10DLC VETTING MANUAL

Comprehensive Guide to Vetting Procedures and Standards

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MESSAGE BROADCAST

Purpose: This document outlines the essential guidelines for the approval of submitted campaigns, providing a clear framework to ensure consistency. It defines the criteria that campaigns must meet. By adhering to these guidelines, we aim to maintain high standards and ensure that all campaigns align. This document serves as a reference for all stakeholders to ensure transparency and fairness in the approval process.

1. Call-to-Action (CTA)

The purpose of a Call-to-Action (CTA) is to ensure the Consumer consents to receive text messages and understands the nature of the program. The CTA language must encourage or invite a Consumer to opt into a Messaging program and must be clearly and unambiguously displayed with the following disclosures:

- Program (Brand) Name/Product Description
- Message Frequency Disclosure
- Message and Data Rates may apply (if non-FTEU)
- STOP keyword (Opt-out information may appear in the terms and conditions.)
- Include HELP instructions on how to request help
- Complete terms and conditions link or the complete message program terms and conditions language. (Popups are not a method for displaying terms and conditions)
- Privacy policy OR link to a privacy policy
- For Web opt in:
- If phone number field is mandatory (*), avoid Forced opt-in by adding a checkbox for optional SMS opt-in, where the person can choose to receive text messages.
- If phone number field is optional, a checkbox is not needed.

For TCR compliance, all campaigns must include the URL for the Terms and Conditions and Privacy Policy or the verbiage, under the Call-to-Action (CTA). Even though this information is available on the website, it must be displayed within TCR.

TCR provides a specific section for the Privacy Policy and Terms and Conditions links, and these can either be added in those designated fields or within the CTA section.

1.1 Consent Types

1.1.1 Implied Consent

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 expected. Since the consumer initiated the contact, no additional permission is needed.

1. The workflow needs to be clear and should state that the customer is initiating contact with the business via text message to opt-in for text message communication. For example: **"the customer sends a text message to initiate text message communication with the business".**

2. First message is always sent by the customer, **it's important to emphasize that this should clearly explain how the customer is contacting the business to provide implied consent.**

1.1.2 Express Consent

The Consumer should give express permission before a business sends them a text message. Consumers may give permission over text, on a form, on a website, or verbally. Consumers may also give written permission.

1.1.3 Express Written Consent

The Consumer should give express written permission before a business sends them a text message. Consumers may sign a form

Guidance when a use case is verbal or over email/written, is to provide the script or sample of CTA sent written to verify all aspects of CTA are fulfilled. As noted, requirements of CTA are based on T-Mobile Code of Conduct section 2.5 Calls-to-Action & CTIA Messaging and Best Practices section 5.1.1 Message Senders Should Provide Clear and Conspicuous Calls-to-Action.

And again, a script should be added that contains the following elements:

- Brand name
- HELP keyword
- STOP keyword
- Message frequency
- Msg & data rates
- Terms and Conditions
- Privacy Policy

1.2 Opt-in Methods

1.2.1 Text

the customer opts in by texting a specific keyword to a designated phone number. **The workflow must include both: the exact keyword and the designated phone number, ensuring no details are omitted.**

Example: **_"Customer opt-in by sending "WELCOME" to phone number 123456789"_**
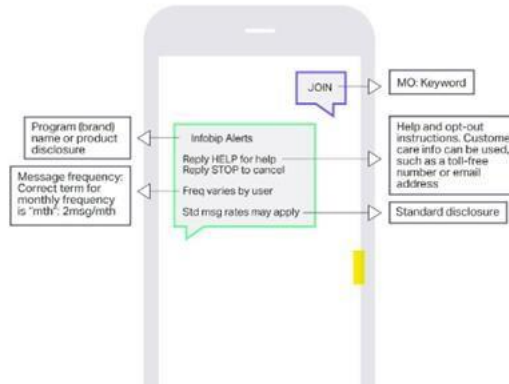
1.2.2 Form

the customer provides consent by completing a form (either electronic or in paper). This specific form must be attached to TCR for verification purposes.

Example: **_"The customer completes a form at the doctor's office that includes opt-in language agreeing to receive text message communications"._**

1.2.3 Website

the customer can opt-in through a webform, which must meet specific compliance requirements:

- If the opt-in takes place on the website but not on the website's main page, **the specific URL where the opt-in occurs should be provided.** Be specific if it's on the Contact US/Check out form, etc., by providing the specific link to the form. The website can display a pop-up form; it should be specified that a pop-up form will appear for customers to opt-in for text messages communication.

- **The phone number field can be mandatory,** as long as there's an additional checkbox for opt-in.

- **If phone number field is optional**, a checkbox is not needed.

- Opt-in language should appear at the bottom of the form.

