the live event on TV. Users make predictions and compare their knowledge in real time against their friends and the overall AirPlay national membership.
86946	America's Got Talent	Beginning Tuesday June 5, 2007 NBC will host the PSMS live reveal "Lucky X" sweepstakes campaign during the America's Got Talent audition shows. The sweepstakes will be included in the 5 audition shows and airs weekly starting Tuesday, June 5th and ending July 3rd. Home viewers can participate in the promotion by answering a multiple choice question on their mobile phone. (99c + standard text message charges per entry), only the correct answers will be entered into the sweepstakes.

Code	Brand	Description
51555	American Idol	On Thursdays beginning January 10, 2008, Bravo will host a new interactive vote show where viewers are invited to vote for the contestants by calling the toll-free number associated with the contestant, by texting the contestant number to 51555, or by voting online at Bravotv.com. The contestants with the highest combined toll-free, SMS, and online votes will be safe from elimination. All votes are standard rate.
97979	American Inventor	American Inventor finale episode had the American public vote and decide which of the 3 remaining contestants had the best invention and should win the \$1M prize. Viewers were invited to vote for the contestants by calling the toll-free number associated with the contestant, or by texting the contestant number to 97979. The contestant with the highest combined toll-free and SMS votes won the prize. SMS votes received within the valid vote window (2 hours after the show per region) were charged 50c
898411	Analog Analytics	Users will see a call to action, they will text the keyword to 898411, and content provider will return information and/or coupon id. Users will then go to the website enter the information to receive the product offered.
22428	Atlas Interactive North America	SMS CHAT is a service that allows users a chance to converse with our trained live operators via text messaging. Chat services include Psychic Chat, Spanish Chat and Spanish Psychic
32677	BERGGI INC	Berggi lets you send and receive any email from any account to your cell phone and chat from your cell phone with your contacts from any AIM, YAHOO,MSN, GTALK and ICQ type of account!
256488	BLOGTV.COM	Blogtv provides a free platform for broadcasting live shows on the internet with no installation of software. Set up alerts so you never miss your favorite blogtv shows!
77000	BLUE FROG MOBILE	Text Alerts - get daily info alerts on dozens of subjects! Examples include: Diet Tips - Text DIET to 77000; Fortune Cookie - Text FORTUNE to 77000; TV Gossip - Text DISH to 77000;
25555	BOX TELECOM	Vote for your favorite TV show, or Hollywood star, Singer,etc... Whenever you have to vote, just text: VOTE to 25555 and get an instant result. Go on www.Mobioo.com and get the vote of the day.
32063	BULLROARER CORPORATION PTY LTD	Mobizoids Content Club: Download the latest polytones, truetones, wallpapers, screensavers, games and more today, @ http://www.clubmorty.com
81000	Bid4Prizes	Bid4Prizes (www.bid4prizes.com) is a brand-new concept in auction games, where the lowest unique bid wins. Using their cell phone, or from their desktop participants "bid" on a wide range of products, including automobiles, consumer electronics, apparel, trips, games and mobile content. Bidders can play for free on the web or sign up for a premium monthly plan that provides them with multiple bid opportunities. Mobile tips direct them in their bidding decisions, letting them know if their current bid is unique or the lowest, and helping them navigate their way to win cash and prizes.
25222	Blabbr.com	Give your 2 Cents about anyone or anything. Found the greatest burrito in the world? Annoying song stuck in your head? Score it with Blabbr! See what your friends are talking about and join the debate!

Code	Brand	Description
70838	Bostogo	Bostogo Friends is a fun text messaging program that helps you stay in touch with your friends. Your friends send a text message to Bostogo posting their status and location and you can text message Bostogo later and find out what your friends are up to. Bostogo Trivia is a fun question and answer game you can play whenever and wherever. Bostogo will send you a text message with a question and you reply back with your answer (or guess).
268623	BouncePad	A mobile marketing service aimed at the residential real estate market, Bouncepad is designed to help real estate sellers and professionals deliver their property info to mobile phones and PDAs. With the real estate market slowing across the country, Bouncepad offers sellers and real estate professionals a unique way to differentiate their properties by providing property details, descriptions, photos, maps, and contact info to anyone, anywhere, at any time. What sets Bouncepad apart from similar services is that it delivers both text messaging and a customized website for every property. In addition, real estate professionals can choose to integrate it into their existing systems while maintaining their current brand. Want to see Bouncepad in Action? Text DEMO to 268623
23623	Brand Jordan	This is the destination shortcode for Brand Jordan. Get info alerts, wallpapers and ringtones from your favorite brand.
28552	Bulla	Send messages to your TV! Text the word NEW to 28552 and follow the instructions on your phone to set up a custom nickname.
66247	CBS	CBS TV is launching standard rate alerts, voting/polling, txt to screen, and sweepstakes applications for 16 of local stations.
69415	CELL SHOUT PARTNERS	CellShout links the cellphone and online social network together for a user. Allowing them to communicate with friends while away from a computer.
63641	CELLIT LLC	Text-for-info service for apartment hunters. Please visit apartmenthomeliving.com for more info, or ahlmobile.com .
33824	CELLWARE LLC	Cellware is the most complete & user friendly provider of free mobile content. Cellware offers free ringtones, wallpaper, videos, games & applications, as well as the ability for users to create their own.
88202	CHATTER	Sign up to get community emergency and non-emergency event notifications.
28292	CLICKATELL	TWB3G is an application used by Avaya's field services organization. It is a wireless WEB application that uses SMS messages to notify the user of alerts from up stream systems. Informational messages are sent to Avaya's field associates about jobs/ job changes. This service is not available to the general public.
90101	CODE JAWA	Premium Mobile Entertainment Service
632778	COLGATE	Colgate Max Fresh Burst, now with 50% more mini breath strips, is offering a free screensaver and wallpaper by texting "FRESH" to MFBRST (632778.) Participants will also receive future information from Colgate, including money saving offers and promotions on Colgate Max Fresh products.
24888	CONNECTION SOFTWARE	Website will promote shortcode. Customer sends SMS opt-in request to shortcode. They then receive updates periodically. Customer can opt-out at

Code	Brand	Description
		any time by sending STOP to shortcode.
57879	CONNECTME 360	Partner with ConnectMe 360° to create your own mobile social network that streamlines everyday interactions with customers, vendors or employees. Using your existing contact databases, you can lease access to the 5STRZ short code and our IVR platform to build your own custom solution. Learn how ConnectMe helped companies like Coca-Cola USA, Coors and RentMarketer unlock the value of connections.
468742	CONTENOCITY	Contentocity enables content owners to deliver premium content to end users mobile devices. Keyword: Andre Miles
828282	COUPONS, INC.	Subscribe by phone or online @ http://mobile.coupons.com/ to get coupons direct to your phone!
60606	COUPONS, INC.	Coupon delivery to all mobile handsets from Coupons, Inc. and Coupons.com the leaders in custom coupon delivery for over 9 years serving over 800 of the worlds leading brands.
269411	COX MEDIA, LLC	Cox Mobile will be offering our viewers the ability to sign up for promotional messages, discounts, alerts and interactive mobile games, sponsored by our advertisers. Our viewers will have the ability to sign up via our web site, or directly through their mobile devices. We will be advertising the mobile campaigns on our TV spots running across the Cox network.
642637	CPX Interactive LLC	Get the latest content for your mobile content at mStyle. Send a test message on your phone to 642637 to sign up now.
462788	CSTV	462788 (GOCSTV) is being used by CSTV Networks, Inc. to provide a college sports headlines and scores alerts subscription product. Fans can choose their favorite school and sports and receive updates at their preferred frequency on their mobile phone (www.cstv.com/mobile).
22558	CTN INC	opt-in emergency contact phone directory
227266	Capcom Entertainment, Inc.	ESPN Poker Club is one of the most exciting poker games available for wireless. ESPN Poker Club mobile game is \$7.99. Keyword: POKER
79274	CellSigns, Inc	User enters a specific "Property ID" and text that number to shortcode 79274. The customer receives a text message from the service with information on that property such as beds, baths, asking price, etc. Our custom application matches the "Property ID" supplied by the user to a message in our database. That message is then sent to the user. The customer only receives a response when they request information for a specific property. Also provides alerts to agents with the lead info.
22191	CellSweeps	Get trivia sent directly to your phone and enter for a chance to win. A monthly fee of \$9.99 will be charged to the end user. Go to www.CellSweeps.com to register.
878787	CellTrust Corp.	The CellTrust Text Message Real Estate Marketing System allows you to promote yourself, and all of your listings. The URL connect feature, when directing a prospective buyer who has requested additional information to your personal web page enables them to see all of your listings, and allow you to promote who you are and what you can do for them.
22888	Cellfire	Cellfire provides consumers with convenient discounts directly on their mobile phones. Cellfire is the first nationwide mobile service that allows

Code	Brand	Description
		consumers to easily access deals and discounts from brand-name restaurants and retailers through their cell phones. Consumers have their own set of discounts and offers specific to their geographic locations. For more information or to download Cellfire, visit cellfire.com on your PC or mobile phone's browser, or text "save" to 22888
43474	Cellfish Media LLC	Play and Share anything on your phone with Cellfish.com.
33563	Cellyspace	Cellyspace is the ultimate user/advertiser gen-content platform for sending of MMS and Videos to mobile phones from the Web. From your computer, MMS slideshows can be created from your personal content and published in a mobile format. Get your own keyword Today! No special software required. Bands can create and sell ringtones. Real estate brokers can create and distribute MMS house viewings. Kids can create persona slideshows for their friends. Local retailers can create mobile coupons.
36500	Champion Call TV	Champion Call TV provides toll-free, pay-per-call, SMS and web-based solutions for "vote management" and Interactive TV applications. Today's campaigns demand innovative concepts delivered on a scalable, dependable platform. Let our proven experience benefit you in your next challenge.
62900	Champion Communications	Champion IVR Mobile - providing text-based content with audio results.
30241	Chat Goblin	Chat Goblin™ is a one-to-one, operator-assisted text chat service designed to help CRM, customer service reps, DJs, administrators or anyone else easily and quickly communicate with customers, audience members, guests or co-workers. You send messages and view received texts right from your desktop while your customers see them on their cell phones. Chat Goblin is ideal for hotels, airlines, information desks, events, radio stations, auto dealerships and others.
44555	Chikka	The Chikka Messenger lets you send SMS or MMS messages from PC to PC, from a PC to a mobile phone, from a mobile phone to a PC. www.chikka.com
43624	Citizens Bank	Mobile Banking at it's finest! Mobile subscriber registers at the Citizens Bank Website, www.citizensbank.com Once signed in, subscribers can check their daily acct balance, bank inquiries and much more via PIN and Short Code.
31043	Clear Channel Broadcasting Inc	Become a KBIG Community 104 Text Member Now! Just text the word 'join' for more info or go to our website!
41027	Clear Channel Broadcasting Inc.	Wanna join the KIIS Vip Text Club? Go2 kiisfm.com and register as a KIIS Club VIP. Then Opt in for text, and complete your text profile!
23923	Clear Channel Broadcasting Inc.	Wanna join the HOT Insider Text Club? Go2 hot923.com and register as a Hot Insider. Then Opt in for text, and complete your text profile
22987	Clear Channel Broadcasting, Inc.	Welcome to the FREELOADERS CLUB! Your official short code to access Star 98.7 is 22987
25827	Club Texting	Text the word PARTY to 25827 (CLUBS) and we'll hook you up with the inside scoop on the hottest parties in New York City. Exclusive invites, RSVP info, and special promotions will be delivered to your phone daily. Don't go out without us. www.clubtexting.com
33565	Compassion	Compassion International exists as a Christian child advocacy ministry that releases children from spiritual, physical, economic and social poverty and

Code	Brand	Description
		enables them to become responsible, fulfilled Christian adults." Compassion's mobile campaign is designed to engage, connect, and inform its constituents. Visit Compassion's mobile site at http://www.compassion.mobi for free ring tones, wallpaper and much more.
38681	Converdia	Converdia creates services that connect consumers and businesses through mobile initiatives.
71938	Coors Light	Text-2-Screen/Text-2-Win (Spanish)
26766	Cosmo	Hearst's Cosmo Convo service is a non-premium text alert service. Alerts goes out 2/week. Keywords: TXTCLUB, CONVO
83200	Cosmo Girl/Seventeen	Subscription txt alert service for Seventeen Magazine and CosmoGirl! audience. This service may also use quizzes, votes, polls, etc on occasion. Keywords: 17TXT, CGTXT
64646	Cricinfo.com	Cricket score updates on your mobile phone from Cricinfo.com. Simply text CRI to 64646 and get to know your team's score. Also find out match results and schedules.
87411	DAMARIS CONSULTING	Get local business listings and other information via text message.
336837	DENVER NEWSPAPER AGENCY	Sign up to get alerts and promotional information from the Denver News.
34381	DIET HEALTH, INC.	This is an application to provide nutritional information for those on-the-go. Here are the steps: A. A user sends a text message with the food/drink name along with the eatery name (for instance: Starbucks Hot Chocolate;) B. The user receive from the application the nutritional information which will include Calorie, Carbs, Fat, and Sugar content of the item C. The user will only receive the information from the application after s/he requests it using SMS.
34387	DIET TELEVISION	Make Dieting Easy! Go to www.diettelevision.com to sign up and then text any meal to DIETS (34387) and get dietary information to help you lose weight.
247898	DIGITAL MARKETING GROUP, INC.	MOBILE USER SEES BILLBOARD AD FOR DISCOUNT AND SENDS KEY WORD. APPLICATION RESPONDS WITH PROPER COUPON. a. User puts keyword from advertisement into text. Example: "pizza" b. User receives SMS message with image of coupon. c. A proprietary application residing on our server generates the response to the user. d.The user will only receive a message from the application if a coupon is requested or if the user signs up for weekly offers.
20100	DISH Racing Interactive	DISH Racing Interactive will provide viewers the latest news, statistics, results, schedules, TV listings, driver profiles, and voting through a multi-media platform gaining access to loyal auto racing fans via set top box, web and cell phones. The mobile service powered by Cellpoint Mobile will include a branded mobile content shop to attract users as well as content related revenue opportunities directly correlating with the DISH Racing Interactive brand. The mobile shop content will also be integrated directly into the iTV application to offer "race" specific downloads. The service will be accompanied by a turn-key wireless marketing and alert system. www.dishmobile.com Send DR W6938 to 20100.
42319	DISNEY ENTERPRISES,	Walt Disney World has a text messaging service that allows people who

