

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

**In the Matter of the** )  
 )  
**Rules and Regulations Implementing** )  
 ) **CG Docket No. 02-278**  
**the Telephone Consumer Protection** )  
 )  
**Act of 1991** )

**Shields Submission For The Record on the Glide Talk LTD Petition**

In the Commission GroupMe Declaratory Ruling issued on March 27<sup>th</sup>, 2014 the Commission stated: "...we have seen very few complaints..." It is possible that the Commission has seen few complaints on the subject because the Commission has a less than stellar enforcement record over the past 2 and ½ years. Simply put why file a complaint with the FCC that winds up in a black hole.

The attached shows that the cellular app from the petitioner Glide Talk LTD is responsible: "...for the majority of the **5 million to 6 million "app-spam" texts** sent each day." Clearly, there is a significant problem with apps that spam contact lists asking people to join the app.

Consequently, I submit the attached so that the Commission has a clear picture of what consumers are suffering through each and every day. Clearly, the issue is not as simple and rosy as Glide Talk LTD would have the Commission believe.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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## Growth Hacking and the App-Spam Scam

The pressure on legitimate apps to blow out their user bases has spawned a form of quasi-hacking that has become accepted as a bona fide growth strategy. “Growth hacking” is a practice employed by popular networking, gaming, and directions apps such as [Glide](#), Meow, Skout, and Tango, whose terms include permission to send SMS texts to the downloader's entire contact list. And it's a growth strategy that's growing at an alarming rate. A [study](#) conducted by security firm AdaptiveMobile discovered mobile players sending 8.5 more invitations per app in the past six months.

“We did the study because we started coming across a lot more complaints from people receiving texts asking them to join an app,” says Cathal McDaid, head of data intelligence and analytics at AdaptiveMobile. “App companies approach it in different ways, but it can be very difficult for installers to avoid texting all of their contacts. And because so many mobile numbers are recycled, people are receiving texts from other people they don't know.”

Glide, a video texting app, and Tango, which allows video calling, are the chief offenders. AdaptiveMobile's investigation uncovered that Glide was responsible for 57% of the SMS invites texted by app companies during February and March. Tango sent 20%. By contrast, [WhatsApp](#), the company acquired by Facebook for \$19 billion in February, sent one tenth as many invitations as did Glide. Though Tango allows users to easily opt out of inviting contacts when installing, the app has an “Invite on Activity” feature that leads to invitations being sent when, for instance, a user takes a photo using Tango.

AdaptiveMobile identified 15 apps as being responsible for the majority of the 5 million to 6 million “app-spam” texts sent each day. The explosion of text invitations led Google to update Google Play terms with a condition that apps in the store must not be involved in “unsolicited promotion via SMS” services. More such restrictions are sure to follow.

“The messaging wars are only getting started, and this practice will continue because it's so effective when the text comes from the phone of a friend,” McDaid says. “The thing is, this is an artificial form of growth. To truly grow, apps have to look at giving users value rather than using them as conduits for expansion.”

<http://www.dmnews.com/growth-hacking-and-the-app-spam-scam/article/344015/>