> Example: "***By submitting this form and signing up for texts, you consent to receive marketing text messages (e.g. promos, cart reminders) from [company name] at the number provided, including messages sent by autodialer. Consent is not a condition of purchase. Msg & data rates may apply. Msg frequency varies. Unsubscribe at any time by replying STOP or clicking the unsubscribe link (where available). HELP for assistance. Privacy Policy [link] & Terms [link].***"

1.2.4 Verbal

customers will have the option to provide verbal consent. For this type of opt-in, the process must clearly outline the scenarios in which the customer is giving their consent. This could happen during a phone call or in person. A verbal opt in should have a script containing the following elements:

- Brand name
- HELP keyword
- STOP keyword

- Message frequency
- Msg & data rates
- Terms and Conditions
- Privacy Policy

Example:

Call to Action / Message Flow:	After Hours Urgent Care will be collecting opt-ins verbally from their patients. The patients will be able to opt-in to receiving messages either in person at their physical location, or over a phone call if the customer calls to request an appointment. When a new patient is registered for the first time, they are asked to provide their phone number and staff are trained to ask if the customer would like to opt-in to SMS-based billing notifications. They will be informed verbally that "message & data rates may apply" and "message frequency varies." They are also informed that they can "text HELP for support instructions and more information, or STOP to unsubscribe." They will also inform the customer that they will not share their phone number with third parties for marketing or promotional purposes. The first message sent to the customer will inform them that they can text STOP at any time to unsubscribe, with the following text: "AFTER HOURS URGENT CARE: You've subscribed to receive billing notifications from After Hours Urgent Care. Text HELP for support instructions or STOP to unsubscribe. Message frequency varies."	Terms and Conditions Link:

2. Campaign and Content Attributes

Each campaign must include keywords and sample messages for subscriber opt-in, opt-out, and help requests. There is a specific template that should be followed for these messages.

2.1 Opt-in Confirmation Message

It should include instructions on how to request help, how to opt out, the frequency of messages, data rates may apply disclosure and the program name or product description.
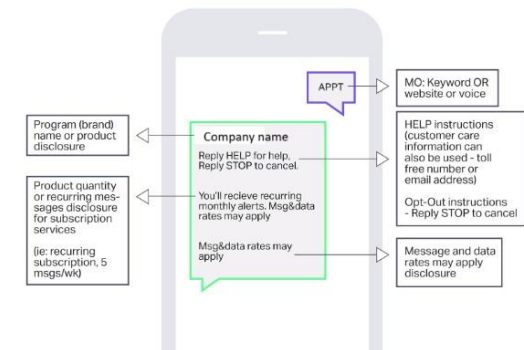
2.2 Help message

It should include program name or product description and customer care contact information (brand support email/phone)
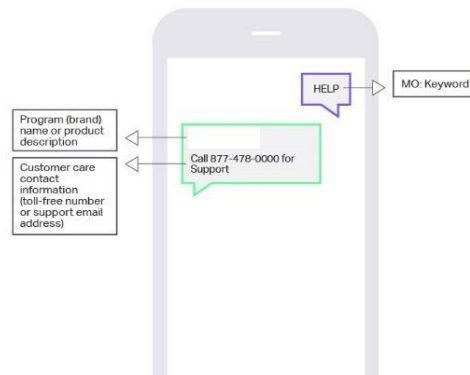
2.3 Opt-out message

It should include program name or product description and confirmation of opt-out and that no further messages will be sent
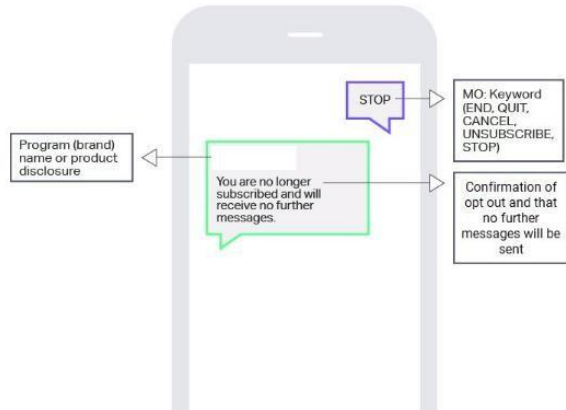
2.4 Sample messages

Sample messages provided in the campaign registration form must correspond to the registered use case. If a campaign is registered under multiple use cases (mixed), a sample message for each use case should be provided or the use case should be declared/reflected in the description/CTA.

3. Terms of Service

Comprehensive terms and conditions might be presented in full beneath the call-to-action, or they might be accessible from a link in proximity to the CTA.

- Popups are not a method for displaying terms and conditions.
- Where feasible, Message Senders may combine multiple program components (e.g., callto-action and terms and conditions)

The following SMS program disclosures must be included within the terms and conditions.

- Program (brand) name.
- Message frequency disclosure.
- Product description.
- Customer care contact information.
- Opt-out information.
- "Message and data rates may apply" disclosure.

It must include the types of messages consumers can expect to receive, texting cadence, message and data rate notices, any associated costs, privacy policy, opt-out instructions and other terms of use.

4. Privacy Policy

Message Senders are responsible for protecting the privacy of Consumers' information and must comply with applicable privacy laws. Message Senders should maintain a privacy policy for all programs and make it accessible from the initial CTA.