Code	Brand	Description
	INC.	visit Walt Disney World's new joke attraction to send in jokes using their mobile phones while they wait in line for the attraction. Once the show begins, the host will announce a selection of these jokes to the crowd, putting a lucky few visitors in the spotlight. While waiting in line for a Comedy attraction, Walt Disney World park visitors will see a Call To Action instructing the park visitor to send their favorite joke beginning with a changing keyword to 42319. Multiple keywords will be rotated. This is to help ensure that each new batch of visitors will hear their own jokes and not jokes submitted hours before they arrived. All text messaged jokes received with the valid keyword will receive a Thank You message informing the user their joke might be used in the show they are about to experience. Disney may also offer participants to join a Walt Disney World Text Club or Joke Club.
73833	DISNEY ENTERPRISES, INC.	Disney is running three campaigns that include text clubs, sweepstakes, ringtones, and wallpaper. The Little Mermaid Campaign includes a text Club- Trivia available and a Sweepstake-Enter to win variety of prizes. The Little Mermaid Campaign Ariel Sweepstakes was promoted on the DVD release. ScarFace Campaign will have available Scarface character ringtones and wallpaper. The Santa Clause Movie Campaign will have a text club, trivia, and games available. Mobile wallpaper will be available only on the movie website.
347639	DISNEY ENTERPRISES, INC.	Disney is running three campaigns that include text clubs, sweepstakes, ringtones, and wallpaper. The Little Mermaid Campaign includes a text Club- Trivia available and a Sweepstake-Enter to win variety of prizes. The Little Mermaid Campaign Ariel Sweepstakes was promoted on the DVD release. ScarFace Campaign will have available Scarface character ringtones and wallpaper. The Santa Clause Movie Campaign will have a text club, trivia, and games available. Mobile wallpaper will be available only on the movie website.
52963	DLOAD.US	LA96.3 Radio Station (SBS Corporation) total wireless and interactive listener marketing provided by www.Dload.us
33879	DeVry	Common short code appears on screen during the television commercials and in various print and outdoor media. Instructions for using the short code will be provided in the advertising.
737247	Dealer Text Solutions	Streamline auto repair operations by communicating with customers via SMS. Send status updates, reminders, work order approvals and vehicle ready alerts.
729832	Diageo	Text-2-Win/Trivia
34726	Discovery Communications	WAP sites for Discovery Channel, TLC, Animal Planet, Discovery Health and Planet Green.
227411	Dogstar Mobile	Try our Mobile search application today! Find local businesses via text!
366466	Domino's Pizza	Get Domino's Pizza special offers and event information on your cell phone. Simply text START to DOMINO (366466) to start receiving offers today!
737737	Dr. Pepper Bubble	BAND IN A BUBBLE sponsored by Dr. Pepper is a live music experience featuring a band living in a temporary inhabitable space where they will record their new album over a three week period. The entire process will be watched by a live audience (surrounding the bubble) in New York City and telecast for an audience of millions on MTV and on-line. Key elements of

Code	Brand	Description
		the show include a fully interactive website which allows virtual communication with the band and a finale concert on the last day when the "bubble is burst." Text "pepper" to 737737 now!
81595	DropInMedia.com	Drop In Media Interactive Mobile Messaging Platform efficiently deploys Campaigns that integrate SMS, MMS, WAP, WEB and IVR. Examples include ChargeHard.com - Daily Surf Report and TextnPlay.com - Casual SMS games. We offer turn-key and custom hosted solutions, contact us today!
37373	E!	The E! Entertainment text club sends out text blasts to members with entertainment updates and news. To join send JOIN to 37373. During the red carpet events for Golden Globes, Oscars, and the Grammys viewers are able to send in their shout out message to run at the bottom of the screen throughout the red carpet show. There are various votes and sweepstakes that run during these red carpet shows. DJ Yo has a text club as well as text your comment application for his radio show.
247365	EDC	In response to recent hurricane activity, the EDC of Collier County, adopted this Mobile Business Alert system. In event of an emergency, the EDC delivers up-to-date information about changing weather, government measures, business activity details and school closings directly to the mobile devices of registered community members.
85693	EZ-TONES.COM, INC.	The latest in graphics, music, ringtones, celebrity news, jokes, dating advice, words of inspiration, horoscopes and more! Go to http://ez-tones.com/ now to sign up!
398987	EasyTXTR	EasyTXTR is a simple marketing tool for small to medium sized businesses. EasyTXTR provides clients with a powerful web application to manage all aspects of a text marketing campaign with 24/7 support. Sign up for free now!
58678	Epana	Mobile Coupon Service. Epana is a leading provider of high-quality, low-cost consumer communications services that meet the needs of rapidly growing U.S. niche markets. By bringing best-of-breed technology and software solutions together with consumer insights and market knowledge, Epana is in the business of building world-class consumer brands.
69916	FANBOX	FanBox.com is the web-based desktop that instantly turns every computer into your computer. It includes over 10,000 web applications to choose from. The shortcode will be on the CTA web page during registration process. Ex. Send STOP to 69916. User subscribes to FanBox services with unique PIN code. They are billed for service(s) via the shortcode and enjoys FanBox until optout.
31825	FASPAY TECHNOLOGY	The FasPay service allows users to create custom ringtones from full track songs. The service can be embedded in music download and mobile content sites or used on a stand along basis. Set up is fast and easy and comes with integrated direct to phone SMS premium billing.
95548	FIRST SCREEN LTD	Get the most glamorous real American women on your cell phone now! Weekly subscription of \$4.99 for all access pass to mobile internet site, containing 30 wallpapers, refreshed each week. To stop txt STOP. Other charges may apply;
21333	FISHBOWL MARKETING	Look for great Fishbowl offers in restaurants across the US. Text restaurant name to 21333 for mobile sweepstakes and special mobile VIP club offers

Code	Brand	Description
36638	FONEMINE	Textable interactive mobile campaigns with campaign keywords, mobile internet and complete tracking and analytics.
47368	FOR RENT MEDIA SOLUTIONS	Apartment communities who advertise in For Rent Magazine can provide property information such as community brochures, current pricing, special promotions, contact information and much more to their prospective renters with our 4RENT text-messaging service.
411511	FOSTERS WINE ESTATES	The campaign acts as a virtual sommelier by pairing 3 wines to queried foods and cuisines. Wine pairings vary in price points, origin and varietal.
66369	FOX Sports Radio	Fox Sports Freqs get MORE! Register and get all the 18st sports news and scores str8 2 ur fone via TXT msg. Never miss a minute of all you favorite sports action and contests all in the palm of your hand!
44566	FRENGO	Frengo provides text based contests, quizzes, polls, games and predictions around Sports, Celebrities and Music, as well as prizes and a sweepstakes drawing
238659	FUNKYSEXYCOOL	FunkySexyCool is the mobile way to make new friends. You can vote and message other members on the site. Registration, messaging and basic voting is free. Members can stand out by doing premium messaging and voting for other members.
38736	FUSE NETWORKS LLC	Fuse Networks runs part-screen SMS-TV Games (interactive programming) for two hours a day. In addition to these text-to-screen “games” using keywords MATCH, PAIR, HEAVY, DUMPED, Fuse launched text-to-screen comment lines where viewers send a message to 38736 and there is a possibility that the message is shown ‘live’ on screen. The keywords for the text-to-screen comment line are CHAT and NICK.
39106	Family TXTConx	Family TXTConx is built for people who are required to place calls to family and friends using an Operator Services platform as well as people that want to hear from their loved ones required to place calls using Operator Services. Now you can share a “Words of Wisdom” text message and complete a call to the cell phone of your family member, friend or associate.
465637	FindHolmes	Find homes with your mobile phone! Text a property listing address to HOLMES.
36287	Focus on the Family	Focus on the Family is offering Christian mobile content that includes devotionals, wallpapers, theme-based info alerts, voting and polls regarding social issues.
36669	Foonz	Foonz is a group calling service which lets anyone start a group call or send a message to a group, from any phone.
57000	Four Score Technologies, Inc	Get the latest content for your mobile content at mStyle. Send a test message on your phone to 57000 to sign up now.
33198	FreeWiiToday.com	User signs up for alerts and enters for a chance to win a Nintendo Wii.
37811	Frucall Comparison Shopping	Frucall (www.frucall.com) is a leader in mobile voice, text, and data-driven price comparison search services. Frucall service is supported by all cell phone brands and PDAs. The Frucall platform’s mobile comparison shopping service uses a combination of telephony technologies to provide the user with multi-modal access to shopping related information.

Code	Brand	Description
45911	G ROCK Radio	Want alerts on ur phone? Rply ACCEPT now, or go grockradio.com to customize ur mobile alerts profile.
464242	GAIA INTERACTIVE	Bring Gaia to your cellphone! We offer a great collection of Gaia related wallpapers! Download them and show them to your friends!
44644	GLOMOBI BV	GLOMOBI: The latest ringtones, coolest games, videos and wallpapers for your cell. www.glomobi.com
45848	GLU MOBILE	Play Now, Player! It's instant game gratification, anytime, anywhere. The freedom to play is in your hands. Text PLAY to 45848 or visit glu.com.
26642	GOCOMICS	Personalize your phone with your favorite GoComics characters including Garfield, Foxtrot, Doonesbury, and more!
32484	GOOD NEWS HOLDINGS	With the simple touch of a button, FaithMobile brings you the most innovative faith-based content in the world. Receive the word daily by phone free! Download Christian Ringtones, Wallpapers and daily inspirations from some of your favorite ministries. Stay connected to God, every day, on your phone. Sign up today @ faithmobile.com
44133	GOOMZEE CORPORATION	Goomzee.com provides innovative text-messaging technology for businesses to adapt their selling strategies to today's buyers' market. With 24 hour access to information needed to make a purchasing decision, buyers are satisfied with the ease and availability of requesting product or service information via their most essential device, their mobile phone.
46673	GOOSE NETWORKS, INC.	GOOSE is the first-of-its-kind real-time ridesharing service, providing an easy way for commuters to find trusted ridesharing partners on the fly. After registering at www.readyssetgoose.com, users can get paired by texting RIDE or DRIVE to 46673 (GOOSE). Save time, save money, and save the environment - try GOOSE today!
46708	GOP	Receive Election campaign alerts on your phone direct from the GOP. More info: http://www.gop.com/secure/mobilesplash.aspx
47624	GQ	Text GQ to our short code 48624 (GQMAG) and we'll hit you with instant access to: VIP events, style tips, private sales, interactive polls, and text-to-win sweepstakes. Plus must-have gear, gadgets, alerts, and more.
48696	GUMIYO	Gumiyo is a web and mobile based service aimed at connecting buyers and sellers. Sellers can list items and buyers can find items or set alerts and be notified when items become available. Buyers can access Gumiyo from their phones (using Wap or Web browser) or from a PC. Sellers can post items to Gumiyo from their phone using MMS/ SMS or Email, or from a PC.
30303	Get Music	GETMUSIC is a new way for music fans to shop in one place for the latest ringtones and wallpapers from their favorite artists to add to their mobile phones. These ringtones and graphics have been specially designed for use on mobile phones.
466626	GoMobo.com	GoMobo is the world's first mobile food ordering service that allows customer to skip the line at busy restaurants all over the United States. Customers store GoCodes, favorite orders, so that they can then order via text message using our short code, 466626. Visit gomobo.com to join now! Keywords: fave, help
94863	GoQube	Text 'Join' to 51684 to sign up for exciting offers and information from Financial Services to Politics to Special Promotional offers.

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53787	Good News Text (International)	Scripture of the day. Consumer will get a good news text every day for the life of the subscription.
476669	Greensboro News & Record	Get news, weather, local information, and deals on your mobile phone from the Greensboro News & Record in Greensboro, NC. Text 'TRYIT' to 476669 (GSONOW) to receive a list of active mobile campaigns. Visit www.news-record.com to sign up for breaking local news and other alerts on your mobile phone.
44354	HI FLI TONES INC	Underground Hip/Hop Ringtones & Videotones Make Your Own Ringtones;
67298	HIGHER ONE	Higher One customers can text in to get information about their One Card account, to help manage their student loans. Find out more at www.higherone.com
74674	HIPCRICKET LLC	You are almost there! Get breaking news alerts to your phone, rply w/ the word 'accept' or go online to WHLT.com .
42648	HOME BOX OFFICE, INC.	Watch full-length episodes and unforgettable scenes from your favorite HBO shows, or catch family-friendly content using Cellular Video on your 3G phone. Plus personalize your phone with exclusive ringtones, games, and graphics from your favorite HBO original series. Text "GO" to HBO4U (42648) now to get started!
295667	HOODINY	www.cyloop.com the leading Hispanic music community is now extending the service to its subscribers by allowing ringtones purchases directly from the site.
41522	HOT 104.5	Hot 104.5 wants to keep you in the know. Reply with JOIN to get alerts and info from Hot 104.5
43848	HearstYP	Yellow Pages Search. Users send their search term and location to 43848 and we will send back the 2 or 3 business names, addresses and phone numbers.
47336	Heineken	Heineken runs a few promotions each year to support their sponsorship of music festivals or events like the Grammys. Enter to win tickets to the event, or while you're there, sign up to receive alerts related to the show.
33088	Hell's Kitchen	For a second season, Hell's Kitchen will incorporate a PSMS Sweepstakes. The question will be Who is Chef Ramsay going to eliminate? Vote window will be open at the top of the show and close around 10 minutes before the end of the show. All entries, regardless of whether correct are opted into the sweepstakes; Cash prize of \$10,000 for East/Central feed and Mountain/West. Free method of entry via fox.com . Limited to 10 valid entries per week, regardless of method of entry.
75712	Hobnobster/SMS Jock	Hobnobster.com, operated by Feedtext Inc., is a web and mobile social networking and bookmarking service where individuals get to message, mix and mingle with individuals of their choice by making use of the advanced profile search engine and the easy browse feature for fast navigation through the member profiles found in the network. In addition, since it can help you hook up with members within your vicinity, you can actually meet online contacts in person.
85276	Hot Cell Chat	Peer to peer chat with moderators in place. Billed at \$0.99 per message.

