

# Code of Conduct

## AT&T Short Code SMS / MMS

### 10/17/2018

#### Foreward:

This Code of Conduct governs the existing Short Code Application-to-Person (A2P) messaging system and the AT&T 10-digit long code (10DLC) A2P Pilot program. The 10DLC A2P Pilot program follows a proof of concept program that allows A2P SMS traffic originating from 10DLCs outside of AT&T's network to be delivered to AT&T mobile customers.

Updates to this code of conduct specific to 10DLC A2P are forthcoming and will be provided at time of 10DLC onboarding.

#### Consumer Consent

The Message Sender must obtain proper consumer consent for each message sent. The type of consent that is required depends on the type of message content sent to the consumer. The table below includes the types of messaging content and the associated consent that is required. Consumers can revoke consent at any time and in any way. Consumer opt-out requests must be honored, whether they are made by phone call, email, or text of the word "Stop" (case insensitive).

The consumer must give the appropriate consent for the given message type.

Where consent is required, the proposed entities authorized to send must be conspicuously communicated prior to obtaining consent, and Consumer's consent must explicitly name the entities authorized to send. Such consent may not be obtained using deceptive methods.

Consumer consent may not be bought, sold, rented, or shared.

Types of Messaging Content & Required Consent		
Consumer-Initiated Conversational	Informational	Promotional
<p>Consumer-Initiated Conversational messaging is conversational messaging in which the messaging conversation is initiated by the consumer via text messaging, and all subsequent consumer-terminated messages are, in content and timing, responsive to the consumer's request. If the consumer texts into the business first and the business responds quickly with a single message, then it's likely conversational.</p>	<p>Informational messaging is application-originated messaging (i.e., not a part of a <b>consumer-originated</b> conversation) related to an ongoing transaction or ongoing business relationship and does not include promotional content. Appointment reminders, welcome texts, and alerts typically fall into this category.</p>	<p>Promotional messaging contains, offers, or references one or more sales or marketing promotions. Adding a call-to-action (such as adding a coupon code to an informational text) may place the message in the promotional category. Businesses that already ask consumers to sign forms or submit contact information can add a field to capture the consumer's consent.</p>
<p>First message is always sent by the consumer</p> <p>Two-way conversation</p> <p>Message responds to a specific request</p>	<p>First message is sent by the consumer or application</p> <p>One-way or two-way conversation</p> <p>Message does not contain promotion</p>	<p>First (or only) message is sent by the application</p> <p>Message may promote a brand or product, or encourage commercial activity</p>
<p><b>IMPLIED CONSENT</b></p> <p>If the consumer initiates the text message exchange and the business only responds to each consumer with relevant information, then no verbal or written permission is required.</p>	<p><b>EXPRESS CONSENT</b></p> <p>The consumer must give permission before a business sends them a text message. Consumers can give permission over text, on a form or website, or verbally. Written permission is also sufficient.</p>	<p><b>EXPRESS WRITTEN CONSENT</b></p> <p>The consumer must give written permission before a business sends them a text message. Consumers can sign a form, or check a box, to allow promotional text messages. Proof of recipient consent must be provided to AT&amp;T on demand. Participation in text promotions should never be a requirement of a commercial transaction.</p>

## Opt-out

Consent must be revocable without penalty to message recipient beyond the termination of any ongoing benefit that the message recipient would receive without the revocation.

Application-originated Informational and Promotional messaging must contain a notice that a consumer may opt-out of future communications by replying with the word “stop” in any combination of lower and upper case.

AT&T deactivation files must be processed daily and those CTN’s removed from the messaging provider / Message Sender’s data base for future messaging.

A “high” volume or percentage of opt-out messages may result in suspension or termination of a specific messaging campaign and/or blocking of sending numbers.

## Consumer opt-in and opt-out must work correctly

Opt-in lists, systems and processes may only contain or add Consumers who have properly opted in. All Opt-out requests must be promptly honored.

Opt-out notices must explicitly notify recipients that the word “Stop” may be used for opt-outs.

Consumer-originated messages indicating a desire to opt-out through the use of the “stop” keyword must result in a cessation of the indicated messaging.

Providing help such as in response to the word “help” is encouraged.

## Prohibited Campaign Types

**SMS A2P messaging may not be used for affiliate lead and/or commission generation.** AT&T may block and/or terminate messaging campaigns and/or accounts which AT&T, at its sole discretion, determines to be affiliate-related. **Additionally, the types of campaigns listed below are prohibited.** Effective immediately, no new campaigns of the nature below will be approved for provisioning. Existing campaigns of this nature on dedicated Short codes will be terminated in Early Q1 2019 with the exact date to be determined and communicated.

Any exceptions require written AT&T approval.

- Loan advertisements with the exception of messages from direct lenders for secured loans
- Credit repair
- Debt relief

- Work from home, 'secret shopper,' and similar advertising campaigns
- Lead generation campaigns that indicate the sharing of collected information with third parties
- Campaign types not in compliance with the recommendations of or prohibited by the CTIA Short Code Monitoring Handbook, Version 1.7 or later.

If a Message Sender is observed sending any of the above-listed disallowed content, then an account review may be performed by AT&T or its agents. This review can result in the suspension of sending rights for a provisioned phone number or short codes; restriction of high-throughput access; suspension of provisioning rights for new phone numbers or short codes; and/or suspension of all network services.

**Service Providers, Aggregators and Inter-carrier Vendors are expected to enforce restrictions on their own networks to prevent these types of content at the intake source.**

## Abusive Messaging Prohibited

Message content that deceives or threatens consumers is not permitted.

Message streams that result in excessive complaints or STOP commands typically indicate an unwanted message campaign and will not be allowed to continue.

If a Message Sender is observed sending any of the content listed below, then an account review may be performed by AT&T or its agents. Based on this review, there may be a restriction, suspension or termination of sending rights, including changes of authorized message classes, throughput, termination of the messaging campaign; and/or termination of all messaging campaigns operated by a party suspected of negligence or complicity, including the Message Sender, Service Provider or Aggregator.

AT&T Messaging Partners are expected to place and enforce restrictions on their own networks to prevent these types of content:

- Phishing
- Fraud or scams
- Deceptive marketing
- Distribution of malware or app downloads from non-secure locations
- Loan, debt consolidation, debt relief and student loan programs from any enterprise that is not able to grant loans itself; affiliate lead generation for these financial programs is prohibited
- Affiliate marketing programs that seek to obtain opt-in subscriber lists

## Prohibited Messaging Techniques

### Shared Codes Prohibited

Shared 10-digit long codes or short codes are prohibited. There may be specific Enterprise based use cases where exceptions may be granted.

Effective immediately no new shared short codes should be onboarded. All existing shared short codes will be terminated at a future date to be determined and will be consistent with the commercial availability of 10DLC A2P messaging. This will formally be communicated with appropriate advance notice.

The use of a single 10-digit long or short code to be “sub-aggregated” in a manner that allows multiple parties control of content and/or receiving phone numbers is prohibited. Exceptions may be considered when appropriately requested via campaign submission as requiring third-party content control. If approved, such campaigns will be assigned an appropriate message class designation to help prevent blocking of wanted messages (interactive messaging, Bots, RCS).

### Deactivation Files

Aggregators and Service Providers assume responsibility for managing information about deactivated and recycled mobile phone numbers. They must either enforce deactivations themselves or ensure that deactivation information is made available to Message Senders with a requirement for the Message Sender to manage opt-out of deactivated numbers.