- When a privacy policy link is displayed, it should be labeled clearly. In all cases, terms and conditions, and privacy policy disclosures must provide up-to-date, accurate information about program details and functionality.

- Any mentioning of 3rd Party Data Sharing, Renting, or Selling is disallowed unless the below disclosure is included: ***"All the above categories exclude text messaging originator optin data and consent; this information will not be shared with any third parties."***

If privacy policy already provides disclaimers around data sharing or selling to nonaffiliated third parties, it needs to clarify that such data sharing or selling will not include a customer's SMS opt-in data or consent status (because explicit, one-to-one consent is required for SMS). If privacy policy does not currently mention data sharing, you need to insert a similar clarification that you will not share SMS opt-in or consent status for non-service-related purposes.

Example: ***"We will not share your opt-in to an SMS campaign with any third party for purposes unrelated to providing you with the services of that campaign. We may share your Personal Data, including your SMS opt-in or consent status, with third parties that help us provide our messaging***

services, including but not limited to platform providers, phone companies, and any other vendors who assist us in the delivery of text messages."

5. Special Use Case Requirements

5.1 Robust Age Gating

Messaging content for controlled substances or for distribution of adult content might be subject to additional carrier review. This type of messaging should include robust age verification (for example, electronic confirmation of age and identity).

Examples of robust age gates include:

1. Document Upload (Government ID)
2. Third-Party Identity Verification Services
3. Credit Card Verification
4. Reply with your birthdate xx/xx/xxxx
5. A web opt-in form field, which requires the user to include their birthday

Asking a user to "reply YES/AGREE" to confirm they are over a certain age is not considered a <u>robust age verification.</u>

5.2 Donations

If the campaign description states that donations will go toward the program, **the only requirement is for the CTA to specify this donation use-case.**

Many non-profit organizations wish to send political traffic, and specific codes qualify for the political use case, including the following:

Organizations	Qualification for sending political traffic
501(c)(4), 501(c)(5), and 501(c)(6) non-profit organizations	Non-profit organizations with codes 501(c)(4), 501(c)(5), and 501(c)(6) qualify to send political traffic automatically without the need to go through any external vetting.
527 tax-exempt organizations	For 527 organizations.

5.3 Test Campaigns

Test campaigns are supported; however, all must be under low volume and under all compliance requirements being asked at this point.

6. Best Practices

The following must be adhered to and considered when submitting a campaign for approval. All mechanisms should be in place at the time of submission.

1) **User Consent:** Messaging programs are expected to provide full transparency so that Consumers are aware of and only receive messages from Messaging Programs to which they have opted in.

2) **Opt-in:** Consumers must opt-in to receive messages associated with a specific program. Enrolling a Consumer in multiple programs based on a single opt-in is prohibited.

3) **Opt-out:** Message Senders must acknowledge and act on all opt-out requests. Monitoring procedures confirm a successful opt-out.

4) **Opt-In Confirmation:** Messaging programs should send a single opt-in confirmation message displaying information to verify the Consumer's enrollment, identify the program, and describe how to opt out. Additionally, opt-in messages must contain the program (brand) name or product description, customer care contact information, message frequency disclosure, "message and data rates may apply" disclosure (non-FTEU), and optout instructions (reply STOP to opt-out).

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6.1 Compliant CTA Templates

All the opt in methods should have a script in the CTA/Message Flow field in TCR, the following templates can be used as reference, depending on the type of opt-in.

6.1.1 Website

CTA/Message Flow (TCR): Subscriber opt-in is gathered at {specific link to sms opt-in form}.

By submitting this form and signing up for texts, you consent to receive marketing text messages (e.g. promos, cart reminders) from **[Company Name]** at the number provided, including messages sent by autodialer. Consent is not a condition of purchase. **Msg & data rates may apply**. **Msg frequency varies**. Unsubscribe at any time by replying **STOP** or clicking the unsubscribe link (where available). Reply **HELP**P for help. **Privacy Policy [link] & Terms [link].**

6.1.2 Implied

When a customer reaches out, they will be informed that they are reaching **"Company name"** and will be disclosed that "**Message and data rates may apply**", **"Message frequency may vary.**", they can "text **HELP** for support or more information and **STOP** to unsubscribe at any time." They will also be Informed that their phone number will not be shared with third parties for marketing or promotional purposes. **(add PP and T&C links here or in the TCR fields).**

6.1.3 Verbal

"Company name" will be collecting opt-in verbally from their customers. The customers will be able to opt-In to receiving messages either in person at their physical location, or over a phone call if the customer calls. When a customer I registered for the first time, they are asked to provide the phone number and staff are trained to ask If the customer would like to opt-In to SMS-based billing notifications. They will be verbally informed that "**Message and data rates may apply**", "**Message frequency may vary.**", they can "text **HELP** for support or more information and **STOP** to unsubscribe at any time." They will also be Informed that their phone number will not be shared with third parties for marketing or promotional purposes. **(add PP and T&C links here or in the TCR fields).**