Code	Brand	Description
71234	Hotprofile	Text the name of your favorite girl in our contest to 71234 to help her win. Each text you send will put your name in drawing for a weekly prize. Prizes will range from cameras to computers to cash.
46873	HouseFront	HouseFront is real estate information services company that provides detailed property information for over 100 million homes throughout the United States. Consumers can send a text message to the word HOUSE (46873) with a property address to find out the estimated house value, number of bedrooms and bathrooms, year built, square feet, lot size and purchase price of any given property. The service is free to use and consumers can go to www.housefront.com for more detailed property information.
99464	I Can't Believe It's Not Butter	Receive Recipe Shopping Lists via text
79649	INNOVATIVE MESSAGING SOLUTIONS	End to End customer communication made easy and immediate. Check us out at www.textricity.com !!!
72225	INTERCASTING CORPORATION	Rabble: Mobile Social Networking & Blogging. Rabble is an exciting mobile community that combines all the things you love doing on the web into an easy to download application for the phone. Chat, blog, meet friends, share pix, and find great new bands all from the convenience of your cell phone. Rabble: www.rabble.com ;
428663	INTEROP TECHNOLOGIES	WIN A HERSHEY'S SINGTONE: Send a text message containing a unique code found in participating Hershey's Ice Breakers mints, sours, and gum packages to see if you've won a free downloadable karaoke ringtone! Winners can redeem SINGTONES instantly via phone or explore the full menu online. One in three wins a SINGTONE instantly, others are encouraged to play again.
64244	Informz Inc	Informz will deliver opt-in information to students on behalf of our College and University clients. Examples could include: Reminders of class schedules, Campus events, Campus scores, etc.
77007	Interlinked Media	To help organizations increase the effectiveness of advertising, marketing, PR and CRM campaigns utilizing text messaging and other cell phone capabilities. Interlinked Media is an enterprise class mobile marketing application and solution provider. Text Info to 77007 for more information.
78852	International Systems Developers	Mayors Models mobile wallpaper offering
48723	Irbe Corporation	Cover4me is a mobile alerts solution used to provide employment and other alerts to hourly and shift workers. Using Cover4me, management can quickly and easily send an alert with the confidence of knowing it will be received on the device held near and dear by each employee – their cell phone!; MO: Chilis453; MT: "To begin receiving work-related alerts for Chilis Bayside Miami, reply YES. Std carrier/other chgs may apply. 4 help txt HELP."; MO: YES; MT: "Thanks! U will now begin receiving wo;
25878	JAMMIN 95.5	Text JOIN to then number 25878 and become a Jammin 95.5 Text Crew member. Get updates from Portland's party station!

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83895	JM Family Enterprises, Inc.	Utilizing 3Cinteractive's messaging platform, JMFE has developed an employee emergency and hurricane text messaging application.
94041	JPM Chase	Customer will opt in to receive future fraud alert from Chase via either outbound phone call, inbound phone call, or email notification. Once customer is opted in, will receive confirmation message. If potential fraud, will receive fraud text, for customer to confirm transaction. Can confirm AOK purchase or fraud purchase. If fraud, customer will be called on their cell phone and a fraud analyst will help them immediately.
76673	JUICE BILLING PTY LTD	Joke of the Day and quote of the day. Just send joke to 76673 or quote to 76673
26733	JW MEDIA INC	Links to the most fun and interesting sites on the Internet. When you have nothing better to do, visit Bored.com.
75555	Jamster International Sàrl	Mobile Entertainment products (music, video, games, alerts). Register now @ Jamster.com
52723	KCRA-TV	KCRA3 TV, located in Sacramento, CA, provides news alert services to its viewers and the local community. Additionally, polls are held during selected news broadcasts to judge community interests.
38828	KISS 107	Want 2 join the Kiss 107 Mobile Club + get alerts on ur phone? Reply with the word JOIN to the number 38828 now. Txt STOP 2 optout anytime. Standard carrier rates MAY apply.
57906	KISS FM 96.5	Hey. I see your not a 96.5 kiss2go member yet. Hookitup. Reply w/ the word 'join' or go kissfm965.com and personalize ur profile. its hot.
39232	KOMO 1000 News	Want alerts and scores from The Mariners? Reply with ACCEPT and stay on top of your favorite team
62458	KPFX-FM The Fox	Become a Fox Text Rocker. Reply with join and you are in.
37530	KRBE FM 104.1	When you're a KRBE Insider you'll never miss out again! Be a KRBE Insider and you could win concert tickets and get concert news! Trying to remember the name of a song or artist that you just heard? Text the words "now playing" to 37530 and get back the last three artists and songs, right over your phone!
75617	KS 95	Want alerts on ur phone? Rply ACCEPT now and never miss out on KS 95 happenings
55336	KTBS TV (ABC)	KTBS-TV ABC, Channel 3 Shreveport, LA
44939	KTCK AM 1310 The Ticket	Become a 'Tickehead'. Find out about Breaking Sports News FIRST. Sign up now, then brag to your buds as the Ticket delivers information about sports news, big name guests and secret contests right to your cell phone, no matter where you are. Stay connected to Sportsradio 1310 the Ticket.
97373	KUBE 93FM	Mobile interactions with Radio Station Audience. 'Mobile Click Club' members can receive special discounts, unique information and offers from the station and advertisers. This is the first station in the US to extend Radio's reach to the Mobile phone and involve regional and local advertisers.
22700	Katz Mobile	The team of broadcast specialists at Katz Mobile add Interactive components to traditional media such as Radio and TV making every campaign measurable and improving brand awareness.

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567325	L'Oreal Paris USA (R/GA)	SMS shopping list from L'Oreal Paris USA. Shop for L'Oreal products online and then send your selections to your phone for easy reference at the store.
53410	LANMET	Register for admissions and financial aid alert.
58255	LETSTALK.COM	Visit Lets Talk.com to download wallpapers, games and ringtones.
56426	LIAZON NETWORKS/Lightning	Once users have opted-in to a business code they can receive up to 3 unsolicited offer messages or an unlimited number of alerts. Unsolicited messages all have opt-out instructions included. Text JOIN to 56426 to opt-in. For current program offerings and information text COUPONS, SPECIALS, INFO, CONTEST, SWEEPS, VOTE and LINKS. To opt-out and for help text the single words STOP, CANCEL, UNSUBSCRIBE, QUIT, END and HELP.
95101	LIVE MEDIA MARKETING	Text messaging services for bands: www.bandtxtalerts.com
82137	La Redoute	La Redoute's LR TXT appeals to the busy consumer of today, enabling them to be able to receive special offers & product alerts while they are on the go, directly to their cell phone via text message. La Redoute is designed to inspire, to encourage self-expression – every season's collection will appeal to your creative side while still meeting your everyday wardrobe needs.
33456	Landmark Theatre	Discount offers, theatre finder and film release details
58463	Lifetime Networks	Lifetime TV runs standard rate mobile clubs, sweepstakes, and voting/polling applications. The mobile club offers subscribers tune-in alerts, sweepstake alerts, games, and more (ie. ringtones, downloads). Lifetime TV runs approximately 2 standard rate sweepstakes per month on their vanity short code (58463-LTIME).
47195	Lincoln Financial Group	1.The user hears the call to action on the radio. 2.The user sends the keyword (radio station call letters) in to the short code 3. system sends back the song title and artist and a menu of options. Example: "1:42pm on 93XRT Cassie, Me & U Reply with # 1.get alerts 3.request song 4.text the DJ 5.prior songs" 4. User replies with # they want to sign up for. 5. User is prompted for dbl opt in if applicable.
22774	Lincoln Financial Group	98.5 KYGO Interactive Radio enables its listeners to interact with the radio station. By texting the keyword (KYGO) to 22774, listeners can instantly receive the artist and title of the song that is playing and be given a menu of options to continue their interaction. Listeners can sign up to receive artist/station alerts, request a song from the DJ, send a message to the DJ, or get a list of the past songs played.
43797	Lincoln Financial Group	KS 107.5 Interactive Radio enables its listeners to interact with the radio station. By texting the keyword (KQKS) to 43797, listeners can instantly receive the artist and title of the song that is playing and be given a menu of options to continue their interaction. Listeners can sign up to receive artist/station alerts, request a song from the DJ, send a message to the DJ, or get a list of the past songs played.
58603	LiveTone	Create and share your own ringtones and show the world how original you are. Best of all, no experience is required. Use our tools to create original poly tones, true tones and video tones in seconds and then compete against other users to be the next big ringtone sensation.

Code	Brand	Description
289669	Livemercial	Users see a call to action for a product. Users will text a keyword to the short code number. Content provider sends back requesting a phone number and shipping address. Then the user will confirm the order and send back a CALL keyword to the number to which a voice call will be required to pay for the item.
567567	Livemercial	Users will see a call to action. Users will send a specific keyword for a product they want to buy. Content provider will ask for phone number and address for shipping. A call will be placed to the user to confirm payment order.
69522	Los Angeles Clippers	Which one of the following players is the greatest Clipper of all time? A) Elgin Baylor, B) Bob McAdoo, C) Danny Manning, D) Loy Vaught, or E) Elton Brand. Text POLL followed by your answer to MYLAC (69522) and see how your answer stacks up with other members of Clipper Nation. Vote now and you will be entered in a contest to win one of many Clippers' prizes.
33217	LoveTxT	Want to spice up your love life or just have a question about what to do with your partner? Then stop by lovetext.net and get a love tip every day or chat with your favorite advisor! Even enter our sweepstakes to talk with an advisor for 20 minutes – one winner every week.
20873	Low1wins	A mobile low bid auction application which can be used as both a revenue generator and a promotional marketing tool.
71879	M.NET CORPORATION LTD	Provides Clients with the ability to build fast and easy mobile sites and to configure information, offers and mobile site links on their websites that consumers can decide to send to their mobile phone via the simple Campaign Mobile pop-up icon. Also provides the ability to grow valuable opt-in databases from the web mechanic and to send non-billed SMS marketing messages to consumers.
50649	MEEGOS	Get your MEEGOS, Dynamic Display Pictures for MSN Messenger 7 that respond as emoticons you use Messenger conversations! Go to www.meezone.com for more information.
54191	MEGA 101 FM	Rply w/ word 'JOIN' or go 2 mega101fm.com 2 win gr8 prizes! Gracias por escuchar a Mega 101, Latino + Proud! Other carrier rates may apply.
35350	MESSAGEbuzz	Powering through the use of our application and services mobile marketing campaigns to a broad range of clients such as Weber Grills, Wyndham Hotels, University of S. California, MOVE-on and Association of Flight Attendants. To join, text WOW to 35350
95483	MICROSOFT	Hungry for a hamburger in Houston? Need a phone number in Newark or an area code for Arcadia? How many calories are in that hamburger? Send a simple text message to 95483 (WLIVE) and get the answers you want when you want them: Find local businesses and call them with a single click. Search residential listings to find people. Get instant answers to questions. Follow the financial markets.
33211	MIX 96 Tulsa	Want alerts on ur phone? Rply ACCEPT now, or go mix96tulsa.com to customize ur mobile alerts profile.
96262	MIX 96.1 FM	Hey, heard of Mix Mobile? U can now receive cool stuff and exclusive info to ur phone! Reply with 'join' now to the number 96262!

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68317	MIX&MEET, INC.	Without requiring any user-to-user interaction, Mix's patent pending Real Time Social Clustering™ technology brings unacquainted people together by coordinating spontaneous, same-day, small group mixers at meeting venues located within the immediate vicinity of the users.
52208	MLSNet.com	Register to receive Major League Soccer Scores, news, transactions to stay on top of the sport.
30377	MMS TECHNOLOGIES INC	Campaigns for International Sports content, Music, Ringtones, Videos and related products.
90999	MOBILE ACCORD	Alerts and premium subscriptions
58648	MOBILE STREAMS	Download ringtones and receive discounts with our Ringtone club from ringtones.com. Send a text message on your SMS enabled phone to 58648 for fun downloads and more.
90210	MOBLISS	Texting to this short code provides the user with paths to all Mobliss games on all carriers.
21534	MOGREET, INC	Same service as associated with short code 25939, but this is for a monthly subscription. For \$2.99, they can send 10. For \$4.99, they can send 20 and for \$9.99, they can send 50!
21355	MONKEY RECORDS	PureRemix provides a website for DJs to share mix content, play dates, and other useful information with fans. Fans register on the site or via keyword to receive phone alerts regarding venue dates. Service will follow all applicable rules regarding opt-in, providing HELP. STOP, rate information and frequency info in response. After user confirmation, they receive a welcome message from the service, as well as a monthly subscription message. Frequency will be up to 3 messages per week.
76185	MOVEONIN INC.	SMS system for roommate matching service. Text landlords and roommates and find your place to live.
78592	MOViN 92.5 FM	Hey, heard of MOViN Mobile MVP? Get exclusive offers + info from MOViN on ur phone! Reply JOIN now to get in!
66937	MOZES INC	Mozes helps organizations conduct text message services to help create stronger connections with their targeted audience.
60700	MSKG	User visits ringkey website and chooses the image or ringtone they would like to download. Each piece of content has a specific keyword that the user must text into 60700. User opts in to receive 2 pieces of content/month.
23882	MTV	MTV will incorporate voting and in-show live reveals for a variety of upcoming shows including MTV 'Say What Karaoke', 'MTV Movie Awards', and Spike 'Guys Choice Awards'. Calls to action will take place during the show informing viewers that they can vote by web or SMS. SMS votes are standard rate. The results for each program will be announced live at the end of each show.
268742	MUSIC.COM	Music.com creates a free community wherein artists, whether the local bar band or internationally touring band can build their fanbase, network and sell their music independent of traditional distribution means. Likewise, fans are now able to purchase downloads and customizable mobile downloads directly from their favorite artists. The Music.com audience is comprised of artists/master rights holders and the music lovers that have chosen to share with and support the artists directly.

