

APPENDIX A

Verizon Wireless Content Policy



Content Policy for Verizon Networks



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Note to Reader:

The guidelines that follow describe Verizon's policies and practices with respect to the various types of content that we make available to our customers through Verizon's wireless, Internet and television services, and the policy issues that relate to such content.

These guidelines offer our customers, business partners and others interested in Verizon's views on content management insight into how we at Verizon view and approach the important policy issues involving content. The guidelines address the use of ratings and other standards, and the use and availability of parental controls and other means we make available to help our customers control the content that they and their families can access and view over Verizon's network.

It is important to note that while these guidelines describe our policies with respect to content that Verizon develops or presents under the Verizon brand, or content that we do not control that is available to our customers through our various services, they are not intended to constitute a contract or to define all operational or commercial requirements applicable to such content. Nor are these guidelines intended to define the legal rights or obligations of our customers or Verizon, as they may change from time to time.

Verizon's Guiding Principles for Content

Verizon distributes, produces and facilitates access to content in a manner consistent with its corporate values. These values include respect for customer choice, respect for customer privacy and security, and dedication to full compliance with the law.

Accordingly, Verizon adheres to the following Guiding Principles with respect to content:

1. Where Verizon offers its own content or other parties' content through one of its platforms, it does so based on factors that include content ratings provided by existing rating systems and consistency with acceptable industry practices. Verizon believes in giving customers the ability to make informed choices about the content it offers by making any ratings and other information readily available to customers and by giving customers access to the tools they can use to monitor and control the content they obtain.
2. As a network provider, Verizon provides access to the Internet and, through it, to services and content, the substance of which, Verizon does not own, develop or control. Verizon is committed to empowering its customers to make informed choices about the services and content they want to access over its network. Verizon is committed to supporting its customers by providing access to personal content management tools, such as parental controls, as well as access to educational materials and other resources about content rating systems to assist parents and other users in identifying appropriate content for themselves and their children.
3. Verizon respects freedom of expression and our customers' ability to freely access and disseminate the lawful content of their choosing in a manner that respects others' use of the network and that complies with the law. Verizon supports sound industry practices for safeguarding children, the intellectual property rights of content owners, and the privacy and security of our customers.
4. Verizon exercises broad discretion over its choice of brands and companies that advertise on its platforms. Verizon's selection of advertising partners and content takes into account our corporate values as well as those of our business partners and customers.

Verizon FiOS TV's General Content Guidelines

1. Content Generated By Or On Behalf of Verizon FiOS TV:

This category covers content/programming that FiOS TV generates or produces, or to content that a third party generates or produces on FiOS TV's behalf. Content in this category is closely identified with the FiOS TV brand and FiOS TV generally has a higher degree of control over it. Examples of content in this category include programming on FiOS TV's FiOS One Channel such as the Push/Pause and Limbo television series.

A. Content standard for this category - FiOS TV will only air content in this category that is lawful and will not knowingly air content that includes material in any of the following excluded content categories:

- Content that contains anything that is obscene or indecent, or anything with strong sexual, explicit or erotic themes or that links to such content; or
- Content that contains hate speech; or
- Content that contains excessive violence; or
- Content that contains extreme profanity; or
- Content that contains misleading or fraudulent claims; or
- Content that promotes or glamorizes alcohol abuse, illegal drug use or use of tobacco products.

Consistent with prevailing industry standards, content that does not satisfy the above guidelines may be aired by FiOS TV if it is included in the context of artistic, educational, medical, news, scientific, or sports material.

2. Third-Party Content FiOS TV Distributes On The Verizon FiOS TV-Branded Video Programming Distribution System:

This category covers third-party programming FiOS TV licenses from other entities and distributes over Verizon's FiOS TV video programming distribution system. Examples of content in this category include the ESPN, Discovery Channel, CNN, ABC, CBS and NBC channels, as well as Hollywood movies and other individual programming assets. In contrast to the content in Category 1, above, content in this category is licensed from third parties and is distributed on the FiOS TV-branded platform without editorial control or input from FiOS TV management.

Much of the content in this category is rated by a third-party ratings body, and to the extent feasible, FiOS TV will leverage existing ratings systems and content management tools to empower customers to make their own choices about the types of content they choose to view. Parental controls are available for most, if not all, of this content.

Additionally, FiOS TV may, in its discretion and where it has the ability to do so, elect not to license a particular channel or distribute specific content that is inconsistent with Verizon's Guiding Principles on Content. For those channels that FiOS TV elects to distribute, FiOS TV has no editorial input or control over the specific programming aired by the channel.

The content standards for content in this category are described below:

- A. Content Standard for Rated Content - Third-party groups have rated this content and content management tools, such as parental controls and service blocks, are available to limit or restrict access to content.
- B. Content Standard for Content That Is Not Rated - Content in this category has not been rated. However, FiOS TV offers state-of-the art content management tools, such as parental controls and service blocks that allow customers to block this content in its entirety. However, consistent with industry practice, parental controls may not restrict news, weather, and sports programming.
- C. Mature-Themed Programming Content - Content in this category is Not-Rated, and customers may block this content in its entirety by activating FiOS TV's state-of-the-art parental controls.

In all of the above cases, FiOS TV will only distribute content that is lawful and is consistent with similar types of programming offered by major cable and satellite providers.

3. Content to Which FiOS TV, As A Video Programming Distributor, Is Required To Provide Access:

Content in this category covers content that FiOS TV, in its role as a video programming distributor, is required, by law or regulation, to offer to customers, but which FiOS TV does not purchase, license, develop, generate, promote or exercise editorial control over. The content standards for content in this category are described below:

- A. Content Standard for Leased Access Channels - Content in this category refers to unaffiliated third-party programming contained on FiOS TV's leased access channels that FiOS TV is required to exhibit pursuant to Federal law and the Federal Communications Commission's Leased Access Rules (47 C.F.R. § 76.701). As a general matter, Federal law and regulation does not allow FiOS TV to have editorial control or input over content third parties air on the FiOS TV leased access channels.

However, consistent with Federal Law and the Federal Communications Commission's Leased Access rules (47 C.F.R. § 76.701), content on FiOS TV's Leased Access channels should not include obscenity, indecency, or nudity. Accordingly, FiOS TV has the right to reject any such content, and any third party that desires to air programming on the FiOS TV Leased Access channels must first, among other things, certify that such content is not obscene or indecent.

Content on Verizon's Leased Access channels is Not-Rated, and customers may block this content in its entirety by activating FiOS TV's state-of-the-art parental controls.

- B. Content Standard for Public, Educational and Government (PEG) Channels - Content in this category is unaffiliated third-party programming contained on FiOS TV's PEG channels that FiOS TV is required to exhibit pursuant to state and/or local franchise agreements. As a general matter, FiOS TV does not have editorial control or input over content contained on the PEG channels that are carried on FiOS TV. Pursuant to the Federal Communications Commission's PEG Channel rules (47 C.F.R. § 702), FiOS TV may refuse to transmit any public access program that Verizon reasonably believes contains obscenity. Content on Verizon's PEG channels is Not-Rated, and customers may block this content in its entirety by activating FiOS TV's state-of-the-art parental controls.
- C. Content Standard for Web-based Programming - Content in this category refers to unaffiliated third-party programming available via the Internet, which FiOS TV customers may be able to access using the FiOS TV set-top box and network. Content obtained from the Internet through FiOS TV is covered by, and subject to, Category 3 of the Verizon Online General Content Guidelines.

Verizon Online's General Content Guidelines

1. Content Generated By Or On Behalf Of Verizon Online:

This category covers content that Verizon Online generates or produces or content that a third party generates or produces on Verizon Online's behalf. Content in this category is closely identified with Verizon or Verizon Online, and Verizon generally has a higher degree of control over it. Examples of content in this category include certain content appearing on Verizon Surround (like V CAST Today) and original content such as FiOS One episodes displayed on a Verizon Online platform.