6.1.4 Keyword

After **"Company name"** receives the keyword, the brand sends a consent request to the consumer, asking if they agree to receive messages. The message consent prompt they received will state: **"Company name"** would like to confirm your consent to receive messages sent to your phone number. Reply 'START' for Consent or Reply **'STOP'** to Decline. For more information, reply '**HELP**'. You will only receive this message one more time within 24 hours if you do not respond. **Message & data rates may apply. Message frequency varies.** Your phone number will not be shared with third parties for marketing or promotional purposes. **(add PP and T&C links here or in the TCR fields).**

6.1.5 E-mail/Written

Attach written form with the same language as all the opt-in methods:

☐ Program (Brand) Name/Product Description
☐ Message Frequency Disclosure
☐ Message and Data Rates may apply
☐ HELP Disclosures
☐ STOP Disclosures
☐ Terms and Conditions link (It is also available in the specified section of TCR)
☐ Privacy Policy link (It is also available in the specified section of TCR)

7. Campaign Rejection Codes

Code	Reason	Explanation or Scenarios where these can be used
701	Prohibited Content; Cannabis	Any submission related to cannabis including (but not limited to) body supplies, teas, beauty products, CBD, hemp infusions, or any derivate of cannabis is subject to immediate rejection. Be aware that this forbidden content includes shipping services.
702	Prohibited Content; Guns/Ammo	The sale of firearms and ammunition should have age verification. However, if the company is educational and does not engage in the sale of firearms, it is acceptable.
703	Prohibited Content; Explicit sexual	The following is prohibited: 1. Content promoting illegal sexual themes (underage, non-consensual) simulated or real 2. Content that may be interpreted as promoting a sexual act in exchange for compensation (sex work) 3. Content promoting the sexual exploitation of minors 4. Content containing adult themes (sex, violence, vulgarity) masquerading as appropriate for consumption by minors (e.g. depictions of children or popular children's characters)
704	Prohibited Content; Gambling	Promotional messaging prohibited. Includes games of chance, typically involving the wagering of money or valuables, with the primary intent of winning additional money or material goods (e.g. casino games, sports betting, lottery games, poker, and online gambling). Regulations surrounding gambling vary by jurisdiction. **Bingo Exception:** due to legal distinctions between bingo and other forms of gambling (e.g. poker, blackjack, slots), promotional messages for bingo may be permitted under certain conditions. The campaign must include an age gate to ensure the targeted audience meets legal age requirements, and it must exclusively promote bingo conducted in a physical setting, such as a bingo hall (no virtual or app bingo).
705	Prohibited Content; Hate	Inappropriate content, profanity or hate speech.

706	Prohibited Content; Alcohol (Age-Gated)	All content must adhere to all applicable laws and support a functioning age gate. The age-gate mechanism should include the date of birth verification during the consent opt-in of the consumer.
707	Prohibited Content; Tobacco/Vape (AgeGated)	All content must adhere to all applicable laws and support a functioning age gate. The age-gate mechanism should include the date of birth verification during the consent opt-in of the consumer.
708	Lead Gen/Affiliate Marketing prohibited; other	Lead generation indicates the sharing/selling of information to third parties.
709	Lead Gen/Affiliate Marketing prohibited; high risk financial services	1. High-Risk Financial Services • Payday Loans • Non-Direct Lenders • Debt Collection (Could be an exception for Account Notification use case in case Debt collector requires the express written consent opt-in from enduser. Verbal opt-in will be never allowed, and Marketing use case is prohibited) 2. Debt Forgiveness • Debt Consolidation • Debt Reduction • Credit Repair Programs
601	Campaign Attributes do not match website and/or sample message content	Inconsistency between the business shown on the website, the attributes marked and the sample messages.
602	Inaccurate Registration. Inconsistency between sample message and usecase.	Inconsistency between sample message and use case.
603	Inaccurate Registration. Inconsistency between website, sample messages or incomplete sample messages.	Inconsistency between the business shown on the website and the sample messages.

611	Opt-in message/Confirmation MT must contain brand name, HELP, opt-out, mssg frequency and associated fees disclosures. Opt-out message must contain brand name and indicate that no further messages will be sent. HELP message must contain brand name and contain support contact (email, phone number, or support website).	Campaigns attributes are incomplete, review they contain the following: ***Opt-in confirmation message:*** ☐ Program name ☐ Includes instructions on how to request help ☐ Includes instructions on how to opt-out ☐ Message frequency ☐ Data and message rates may apply ***Help confirmation message:*** ☐ Program name ☐ Includes toll free number, e-mail or website where to reach for help ***Opt-out message:*** ☐ Program name ☐ Confirmation of opt-out ☐ Confirmation no further messages will be sent
710	Reseller / Non-compliant KYC. Register the brand info, not the agency behind the brand.	Client that is sending the messages to end-user is the one who must be registered in TCR as Brand. Marketing agencies, software providers, etc. should always register the brand that contracted them as part of our KYC process.
711	Repeated use of same EIN for multiple different brands	Client must provide a valid reason of why this is happening to be analyzed for approval.
712	Misleading Registration. Based on details submitted, Campaign appears to be Direct Lending Arrangement, but appropriate Content Attribute was not selected.	Direct lenders and regulated companies must always check the attribute in TCR no matter the use case or objective for the campaign.
713	Appears to be large company or company that would have an official email domain.	Big and well-known companies who listed personal email in the campaign. Check for fraud, use official / working email domain.