Code	Brand	Description
		Music.com is engaging musicians and fans of every genre. They do not charge set up or monthly fees for belonging to the Music.com community or for using the music store service. Artists have the option of making their music available for streaming or download simply by uploading their music to the site. Artists set pricing for their music should they choose to sell it. On Music.com artists retain up to 80% of the purchase price of a music download and offers the most competitive rates on mobile downloads.
695433	MYLIFE BRAND	Access your MyLifeBrand.com account from anywhere via your mobile phone, and share media and messages with your friends between your mobile and the web.
69911	MYSTATEUSA	In addition to error/help messages shown in the message flows, text messaging help pages will be available on the website with instructions on how to sign-up for alerts, and cancel alerts. Help and toll-free number will also be listed on the website.
468468	MYTHUM INTERACTIVE	Text in a question to get information back from your favorite on-air personality. Each question you ask gives you free entry into the sweepstakes contest. Ask today and win!
65246	Major League Baseball	Official MLB.com Team and Player Alerts
626646	Mamogo	Mobile community where content is created by the people for the people. Mamogo allows users to sell and buy mobile content, create mobile storefronts, promote original mobile ringtones, wallpapers, videos, screensavers and more. Mamogo is also a free service for those wishing to promote themselves and their own artistic creations in the latest most exciting medium yet.
232889	Marinello School of Beauty	Marinello School of Beauty will use their short code for all 23 campus enrollment, information, alerts, tips, registration, etc.
787839	MarketTools	Would you be willing to join a special ZoomPanel, Mobile ZoomPanel, which sends market research surveys for you to complete on your mobile phone? Panelists will earn one of several rewards for participating in Mobile ZoomPanel surveys including Zoom Points and Cash Sweepstakes Entries.
96625	Markettools	MarketTools leads the way to understanding the opinions, desires and motivations of your customers. As the defining provider of market research for the on-demand era, MarketTools helps you connect with the universe of voices within your target market or gives you the tools to do it yourself—so that you can make the right decision.
864237	Masala	Masala provides people with multiple perspectives around news and events, ranging from firsthand accounts to local and global news sources, blogs, along with user generated videos and images. The allvoices platform allows people to create events that matter to them and our system helps to provide context to those events and a large audience.
44571	Matchmaker	MatchMaker is an entertainment based service that computes couples romantic possibilities based on their name, age and sign. Users text in the required information and receive the results back.
77003	MeetSomeoneTonight	One-time purchase of 20 min voice chat.
51684	Message Goblin	Message Goblin™ is a web-based text messaging solution that will help you

Code	Brand	Description
		build an opt-in community for ongoing outreach. It is ideal for contests, promotions, coupons, alerts, crisis management and getting information quickly to any subscriber group. You can send broadcast text messages containing information of interest to your audience such as facts, coupons, specials, alerts, incentives, sweepstakes, and entertaining content. Message Goblin supports both web and keyword opt-in as well as sophisticated reporting and the ability to send messages at pre-determined future dates/times. It also supports email and voice messages. Its simple user interface makes it easy for you to automate and manage campaigns. Messages can be sent in almost any language.
23333	Microbilling	MICROBILLING uses the convenient and instant premium SMS billing mechanism to bill for content that is not delivered on the mobile phone. Examples include -access to premium content web sites; -access to web downloadable content (like full tracks of songs);
76171	Mighty Tones	Get your ringtones at: www.mightytones.net ;
696468	Mint Software, Inc	The My Mint application automatically checks personal finance details and sends alerts. Subscriber periodically makes requests for specific alerts and balance updates.
648808	Mitt Romney	MITT ROMNEY OUTREACH AND ADVOCACY
53900	Mobarama	Mobarama is a double opt in service that rewards its members for participating in targeted surveys and offers sent via SMS. Join now at mobarama.com !;
77980	Mobile Affirmations	Mobile Affirmations provides daily inspirational and motivational messages to mobile devices. The service is delivered via the state of the art Mobile Messaging Ventures mKinnect platform which is suitable for integration into a broad variety of mobile messaging applications and campaigns. Visit maffirmations.com .
74362	Mobile Agent by CellSigns, Inc	Buyers and Agents can now search and retrieve property information on any home in their local market through Mobile Agent(tm). Buyers can access the entire MLS through text messaging (SMS) and retrieve listing details including photos on their cell phone. Powered by CellSigns, Inc. Patent Pending. Visit http://www.cellsigns.com for participating brokers and additional information.
53571	Mobile Alert Network	Geographically targeted mobile alerts from local government, traffic, weather, and other emergencies.
30644	Mobile Commons	Ringtone store branded with our clients identity who will provide the tones for free. The tones will be created by the client. Keyword: TONES
59568	Mobile Ice	Mobile Ice provides complete mobile solutions to companies who are interested in engaging in mobile marketing, SMS, MMS, m-commerce, all forms of mobile content delivery, premium services and more. Mobile Ice is an inexpensive yet advanced carrier to carrier mobile marketing tool which provides both managed and self-managed campaigns through an easy to use, powerful web interface. Text ICE to 59568 for more information, or go to http://www.mobileice.net .
73914	Mobile Verses	Mobile Verses delivers a Bible Verse to your phone daily. Carefully selected

Code	Brand	Description
		verses arrive on your mobile phone to provide a moment for reflection and inspiration during your busy day. Mobile Verses also builds customized faith based mobile channels for organizations to better communicate with their congregations. For more: www.mobileverses.com
48484	Mobile Village	The Mobile Village campaign is a subscription and transaction service providing color wallpapers and ringtones. The delivery system is based on the recognition of the model of cell of the user to be able to send the best-fitting content for the customer.
535537	Mobile Visions Inc	Tired of calling real estate agents for property information. Simply text the property ID# to 535537 and enjoy the property information from the comforts of your phone!
85944	MobileCause	MobileCause develops and executes mobile strategies with a socially conscious vision. We move beyond entertainment and work with non-profit organizations and their corporate partners to meaningfully extend their reach to develop end-users into committed allies, interacting with technology that is turn-key and cutting edge. We identify our clients' partnering needs, pursue corporate partners with complimentary strengths and link the parties together. www.mobilecause.com
27138	MobileCause	MobileCause develops and executes mobile strategies with a socially conscious vision. We move beyond entertainment and work with non-profit organizations and their corporate partners to meaningfully extend their reach to develop end-users into committed allies, interacting with technology that is turn-key and cutting edge. We identify our clients' partnering needs, pursue corporate partners with complimentary strengths and link the parties together. www.mobilecause.com ;
78779	MobileChat	MobileChat is the new exciting way to meet new people on your cell phone. Flirting with men or women in your area or around the country has just gotten easier! Simply text the word SEXY to 78779, and have a date for tonight.
38714	MobileStorm	mobileStorm Inc., provides small businesses to Global 2000 enterprises with a complete on-demand digital messaging solution for superior marketing and customer communication via email, wireless text messaging, voice, fax and direct mail.
44665	Mobilehookup	Mobilehookup TXT Dating application is a one-on-one dating application. keyword: HOOKUP
71906	MobillCash.com	Alternate billing solution allowing websites to take payment by conveniently charging it to a cell phone account. Go to MobillCash.com now for a live demo.
46898	Mobillion	Via short code 46898 you're able to participate in moderated SMS chat services. www.mobdesk.com for more info.
386898	Mobilove	Mobilove is the most widely distributed mobile community dating, friendship and chatting service available on the market today. It's fun, casual, safe and exciting and allows singles to interact with each other whenever and wherever they want! All human beings need to connect and Mobilove gives its members the chance to interact with like-minded people in a positive environment and through the ultimate communication tool Text

Code	Brand	Description
		in key words "mobilove start" to participate.
35050	Mobimii.com	Mobimii.com is a mobile portal that offers you everything you need for your mobile phone, chat with other members anywhere in the world, download unlimited ringtones, graphics and video content or post mBlogs and your pics for others to see.
46666	Mobioo	To get the Hottest Ringtones, Wallpapers or any Cell phones content, go to www.Mobioo.com and choose among thousand contents, or simply subscribe and get 7 credits every month. Simply click on the content to get it, and follow the information needed to send a txt message and get the content. One time transaction downloads;
61885	Mobzilla	Mobzilla is a music streaming service that brings over 27 exciting user selectable music channels to your phone. This service includes the ability to create your own customized station that plays what you like. Text "start music" to 61885 to sign up for the service. Users will be billed \$9.99 per month after the initial 14 day trial.
22095	Mogreet	User selects a Mogreet - Video Text Message from www.mogreet.com and sends to themselves or to a friend.
76937	MoneyGram International	MoneyGram International (MGI) will be providing a service to MoneyGram Rewards members who have requested to receive notifications when the transfers they initiated have been completed. A double opt-in is required for registration. Once registered, users will be informed that the funds they have sent have been picked up by the intended receiver at the time of pickup. Registrants can opt-out at any time.
64726	MoneyGram International	MoneyGram International (MGI) will be providing a service to MoneyGram Rewards members who have requested to receive notifications when the transfers they initiated have been completed. A double opt-in is required for registration. Once registered, users will be informed that the funds they have sent have been picked up by the intended receiver at the time of pickup. Registrants can opt-out at any time.
60962	MonsoonMobile	As a mobile marketing company, we offer products designed to fit the specific needs of clients in a mobile world. Our mobile solution provides all the support and services necessary to successfully implement anything mobile- from text campaigns, to selling mobile content, and providing you access to our latest in mobile technologies.
843529	MooseJaw.com	Customer initiated SMS marketing programs, communication and integration of mobile into their customer service department. To join in the madness, text MOOSE to 843529
70250	Movaya	Movaya (www.movaya.com) is a Seattle-based technology company, whose mobile content management and distribution software system allows mobile content producers and ecommerce retailers to effortlessly extend their businesses to the growing mobile data market. Movaya's products and services are targeted to take advantage of the explosion in mobile content services.
46988	My Local TV	Get local television news when you're on the go, including news, weather, sports, traffic, Doppler radar, and video from top local TV stations across the country. Local TV stations promote sending a text message to 46988. The user

Code	Brand	Description
		simply sends an SMS with the station call letters as the message text to 46988. In return the user receives confirmation SMS with instructions or redirect links that will send the user to a free mobile web site or an on-deck download area for news applications.
67337	MyCoolMobile.com	MyCoolMobile.com offers ringtones, images, text services and games on pSMS using transactional charging only.
74415	MyNuMo	MyNuMo is an online community that lets its members create, show, and sell mobile content. We provide tools for creating and publishing mobile ringtones, wallpapers, videos, text, and games. The MyNuMo mobile portal delivers independently created content that's rated by real people around the world, and delivered right to your mobile phone. MyNuMo is selling user-generated content to mobile users with direct billing and delivery agreements on major US carriers.
25404	MyStop	myStop delivers real-time bus Estimated Time of Arrival (ETA) information directly to the rider using text messaging on cell phones. Real-time ETAs are calculated for every bus stop in the transit network and are based on GPS-monitored bus behavior.
69937	Myxer	Myxer radically simplifies mobile content and service delivery, allowing everyone from local bands to national brands to easily access a mobile world. Thru MyxerCodes™, artists and other content owners have the ability to have anyone request items such as ringtones, wallpapers, and video clips using text messages sent to MYXER (69937). Users can verify that their phone is compatible with Myxer by texting 'test' to the MYXER shortcode (69937).
88686	NINE Multi-Media / UVOTO	NINE Multi-Media provides mobile marketing, online marketing, and customer list management services to ad agencies and tv shows. Our 'Audience Link' ASP platform technologies connect directly to the cell phones of targeted consumers to quickly deliver appropriate marketing messages, automate lead generation, raise brand loyalty, increase awareness, and lower cost of client acquisition. We currently manage campaigns for online and tv shows, including the mobile social video network called Uvoto.
738245	NATIONAL IN-STORE	National In Store the leading in store promotional agency uses this a single opt in branded message to drive leads and in store sales for their clients.
46833	NBC Today Show	NBC's Today Show runs non premium text alerts and also a premium iTV poll which runs during the Today Show Weekend program.
97587	NBC WEATHER PLUS	Local weather forecasts sent to your phone from NBC Weather Plus
96468	NCIC OPERATOR SERVICES	NCIC Operator Services provides a collect call service to mobile phones with an easy payment option that allows the cell phone user to send a premium SMS to pay for the call.
31313	NEUROTIC MEDIA LLC	Consumers can either purchase designated mobile download products (truetones, videotones, wallpaper downloads); or redeem a PIN code to unlock a Credit value and then download value-add products. For more Visit www.neuroticmedia.com
45998	NEW MOTION INC	MobileSidewalk™ (www.mobilesidewalk.com) is one of the largest U.S.