A. Content standard for this category - Verizon Online will only distribute content that we produce or generate (or others do on our behalf) that is lawful and will not knowingly distribute content that includes material in any of the following excluded content categories:

- Content that contains anything that is obscene or indecent, or anything with strong sexual, explicit or erotic themes or that links to such content; or
- Content that contains hate speech; or
- Content that contains excessive violence; or
- Content that contains extreme profanity; or
- Content that contains misleading or fraudulent claims; or
- Content that promotes or glamorizes alcohol abuse, illegal drug use or use of tobacco products.

Consistent with prevailing online industry standards, content that does not satisfy the above guidelines may be distributed by Verizon Online if it is included in the context of artistic, educational, medical, news, scientific, or sports material.

2. Third-Party Content Verizon Online Distributes On A Verizon Online-Branded Distribution Platform:

This category covers content contained on a Verizon Online-branded distribution platform (e.g., Verizon Surround) but which is not created by or on behalf of Verizon Online. Examples include NFL Network, Music by Rhapsody, and other similar content.

The content standards for content in this category are described below:

A. Content Standard for Rated Content - "Rated content" refers to content that third-party groups have rated and for which content management tools, such as parental controls, are available. Verizon Online will typically require its content suppliers to provide their content with a rating that is benchmarked to the appropriate industry standard (e.g., Electronic Software Ratings Board, Recording Industry Association of America, Motion Picture Association of America.).

- B. Content Standard for Content That is Not Rated - Content in this category has not been rated by any third-party ratings group. In making this content available, Verizon Online will generally adhere to the guidelines in Category 1, above, and will not knowingly distribute content that does not adhere to these guidelines.

In each of the above cases, content appearing on Verizon Online-branded distribution platforms must be lawful and consistent with standard industry practices. In addition, Verizon (and others) makes available content management tools, such as parental controls, to help parents and other users limit access to content they may find objectionable.

- C. Internet Search - The use of Internet search tools can lead to content that some users may find unsuitable. Recognizing this, Verizon Online makes available safe search tools for searches conducted on Verizon-branded websites that help its customers determine the level of search filtering they deem appropriate, and that help parents and other users to limit access to content they may find objectionable.

3. Content to Which Verizon Online, As A Network Provider, Provides Access:

General Internet Content: This category covers non-Verizon content that customers access using their Internet connection. Content in this category includes the vast range of information and images generally available via the Internet through websites, search, newsgroups, and other sources. Verizon Online does not generate, own or develop this content, and, therefore, has no control over it.

- A. Content Standard for General Internet Content - The Internet is a free marketplace of ideas. Currently, no industry standards apply to content on the Internet. However, Verizon Online offers content management tools to help customers establish appropriate controls regarding the content that is accessible through their computer, and, in the process, Verizon Online helps parents and other users control the types of content that they and their families can access online. These tools include parental controls offered by Verizon Online and by its portal partners, as well as an Internet Safe Search feature to help control search results initiated from Verizon Online websites.

Verizon Wireless' General Content Guidelines

1. Content Generated By Or On Behalf of Verizon Wireless:

This content category covers content Verizon Wireless generates or produces or that a third party produces or generates on Verizon Wireless' behalf. This content is so closely identified with the Verizon Wireless brand that one could reasonably assume Verizon Wireless has given the content its approval. Examples of content in this category include some of the video clips distributed through V CAST Video (e.g. V CAST Today video clips) and some of the applications distributed through Get It Now (e.g., VZ Navigator, VZW Tones, VZW Pix).

Advertising, user generated and short code-based messaging campaigns used for purposes other than distributing content are not covered by these guidelines. They are addressed below by separate guidelines.

A. Content standard for this category - Verizon Wireless will only distribute content in this category that is lawful and does not otherwise fall into the categories of excluded content described below. Verizon Wireless will not knowingly distribute any content in this category that includes material described below:

- Content that contains anything that is obscene or indecent or anything with strong sexual, explicit or erotic themes or that links to such content; or
- Content that contains hate speech; or
- Content that contains excessive violence; or
- Content that contains extreme profanity; or
- Content that contains misleading or fraudulent claims; or
- Content that promotes or glamorizes alcohol abuse, illegal drug use or use of tobacco products.

Consistent with prevailing standards in other content distribution mediums, content in this category that does not satisfy the above guidelines may be distributed by Verizon Wireless if included in the context of artistic, educational, medical, news, scientific or sports material.

Content in this category must also comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines).

2. Third-Party Content Verizon Wireless Distributes On A Verizon Wireless-Branded Distribution Platform:

This content category covers content distributed through Verizon Wireless-branded distribution platforms such as Get It Now, V CAST Mobile TV, V CAST Music, V CAST Video and short code-based messaging campaigns. Some of this content is rated, while other content is unrated. Content management tools are available to limit or restrict access to this content.

This content must be lawful and comply with applicable industry standards (e.g. Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines, etc.). Content distributed through Verizon Wireless-branded distribution platforms cannot disparage Verizon Wireless or its affiliates.

The content standards for content in this category are described below:

- A. Content Standard for Rated Content - Third-party groups have rated this content and content management tools, such as parental controls and service blocks, are available to limit or restrict access to this content. Verizon Wireless will leverage existing ratings systems and make content management tools available in connection with the distribution of this content. Equipped with these tools, customers are empowered to make their own choices about the types of content they choose to access. Verizon Wireless may, in its discretion, elect not to carry certain types of content based on, among other things, ratings and prevailing industry practices.
- B. Content Standard for Content That is Not Rated - Content in this category has not been rated. However, content management tools, such as parental controls and service blocks, are available in connection with the distribution of this content to enable customers to limit or restrict access to the content. Examples of content in this category include unrated wallpaper and ringtones distributed through Verizon Wireless' Get It Now platform.

Verizon Wireless will encourage its content providers to rate content they seek to distribute over a Verizon Wireless-branded distribution platform. If, however, the content is not rated, Verizon Wireless will not distribute any such content unless it complies with the requirements contained in Category 1 above.

3. Content To Which Verizon Wireless, As A Network Provider, Provides Access:

Content in this category covers content that Verizon Wireless, in its role as a network provider, enables customers to access on the Internet, but which Verizon Wireless does not generate, own or control (e.g. content that a user accesses by browsing or searching). This content includes the vast range of content available on the Internet using mobile devices.

Content Standard for General Internet Content - The Internet is a free marketplace of ideas. Currently, there are no industry standards that apply to content on the Internet. However, Verizon Wireless offers content management tools to help customers establish appropriate controls regarding the content that is accessible to them from the Internet via their mobile devices. These tools include parental controls and service blocks.

Verizon Wireless' Short Code Messaging Content Guidelines

Short code-based messaging campaigns vary widely. The following standards apply to the various categories of short code messaging.

- 1) Campaigns used to distribute content (e.g., wallpapers, ringtones, games, videos, jokes, horoscopes, alerts, etc.) to customers of Verizon Wireless must comply with Verizon Wireless' General Content Guidelines.
- 2) Campaigns used to advertise, promote or market companies, goods or services (e.g., coupons, offers, brand awareness, marketing-oriented sweepstakes and contests, etc.) to customers of Verizon Wireless must comply with Verizon's Advertising Content Guidelines.
- 3) Campaigns used to provide services that enable posting or transmission of user-generated content (e.g., chat or flirt programs, communities, bulletin boards, blogs, photo or video portals, social networks, etc.) by customers of Verizon Wireless must comply with Verizon's User Generated Content Guidelines.

All other campaigns, including campaigns of political and advocacy groups, will be governed by the policy set forth in the letter of Lowell C. McAdam, President and Chief Executive Officer of Verizon Wireless, to The Honorable John D. Dingell dated September 28, 2007. Under that policy, Verizon Wireless will provide short code-based messaging services to any group that is delivering legal content to customers who affirmatively indicate that they desire to receive such content.