801	Not Sole Proprietor. Does not meet small business Sole Prop (EIN) criteria set by TCR and mobile carriers.	Clients that don't meet the criteria of a Sole Proprietor. **NOTE:** Message Broadcast does not support Sole Proprietor use cases.
802	Sole Proprietor. Not yet authorized	**NOTE:** Message Broadcast does not support Sole Proprietor use cases.
803	Opt-in is language required on website if used to collect mobile numbers.	Form of contact in website requires a mandatory phone number but has no message or check box for end user to accept SMS.
804	Unable to verify, need website / working website or complete CTA information if opt-in occurs outside of website	1. CTA occurs on the website, but the website link is not added on the website field. Applies to broken links, 404 errors and wrong links. 2. When there is no way to verify the business and CTA information is not clear enough to understand the business.
805	Compliant privacy policy is required, add link and/or verbiage for compliant Privacy policy disclosures (state that no mobile opt-in data will be shared with third parties).	No Privacy Policy or incomplete privacy policy added to the campaign. Privacy Policy must indicate information collect is not shared with 3rd Parties.
806	Unable to verify, needs compliant and accurate CTA information. Update with specific path for mobile opt-in.	5. CTA is inaccurate and does not explain where the customers opt into the campaign (website, verbal, written, etc.) 6. When the opt in is on the website and there is no phone field to add the phone number. 7. When CTA doesn't have the mandatory information: **Verbal/Keyword/Implied/Email/Written/ Website:** There should be a script in the CTA/Message Flow field in TCR or specific link (when online opt-in), that includes all the listed items below. ☐ Program (Brand) Name/Product Description ☐ Message Frequency Disclosure ☐ Message and Data Rates may apply ☐ HELP Disclosures ☐ STOP Disclosures

		☒ Terms and Conditions link (include a link to the message program terms and conditions, or the complete message program terms and conditions language) ☐ Privacy Policy link (include a link to the message program privacy policy, or language referring to the privacy policy, that indicates that mobile opt-in data will not be shared)
807	Unable to verify, inauthentic website	Special reason for Real Estate and Insurance companies who use generic/incomplete websites that don't allow to verify the business
808	Campaign has been declined 5+ times, without sufficient updates. Each denial incurs in a vetting fee.	When campaigns have been denied more than 5 times without fixing the rejection reason (s).
851	Privacy Policy missing/incomplete/requires disclosure ("no SMS opt-in data will be shared with third parties"). OR Opt-in Confirm, Opt-out Confirm or HELP MT missing components.	PP must indicate information collected is not shared with 3rd Parties. MT Requirements: ***Opt-in confirmation message:*** ☐ Program name ☐ Includes instructions on how to request help ☐ Includes instructions on how to opt-out ☐ Message frequency ☐ Data and message rates may apply ***Help confirmation message:*** ☐ Program name ☐ Includes toll free number, e-mail or website where to reach for help ***Opt-out message:*** ☐ Program name ☐ Confirmation of opt-out ☐ Confirmation no further messages will be sent.

852	Needs compliant Privacy Policy. Add link and/or verbiage for compliant Privacy policy disclosures (state that no mobile opt-in data will be shared with third parties). Include instructions on how the end user can receive further support from the brand regarding the message program (for example, Reply HELP for help), or this information must be present in the brand's terms and conditions.	Provide Terms and Conditions link (include a link to the message program terms and conditions, or the complete message program terms and conditions language). Provide a Privacy Policy link (include a link to the message program privacy policy, or language referring to the privacy policy, that indicates that mobile opt-in data will not be shared)
861	Needs compliant and accurate CTA information, Opt-in message/Confirmation MT must contain brand name, HELP, opt-out, mssg. frequency and associated fees disclosures. Opt-out message must contain brand name and indicate that no further messages will be sent. HELP message must contain brand name and contain support contact (email, phone number, or support website).	The CTA must have the following: **Verbal/Keyword/Implied/Email/Written/ Website:** There should be a script in the CTA/Message Flow field in TCR or specific link (when online opt-in), that includes all the listed items below. ☐ Program (Brand) Name/Product Description ☐ Message Frequency Disclosure ☐ Message and Data Rates may apply ☐ HELP Disclosures ☐ STOP Disclosures ☒ Terms and Conditions link (include a link to the message program terms and conditions, or the complete message program terms and conditions language) ☐ Privacy Policy link (include a link to the message program privacy policy, or language referring to the privacy policy, that indicates that mobile opt-in data will not be shared) Also review that campaign and content attributes contain the following: ***Opt-in confirmation message:*** ☐ Program name ☐ Includes instructions on how to request help ☐ Includes instructions on how to opt-out ☐ Message frequency