Code	Brand	Description
		based mobile entertainment companies. Wired Magazine recently declared MobileSidewalk to “rival those of their mainstream-media counterparts,” and Wireless Business Forecast named MobileSidewalk “a company to watch.” Dedicated to realizing the full potential of mobile phones as an entertainment and promotional medium, MobileSidewalk reaches consumer groups with interest-specific campaigns via the Internet, print ads, radio and other marketing mediums. Content is delivered using state-of-the-art, user-friendly applications. The division’s rich array of engaging, well-designed content ranges from ringtones, wallpapers, games, sports stats, music artists, horoscopes, spiritual / religious topics and real-time news updates to interactive capabilities, including live mobile voting with results broadcast on TV. Consumers also get exclusive access to members-only fan clubs, licenses, promotions, contests and major brands.
44577	NEW MOTION INC	GatorArcade (www.gatorarcade.com) is a top quality integrated online and mobile gaming site, dedicated to “Putting the fun back into your cell phone.” For a nominal monthly membership fee, gamers gain access to an extensive selection of premium-quality online and mobile games as well as a robust selection of ringtones, graphics and other mobile entertainment content. Members can earn points when playing the online games which can be redeemed to enter sweepstakes to win valuable prizes, such as the XBOX 360, iPods and plasma TVs. Players also have the option of playing the Internet version of certain games at no charge.
46692	NEW YORK MAGAZINE	Mobile Restaurant/Bar Listing Requests from Nymag.com. Users send a text request for listings using the following keyword types: Establishment Name, Cuisine, Bar Type, Neighborhood, Zip Code. For example, “food thai Chelsea.” In return, users receive up to 3 text messages with information matching their search, including: Establishment Name, Address, Phone Number, Cuisine/Bar Type, Price Range/Payment Types
22411	NEW YORK TIMES	22411 makes information interactive and customizable to you. Get the news, information and entertainment you want when you want it.
85700	NMS	National Messaging Solutions is a full service SMS provider offering entertainment-grade messaging programs and critical messaging programs.
44944	NMS	Turtle Text offers a variety of mobile campaigns in the entertainment field.
48510	NMS	Accenture mobile programs.
81492	NMS	National Messaging Solutions Short Code. Various Mobile Applications. Find out more at www.nmessaging.com
42269	NY DOT	The NY DOT provides a public service of alerting urban citizens, especially those in the NYC area, when air quality is at such a poor level that citizens need to help by using public transportation or carpooling. Mobile will allow those alerts to reach citizens much faster, which is important as sometimes air quality determination is made with little advanced notice. Consumers can opt-in at http://www.CleanAirNY.org or by texting AIR to 42269 (4CANY).
53871	NY Jets	This New York Jets short code is focused on Polling, Trivia, premium JETS Alerts, downloadable content via SMS, Web / WAP storefronts: VOTE, PLAY, YES, SCORE, GREEN, BLITZ
58163	Neighborhood America	Several single and double opt in promotional campaigns. Also used as a test

Code	Brand	Description
	(MOVO)	and development short code.
48457	Netbiscuits	www.netbiscuits.com is a self-enabling platform for creating mobile portal applications. Additionally the platform offers messaging features like Tell-a-friend, SMS-Campaigning, Voting/Polls, Premium Downloads.
87777	New Motion, Inc.	GatorArcade is a premier entertainment site that offers free game play, and premier membership offers opportunities for prizes and mobile content.
639344	Newegg.com	Discover Exclusive Newegg offers on your mobile phone, receive coupons, comparison shop, Daily Deals, and new product alerts from Newegg.com.
40240	Nokia	Used to inform and alert Nokia employees about issues to certain operator networks.
77477	Nokia Nseris	Consumer texts a promoted key word to win a prize. Message is returned that indicates if they won or where to go to find out if they won. Customers will also be given the option to opt in to mobile alerts.
222427	NumberLink	NumberLink moves content to mobile phones.."giving content mobility". NumberLink has launched the AAA Mobile FuelFinder; and FreeMobileFuelFinder.com which finds the cheapest gas in any area within the U.S. and sends the information to a persons mobile phone in a text message.
656562	OK OK N.A. CORPORATION	Part of the proceeds of the purchase will go to the Leyte landslide victims. Save Leyte will be a web portal where subscribers can opt-in and have content delivered to them via SMS and WAP Push. Content include ringtones, personalized wallpaper, personalized phone themes and newsletter service. The campaign offers both a subscription model (web opt-in) and per purchase model.
51051	OOOBER	Provider of mobile SMS campagin tools and solutions to Operators, Brands and Marketing agencies.
90185	OPERA TELECOM USA	Customer browses to the web site looking for images to download to their phone. The customer enters their phone number into the web site to request the services. A pin code is then sent to the customer via an SMS message. The customer must enter the code and chack mark that they have read and agreed to the Terms and Conditions of the of the offer. The customer then receives two images. One is a complementary image the other is one of the four per month that will be sent in the next thirty days.
79886	OPERA TELECOM USA	The customer will see a question scroll across the bottom of the screen during a live program. Example of program would be a live fight) The customer enters into the contest. For enrolling in the trivia the customer will receive one month of complimentary test feed relivant to the program.
83190	OPERA TELECOM USA	Customer will browse to the web site and see the offer to receive wallpapers sent directly to their cell phone. Customer enters their cell number that they wish to receive the images. We then send them a pin code which has to be re-entered into the web site along with checking the box that they agree to the terms and conditions of the offer. The customer then receives one complimentary image and then one image per week until the customer stops the subscription.
68247	OTAir	Mobilize your next marketing campaign with OTAir. Text OTAir to 68247

Code	Brand	Description
		to experience OTAir's mobile service offerings. OTAir is a national mobile impulse marketing and media firm specializing in impulse marketing™ with mobile devices. OTAir empowers consumers to engage the promotion of a product, event, or organization they are interested in. OTAir's services extend the message of traditional marketing with instant information, interactive communications, corporate mobile applications and more.
62262	Obama for America	Join Obama Mobile. For periodic campaign updates from Barack Obama's presidential campaign. Receive localized information, news on issues, updates and more. Txt "JOIN" to OBAMA (62262) Standard rates may apply. Text HELP for help and STOP to quit. Paid for by Obama for America;
78243	Our Stage	OurStage.com will run a series of premium SMS votes to let fans decide the best music, videos, and photos on the website. The website has multiple channels. Each contest will renew monthly. People will both upload and view content on the web. The OurStage online ranking platform will narrow each contest. In the last 5 days of each month, viewers are asked to vote for the winner using their cell phone. The grand prize winner who receives the most votes across all stages receives a prize of \$5,000. The keywords are promoted each month next to the video or music that they correspond to.
34343	P1SMS	P1SMS is an interactive radio application available to all radio stations nationwide. Utilizing proprietary technology, the platform delivers real-time song and artist information for songs being played, ringtone purchase options and interactive messaging capabilities. P1SMS supports real-time mobile music sales, artist alerts, polling and voting, contests, text club alerts and song requests.
725223	PALACE SPORTS & ENTERTAINMENT	Get concert announcements, ticket alerts, and exclusive offers for area shows and sporting events at the Palace of Auburn Hills, DTE Energy Music Theatre and Meadow Brook Music Festival. Sports scores and insider news for the Detroit Pistons and Detroit Shock.
77812	PES	Progressive Employer Services uses this mobile payroll alerting system to replace time consuming phonecalls to alert clients of upcoming payroll amounts to ensure available funds. This campaign is more efficient, and customer friendly than the old method, and decreases the cost of support for PES.
77950	PHINDME	The short code is registered to support a marketing application giving local businesses the opportunity to promote to customers that opt-in through mobile marketing. The program also creates a mobile website for the consumer and enable customer reminders through opt-in. All opt-in and consumer preferences are housed in the PhindMe platform that can be logged into through each businesses site.
33888	PLAYPHONE INC.	1.The user will enter their mobile number on the ACME ONLINE website. 2.The Playphone system will send an opt-in verification message to the mobile device asking the user to verify the premium charges by responding with the letter Y.
88099	PLUS MOBILE LLC	User send keyword HI or HOLA and pass an doble opt-in process to accept T&C and start to enjoy the more funny hispanic chat in US interaction with new friends or identified operators.
88077	PLUS MOBILE LLC	Receive content of your interest daily. Be informed about soccer or other

Code	Brand	Description
		sports, have fun receiving your daily joke, receive your daily love tip and much more. It's easy. Send a text message on your SMS enabled phone to 88077 and enjoy your daily content.
22767	POP RETAIL	POP Solutions is a leading Mobile Media Services Provider and a leader in the emerging, interactive Mobile Marketing sector in North America. POP Solutions' comprehensive content delivery package of Mobile Media Services enables advertisers and media companies to connect with individual consumers, directing specifically targeted advertising campaigns at the right time and the right place, thus achieving higher sales conversion rates than traditional media, including the Internet.
48747	PORTAGA, INC.	Real time business travel alerts for late departure, arrival, gate change, baggage change and the like.
37503	POWER 96	Join the Power 96 crew and never miss out. Reply with JOIN to get connected now.
56948	PRIMETIME-US, INC.	Receive a daily inspirational message from Rhonda Byrne, the creator of the global phenomenon film "The Secret" and author of the NY Times #1 best selling book "The Secret." Simply text JOY4U (56948) to receive your daily inspirational message, Monday through Friday. The monthly subscription fee is \$3.99.
50709	PRIMIRO	Corporate Marketing Professionals use Clear TXT to connect with customers and prospects when they are not on-line; advertisers can offer instantaneous, on-demand promotions and create a personal connection with prospects that could never before achieve from print and visual media content.
37865	PROFILE ANALYSIS	Get real-time sales statistics using i-Snapshot Sales Management Tool. Contact us via http://www.i-snapshot.com for more information
77946	PROXITO LLC	Proxito is a wireless service focused on providing consumers with a free and easy way to locate and compare local gas prices. Using SMS, mobile web, or on your PC, Proxito makes it easy by allowing you to search using a zip code, city, or address. Simply text your location to 77946, and Proxito will send you back the gas prices in your area. It's functional, it's fast, and best of all, it's free. Of course, standard SMS rates may apply, depending on your plan. For more info, please visit www.proxito.com .
78624	PUNCH ENTERTAINMENT, INC.	The application is a game that is downloaded using a shortcode. User will see an ad for the game on the Web or in print, and will text to get the link to download the game
72727	Palm Beach Post	Palm Beach Post offers mobile search and info on demand. Get autos, homes, cars, job information and more – on the go. The paper offers Mobile Classified and Ad IDs for local advertiser participation. Local weather alerts, local business information accessible on demand.
33287	Paramount Mobile	Get exciting Hollywood content from Paramount Pictures on your mobile phone. Text MOVIES to 33287 to sign up for text alerts, download wallpapers, ringtones and video clips from our hottest movies!
729725	PayPal, Inc.	PayPal Mobile - Now you can buy things, send money, and donate to charities using your phone. Use PayPal Mobile to make purchases by

Code	Brand	Description
		sending a text message or while browsing the mobile internet.
373323	PennySaverUSA	PennySaverUSA now allows customers to post their own ad via SMS. Text message the ad copy to PennySaverUSA's FREEAD to upload the ad. Select the type of ad by text and the ad goes live. Also access the entire database of over 1 million classified ads through mobile search.
69964	Phonezoo Communications Inc.	Create and share your own personalized ringtones at no charge. Go to www.phonezoo.com to easily create your own ringtone from any sound source and send it to your phone and share it with your friends.
97868	Pictavision	Go to www.pictavision.com to get premium photo application including Pictavision, Pictavision! Teleprints, Pictavision Mediashare. And visit www.Myapps-mobile.com for MyHoroscope, MyLovesigns, MyFaith and more.
30100	Pixelplay Interactive	Cellpoint Mobile and PixelPlay have launched a Short Message Service (SMS) value-added sweepstakes. The sweepstakes will appear on PixelPlay's iTV service, DishGAMES, available from EchoStar Communications Corporation and its DISH Network satellite TV service. The initial sweepstakes on DishGAMES will enable players to "text-in and win" one of three iPod Nano's. Winners will be notified via text message. In return, PixelPlay will acquire the capability to alert players through SMS of future game releases, new sweepstakes offerings and promotions. Send GAME to 30100 to test.
24365	Playaction	Sign up by phone! Text your team's keyword to short code 24365 before or during every game and play live on your phone! See the list of upcoming games here. Make your picks! Once the game starts you are playing live! Who will score next? Each pick costs \$.25. Up to 10 picks per game.
77177	Playmania	This is a Call TV Game Show that allows the customer to purchase a practice through an SMS and will also allow them to interact with the on-air talent.
26220	PocketFuzz	PocketFuzz helps independent artists sell their music as ringtones and stay in touch with their fans. Fans can select any part of their favorite band's song and send it to their phone as a ringtone!; Text MEESE to 26220 now!; www.pocketfuzz.com ;
84331	Procter & Gamble	Tide Stain Detective - users can receive advice on how to treat their stain while on the go. Just text in your stain and fabric (EX: Text COFFEE SILK) to 84331 to receive information from TIDE on how to treat your stain.
41513	Promo2cell.com	Promo2cell.com is a turnkey solution for all your mobile marketing needs. With our advanced SMS platform you can create almost any kind of a mobile marketing campaign within minutes. Text PROMO to our short code 41513 for more information!;
84444	Promotxt	Cast your vote for the Marshall's figure skating challenge. To vote for Michelle text vote 1 to 84444; To vote for Sasha text vote 2 to 84444; To vote for Emily text vote 3 to 84444; Thanks for your vote and good luck.