All short code-based messaging campaigns provided to customers of Verizon Wireless must comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Guidelines, etc.).

Verizon Business' Content Guidelines

As a network provider, Verizon Business provides business, government and wholesale customers with access to the Internet and, through it, to services and content which Verizon Business does not own, develop or control.

Verizon Business respects freedom of expression and our customers' ability to freely access and disseminate the lawful content of their choosing in a manner that respects others' use of the network and that complies with the law.

All use of Verizon Business' Internet Services and related equipment and facilities must comply with Verizon Business' Acceptable Use Policy, available online at <http://www.verizonbusiness.com/terms>.

Verizon's User Generated Content Guidelines

These guidelines apply to services that enable the posting or transmission of content that users generate (e.g., chat or flirt programs, communities, bulletin boards, blogs, photo or video portals, social networks, etc.); in other words, "User Generated Content Services" or "UGC Services." These guidelines apply to UGC Services hosted by others but offered on a Verizon-branded content platform (Section I), and to UGC Services that are hosted by or on behalf of Verizon (Section II).

1. User Generated Content Services Provided by A Third Party on a Verizon-Branded Content Platform.

A third party User Generated Content Service appearing on a Verizon-branded content platform must comply with the law and have in place a set of sound practices which incorporate safeguards aimed at protecting users of the services from abuse, fraud and other inappropriate conduct or activities. These safeguards should, in particular, protect children and adolescents from predators and inappropriate content.

Sound practices may evolve over time, but third party UGC Service policies under this category should include, at a minimum, the following:¹

- Prominent disclosure of the existence and nature of the safeguards on or through the provider's delivery platform (e.g., websites and other applications);
- Assurances that relevant business practices conform to the disclosures made about the safeguards;
- Processes to accept complaints from users of the services about nudity, pornography, harassment, unwelcome contact, fraud or other inappropriate conduct or activity via hyperlinks prominently placed throughout the provider's delivery platforms or other complaint reporting mechanisms; and
- Processes to immediately (within 24 hours) acknowledge receipt of a complaint about inappropriate conduct or activity and promptly (within three business days) provide an explanation to the complainant of the steps taken to address the complaint.

While the above sound practices represent the minimum basic elements that UGC Service providers should include in their practices, such providers can and should have additional requirements that are customized to the unique characteristics of their individual services.

Additionally, third party hosted UGC Services should adopt policies and practices to ensure compliance with the law, including appropriate notice and take-down procedures for unlawful content.

¹ These requirements are consistent with evolving industry standards, such as those adopted by Facebook. See "Facebook Content Code of Conduct," <http://register.facebook.com/codeofconduct.php>, and "Facebook Terms of Service," <http://www.facebook.com/terms.php>.

User Generated Content Services in this category must also comply with applicable industry standards (e.g., Mobile Marketing Association’s Best Practices, CTIA’s Wireless Content Guidelines, etc.). These guidelines apply to any User Generated Content Services that will be included on Verizon-branded content platforms as well as to short code-based messaging campaigns that will be used to provide such services.

2. User Generated Content Services Verizon Hosts Or User Generated Content Services Hosted On Verizon’s Behalf.

UGC Services offered and hosted by Verizon or that are hosted by a third party on Verizon’s behalf must comply with the minimum sound practices referenced in Section 1 above.

Hosted UGC Services in this category generally fall into two groups: those that are “open” (e.g., publicly accessible) and those that are “closed” (e.g., not publicly accessible). Verizon supports the use of proactive controls on “open” UGC Services, where they are commercially available, to help identify and protect against user generated content that is offensive or unlawful, or content that fails to comply with the UGC Service’s terms of use or acceptable use policy. For “closed” communities or sites, Verizon generally will not provide (or require others to provide) proactive controls.

Verizon will provide an acceptable use policy for its UGC Services that is consistent with Verizon’s Guiding Principles for Content, and all users will be required to comply with the policy as a condition of their continued use of Verizon’s UGC Services.

In all cases, UGC Services that Verizon offers will comply with the law, including applicable notice and take-down requirements for unlawful content.

User Generated Content Services in this category must also comply with applicable industry standards (e.g., Mobile Marketing Association’s Best Practices, CTIA’s Wireless Content Guidelines, etc.).

Verizon's Advertising Content Guidelines

These advertising guidelines apply to third party advertisements, which appear on Verizon-branded websites or platforms and are part of a Verizon-controlled advertising inventory ("Advertisements" or "Advertising"). These guidelines also apply to short-code based messaging campaigns that advertise or promote companies, goods or services (e.g., coupons, offers, brand awareness, marketing-oriented sweepstakes or contests, etc.). These guidelines do not apply to advertising that may appear on a non-Verizon website, or on a Verizon-branded website or platform where Verizon does not control the advertising inventory.

Verizon maintains an advertising review group that examines Advertising for compliance with these guidelines. Wherever practicable, Verizon's advertising review group will review Advertising prior to publication.

Verizon may reject Advertisements which it believes are misleading, inaccurate, or which make fraudulent or unfair competitive claims. Verizon may also reject Advertisements which, in our judgment, make insufficiently supported claims or claims that distort the true meaning or practical application of statements made by the advertiser. Advertisements may not contain material that is patently offensive or which violates the law (e.g., libel, copyright, trademark, right of privacy, etc.). Additionally, Verizon may reject Advertisements which fail to comply with Verizon's standards of decency and good taste.

All Advertisements must comply with applicable industry standards (e.g., Mobile Marketing Association's Best Practices, CTIA's Wireless Content Standards, etc.). All Advertising should also comply with applicable advertising standards adopted by various associations for specific products and services such as the advertising guidelines adopted by the Distilled Spirits Council of the United States and the Children's Advertising Review Unit of the Council of Better Business Bureaus.

Verizon's Advertising Content Guidelines are based on industry practices and do not purport to include an exhaustive list of all types of Advertising Verizon would find objectionable. As part of Verizon's commitment to provide the highest quality services and experience to its customers, Verizon will not accept certain types of Advertising. For example, in addition to the foregoing, Advertisements may not contain any material that Verizon, in its discretion, deems to fall into the following categories or that links to such material²

- Anything that is obscene or indecent or that contains strong sexual, explicit or erotic themes; or

² The bulleted restrictions are based on similar restrictions in the publicly available advertising guidelines of Google and The New York Times.

- Products or sites depicting or providing how-to materials about pedophilia or other non-consensual contact; or
- Products or sites that suggest the availability of prostitution services; or
- Products or sites that advocate, glorify or promote rape, torture, cannibalism, suffering or death; or
- Individuals seeking to adopt children or who offer children for adoption; or
- Products that descramble cable or satellite signals in order to get free services; or
- Products that promote software or techniques that bypass copyright protections; or
- Counterfeit, fake or bootleg products or replicas or imitations of designer products; or
- Promotes nudity, nude beaches or naked cruises or resorts; or
- Products or sites that appear to facilitate or promote the evasion of laws (e.g., radar detectors, etc.); or
- Products made from endangered species; or
- Products or sites that offer fake identification or falsified documentation; or
- Promotes the sale of firearms or ammunition by mail order or at gun shows; or
- Products or sites that have online gambling as a central theme; or
- Promotes services, contests or games that predict winners of races or sporting events; or
- Trivializes historic events such as the Holocaust, the Irish Famine or September 11th; or
- Hunting trips that guarantee animals will be available for kill; or
- Multilevel marketing schemes; or
- Organ transplant services; or
- Products or sites that guarantee credit repair or credit cards; or
- Products or sites of questionable legality (e.g., miracle cures, etc.); or
- Escort services or “strip” clubs; or
- Hate speech; or
- Excessive violence; or
- Defamatory, libelous or threatening sites; or
- Extreme profanity; or
- Depicts, promotes or is designed to facilitate alcohol abuse, illegal drug use or use of tobacco products.