		☐ Data and message rates may apply
		Help confirmation message: ☐ Program name ☐ Includes toll free number, e-mail or website where to reach for help ***Opt-out message:*** ☐ Program name ☐ Confirmation of opt-out ☐ Confirmation no further messages will be sent

8. Remediation Guidelines

Campaign attributes	
Attributes missing	**Recommended action**
Campaign appears to be for an age-gated content type, but age gate attribute is not selected.	Verify if the Age Gate attribute is selected for the campaign registration. If the campaign is not related to age-gated content, update the campaign description.
Campaign is for direct lending or loan arrangement and is missing the content attribute indicating direct lending.	Verify direct lending or loan arrangement is selected for campaign registration. If the campaign is not related to direct lending or loan arrangement, update the campaign description.
Campaign Description/Program Summary	
Attributes missing	**Recommended action**
Campaign registration is not unique or duplicate campaign	Duplicate campaigns are disallowed. Campaigns should be uniquely registered.
Unclear campaign description	It must be clear from your campaign description what the purpose of your message program is. Add more details to the description and resubmit.
Campaign description does not match declared use case(s)	The use case described in the campaign description must match the registered use case. Update the description or register the
	campaign again with the correct use case and resubmit.

Campaign description does not match sample messages	The use case described in the campaign description must match the use case demonstrated in the sample message content. Update the description or sample message content and resubmit.
Undeclared use case	The campaign description indicates the campaign will be used for a use case that is not selected. Check your campaign description is accurate, and all use cases are selected.
Brand referenced in campaign description does not match registered/DBA brand	The brand in the campaign and messaging should be consistent with the brand registered. Update and resubmit.

Call to Action

Attributes missing	Recommended action
Call-to-action does not obtain sufficient consent	All CTA's must obtain consent via proper consent mechanism. Update and resubmit.
Call-to-action does not contain registered/DBA brand name	The company/brand name must be included in the CTA and must match the registered Brand or be easily recognizable as the same entity. Update the call-to-action and resubmit.
Call-to-action does not contain HELP instructions (for example, Reply HELP for help) or HELP instructions in Terms & Conditions	The call-to-action must include instructions on how the end user can receive further support from the brand regarding the message program (for example, Reply HELP for help), or this information must be present in the brand's terms and conditions. Update the call-toaction and resubmit.
Call-to-action does not contain STOP instructions (for example, Reply STOP to cancel)	The call-to-action must include instructions on how the end user can opt out of the message program (for example, Reply STOP to opt out). Update the call-to-action and resubmit.
Call-to-action does not contain message frequency disclosure for recurring message program	The call-to-action must include the frequency at which messages will be sent to end users (for example, #msgs/mo, msg frequency varies, recurring messages, etc.). Update the call-toaction and resubmit.
Call-to-action does not contain "message and data rates may apply" disclosure	The call-to-action must include the message and data rate disclosure, as mandated by U.S. carriers. Update the call-to-action and resubmit.

Call-to-action does not contain complete terms and conditions OR link to complete terms and conditions	The call-to-action must include a link to the message program terms and conditions, or the complete message program terms and conditions language. Update the call-to-action and resubmit.

Call-to-action does not contain link to privacy policy OR state that mobile opt-in data will not be shared with third parties	Mobile opt in data (for example, the end user's phone number) cannot be shared with third parties. The call-to-action must include a link to the message program privacy policy, or language referring to the privacy policy, that indicates that mobile opt-in data will not be shared. Update the call-to-action and resubmit.
Call-to-action does not obtain express written consent for promotional message content	For promotional message programs, the callto-action must show that express written consent was obtained from the end user before sending promotional message content. Update the call-to-action and resubmit.
Call-to-action does not contain a robust age gate for age-restricted message program (alcohol/firearms/tobacco	Message content related to age-restricted goods, such as alcohol or tobacco, is not permitted without an age gate mechanism. An acceptable age gate would consist of, at minimum, a recipient entering a day, month, and year confirming their age at messaging optin prior to receiving messaging. If the call-toaction indicates that the message program will be sending this type of content, and no age gate is in place, the campaign will be rejected. Implement age gate and resubmit.
Call-to-action is missing/inaccessible	There is no call-to-action URL provided in the campaign description, or the URL provided is inaccessible. You must provide evidence of a compliant opt-in process via either a live opt-in URL or a URL to a hosted opt-in image (screenshot or mock-up). Update the call-toaction description to include the call-to-action URL and resubmit.
Call to action appears to have multiple types of opt ins in a single CTA which does not make SMS consent optional or clear.	All CTA's must obtain consent via the proper consent mechanism for SMS. Update and resubmit.
Call to Action - in market on web URL or provided in screenshot/media file	
Attributes missing	**Recommended action**

Call-to-action (on website, or provide via screenshot/media file) does not obtain sufficient consent	All CTA's must obtain consent via proper consent mechanism. Update and resubmit.
Call-to-action does not contain registered/DBA brand name	The company/brand name must be included in the CTA and must match the registered Brand or be easily recognizable as the same entity. Update the call-to-action and resubmit.