Code	Brand	Description
49469	Promotxt	Promotxt is a complete text messaging platform used for contests, alerts and marketing campaigns
47769	Proxpro Inc	Text NOW to shortcode 47769. Being unprepared for a meeting is unacceptable. Making a good impression can not be left to chance. Feel the power of 35 million professional resumés, often photos too, in your pocket. Step into your counterpart’s world. Understand their priorities, know their proudest achievements. With Proxpro you can humanize any meeting, bond and have fun.
78573	Pulse Media Response	Response and Brand awareness programs for national and local advertisers.
438427	QTAGS	Conoco Phillips Gas Station Location Finder. Text a zipcode to 438427 to find the address of the nearest Conoco Phillips Gas Station
40200	QTones	The Qtones Text Services program focus on horoscopes, jokes, dating tips, celebrity news. The subscribers receive alerts daily or weekly.
742350	R/GA	The Mobile & Emerging Media / Applications Group at R/GA uses 742350 a a shared shortcode for multiple clients. Currently, It is used by our client Subaru to power mobile programs for the WRX and Impreza vehicles.
36453	R/GA on behalf of Nike, Inc.	Various Nike mobile programs and services, including Nike Zoom mobile. Text ZOOM to ENIKE.
53927	RAZOR AND TIE ENTERTAINMENT	Children and parents alike will have the opportunity to experience mobile content such as realtones and voicetones from KIDZ BOP, the top rated music series brand for kids. The storefront will also offer ongoing text in to win sweepstake campaigns, as well as opt in SMS alert functions notifying fans of up "text in" special offers and value-added incentives. In support of the partnership, Razor & Tie launched a nationwide mall campaign promoting the new brand. Fans also had the opportunity to 'text in' to receive the KIDZ BOP realtone for "Kidz Bop World" for free. Send KB R8292 to 53927;
26469	RED FISH MEDIA	Red Fish Media is a turn-key mobile services provider. With the Red Fish Media “BluWater” platform you have the ability to launch mobile programs such as: Mobile Sweepstakes, Voting and Polling campaigns, SMS based trivia applications, Text-to-screen promotions, Text alerts and daily alert subscriptions, Ringtone and Wallpaper downloads and SMS gateway services.
23000	RED FISH MEDIA	Red Fish Media is a turnkey mobile services provider. With the Red Fish Media “BluWater” platform you have the ability to launch mobile programs such as: Mobile Sweepstakes,Voting and Polling campaigns, SMS based trivia applications, Text-to-screen promotions, Text alerts and daily alert subscriptions, Ringtone and Wallpaper downloads and SMS gateway services.
69035	RINGSPIRATIONS	Ringspirations, LLC is an exclusive Christian and Inspirational mobile content provider that offers mobile content for direct downloading by mobile phone subscribers, customized mobile solutions and campaigns for Christian organizations, retailers, churches and artists, content licensing for mobile platforms, customized text messaging services and mobile advertising.
411911	ROAM SECURE	Localities and Universities throughout the USA are acquiring emergency alert systems to keep their constituents safe and informed. Text messaging is

Code	Brand	Description
		an obvious way of accomplishing this, thanks to the widespread adoption of cell phones and reliability of text messaging. Text JOIN to 411911 to receive a list of emergency alert systems to which you can subscribe. More information on Roam Secure's Alert Networks at www.roamsecure.net .
360360	Rayve	Text in recommendations for stuff you like to share with friends, family and other folks with your tastes.
21523	Red Bull	Sign up for the Red Bull text club and alert service. Standard rates apply.
78639	Reebok RunEZ	Single opt in branded message integrated with a runners based social network. www.goruneasy.com
25000	Ringtone Channel	Buy ringtones, wallpapers and games for your mobile phone. Also sign up for text and traffic alerts. Go to www.ringtonechannel.com for more information.
63021	Ringtonedeck.com	RingtoneDeck.com is an off-deck mobile content download portal where mobile phone users can go and download a variety of the latest mobile content, delivered straight to their handset.
784637	Roanoke Times	Get news, weather, local information, and deals on your mobile phone from The Roanoke Times in Roanoke, Virginia. Text 'TRYIT' to 784637 (RTIMES) to receive a list of active mobile campaigns. Visit www.roanoke.com to sign up for breaking local news and other alerts on your mobile phone.
77899	SENDME, INC.	Sendme Mobile is a leading provider of direct to consumer mobile entertainment. We offer a broad selection of mobile subscription services, including interactive mobile trivia, ringtones, games, wallpaper, mobile sweepstakes and more.
61827	SEXINFO	SEXINFO is a text message-based application that provides youth in San Francisco access to local sexual health resources while maintaining privacy. By texting "SEXINFO" to the short code 61827, youth receive health information and referrals related to their topic choice
74666	SIMON PROPERTY GROUP	Ability for Simon Gift Card users to obtain remaining balance on their gift card. Gift card holder will send a text message with their card information or a blank message to our short code to have their remaining gift card balance returned via text message.
62517	SMASH EMPIRE, INC.	Use your music, photos, pictures, and animations to create ringtones and graphics for free: online, without needing software for your computer.
22000	SMS Dating	SMS DATING provides users with an instant match-up with other like-minded people. The registration process takes a mini profile: - Nickname; - Age, gender; - Age range and gender of preferred mate; - Introduction; Having registered, the player immediately receives the nicknames of 5 other users who meet his/her criteria. Users can chat anonymously by sending each other messages starting with the other party's nickname.
762775	SOUTHBEND	SnappLink is a social network where members can meet new friends,

Code	Brand	Description
762775	TECHPRODUCTS	connect with old ones, and have a little competitive fun as well. Users can increase the rankings of other members' images by adding more "Snapp Points" to the image. In turn, they also include a message to the member. Snapp Points can be assigned to an image through a \$0.75 premium SMS. Sample Flow: Member sends MO: "VOTE20 Mikedenver rocky80 5554444 Your picture is great !!! :))" to add 20 Snapp Points to image # 5554444, and I;
73223	STROTHER DUFFY STROTHER	This is a presidential campaign for Dennis Kucinich. The campaign will appear in printed materials, during speeches and debates. The user texts PEACE to 73223. User will receive additional SMS messages regarding campaign developments. At the conclusion of the campaign, customers will receive an SMS asking if they want to receive PEACE alerts in the future.
729329	STROTHER DUFFY STROTHER	Your directory for short term loans. Text loan to payday, and receive all required information.
77136	SURVEY ANALYTICS	Free Web Polls. http://www.micropoll.com/
72286	Saavn Mobile	You can now download Bollywood music ringtones, music videos, images to your phone! Also, receive text alerts on the latest celebrity news, horoscopes, jokes and other entertainment.
83930	Salient Mobility	Founded in 2007, Salient Mobility LLC is a leading provider of applications content for users interested in networking within a social network environment. The companies flagship, txtysingles.com offers a secure, and exciting way to social network from your mobile phone via short code 83930.
73265	Seamless Web	SeamlessWeb is the fastest, easiest, and smartest way to order food online or via your mobile phone.
429512	Seattle Seahawks/Qwest Field	Report any inappropriate activity that is disrupting your enjoyment of the game or for housekeeping needs during Seattle Seahawks games or other major events at Qwest Field.
467467	ShopText	Consumers can use text messaging to shop for and sample physical goods. Register at www.shoptext.com .
22748	Shortcode Inc.	Available to wireless subscribers in the US and Canada, interested buyers of used vehicles from text4cars.com get alerts of matched vehicles directly on their mobile device. Buyers browse the entire inventory online or search for the specific vehicle they want. When the buyer is interested in a particular vehicle, the buyer provides contact information and will be sent a text message with contact information for the vehicle. The seller then receives the lead through SMS text messaging or email at a Pay per Contact charge.
33455	Smart Text	Play2Text is a premium program where players receive a trivia game and a fun. Players are entered to win a prize for the game they have chosen to play.
43143	SmartSigns	This program is designed to allow end-users who pass posted house-for-sale signs to text in to receive additional information about that particular house. User texts in the number displayed in front of the house (ex. Text 20 to 43143) User texts 20 and receives additional information about the listing, including pricing, square footage and additional photos. This provides prospective buyers the opportunity to get information when a realtor is unavailable.

Code	Brand	Description
86961	Smile Reminder	Content provider will send reminders to remind subscribers of their appointments
88663	Sonic Branding Solutions Corp.	ToneMakerDJ lets anyone, regardless of musical experience, make their own custom ringtones!
40477	Sony BMG Music Entertainment	Sony/BMG Music Entertainment is promoting ringtones by Chayanne & Vicente Fernandez, R. Kelly, Huey, T-Pain, Mario, priced at \$2.99 each. Keyword CHAY101, CHAY104, FLIRT, iFLIRT, PLD1, XPLD, DRANK1, XDRANK, HELLNO, XHELLNO, HOWDO, XHOWDO
65279	Space2Phone	Space2Phone is the only global mobile portal for Space enthusiasts. Users get Space news from Space.Com and NASA Breaking News, rocket launch text alerts and launch video highlights, plus Space-themed ringtones, wallpapers, games, video downloads and lots of other content.
23754	Spirit 105.3	Join Spirit Txt Messaging! Exclusive family-fun offers, alerts and more Rply w/ 'JOIN'.
768723	Sporting News	Sporting News is a multi-media sports company catering to passionate sports fans. Its content is available through a weekly publication, Sporting News Magazine; a national radio network, Sporting News Radio; and a leading community-based website, SportingNews.com. SportingNews.com delivers fantasy baseball and fantasy football player alerts to sports enthusiasts' mobile phones.
35253	Star 102.1	Ur almost in. Reply with ACCEPT to become a Star 102.1 Texter and get updates on concerts, contests and more
697289	Starbucks	Text "Break" to MYSBUX (697289) to receive your next Starbucks Coffee Break reminder. Enter your zip code and we'll deliver the nearest Starbucks store locations right on your mobile device.
40612	Starmedia	Ringtones and Alerts by suscription and transaction. Customers will find the instructions on the website as well as the rules and regulations. The alerts are: Country News (Mexico, Colombia, Venezuela, Argentina, Puerto Rico, Panama, Cuba, Peru, Uruguay, Ecuador, Honduras, Nicaragua, Guatemala, Dominican Republic) Sports News (Mexico, Colombia, Venezuela, Argentina, Uruguay, Ecuador, Dominican Republic) Horoscope. Humor.
478959	Styky	Social networking through a mobile phone application where users save, share and restore digital content.
78669	SunnyLogo	On SunnyLogo, users can subscribe to the service for \$5.99 a month for any 6 wallpapers or ringtones from SunnyLogo.Com. Single item downloads from the website cost \$1.99.
20964	Swank	Swank Motion Pictures College Alerts Club will be sending out daily or weekly text message alerts on your mobile phone. Swank College Alerts will keep you up to date about class schedules, school closures, meeting requests, grades and other information about your college. You can sign up to receive alerts from Swank Motion Pictures College Alerts Service by registering at http://blast.swankmp.com , or by sending a text message with the keyword SWANK to 20964.
31541	TAP.tv	TAP.tv builds custom television networks for commercial venues – e.g., sports bars, restaurants, health clubs, waiting rooms - using TV to entertain their customers. TAP manages all aspects of these networks: providing proprietary hardware; sports, news and comedy content; a multi-screen

Code	Brand	Description
		touch-screen control system; interactive games and sports stats; an ad-creation tool kit; and manages the entire process over a web services IP network.
89829	TELESCOPE	CW Network is launching standard rate alerts, voting/polling, txt to screen, and sweepstake applications for 10 of their local stations. The role out of these campaigns will be a gradual process beginning with alerts and voting/polling, and sweepstakes for a select few local stations.
47074	TELRITE CORP	Customer signs up for services with Telrite Corp. and agrees to allow us to send SMS' to them for account related and/or marketing-related purposes. We also offer them codes to check various account details, like their balance.
70777	TERACOMM	TERACOMM's flagship product - Interactive Solutions Machine (ISM) allows the audience to interact almost instantaneously with multimedia content displayed on any audiovisual device, using their mobile phones as a powerful remote control. Starting from this concept we have developed a wide range of interactive services and applications providing significant values for businesses in the entertainment, media and marketing areas. This technology is already being used in the largest broadcasting studios in Europe and North America. Right now there are 40 interactive applications in the TERACOMM portfolio and new services are constantly being added. For more info check our corporate web site tera-com.com .
865766	TEXT YOU BACK LLC	Text Message Listing System (TMLS) for Minnesota. Allows users to text for information on MLS-listed properties in the Minnesota market.
34663	TEXT4MLS	A new service for those looking for a home/condominium/townhome to purchase. A Real Estate agent can register their property for sale, and will provide a property number at the residence sign, or through printed material. You simply text the property number to our short code (34663), and you will receive property information. Log into our website at www.text4mls.com to pre-register or to list a property if you are a broker or listing agent.
99134	TEXTOPOLY	Setting the trend in Mobile Marketing. Our mobile marketing strategies integrate technology, creativity and feasibility, which in turn drive the success of each project we undertake. Our strongest assets are that we work closely with our clients, conduct diligent research and have a strong sense of the market as it is today, as well as a vision for how it will be tomorrow.
58341	TG Telecom Ltd	Promotion is called 'Celebrity World'. Users respond to a call to action to text in and start a subscription for bi-weekly information alerts about the entertainment industry.
325527	THE DALLAS MORNING NEWS	News and Information Alerts
42278	THE WEATHER CHANNEL	Get on-demand weather information fast with our 4CAST text-messaging service.
25462	THE WEATHER CHANNEL	Spanish Language Weather updates
53173	THE WEATHER CHANNEL INTERACTIVE	User registers and pays for service on website. User selects various alert endpoints, which may include SMS. User enters endpoint information (actual number). User selects alert types (such as severe thunderstorm, tornados, etc.). National Weather Service issues severe weather alert. User is notified about the alert via SMS (and other if applicable). User pays set and