Verizon reserves the right to reject Advertisements that promote competitors of Verizon and Advertisements that harm Verizon’s brand or public image.

If Advertisements contain statements or illustrations that are not deemed acceptable and that Verizon thinks should be changed or eliminated, Verizon may, at its election, notify the advertiser. Verizon may attempt to negotiate changes to the Advertisements with the advertiser, but is not obligated to do so.



For information about industry standards, visit:

CTIA CONSUMER CODE:

www.ctia.org/content/index.cfm/AID/10352

CTIA CONTENT GUIDELINES:

www.ctia.org/advocacy/policy_topics/topic.cfm/TID/36

MOBILE MARKETING ASSOCIATION'S BEST PRACTICES:

www.mmaglobal.com/bestpractices.pdf

CHILDREN'S ADVERTISING REVIEW UNIT OF THE COUNCIL OF BETTER BUSINESS BUREAUS:

www.caru.org/guidelines

To download an informal brochure describing Verizon's Content Policies, visit:

verizon.com/contentpolicy

Verizon Communications Inc. (NYSE: VZ), headquartered in New York, is a leader in delivering broadband and other wireline and wireless communication innovations to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving nearly 66 million customers nationwide. Verizon's Wireline operations include Verizon Business, which delivers innovative and seamless business solutions to customers around the world, and Verizon Telecom, which brings customers the benefits of converged communications, information and entertainment services over the nation's most advanced fiber-optic network.

A Dow 30 company, Verizon employs a diverse workforce of nearly 235,000 and last year generated consolidated operating revenues of \$93.5 billion.

For more information about Verizon, please visit:

verizon.com

APPENDIX B

Mobile Marketing Association Common Short Primer



Common Short Code Primer

Revision number:

1.0

Common Short Code Primer

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Common Short Code Primer

Overview

The Mobile Marketing Association's (MMA) Short Code Working Group developed this primer to provide an overview of the process that a brand, content provider, agency or technology provider should follow when considering launching a short-code-based marketing campaign or initiative.

About the Mobile Marketing Association (MMA)

The Mobile Marketing Association (MMA) is the premier global association which strives to stimulate the growth of mobile marketing. The MMA is an action-oriented association designed to clear obstacles to market development, to establish standards and best practices for sustainable growth, and to evangelize the mobile channel for use by brands and third party content providers. MMA members include agencies, advertisers, hand held device manufacturers, wireless operators and service providers, retailers, as well as any company focused on the potential of marketing via the mobile channel. The Mobile Marketing Association's global headquarters are located in the United States. For more information, please visit www.mmaglobal.com

Short Code Working Group

The MMA created the Short Code Working Group, chaired by Mobile Accord and Twelve Horses, to establish administrative and technology guidelines for short-code utilization. In a future phase, this group will reconvene to evaluate the feasibility and market demand for short codes that will work in both Canada and the United States.

The Short Code Working Group developed this primer in collaboration with representatives from ipsh!, Mobile Accord, NeuStar Inc., Sprint Nextel, Syniverse Technologies and Twelve Horses.

Common Short Code Primer

Executive Summary

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. By making it fast and convenient for mobile users to select and receive information, CSCs greatly increase consumer response to advertising and marketing promotions.

CSCs also put consumers in control because they can customize the information that they receive. That ability is important because under most rate plans, users pay for incoming SMS messages. By giving users a way to specify exactly what they want to receive, CSCs improve the chances that they'll participate in SMS-based campaigns.

CSCs are provided and managed by an ecosystem of companies, including the Common Short Code Administration (CSCA), participating wireless carriers, Mobile Application Service Providers (MASP) and Aggregators. Any company can use a CSC, but it must be obtained from this ecosystem through a series of steps, which include applying for a CSC and submitting the CSC-based campaign to wireless carriers for review and testing.

This primer provides an overview of CSCs, including the available types and how they are currently used in advertising and marketing promotions. This primer also describes the roles of each of the ecosystem's members and their relationship with the company conducting the CSC-based campaign. Finally, this primer provides step-by-step instructions for successfully developing, applying for and executing a CSC-based campaign.

Common Short Code Primer

Background & Ecosystem Definition

The Common Short Code Primer was created to help brands, content providers, agencies and technology providers better understand what's involved in implementing Short Messaging Service (SMS) campaigns using Common Short Codes (CSCs).

Since their creation in 2003, CSC-based campaigns have evolved in terms of acceptable use and business requirements. The CSC ecosystem is still evolving, so it's recommended that new entrants work with companies that have experience in the implementation of CSCs. This primer documents the process and expectations for registering and provisioning a CSC in the United States.

The following section provides an overview of the CSC ecosystem, the companies involved and the process of developing and executing a CSC-based campaign.

General CSC Ecosystem and Processes

1. A wide variety of companies use CSCs to build their brand and generate product awareness. One way to launch a successful CSC is to work with a Mobile Application Service Provider (MASP), which is a partner that provides guidance for understanding CSCs and adjunct wireless technologies. Although this primer provides a basic overview of CSCs, working with a MASP is recommended in order to address the nuances and complexities of a mobile campaign.

Depending on your in-house resources and capabilities, you may choose to either completely outsource to a MASP, or work with the individual provider partners in the eco-system. MASPs have a varying level of capabilities and services, so it's important to pick one that meets your needs. For a list of MASPs, visit the MMA membership directory at

<http://mmaglobal.com/modules/content/index.php?id=8>.

2. MASPs typically – but don't always – complete a CSC application form for leasing a short code. If they complete the application, it will then be reviewed according to wireless carrier guidelines and approved pending payment with the Common Short Code Administration (CSCA). Although companies may submit an application without the



Common Short Code Primer

help of a MASP or an aggregator, their assistance is highly recommended. The MASP's assistance with the application improves the chances that the campaign will be accepted the first time, although it's not a guarantee. Once payment is approved, your CSC is assigned as a random code or a vanity code. A CSC can be ordered either on your behalf or directly by your company. CSCs are required by the CSCA registry to be registered on behalf of the content provider, which is the legal owner of the CSC and thus responsible for any disputes or changes.

3. It's important to clearly outline your campaign before submitting the application for a CSC lease with the CSCA. For tips on submitting applications, see the Best Practices section at www.mmaglobal.com/bestpractices.pdf. A later section of this primer provides more details about the application.

Once the CSC application is accepted, the next phase is carrier provisioning and certification

4. When working with MASPs, you will seldom, if ever, have to work directly with an aggregator. Many aggregators have the capability to be the application provider; however, the capability varies from aggregator to aggregator. If you decide not to work with a MASP, make sure that you review the aggregators' capabilities and functions to assure that they meet your needs. Some aggregators won't work directly with a brand or a content provider. Not all aggregators will submit your CSC application for you; however, it's important to note that this often assures acceptance of the campaign the first time. For a list of aggregators, see http://www.usshortcodes.com/csc_find_con_agg.htm.

Aggregators will typically work with a MASP, wireless carriers and/or you to provision your CSC within the carrier network(s). Provisioning is the process of establishing and opening the connection between the aggregator and each carrier's network to allow for testing by the MASP and prepare the application/campaign for certification. Aggregators are the first point of wireless network connectivity. Carriers rarely allow brands or content providers to connect directly to their networks.

5. Carriers have the right to accept or deny any campaign, hence the importance of clearly defining your campaign in detail. If it's not clearly defined and doesn't follow the MMA Best Practices Guidelines, it will be rejected, delaying your campaign. The application is reviewed for legal risks to the carrier because they're responsible for delivery to their customers. Depending on your campaign goals, you may need to provision your CSC on multiple wireless carriers.