Call-to-action does not contain HELP instructions (for example, Reply HELP for help) or HELP instructions in Terms & Conditions	The call-to-action must include instructions on how the end user can receive further support from the brand regarding the message program (for example, Reply HELP for help), or this information must be present in the brand's terms and conditions. Update the call-toaction and resubmit.
Call-to-action does not contain STOP instructions (for example, Reply STOP to cancel)	The call-to-action must include instructions on how the end user can opt-out of the message program (for example, Reply STOP to opt-out). Update the call-to-action and resubmit.
Call-to-action does not contain message frequency disclosure for recurring message program	The call-to-action must include the frequency at which messages will be sent to end users (for example, #msgs/mo, msg frequency varies, recurring messages, etc.). Update the call-toaction and resubmit.
Call-to-action does not contain "message and data rates may apply" disclosure	The call-to-action must include the message and data rate disclosure, as mandated by U.S. carriers. Update the call-to-action and resubmit.
Call-to-action does not contain complete terms and conditions OR link to complete terms and conditions	The call-to-action must include a link to the message program terms and conditions, or the complete message program terms and conditions language. Update the call-to-action and resubmit.
Call-to-action does not contain link to privacy policy OR state that mobile opt-in data will not be shared with third parties	Mobile opt in data (that is, the end user's phone number) cannot be shared with third parties. The call-to-action must include a link to the message program privacy policy, or language referring to the privacy policy, that indicates that mobile opt-in data will not be shared. Update the call-to-action and resubmit.
Call-to-action does not obtain express written consent for promotional message content	For promotional message programs, the callto-action must show that express written consent was obtained from the end user before sending

	promotional message content. Update the call-to-action and resubmit.
Call-to-action does not contain robust age gate for age-restricted message program (alcohol/firearms/tobacco)	Message content related to age-restricted goods, such as alcohol or tobacco, is not permitted without an age gate mechanism. An acceptable age gate would consist of, at minimum, a recipient entering a day, month, and year confirming their age at messaging optin prior to receiving messaging. If the call-toaction indicates that the message program will be sending this type of content, and no age

	gate is in place, the campaign will be rejected. Implement age gate and resubmit.
Call-to-action is missing/inaccessible	There is no call-to-action URL provided in the campaign description, or the URL provided is inaccessible. You must provide evidence of a compliant opt-in process via either a live opt-in URL, or a URL to a hosted opt-in image (screenshot or mock-up). Update the call-toaction description to include the call-to-action URL and resubmit.
Call to action appears to have multiple types of opt ins in a single CTA which does not make SMS consent optional or clear.	All CTA's must obtain consent via proper consent mechanism for SMS. Update and resubmit.

Message flow rejections

Attributes missing	Recommended action
Opt-in message/Confirmation MT does not contain registered/DBA brand name	The company name in the opt-in message must match the registered brand name. Update the opt-in message and resubmit.
Opt-in message/Confirmation MT does not contain HELP instructions (for example, Reply HELP for help)	The Opt-in message/Confirmation MT must include instructions on how the end user can receive further support from the brand regarding the message program (for example, reply HELP for help). Update the opt-in message and resubmit.
Opt-in message/Confirmation MT does not contain opt-out instructions (for example, Reply STOP to stop)	The Opt-in message/Confirmation MT must include instructions on how the end user can opt-out of the message program (for example, , Reply STOP to opt-out). Update the opt-in message and resubmit.

Opt-in message/Confirmation MT does not contain message frequency disclosure (#msgs/mo, msg frequency varies, recurring messages, and so on.)	The Opt-in message/Confirmation MT must include the frequency at which messages will be sent to end users (for example, msg frequency varies, recurring messages, and so on.). Update the opt-in message and resubmit.
Opt-in message/Confirmation MT does not contain clear and conspicuous language about any associated fees or charges and how those charges will be billed. (for example, "message and data rates may apply" disclosure)	The Opt-in message/Confirmation MT must include clear and conspicuous language about any associated fees or charges and how those charges will be billed. Add "message and data rate disclosure" in the opt in/confirmation MT and resubmit.
Opt-in message/confirmation MT not provided	An Opt-in message/Confirmation MT is required for all recurring programs. Update the campaign to include the required message with all required elements as outlined in CTIA best practices.