Code	Brand	Description
		constant monthly or annual fee for service.
31853	THE WEATHER CHANNEL INTERACTIVE	The Weather Channel delivers FREE severe weather alerts, pollen alerts and others by e-mail or wireless text.
48000	THUMBPLAY	Thumbplay, Inc. is a leading online retailer of mobile entertainment content. The company aggregates, promotes and delivers mobile content directly to members via Thumbplay.com. The site offers ringtones, wallpapers, games and text-based services through a membership-based, community experience.
82587	TICKETBEAN, INC	Members of TicketBean or any of its affiliated Ticketing companies (eg ticketclub.com) are always in-the-know about the latest sport and concert deals through TCKTS mobile alerts. Users opt in easily and for free at TicketBean.com or an affiliate website (eg. ticketclub.com) by filling out a quick profile describing events they are interested in.
47645	TOP THREE MOBILE	TextCare is a Text Messaging-based Customer Service system for registered users of TextCare.com.
72487	TRANSEND ED	Learn more about your university and great opportunities for your college career. Text the word "College" to 72487 to get started and receive special news alerts about admissions and financial aid.
80588	TRUTHTEXT.COM	Truthtext is designed to raise funds for a Christian hip hop ministry, God's Block ministries www.godsblock.org/ and church planting through the Acts 29 Christian church planting network www.acts29network.org . Truth text sends encouragement through a daily Bible verse to the subscribers cell phone for only 3.99/month.
20369	TWENTIETH CENTURY FOX	Exciting mobile campaigns for Fox Films and Fox Searchlight. Each film release will have a minimum of 3 ringtones and 3 wallpapers. The fox films mobile club will send messages about each movie release as well as other promotions, and games. There are various clubs specific to each movie. To join the 20th Century Fox Mobile Club text JOIN to 20FOX (20369).
68437	TaggLine	TaggLine offers you a complete communications solution, enabling you to provide listing information to prospective buyers around the clock and across multiple formats, including voice, text, and picture messages. Not only is it the most comprehensive product on the market, but it is the easiest to use by your prospects as well. Whether your listing is residential, commercial or multi-unit, our patent-pending system offers you the ability to stand out in the ever-competitive real estate market,
82672	Tampa Bay Online	Get news, sports, or weather alerts from the Tampa Tribune Newspaper and Tampa Bay Online. See www.tbo.com for more details.
75007	TelTrust Corp.	TelTrust Telecom provides innovative solutions for the telecommunications industry.
772948	Tele-Angels	Nationwide premium text campaign on a vanity shortcode providing inspirational messaging and unlimited prayer requests both in English and Spanish. To join, text ANGELS to 772948.
80801	Telescope	Declare Yourself is a non-profit group that is looking to register youngsters, 18-24, to vote in the 2008 presidential election. If you text VOTE to the short code you'll be entered into the Declare Yourself Mobile Club, and you'll receive voting registration info, primary voting info, and general political info. There will also be opportunities to run mobile polls with the

Code	Brand	Description
		list.
53237	Television Dominicana	Media World, a production and TV distribution corporation will sell mobile products through TV advertising to the audience of the 11 shows it distributes in the United States. These shows target the Dominican market and currently run on the Dish network. With an offering of mobile products and services available directly via mobile phones, Media World connects people with their Dominican roots, offering news and jokes from the Dominican Republic, and ringtones of their favorite artists. Ringtones will include chart-topping music from top music labels, and original content made exclusively for mobile phones (alerts and subscriptions).
87821	Telezone	Get ringtones, wallpapers and games for your phone. Visit the storefront on www.telezone.com for complete details. \$1.99 for ringtones, wallpapers; \$3.99 & \$4.99 for games; keywords: 3WALL or 3REAL, 3GAME;
44663	Text 4HOME, LLC	4HOME provides real estate buyers with up-to-date sales related information by simply texting any property's address to 44663(4HOME)
37284	Text-a-day	Make your phone a part of your lifestyle. Sign up to receive a daily text-a-day alert on a topic that matters to you. Text-a-day offers daily messages about sports, faith, jokes, self-improvement and more.
76121	Text-ed.com	Text-ed is a unique, hassle-free mobile technology which allows potential buyers to call an ordinary telephone number on a For Sale sign to instantly obtain listing details and agent contact information. Potential buyers instantly receive property details on their phone free of charge, and the real estate agent simultaneously receives a text message or e-mail with the potential buyer's phone number!;
678678	Text678678	678678 allows consumers to respond to a printed or verbal advertisement and text in for more information on the product or service or receive a text coupon. Consumers will also have the ability to opt-in to the program to receive alerts from time to time.
711711	Text711711	711711 allows consumers to respond to a printed or verbal advertisement and text in for more information on the product or service or receive a text coupon. Consumers will also have the ability to opt-in to the program to receive alerts from time to time.
28255	TextRox	Lexus Entertainment uses short code 28255 for a mobile chat room. The chat rooms are moderated 24/7 and automatic logoff if no MO response after 20 MT messages. \$0.99/MT. keyword: PARTY
84966	Textiwon.com	Do u want to Win Money? Now you could win up to \$1,000 with TEXTIWON.COM - all you have to do is text the words "PLAY" to 84966. It's that easy. Text "P-L-A-Y" to 84966 and you will be entered in the weekly sweepstakes to win the \$1,000. Every Friday, Textiwon has a cash drawing where one person will win \$1,000 and 60 others will win runner-up cash prizes. Check this out! Textiwon will also send you a joke or fortune for your own personal entertainment. Nobody leaves empty handed! Text "play" to 84966 and you're entered. All it costs is \$.99 & standard rates may apply. You can play up to 5 times per week to increase your odds of winning.
70734	Textopoly Inc	"Setting the trend in Mobile Marketing" Our mobile marketing strategies

Code	Brand	Description
		integrate technology, creativity and feasibility, which in turn drive the success of each project we undertake. Our strongest assets are that we work closely with our clients, conduct diligent research and have a strong sense of the market as it is today, as well as a vision for how it will be tomorrow.
83276	The Concept Studio	For informational alerts on Teradata Offerings please text TD to 83276 (TDCRM).
54889	The Eternal Order of AccessVia	You meow, we purr. Members only catbox.
51359	The Fix	Make sure you have the latest ringtones and wallpapers. Get your Fix! Monthly download subscription for 10 pieces of content.
74568	The Virginian-Pilot	Get news, weather, traffic, local information, and deals on your mobile phone from The Virginian-Pilot Media Companies in Hampton Roads, Virginia. Text 'TRYIT' to 74568 (PILOT) to receive a list of active mobile campaigns. Visit www.pilotonline.com/alerts to sign up for breaking local news, traffic, and other alerts on your mobile phone.
59495	Think Partnership, Inc.	This subscription service enables users to receive hot product alerts direct to their mobile device when products become available on their website.
95534	Ticket 760 Sports Radio	Want 2 join Ticket Mobile Mafia + get offers 'n discounts 2 ur cell? Go2 ticket760.com or rply JOIN. Txt STOP 2 optout. Othr carrier rates may apply.
73200	Tracfone	Customers can purchase a pre-paid plan for local, national and international dialing. You can use our short code to replenish minutes, order ringtones, and get the latest news, weather and sports! No bills, no surprises, no annual contracts. Go to www.tracfone.com for more information.
843643	Traffic Genie	Traffic Genie is a new, innovative and personalized service that gives you travel times and alternative routes between your key destinations - such as home, work, or the airport. When it's time to get on the road, simply call the Traffic Genie info line. In seconds, you'll get personalized travel time and alternative route information - all based on current traffic conditions.
58850	Trimfone	Trimfone provides individuals a revolutionary new way to manage their personal fitness. Trimfone offers powerful, fully-personalized diet or exercise program administration services on mobile phones.
46835	Tripwing	Users can go to www.tripwing.com and sign-up to receive offers via text message on their cell phones about special travel rates. Only offers related to the destinations that the user chooses will be sent. Users can stop messages whenever they choose via text or by visiting the website. Users can choose to receive messages about accommodations, airfare, cruises, and vacation packages. Users can also limit the number of messages that they receive per day.
55358	Turbohorse	Live from the Windy City--Cubs fan, White Sox, Northside, Southside--we bridge the digital divide with exciting mobile messaging and content applications. Come join us!!
85858	TxT85858	Lexus Entertainment uses short code 85858 for a mobile chat room. The chat rooms are moderated 24/7 and automatic logoff if no MO response after

Code	Brand	Description
		20 MT messages. \$0.99/MT. keyword: PARTY
300300	Txt300300.com	Txt300300.com is a Text Marketing Service that gives consumers the ability to research and shop for new homes using their cell phone or PDA. Home buyers have the ability to gather details about properties they are interested in by simply texting the Listing ID# to 300300. For more information Text: HELP to 300300.
87000	TxtHookup	1 to 1 text chat. Text the word NEW to 87000 and follow the instructions on your phone
56142	TxtVox	TxtVox is a mobile alert service that gives subscribers the information they want, when they want it. TxtVox has a wide selection of alerts including exclusive entertainment content. TxtVox is a non-premium service. Consumers opt in at www.TxtVox.com
29222	TxtWire Communications	One time event, user will use call to action and content provider will send back the business alert MT
59173	U92 KUUU FM	Hit us up anytime you like. You can text in your requests, messages, and even play contests by texting U92 at our short code - 59173. You can also get updates and be eligible to win exclusive contests by joining the U(@ Mobile Click Club Unit (MCU).
39649	UNIVERSITY DIRECTORIES	University Directories promotes local businesses, services and savings opportunities to college students, faculty and staff in over 250 markets throughout the U.S. UD's mobile services allow for mobile users to text for instant specials or sign up online to receive periodic specials.
90430	UNWIRED APPEAL	Interactive SMS Services. Premium and standard rate voting and polling, information alerts, contests, and text-to-screen applications.
38435	UNWIRED APPEAL	Mobile Customer Relationship Management System for Mercedes-Benz. Allows Mercedes-Benz dealers to notify customers via text-messaging of important information from dealer service centers and customer relations.
47647	UNWIRED APPEAL	Interactive SMS services. - Mobile Voting and Polling; - SMS Alerts with Opt-in Database Management; - Mobile Trivia and Contests; - Mobile Search and Information Reply.
42349	UNWIRED APPEAL	Mobile Multimedia service Delivery of ringtones, graphics, and video to cell phones. The service employs Unwired Appeal's proprietary Adaptive Content Server (ACS) and Dynamic Device Detection technologies. ACS supports audio/visual source files in standard audio/visual file formats (MP3, MID, GIF, JPEG, 3GPP, and more).
36263	UNWIRED APPEAL	Zuku Interactive Messaging Platform.
55202	UP-MOBILE	Spanish Mobile Chat/Dating targeted towards 45 million US Hispanic population. Keywords: LCHAT, VIPCHAT
839887	US AIRWAYS	Text your flight number to our short code 839887 (TEXTUS) and we will give you up to the minute info on Flight Status. Plus Dividend Miles Enrollment and other helpful and informational texts.
374363	US CAPITAL LLC	Play games, chat, manage your contacts and interact with your closest group of friends. Text "FRIEND" to learn more. This is a free service.

Code	Brand	Description
842538	US CAPITAL LLC	Purchase tickets to your favorite events directly from your cell phone, receive alerts on upcoming shows and participate in entertainment surveys. Text "TICKET" to learn more. This is a free service.
47253	US CAPITAL LLC	Real estate professionals can list their available properties for sale. Simply text "4SALE" with the unique property code to learn more about the listing. Service is free to use.
82583	US CAPITAL LLC	Are you getting the best deal on electronics? Text "VALUE" with any SKU# to find out what the product retails for at competing stores. This service is free to use.
76433	USEFUL NETWORKS, INC	Application discovery - potential users will enter sniffme to 76433 (sniff) to receive a message with an embedded WAP URL to learn more about the Facebook integrated friend finder service and to complete registration. Once the user is opted-in, the same short code is used to invite, locate, and remove friends as part of their locationships (i.e., user sends sniff Jim to 76433 and receives a message describing Jim's location and a WAP link to display a map.
81895	United States Coast Guard	Government emergency alerts generated by a US Federal Government application and sent to industry and government subscribers using personal/company supplied mobile devices
864833	United Way	United Way Shortcode
42627	Univision	Univision is launching a 'Malena' Web Soap Opera sponsored by Caress-Unilever that will include mobile marketing services. The campaign will include a tune in alerts club, and an exclusive 'Anais Solo mio' ringtone to members of the alerts club. Univision.com will have an entry form for the text club. Keyword for text club: MALENA Keyword for ringtone: SOLOMIO
868686	Urban Outfitters	Urban Outfitters is enrolling consumers to receive ongoing alerts about exclusive offers, in-store appearances, contests, and other cool stuff.
27777	VECTOR ENTERPRISES, INC	Our Psychic text chat service lets you chat with professional Psychics in real time. You can access this service 24/7 using your mobile phone. Just text the advertised keyword to 27777. Available in English. Applicable charges will appear on your cell phone bill. Must be 18+
99000	VECTOR ENTERPRISES, INC	Vector Enterprises, Inc. provides premium mobile content to the mobile consumer. Content includes approved content programs such as chat and horoscopes and device content such as ring tones, screensavers, and games.
55777	VECTOR ENTERPRISES, INC.	Our text chat service lets you flirt with other singles and make new friends in real time. You can access this service 24/7 using your mobile phone. Just text the advertised keyword to 55777. Available in English. Applicable charges will appear on your cell phone bill. Must be 18+.
33221	VERTRUE, INC.	Text to win great prizes daily and monthly! Invite your friends and increase your chances to win!
367787	VERVE WIRELESS	Free mobile sports alerts from Philadelphia's #1 Sports editors - The Daily News
847898	VIP TXT	Info alert program for consumers to get updates on events at local nightclubs and restaurants.
66915	VIVOTECH	ViVOtech has created an ePayment/mPromotion/eCoupon application, that