While the provisioning of a CSC does permit the delivery of the content or campaign to any of the carriers' subscribers, handset type, wireless plan, preferences, credit class and other variables will limit your actual addressable base of subscribers delivered to the carrier's or carriers' entire customer base(s). Instead, it often means that content can be delivered only to phone numbers that have been white listed or pre-approved by the carrier(s). Provisioning is an interim step that allows for testing and certification to occur. Once that's complete, the campaign must be certified. Certification is a process that includes testing the application, reviewing your campaign to verify that it's functioning and delivering content as outlined within your CSC application.

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6. Once testing and certification are complete, you can launch your campaign. If you decide to change the type of campaign, eco-system providers or its message flow, a CSC modification request must be made to the CSC help desk which will then inform the carrier(s) and affected ecosystem partners. Failure to submit this request will result in termination of the campaign.

CSC Types and Categories

All CSCs are five-digit numbers available in two different versions: random and vanity. Random CSCs are numbers that the CSCA assigns to you following approval of your application. Vanity CSCs are numbers that you select from a database of available CSCs. Before submitting an application for a campaign that includes a vanity CSC, you must search the CSCA's on-line database to determine its availability.

There are two types of CSCs: Standard SMS, where there's no charge for the content, and Premium SMS (PSMS), where there is a charge. The way you use the CSC in an SMS campaign determines the CSC type. For example, if you use a CSC to send messages that aren't billed to the end user by the carrier, then a Standard CSC applies. (However, keep in mind that depending on their rate plan, users still may be charged for each SMS.) With a PSMS, the user is charged a fee for the content in addition to any basic messaging charges that apply under their rate plan.

CSCs also can be grouped into use-case categories. Although agencies, application providers and carriers may use different titles and definitions, the basic categories include:

- iTV
- iRadio
- In-venue
- Ringtones and graphics
- Contest
- Consumer packaged goods
- Movie promo
- Information & Entertainment
- Alerts
- Chat
- M-commerce
- Coupons/advertising

SMS Information and Alerts

This is a "pull"-based method to deliver information, statistics and schedules about a certain topic or event. Users text a keyword to a CSC and receive or "pull" instant news and information. Users can also sign up to receive alerts on any topic – also known as "permission-based" services. Examples include weather alerts, store openings, the winner of a baseball game and medical alerts.

Interactive Media

CSCs enable users to interact with mobile marketing campaigns. As a result, they're a way for traditional media channels – such as TV networks – to provide a new form of content interaction with current or

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potential customers. For example, a radio station could use CSCs so that listeners can receive alerts when their favorite songs are about to be played. CSCs can also give traditional media channels more options for attracting new audiences and creating additional revenue streams. One example is promotional games, which are a fun, interactive way to increase brand loyalty and awareness.

Tones and Images

Most cell phones sold over the past two years support ringtones and wallpapers. This content is ideal for promoting a brand. For example, a record company could promote a new album by creating a CSC-based campaign that distributes wallpaper photos of the artist and ringtones based on the album's first single.

Mobile Tickets and Coupons

Using cell phones to purchase products such as songs and movie tickets is common, particularly among younger demographics. Known as mobile commerce, or simply m-commerce, this approach includes secure payments and delivery of the product – such as a song – directly to the handset. M-commerce is extremely cost-effective and an excellent opportunity for cross-promotions and sponsorships. Examples include tickets for sporting events, movies, hotels and transportation, as well as coupons.

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Tips for a Successful CSC Application

The first step in launching a CSC-based campaign is to register with the CSCA and then submit an application documenting your program. The application-review process takes less than two business days. Payment is due upon approval of the campaign, and a random CSC is not assigned until payment is received.

Regardless of whether the application is submitted by an application provider, agency and/or aggregator, it should be as detailed as possible. Insufficient detail, including not answering all of the questions in an application, is the most common reason for rejection.

The application submitted to the CSCA differs from the Campaign Brief Application that will be submitted to the wireless carriers via the MASP and/or aggregator. Every application provider, agency and aggregator has its own format, and every wireless carrier has its own submission process. As a result, approval at one stage doesn't guarantee approval at other stages. The industry is working to streamline this process and combining the application process. Until the new procedures are in place, it's important to work closely with your application provider, agency or aggregator because they have a greater understanding of what the CSCA and wireless carriers will accept.

If you choose to select and contract with an MASP to work with you, you can expect the following:

- The aggregator will assist in creating a campaign brief for submission to the carrier(s). The brief is based upon the application submitted to the CSCA and the information obtained from the MASP.
- The aggregator will submit the program to the requested wireless carrier(s).
- The aggregator's account manager will track the program submission, provide updates and monitor launch process. They will also provide detailed reporting following launch at a pre-determined interval as described in the contract.

If a wireless carrier rejects a program, you may be able to modify it to meet the carrier's requirements. Once the changes have been made, the program can be resubmitted to the carrier. However, resubmissions aren't prioritized ahead of first-time applications, so companies should be aware the second review may result in delays for launching the campaign.

The campaign must follow the program brief that was approved, as well as the MMA Consumer Best Practices guidelines. The carrier will test each aspect of the program, including billing. Once this testing is complete, the program is considered "launched" and "live" on the network. The entire process can take anywhere from one to over eight weeks, depending on the number of participating carriers and the campaign's use-case category.

Campaigns that have a detailed marketing campaign with an associated and committed ad support are likely to be approved faster than those without a plan.

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MMA Best Practices

The aggregator submits the campaign to the carrier's messaging organization, which reviews it for both content and complexity. The submission is first checked for compliance with the MMA Consumer Best Practices guidelines, and those that don't meet the guidelines typically are rejected immediately.

For more information about the guidelines, see www.mmaglobal.com/bestpractices.pdf.

Carrier Content Standard Guidelines

Content is considered restricted if it contains any of the following:

1. Intense profanity
2. Intense violence
3. Graphic depiction of sexual activity
4. Nudity
5. Hate speech
6. Graphic depiction of illegal drug use
7. Any activities that are restricted by law to those 18 years of age and older, such as gambling and lotteries

Campaigns that include restricted content or that violate individual carrier standards will be rejected immediately. If the carrier's department determines that a campaign may be in violation, it may ask other members of the department to review it or send it to the carrier's legal department for a formal review. These additional review steps can delay approval.

Large-Volume CSC Campaigns

Some campaigns are referred to as "spike-inducing", suggesting that they could produce sudden increases in messaging volumes. One example is a CSC that TV viewers use to vote for a contestant on a show. Within the hour or half-hour that the show airs, messaging traffic can increase suddenly and significantly. Wireless carriers must be prepared for such spikes in order to ensure that messages aren't lost or delayed. Companies conducting CSC-based contests have a vested interest in helping carriers anticipate and accommodate traffic spikes: For example, if the contest awards a prize to first 100 people who send a message to a CSC, participants whose messages are lost or delayed are unfairly penalized.

Each carrier has different spike thresholds. Companies should be aware that if a particular campaign adversely impacts the network, it may be rejected. When a spike-inducing campaign is submitted, the carrier's messaging department will work with its colleagues in other business units, such as engineering and network operations, to determine if there will be problems once the campaign is underway. The process of working with multiple departments may create delays in CSC approval.

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Billing & Network Provisioning

After a campaign is reviewed for MMA Guideline compliance, content and network impact, it may be subject to another review for billing, such as if it involves a new price point for premium campaigns. This is especially true for campaigns that require aggregator involvement for supporting either a new billing procedure, price point(s) or billing system. This additional step varies by carrier and may delay the CSC approval process.

After the billing components are approved, the carrier follows procedures – which vary throughout the industry – for provisioning the campaign on its network. Carriers often work with the aggregators for notification of network readiness and end-to-end testing of the campaign, all the way out to the handsets.

Business Issue

The Aggregator model is the current business model for CSC campaigns.

Broadly speaking, under the Aggregator Model, carriers will not have a contract with you directly. Instead, each carrier has a master agreement with each of their connected aggregators/MASPs, which will in turn have a contract with you. As a result, the carrier does not have to contract individually with each of the thousands of content and application providers seeking to have their campaign accessed via a CSC.