HELP message does not contain registered/DBA brand name	The company name in the HELP message must match the registered brand name. Update the HELP message and resubmit.
HELP message does not contain support contact (email, phone number, or support website)	The HELP message must include customer care contact info (such as an email address, phone number, or link to a support website) informing the end user how they can receive further support. Update the HELP message and resubmit.
HELP message support contact email address does not match the registered brand support email address	If an email address is provided in the HELP message as the customer care contact info, it should match the email address that was registered as the support contact email shown in TCR. Update the HELP message and resubmit.
Opt-out message does not contain registered/DBA brand name	The company name in the Opt Out message must match the registered brand name. Update the STOP MT and resubmit.
Opt-out message does not indicate that no further messages will be sent	The opt-out message must clearly indicate that the end user will no longer receive further messages from the brand/message program. Update the opt-out message and resubmit.
Sample message(s) do not contain registered/DBA brand name	The company name in the sample messages must match the registered brand name. Update the sample messages and resubmit.

Sample message(s) contain public URL shortener	Public URL shorteners such as bit.ly or tinyURL are not permitted to be sent in 10DLC message content. Update sample messages to use a branded URL shortener and resubmit.
Sample message(s) use case does not match declared use case(s)	The use case indicated in the sample messages must match the registered use case. Update the sample messages or register the campaign again with the correct use case and resubmit.

Disallowed content

Attributes missing	Recommended action
This brand or program references third-party job boards.	Messaging content related to third party job boards is not permitted. This is considered disallowed content.
This brand or program appears to be lead generation or affiliate marketing.	The brand website or messaging content examples appear to be lead generation or affiliate marketing. These are disallowed content types.
This brand or program appears to include disallowed content - gambling.	Message content related to gambling is not permitted. If the brand's website indicates that its message program will be sending this type of content, the campaign will be rejected.

This brand or program appears to include disallowed content - high risk financial services	Message content related to high-risk financial services, such as short-term loans or cryptocurrency, is not permitted. If the brand's website indicates that their message program will be sending this type of content, the campaign will be rejected.
This brand or program appears to include disallowed content - illegal substances	Message content related to federally illegal drugs, such as cannabis, is not permitted. If the brand's website indicates that its message program will be sending this type of content, the campaign will be rejected.
This brand or program appears to include disallowed content - SHAFT (sex) with no robust age gate	Message content related to age-restricted products or content, such as sexually explicit items or images, is not permitted without a roust age gate. Implement age gate and a resubmit.
This brand or program appears to include disallowed content - SHAFT (alcohol/firearms/tobacco/vape) with no robust age gate	Message content related to age-restricted products, such as alcohol or tobacco, is not permitted without a roust age gate. Implement age gate and a resubmit.

This brand or program appears to include disallowed content - competitive marketing.	Message content that promotes or markets services that are competitive in nature to the US operators will be rejected.
This brand or program appears to include disallowed content - weapons that are not legal in all 50 states.	Message content related to certain weapons which are not legal in all 50 states is not permitted. If the brand's website indicates that its message program will be sending this type of content, the campaign will be rejected.
This brand or program appears to include disallowed content - 3rd party debt collection	Third-party debt collection messages are not permitted. This includes messaging related to debt forgiveness, debt consolidation, debt reduction, or credit repair programs. Messaging related to debt forgiveness, debt consolidation, debt reduction, or credit repair programs is not permitted the campaign will be rejected.
This brand or program appears to include disallowed content - firearms that are not legal in all 50 states.	Message content related to firearms which are not legal in all 50 states is not permitted. If the brand's website indicates that its message program will be sending this type of content, the campaign will be rejected.

Use case missing or mismatched

Attributes missing	Recommended action
Brand website or campaign references charitable donations and the declared use case is not charity	If the brand's website or campaign information indicates that they are soliciting charitable donations through their message program, then the campaign use case should be Charity.
	Register the campaign again with the correct use case and resubmit.
Brand website or campaign references political content and declared use case is not political	If the brand's website or campaign information indicates that they are sending political content through their message program, then the campaign use case should be Political. Register the campaign again with the correct use case and resubmit.
Brand website or campaign references cart reminders but declared use case is not marketing.	If the brand's website or campaign information indicates that they are sending abandoned shopping cart notifications through their message program, then the campaign use case should be marketing. Register the campaign again with the correct use case and resubmit.
Brand website or campaign references multiple use cases but only one declared use case is selected	If the program will support multiple use cases all use cases must be declared. Register the

	campaign again with the correct use cases and resubmit.

Use case submission does not meet requirements	
Attributes missing	**Recommended action**
Campaign submitted is POLITICAL but does not contain the required information for this use case	Political message programs must include: Politician/Organization Name FEC Committee ID Politician/Organization Website as part of the submission. These should be included in the program summary so we can confirm this information during the review.
Campaign submitted is CHARITY but does not contain the required information for this use case	CHARITY programs must provide the following information in the Campaign Description/Program Summary for appropriate review. Provide the following Charitable Organization information for proof of qualified as tax-exempt under Section 501(c)(3) of the Internal Revenue Code: 1. Name of Company/Non-Profit Organization 2. Tax Identification (EIN) 3. Charitable Organization Website 4. Accreditation Organization Website Listing Company/Non-Profit