Code	Brand	Description
		uses SMS to communicate with the end consumers. Once users are enrolled and have opted to receive SMS for promotions/coupons/account updates, they will be send the SMS with that message based on some trigger point. Users can also communicate with the application by sending SMS key word, to get the promotion. Some predefined action from user generates a SMS to the user, like shopping using some card at a merchant.
28647	VOIP.COM	By adding a second number to your mobile phone, Voip's Mobile Line 2 enhances your existing cellular service. By adding an additional number, you can screen calls, keep your cell phone number private (even when using it to call people), and provide your public or private life with enhanced Voip features and voicemail. Plus, even if you change cellular providers, you won't have to change your Voip number! Visit www.voip.com
75000	Vector Enterprises, Inc.	Our text chat service lets you flirt with other singles and make new friends in real time. You can access this service 24/7 using your mobile phone. Just text the advertised keyword to 75000. Available in English. Applicable charges will appear on your phone bill. Must be 18+.
85000	Vector Enterprises, Inc.	Our text chat service lets you flirt with other singles and make new friends in real time. You can access this service 24/7 using your mobile phone. Just text the advertised keyword to 85000. Available in English or Spanish. Applicable charges will appear on your cell phone bill. Must be 18+
51500	Velti	User will select a category via the web for which they would like to receive alerts. i.e. Diet Alerts. The user will then get a diet alarm message sent on a daily basis. For downloads the user selects via the web the item they would like to download and then is sent the file directly to their phone via WAP Push. Both services follow the MMA guidelines in regards to double-opt ins, help, etc.
65377	Velti	Ringtones, Graphics and Alerts
70700	Velti	Ringtones, Graphics and Alerts
71097	Videoplay	VideoPlay is a TV Program featuring latest and hottest music videos of various genres. VideoPlay lets viewers become an integral part of the show and creates an additional revenue stream for broadcasters and TV channels. The show's text message (SMS) interactivity boosts channel ratings through an audience voting system in which fans can vote for their favorite artist and therefore are able to affect the show's music video chart on a regular basis. In addition, all voters are automatically entered into a contest to win sponsored prizes.
242424	Voice Mail Broadcasting Corp.	Entice your retail customers to text in to a short code and "Text2Win" a valuable coupon. VMBC can tailor your event to deliver coupons based on a pre-determined markdown rate. eg. 1/100=40% off, 2/100=30% off, and 97/100=20% off. Customers love it and our retail clients cut direct mail costs. Call 214-923-7025 for more ideas and more information.
97107	WAAF 107.3	Heard about WAAF Mobile? Receive exclusive offers + info over ur mobile phone! Listen on air for your call to action and text and WIN! Opt-out anytime by texting 'stop' to 97107.
97328	WASHINGTON STATE EMPLOYEES CU	WSECU Alerts and Information Service. WSECU provides its members the ability to receive account alerts and informational messaging. Informational messaging is obtained by members texting keywords to WSECU's

Code	Brand	Description
		shortcode. Alerts are activated by the member based on selected account activity or changes.
253788	WATERFALL MOBILE	AlertU, Waterfall Mobile's web-based emergency short messaging service or SMS (text) messaging technology developed for enterprises, institutions and school campus communities. Account administrators can easily send text messages to subscribers' mobile devices communicating critical information and updates to employees, students, staff and faculty in real-time. For more information on Waterfall Mobile or AlertU please visit, www.waterfallmobile.com or www.alertu.org .
67463	WATERFALL MOBILE	Msgme, Waterfall Mobile's flagship platform, enables marketers to build direct-to-consumer relationship management, create a mobile media distribution channel for messaging and multimedia content and analyze all reporting results from a simple-to-use web platform. For information on Waterfall Mobile or Msgme, please visit www.waterfallmobile.com or www.msgme.com .
78846	WEBAROO	SMS based group messaging, std rate for users and subsidized by inline 40-60 character "footer" advertisements.
87415	WEBSNAPME Inc	PC to Mobile message service - send text, images, audio video from PC to your phone.
42540	WEEI 850 AM Sports Radio	Send any text message to the number 42540. Visit our website to learn about exclusive offers to your phone from WEEI-AM. Carrier std charges/other rates MAY apply.
35192	WMMS 100.7 FM	Like to join the MMS Text VIP Club? Visit us online to get exclusive offers + info 2 ur phone. Reply JOIN to the number 35192 now or go to WMMS.com 2 setup ur MMS text profile!
55979	WNCI 97.9	Congrats! Ur now part of WNCI Text! U get 1st dibs on concert tix, prizes + breaking news!
95409	WNCT 9 Eyewitness News	Heard about WNCT Powertext? Receive exclusive news + offers to ur mobile phone. Reply w/ word JOIN.
86335	WOAI 1200 News Radio	Get the latest onfo on ur cell from WOAI news + learn how 2 win contests and get gr8 offers. Visit our website form more!
49463	WOMEN & WINE	Take the mystery out of buying wine. Dial 4WINE and find wines to pair with recipes from your favorite chefs - and where to buy them.
27336	WORKING ASSETS WIRELESS	Make sure your voice is heard, send us your vote on the next "Posting". It's easy. Send a text message on your SMS enabled phone to 27336 to participate after the next posting on the web
89332	WSAV News 3	Get breaking news alerts from WSAV. Reply ACCEPT now, or go online 4 more info + options and get alerts on ur phone.
56221	WSTW 93.7 FM	U want alerts from 93.7 on ur phone? Reply ACCEPT nowto get 93.7 alerts on ur phone.
63532	WTMX FM 101.9	Thx 4 joining! Exclusive MIX offers and info comin ur way. Txt 'join' to 63532
36957	WTVQ TV 36 (ABC)	Want breaking news + alerts 2 ur phone? Reply ACCEPT now, or go online 4 more info + options; 1-3 alerts per week; STOP to optout; Other charges may apply

Code	Brand	Description
99231	WYCD Radio	WYCD Text provides contests, voting and information alerts for listeners
73807	Warner Brothers	Text Mystery Game
889898	We Text It	We Text It is a customer survey and feedback system that will allow consumers to inform vendors and business owners of their customer service, instantly guaging feedback via sms.
60145	Wired 96.5	Want alerts on ur fone? Rply ACCEPT now or go wired965.com 2 customize ur mobile alerts profile.
22583	XINLAB	Send keyword and receive videos and rich media on your phone
99299	XTRA! Coupons	Xtra! Mobile Coupons - Get local coupons for merchants in your area. Text the word "XTRA" to 99299 and we'll guide you through the process from your mobile phone.
53318	Xanthem	Xanthem mobile marketing program will allow for the execution of a wide range of non-premium non-subscription mobile campains including contests, appointment reminders , home query, resturants adv, and service applications. Users will send a keyword to the short code number and content provider will return requested information. All campagins will be a one time events. and all are standard rate programs;
98823	YOUTUBE	Users can send videos to YouTube shortcode and videos will be uploaded to user's channel.
98966	YUUZOO PTE. LTD.	YuuZoo: a global web and WAP store front selling mobile content for end users. Premium ring tones, music, games, images, videos, mobile books, daily alerts, mobile social networks for the mobile phone.
98900	YUUZOO PTE. LTD.	YuuZoo is a WEB and WAP mobile content store-front for end users. YuuZoo provides premium mobile content, ring tones, music, games, images, books, videos, social networks, sms alerts. Extreme sports, Ford Models, Freeplay Casino games, Books, NBA and much more.
46927	Yap	Yap is a free application which enables users to compose SMS messages simply by speaking. Additionally, once the users phrase is converted to text, the application allows interaction with a multitude of web services such as Google, Yahoo!, Amazon, eBay, Wikipedia, etc.
81530	Z100	Register to receive alerts on your phone about station info, events and chances to win! Members get more! Txt ur 'shoutouts' to 81530
333363	ZANNEL	Zannel is an instant media messaging platform that enables social networking and the exchange of user generated/major media content.
48248	Zig Mobile	Download images and ringtones to personalize your cell
33669	Zingku Inc.	Zingku! Supercharged mobile text & picture messaging. The service allows users to create and exchange things of interest ranging from invitations to mobile flyers. On the mobile phone, Zingku uses standard text messaging and picture messaging features that come with every phone. With Zingku, things you wish to promote or share, can easily be created and fetched via mobile, instant messenger, and web browser. The service integrates your mobile phone with a personalized web site so that you can easily move things back and forth between the web and and your mobile as

Code	Brand	Description
		well as powerfully connect with friends and optionally their friends.
39044	i2SMS, LLC	Mobile Marketing Platform for Marketing Agencies to run Mobile Marketing Campaigns for their clients. Campaigns can be set up and live within seconds.
59925	iVisionMobile, Inc.	iVisionMobile is an industry leader in interactive SMS and PSMS technology for mobile marketing and m-commerce. iMessenger is a turnkey web-based platform that allows companies to independently create, activate, monitor and control mobile messaging and m-commerce campaigns. Customers can create targeted mobile messaging campaigns in minutes. iVisionMobile's software supports mobile campaigns including mobile alerts, text-to-buy, text-to-win, text-to-vote, mobile content and more.
426682	iamota impact	iamota impact helps agencies & brands of all sizes access, interact with & sell to mobile consumers. iamota impact removes the complexity in the mobile channel by providing on-demand mobile services that support all types of mobile marketing, messaging and payment. iamota impact enables you to add mobile "Opt-ins" to virtually any type of media: Web, blogs, email, social networks, TV, print, billboards, busboards, on-product, radio, POS and live events.
59479	kwiry	kwiry turns text messages into reminders and results you retrieve online. Whether it's the band you heard about over dinner, the billboard you passed on the way to work, or the bill you have to pay when you get home... text it before you forget it with kwiry. Advertisers and media companies can use kwiry's platform to create explosively viral mobile marketing within our community. Go to kwiry.com to learn more.
56678	loopt, Inc.	loopt is a revolutionary social mapping service that changes the way you use your mobile phone to keep in touch with friends. loopt lets you know where your friends are by automatically updating maps on your mobile handset and the web. loopt also lets you send messages to nearby friends or receive automatic alerts when they're nearby so that you never miss an opportunity to meet. With loopt, you put yourself on the map. Go to loopt.com to learn more.
639227	m3 - mobile messaging manager	The mobile marketing solution for automotive retailers.
47171	mSmart, Inc.	Short code for 2 way promotions serving brands such as Mc Donald's, Kraft Foods and Miller Beer.
29608	mVentix, Inc	cellYourBrand is a white label Mobile Marketing Program providing a direct medium to allow Brands to communicate key marketing messages under the form of text message based multiple choice questions to a specific audience. Text the keyword (ex:ABC123), an account code (ex:22) and a participant code (ex:123), separated by spaces to the program short code 29608. Refer to the campaign-specific materials for the required keyword and account code to participate @ http://www.mventix.com/cellyourbrand
35016	mix106.5 Baltimore	Reply ACCEPT now to get alerts and concert news.
99158	mobileStorm Inc.	99158 is mobileStorm's shared premium and standard short code for it's mobile marketing customers using the Stun! Digital Marketing Platform.
68267	ooober	ooober is a global platform where buyers and sellers come together; Buyers

Code	Brand	Description
		can shop internationally to find unique and diverse user created mobile content in the form of ring tones, pictures, logos and videos, themes, screensavers and games that can be easily downloaded to your cell phone. Sellers can open up personalized store fronts to which they can upload and sell their personal content including ringtones, wallpapers and much more.
78247	qtags	qtags is a keyword based service that is off-the-shelf easy to setup and manage, but robust enough to support even the most creative communications. qtags keywords are used to 1). make ads stickier, 2). build permission-based communities, 3). deliver promotions like coupons and contests, and 4). create interactive experiences. Advertisers including Microsoft, Fidelity Investments, Accenture, Verizon Wireless and Baymont Hotels are successfully integrating qtags keywords in their campaigns throughout the U.S. and Canada. Visit www.qtagsforadvertisers.com
66444	txttunes ltd.	txttunes is a unique online music destination made up by a growing community of artists running their own personal online music store where their fans can buy full track music for the computer or ringtones and wallpapers for their phones via txt message or credit card. txttunes provides a unique txt based community called TXTCOMM that allows txttunes users to communicate with each other by text message. bands can send alerts to subscribers of their community, as can individuals.
99695	uVuMobile, INC.	The Notre Dame Radio application is an enhanced audio streaming application that delivers the radio show to mobile handsets live during games and 24/7 through encore and on-demand audio. In addition to the radio show, the application offers wallpaper and interactive options for instant messaging and polling.
72600	uVuMobile, INC.	The Dennis Miller Radio application is an enhanced radio streaming application that delivers the radio show to mobile handsets live every day, and loops when the program is not live. In addition to the radio show, the application offers three channels of 24x7 streaming music. In the JAVA version, the application features an integrated chat application as well as dynamic, slideshow presentation of visual assets. In the WAP version, there is a similar graphics presentation, but no chat feature.
49451	www.950KJR.com	Become a 950 KJR Insider now. 2 sign up, Go 2 www.950KJR.com keyword: insider - Thank you!
78445	www.SEARCHTOPPERS.com	www.Searchtoppers.com provides mobile messaging and mobile marketing services to clients of all types. Some of the programs include Mobile Video on Demand, Mobile VOD, Mobile Games. Mobile Contests, Mobile Quizzes, and Mobile Sweepstakes.
26724	www.searchtoppers.com	26742 is a place consumers can go to get information about kitchen appliances