If you have not already chosen a connection aggregator/MASP, you should check with them to see how they provide access to the carriers and geographic areas that you wish to market to. For more information, visit the Connection Aggregator Information site at www.usshortcodes.com/csc_find_con_agg.htm.

Depending upon the type of campaign you're running, the type of messages involved (Standard or Premium) and your agreement with your connection aggregator/MASP, you may be able to participate in revenue sharing. The revenue share from the carrier to your connection aggregator/MASP is included in their contract. That contracted share percentage will also vary by each carrier.

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Testing

Once the carrier messaging point of contact is made aware that the campaign is available on the network (which may entail provisioning on multiple network elements), testing can begin. Testing ensures that the language and content are suitable, program flow is logical, handset rendering (display) is proper, keywords (including opt-out and help) work and the billing is functional.

The aggregator will be notified of any deviations or errors at this point. These may cause further delays in the campaign's launch. A program that passes testing is ready for launch, and the aggregator is notified.

Common Mistakes to Avoid

Below is a list of issues and mistakes that can result in the delay or denial of a CSC campaign:

- Deviation from MMA Consumer Best Practice Guidelines
- Violation, or questionable conformity, with Carrier Content Standard Guidelines
- Spike-inducing or massive-volume programs
- Unusual billing requirements
- Network-provisioning considerations
- Testing issues
- Lack of forward planning or consultation of experienced partners
- Technical aspects of your campaign are not in place well before the intended launch date.

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CSC Requirements Checklist

The following items must be completed/ implemented in order for a campaign to be approved by carriers:

1. **Terms and Conditions (T&Cs):** All campaigns must have associated T&Cs. These can be added to the message text. The most basic acceptable T&Cs must include billing rate, help instructions and opt-out instructions. An alternative to using limited text messaging characters to define the T&Cs is to include a URL in the message to a Web site that includes the T&Cs. If the campaign is a sweepstakes, this is highly recommended because certain carriers require an alternative way to enter the sweepstakes other than using the CSC.
 - a. It is recommended that if you choose to set up a Web site that you provide the T&Cs, as well as information about the campaign, the HELP access procedure and opt-out information.
 - b. Include help and opt-out verbiage. All campaign messages must include the methods to get help or opt out.
 - c. Help verbiage must include a phone number to get help, as well as an e-mail address. If there's a Web site established for the campaign that includes help information, that site's URL should be included.
2. **Opt-out verbiage:** Reply *STOP* to opt out must be included in all messages. If a user opt outs, an opt-out confirmation must sent to the user and include help verbiage.
 - a. **Opt-in All Contacts:** All contacts must receive an opt-in message and be required to reply with specified opt-in text in order to be added to the contact list for the campaign. Sending messages to contacts that have not opted in is considered Spam. Spam will not be tolerated and will result in immediate termination of the campaign.
3. **Define the message flow:** For all campaign applications, you must define the flow of all messages, including opt-in, confirmations, help and opt-out verbiage.
4. **Help and opt-out functionality:** Help and opt-out functionality must work for anyone, including those not opted-in to the campaign.
5. **CSC receipt:** If you choose to procure a CSC on your own, you will be required to submit a copy of that receipt to the MASP.

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Acceptable Campaigns

The following is a list of acceptable campaigns:

1. Sweepstakes: Examples include giving away an item at a booth at a convention by routing sign-ups through a CSC campaign and notification of the drawing time.
2. Voting applications: Examples include voting for your favorite booth at a convention or for a favorite sports player.
3. Information alerts such as weather and road conditions
4. Downloads such as ringtones, music and graphics
5. iTV/iRadio, such as streaming audio/video and Podcasts.
6. In-venue
7. Movie promo
8. Coupons and advertisements
9. Chat

Unacceptable Campaigns

The following campaigns are not acceptable unless on a restricted content carrier that has implemented the appropriate access controls:

1. Those that promote the use of illegal drugs.
2. Offering sexually explicit images, pornographic content.
3. Any content that facilitates or promotes illegal activity.
4. Prejudicial comments, communications and/or content that facilitates or promotes unlawful violence, and/or discrimination based upon gender, ancestry, race, sexual orientation, religion, marital status, age, disability, national origin, veteran status, creed or color.

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Information required for CSC Application

There are several components to a CSC application, and each serves a purpose through the ecosystem. Hence the importance of providing as much detail as possible. One of the biggest frustrations is successfully leasing a short code from the CSCA and then having the application rejected by a carrier because insufficient detail was provided.

Below are the general categories that you'll be expected to complete for a CSC lease.

Applicant details – This section of an application form lists the contact information for any questions that the CSCA may have with the initial CSC application. The applicant also pays the CSC registration, either for themselves or on behalf of the content provider.

Content provider details – This is contact information for the entity providing the content that will be delivered to the handset. This information is used by the carrier to allow them to put the end user in contact with the entity providing the content in order to allow resolution of billing or problems such as opt-out and delivery failures.

In the event of any dispute, the CSCA looks to the Content Provider as the ultimate responsible and decision-making party.

Application provider details – This is contact information for the entity that will be providing the application infrastructure to deliver the messages to the aggregator for delivery to the carriers. This information is important for carriers and aggregators because it tells them whom to contact if there are problems with the campaign, such as messages not being delivered properly.

Connection aggregator details – This is the contact information for the entity doing the connectivity/bind with the carriers. Carriers use this information when there are problems with a campaign. As noted earlier, carriers don't work directly with companies or content providers. Instead, they work with aggregators, so this information needs to contain your primary contact at your aggregator. If you are working with a MASP, you'll need to get this information from them if you lease the CSC directly from the CSCA.

Payment method – This information specifies how you will pay for your lease. Payment is expected upon approval of your campaign application.

Term – This is how long you will be leasing the CSC. There are three options for the lease length. You must stay current on your lease payment or the campaign will be shut down and you will have to start the whole ecosystem over again. Failure to stay current on your payment will also put the CSC number back into the number pool and could mean that you lose that number for further use.

Requested CSC – This section describes the kind of CSC you want to register. If you choose a vanity CSC, you must verify that the number is available before requesting it.

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Application type – In this section, you must provide information about the campaign’s category type. For example, you’ll need to select Contest if you are running a contest. This information is provided to make it easy to identify and track the various types of campaign requested and used.

Duration – You will need to determine ahead of time how long you will be conducting your campaign. This information helps carriers and the CSCA determine when a CSC will be available for re-use. You will need to provide a start and an end date; however, it’s possible to select ongoing if you do not have an end date determined.

Time of day/day of week – You will be expected to provide information on the day and week the program will be available or unavailable. This information helps the carriers and aggregators to better understand traffic/volume models of the campaign so that they can properly plan and scale their networks for capacity needs.

Campaign advertising/marketing – When completing the CSC application, you must provide information about how you plan to advertise the campaign. You will need to provide information such as where it will be available for use, the distribution reach of your advertising and how you’ll be promoting the campaign, such as in magazines or on TV. You also must provide details about when these materials will be issued. This information helps aggregators and carriers better understand the needs of the campaign in order to scale their networks to assure availability and deliverability.

Traffic volumes – It’s important to have an understanding of the expected traffic volumes the campaign is going to create. It’s better to overestimate traffic volumes than to underestimate them. You also must explain how you estimated the traffic volumes. For example, 5% of the print readership is expected to participate, and the circulation of the printed material is 1,000 people, so it is expected there will be 50 people participating in the campaign. Of those 50 people, you will need to define how many of them are going to be participating from each carrier.

Step-by-step message flow – Before you will be able to lease a short code, you must fully develop your campaign. To do that, you must think about every step the end user will go through as they participate. Common practice is to use the terms MO (Mobile Origination) and MT (Mobile Termination). Both terms define where the message starts from. An MO is a message that was generated by the end user from their handset and is delivered to the application. An MT is a message that is generated by an application and is sent to the end user. You also should provide a contextual description of the campaign. This information is necessary for carriers to be able to understand the campaign and determine if it meets the best practices guidelines.

Message rate – You will be expected to define the type of CSC you are planning to run: a Premium SMS or a Standard Rate SMS. This information helps carriers and aggregators in handling billing for the content delivery.

Help – You must provide information about how end users will be able to get help. If the end user experiences problems, you are expected to provide resolution. You must provide information about how they get this information within the campaign, as well as through a Web site and a toll-free number. This information is required so that the carriers can point the end user to you if there is a problem.

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Opt-out – You will need to define the text for the opt-out message, which must include the help information and a confirmation that the user has been opted out. Opt-out functionality must work for the following keywords at a minimum: stop, quit and end.

Short description – You should provide a short description of a campaign within the application. This short description is given to customer support within the carriers to better answer end user questions when a customer calls requesting information.

Definitions

- **Aggregator:** Aggregators are the first point of wireless network connectivity. Aggregators work with carriers to implement the functionality of a CSC.
- **Carrier:** Wireless carriers that provide cellular service to their users.
- **Campaign:** the series of messages and marketing activities that comprise a CSC campaign.
- **CSC:** Common Short Code
- **CSCA:** Common Short Code Administration
- **MASP:** Mobile Application Service Provider
- **MO:** Mobile Origination is a message that was generated by the end user from their handset and is delivered to the application
- **MT:** Mobile Termination is a message that is generated by an application and is sent to the end user.
- **MMA:** Mobile Marketing Association
- **Opt-Out:** The means by which the wireless subscriber takes action to withdraw permission.
- **Opt-In:** The process that requires the wireless user to grant permission to the party that wants to send it information.
- **PSMS:** Premium Short Messaging Service require billing to the end user's account by the carrier.
- **SMS:** Short Messaging Service

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FAQ

Q: How long will it take to launch a program?

A: This timeline depends on the application type and number of participating carriers. Assuming a fully developed, ready-to-run program/application, it may be six to eight weeks (or more) from carrier acceptance. If the program is rejected during this process for any reason, the timeline obviously can increase.

Q: Once the program is submitted to the wireless carriers, how long will it take for an initial response?

A: All wireless carriers have their own review processes, but typically a response with an approval or rejection will be within five to 10 business days.

Q: How are programs tracked?

A: The MASP/Aggregator account manager will track all steps during the process of approval and provisioning and is responsible for sharing this information with you in a timely basis as determined during initial consultation. Most wireless carriers are utilizing online submission applications which are accessible by the carrier operations staff at the aggregator. The program submission may be viewed along with its status and forwarded to your account manager for tracking.

Q: Can I get updated information on my submission at any time?

A: Typically the first week following submission there is little or no information to share regarding a program. After the first week the account manager should have a status update on the whether or not it has been reviewed.

Q: What is acceptable content and what is not?

A: Each wireless carrier has their own specifications regarding content. Your MASP/aggregator knows these specifications and is alerted by the carrier when changes are made. The account manager will be able to share this information with you. Some examples of what is not acceptable by some carriers are pornography, the use of firearms and tobacco and some religious content.

Q: What types of information must I provide in addition to the program brief description given to the CSCA?

A: The wireless carriers have individual requirements that must be fulfilled in order to launch a program. The application for the CSCA may not provide the necessary level of detail to submit to the wireless carriers but serves as a starting point for describing the program's highlights and what it is designed to accomplish.

Q: At what point in time does my program development need to be finalized?

A: This date must be prior to the planned test date.

Q: Why does my marketing plan need to follow the launch dates assigned by the aggregator?

A: If the launch process is delayed due to requested changes in the program by the wireless carrier, or backlog in the aggregator or carrier's internal organizations, the marketing release date may lapse prior to launch. If a major ad buy is involved, the provider will need to have a clear understanding of the launch dates in order to submit program applications with ample lead time to meet ad dates.

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Working with the account manager to identify solid release dates will alleviate many of these concerns.

Q: How long does it take to completely implement the provisioning process?

A: After a program has been approved and submitted to an aggregator, the provisioning process phase will begin with the selected wireless carriers. Depending on each carrier's provisioning cycle and backlog, it can take anywhere from one to over eight weeks to be provisioned and certified.

Q: Where can I locate the Mobile Marketing Association guidelines?

A: Visit www.mmaglobal.com/bestpractices.pdf for the consumer best practices.

Resources

CSCA (Common Short Code Administration), www.USshortcodes.com

CSCA (Connection aggregator list), http://www.usshortcodes.com/csc_aggregators.html

Mobile Marketing Association (MMA), <http://www.mmaglobal.com/>

Mobile Marketing Ecosystem, <http://mmaglobal.com/modules/content/index.php?id=53>

MMA Code of Conduct, <http://mmaglobal.com/modules/content/index.php?id=5>

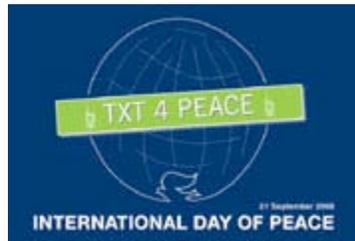
MMA Consumer Best Practices, <http://www.mmaglobal.com/bestpractices.pdf>

APPENDIX C

Selected Stories on Short Code Uses

UN launches campaign to text message for peace

<http://www.un.org/apps/news/story.asp?NewsID=27901&Cr=peace&Cr1=campaign>.



2 September 2008 – The United Nations launched a text messaging for peace campaign today, urging cell phone users in the United States to compose peace messages to be published on a website and delivered to world leaders gathered for the General Assembly later this month.

One of the events promoting the International Day of Peace, held on 21 September to observe “a day of ceasefire and non-violence”, encourages US cell phone users to send 160-character text messages starting with the word ‘PEACE’ to phone number 69866.

The UN Department of Public information will collect the texts on a website www.peaceday2008.org as well as send the messages to dignitaries attending the UN General Assembly on 23 September.

“I call on world leaders and peoples around the world to join forces against conflict, poverty and hunger, and for all human rights for all,” Secretary-General Ban Ki-moon said in a message on 29 August.

“Together let us send a powerful signal for peace that will be read, heard and felt around the world,” he added.

The International Day of Peace was established in 1981 by the General Assembly, and this year the Secretary-General will ring the Japanese Peace Bell at UN Headquarters on Friday, 19 September at noon to signal a minute of silence.

Attending the ceremony in New York will be Princess Haya Bint Al Hussein, Michael Douglas, Jane Goodall and Midori Goto, who are all UN Messengers of Peace.

After the ceremony, students from schools around New York will hold a video conference with their counterparts in Sudan, Afghanistan and Liberia.

<http://www.mobilevoter.org/about.html>

Founded in 2004, Mobile Voter is a non-profit non-partisan organization (501c.3) seeking to facilitate the process of civic participation via web and mobile technologies. Over the past four years, Mobile Voter has conducted innovative youth-focused campaigns making extensive use of mobile phone technology.

In 2006, Mobile Voter's, TXTVOTER '06 campaign registered tens of thousands of young voters across the country. The multi-pronged campaign leveraged the ubiquity of text messaging, a unique peer-to-peer registration model, and the organizational might of existing grassroots organizations. Over 200 groups worked with Mobile Voter to register and mobilize their constituencies. TXTVOTER '06 was funded by grants from the Pew Charitable Trusts (coordinated by Young Voter Strategies) and the MacArthur Foundation.

www.TxtVoter.org

You've arrived at TxtVoter, which was a campaign to register young voters for the 2006 election cycle - using a combination of SMS, snail mail, social networking, and an online voter registration tool. The TxtVoter program is no longer active. But a lot of people continue to ask about it, so we're keeping the site up.

If you're curious, this is how it worked:

- Using this site, you or your organization could sign up for a keyword on our shortcode (75444).
 - You could then go out in the world and try to get your friends, colleagues, and strangers to text your keyword to our shortcode.
 - When they texted in, they would be engaged in our SMS-based voter registration process, which would result in sending them to a Web site to generate a PDF voter registration form, or would mail them a pre-filled out voter registration form (as per their stated preference)
 - You, the registrar, could track your new voter all the way through the registration process - be it online or by snail mail. If they got stuck on one of the steps (such as mailing back the form to their state registrar), you would know about it and could give them a nudge.
 - Using the site, you could see how you were doing compared with your friends. Top registrars were listed on your personalized home page - along with a bunch of other tools to help you become a more successful registrar - such as Poster and Flyer generators.
-

Text messaging deployed to quell rowdy behavior at Ravens games

Baltimore Business Journal - by Ryan Sharrow Staff

The Baltimore Ravens are turning to text messaging to improve safety among fans attending games at M&T Bank Stadium.

Houston-based Qtags will provide GuestAssist, a text messaging code to fans through stadium signage and public address announcements. Fans can then text via their mobile phones any issues or security concerns they may have. The message will be received by members of M&T Bank Stadium's gameday staff. The staff can also send reply messages to the fan.

Venue staff will be able to dispatch security, medical or guest services staff to the appropriate location of the stadium where fans have concerns. GuestAssist will be available at as many as 10 NFL stadiums this season, including FedEx Field in Landover and Giants Stadium in New Jersey.

The Philadelphia Eagles were the first NFL team to use GuestAssist, during the 2006-2007 season.

From [www. Guestassist.net](http://www.Guestassist.net):

GUESTASSIST is a web-based communications service that enables one-to-one text messaging communications between fans and guests and central stadium or facility operations. A stadium guest in need of assistance may use their mobile phone to text a stadium- or event-specific keyword to a designated 5 digit phone number. Each request is instantly routed to the GUESTASSIST web-based Communications Center. Stadium or Event operations personnel can monitor and respond to guest inquiries on a real-time basis and dispatch support, security or medical staff to the guest's location as needed.

Mobile marketing start-up will target real estate first

<http://www.bizjournals.com/memphis/stories/2008/02/25/story2.html>.

Memphis Business Journal - by Einat Paz-Frankel Staff writer

A Memphis start-up company that has developed a mobile marketing application plans to make text messages the new mass media for advertisers.

TextBound, the latest addition to venture firm Mercury Technology Labs LLC's portfolio, capitalizes on the popularity of cellular phones and consumers' need to instantly find information on products and services.

The company's first target market is the real estate industry. TextBound's beta version of its mobile marketing application, which is currently being tested by real estate agents, stands to extinguish paper fliers as a marketing tool.

TextBound founder Rajesh Ramanand illustrates: You drive by a house for sale; you see a sign telling you to send a text message containing a certain keyword to a certain number; you instantly receive a text message with the house's price, number of bedrooms, exact address and the name of the listing agent. Clicking on a link in the text message will send you to a TextBound-hosted Web site with photos of the property, the appraised value of nearby houses, etc.

The main benefits of mobile messages for the Realtor are: Unlike fliers, they don't run out and they generate contact numbers of potential buyers. The benefits to the buyers: They get instant information that they can keep on their cell phone; they can instantly browse additional information; and they may ask to be contacted by the agent, Ramanand says.

And there's a benefit to the environment. The agent doesn't consume fuel and paper by driving to the printer to make additional copies.

Beverly Pickens, a real estate agent with Re/Max Premier in Atoka, has been testing TextBound's beta version and says it's a viable alternative to paper fliers.

"Eventually, there will be no fliers," she says. "I'm 56 and I text message and use a BlackBerry. They say that if you're doing e-mail, you're showing your age. Now, it's all about text messaging."

Besides being more environmentally friendly, mobile real estate marketing may actually cost less. Pickens plans to sign up for TextBound's service, which Ramanand says will start at about \$10 per month for Realtors.

One double-sided color flier costs Pickens 70 cents. For \$10 she can print 14 fliers.

TextBound is now in talks with the Memphis Area Association of Realtors to connect its Multiple Listing Service to TextBound's mobile system and also offer TextBound's services to MAAR's 5,000 members.

How to Block Cellphone Spam

<http://pogue.blogs.nytimes.com/2008/06/12/how-to-block-cellphone-spam/>

June 12, 2008, 12:21 pm

If I told you that today's e-column would change your life, would you mind that it's sort of short?

The story goes like this. A few weeks ago, in my [blog](#), I wrote this:

“OK, now I'm really, REALLY annoyed. Within a week, my wife and I have both started getting spam text messages on our Verizon cellphones. I know that this is nothing new, but it's new for us, and it's apparently getting worse.

“According to Wikipedia, this sleazy practice is described as ‘mobile spamming, SMS spam or SpaSMS, but is most frequently referred to as m-spam.’

“It's actually far worse than regular e-mail spam, for three reasons. First, you generally can't delete it without opening it first.

“Second, you have to pay for it. (And, of course, the senders pay nothing, since they can send text messages from a computer's e-mail program for nothing.)

“Third, there's no way to stop it. You can't install an anti-SMS spam program on your cellphone.

“If you're not feeling helpless and livid already, if you're not already storming your carrier and Congress, I can think of only one reason: you haven't been m-spammed yet. But your time will come.”

Shortly thereafter, I heard from an AT&T representative who revealed the presence of an astonishing little-known cellular feature: you can block cellular spam.

“Our customers can get onto our Web site,” he wrote, “and set their handset so that it receives no messages from the Internet, the origin of the vast majority of wireless spam.”

He also said:

“Text messages sent from the Internet are addressed as follows: [Your 10-digit wireless number]@txt.att.net.

“What spammers try to do, of course, is attempt to guess your number, largely by trial and error. This brings me to the second capability we offer our customers. Let's say you want to block spam, but still want to receive messages originating from the Net that you would actually find useful (airline schedules, hotel reservations, etc.). For this purpose, we let you replace your wireless number with an alias. It could be some quirky name, or whatever you like. [You share

this address only with people you know.] This could disrupt the guessing game spammers play to try to discern your number and send you their junk.

“Though not perfect, our efforts have helped keep spam in the category of minor, though annoying, phenomenon. Thanks for listening.”

The beauty of this feature, of course, is that it blocks ONLY text messages from the Internet. Your friends, using cellphones, can still text you.

As it turns out, Verizon Wireless offers these features, too. Sprint and T-Mobile don't go quite as far, but they do offer some text-spam filtering options. Here's how you find the controls for each company:

- * AT&T: Log in at mymessages.wireless.att.com. Under Preferences, you'll see the text-blocking and alias options. Here's also where you can block messages from specific e-mail addresses or Web sites.

- * Verizon Wireless: Log in at vtext.com. Under Text Messaging, click Preferences. Click Text Blocking. You're offered choices to block text messages from e-mail or from the Web. Here again, you can block specific addresses or Web sites. (Here's where you set up your aliases, too.)

- * Sprint: No auto-blocking is available at all, but you can block specific phone numbers and addresses. To get started, log in at www.sprint.com. On the top navigation bar, click My Online Tools. Under Communication Tools, click Text Messaging. On the Compose a Text Message page, under Text Messaging Options, click Settings & Preferences. In the text box, you can enter a phone number, email address or domain (such as Comcast.net) that you want to block.

- * T-Mobile: T-Mobile doesn't yet offer a “block text messages from the Internet” option. You can block all messages sent by e-mail, though, or permit only messages sent to your phone's e-mail address or alias, or create filters that block text messages containing certain phrases. It's all waiting when you log into www.t-mobile.com and click Communication Tools.

As soon as I heard about all this, I went to the Verizon Wireless page for my own account and turned on the “block” options.

And you know what? We haven't had a single piece of cellphone spam since.

You're welcome.