

Optus Message Flow Infringements and Actions Required					
	Infringements	Severity	Actions Required		
Subscription Request	Programme	Failure to send subscription request message 4.4.1	1	Send subscription request message, instructing customer to send MO message to shortcode	
		Multiple subscription request messages resent 4.4.6	1	Resend <i>only one</i> subscription request message and <i>only</i> within <i>one</i> hour of first subscription request message sent	
		Unapproved Optus endorsement or use of Optus name 4.4.1	1	Remove Optus endorsement or Optus name	
		No message quantity 4.4.1	1	Display actual message quantity for which customer will be billed per charge period	
		Duplicate double opt-in keyword 4.4.6	1	Ensure double opt-in keyword is unique for shortcode and service	
		Double opt-in keyword fails to express clear and positive intention to proceed 4.4.6	1	Ensure word used as double opt-in keyword is expression indicating clear and positive intention to proceed	
		Double opt-in keyword displayed within insufficient proximity to pricing and subscription charge period 4.4.2	2	Display double opt-in keyword within sufficient proximity to pricing and subscription charge period, with no intervening text	
		Subscription request message resent later than permissible 4.4.8	2	Resend <i>only one</i> subscription request message and <i>only</i> within <i>one</i> hour of first subscription request message sent	
		Failure to preface subscription request message with "FreeMsg" 4.4.1	2	Preface all subscription request messages with "FreeMsg"	
		Misrepresentation of product offering 3.1.2	2	Display references to product type accurately, consistently, among all messages and ad	
		Misrepresentation of product quantity 3.1.2	2	Display product quantity accurately, consistently, among all messages and ad	
		Incorrect, unclear, or no product quantity 3.1.2	2	Display product quantity accurately, consistently, among all messages and ad	
		Misrepresentation of billed quantity	1	Display product quantity accurately, consistently, among billing	
		Failure to identify service 4.4.1; 4.4.9	2	Display service name in message body or header	
		Pricing	Failure to identify service or identify service clearly 4.4.1; 4.4.9	2	Display service name in message body or header and consistently in all messages and ad
	Failure to identify service clearly 4.4.1; 4.4.9		3	Display service name in message body or header and consistently in all messages and ad	
	Failure to disclose clearly duration of "free" period 3.1.14		3	State clearly duration of period during which service is delivered free of charge	
	Failure to disclose the homepage URL within the subscription charge confirmation		2	Disclose homepage URL within the subscription charge confirmation	
	No pricing 4.4.1		1	Display full, accurate pricing in prescribed format: \$XX.XX	
	No mention of signup cost 4.4.1		1	Disclose signup cost	
	Unclear pricing 4.4.1		2	Display full, accurate pricing in prescribed format: \$XX.XX	
	Unclear or conflicting pricing 4.4.1		2	Display pricing accurately, consistently, in prescribed format in all messages and ad: \$XX.XX	
	Conflicting pricing 4.4.1		2	Display pricing accurately, consistently, in prescribed format in all messages and ad: \$XX.XX	
	Use of the term <i>free</i> , implying product comes without charge 3.1.14		2	Remove the term <i>free</i>	
	Subscription		No subscription disclosure 4.4.3	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in subscription request or subscription confirmation message
			No subscription charge period or unclear charge period 4.4.1	2	Express subscription charge period per time interval such as day, week, or month
	T&Cs	No local-charge or free-call Helpline number 4.4.1	1	Display local-charge or free-call Helpline number	
		Alphanumeric Helpline number 4.4.1	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)	
		No unsubscribe information 4.4.1	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"	
		Unclear or incorrect unsubscribe information 4.4.1	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"	
		Unsubscribe information positioned incorrectly 4.4.2	2	Display unsubscribe information <i>after</i> service name, pricing, charge period, and double opt-in keyword	
		Helpline number positioned incorrectly 4.4.2	2	Display local-charge or free-call Helpline number <i>after</i> service name, pricing, charge period, and double opt-in keyword	
	Subscription Confirmation	Programme	Failure to send subscription confirmation message within one business day of receiving customer opt-in MO 4.4.4	1	Send subscription confirmation message within one business day of receiving customer opt-in MO
Failure to require double opt-in 4.4.4b			1	Require customer to send MO message to shortcode before sending billed MT	
Failure to send subscription confirmation message before other service messages 4.4.4			1	Send subscription confirmation message before other subscription service messages	
Subscription confirmation message sent as paid message, without content 4.4.5			1	Include content with subscription confirmation message, if sent as paid message	
Subscription confirmation message sent as WAP push 4.3.4; 4.4.5			1	Send subscription confirmation message as standard SMS message only	
Unapproved Optus endorsement or use of Optus name 4.4.4			1	Remove Optus endorsement or Optus name	
Contains unauthorised marketing elements 3.1.23			1	Remove unauthorised marketing elements from subscription confirmation message	
Subscription		Misrepresentation of product offering or product quantity 3.1.2	2	Display references to product type accurately, consistently, among all messages and ad	
		Failure to identify service 4.4.9	2	Display service name in message body or header	
		Failure to identify service clearly 4.4.9	3	Display service name in message body or header and consistently among all messages and ad	
Non-subscription WAP Purchase Confirmation	Programme	No subscription disclosure 4.4.3	1	Disclose subscription nature of offer at start of message by displaying word <i>subscribe</i> or <i>subscription</i> in subscription request or subscription confirmation message	
		Failure to send purchase confirmation message 4.3.2	1	Send purchase confirmation message, instructing customer to send MO message to shortcode	
		Unapproved Optus endorsement or use of Optus name 4.3.2	1	Remove Optus endorsement or Optus name	
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from purchase confirmation message	
		Failure to preface purchase confirmation message with "FreeMsg" 4.3.2	2	Preface all purchase confirmation messages with "FreeMsg"	
	Pricing	Failure to identify service or identify service clearly 4.3.2	2	Display service name consistently in all messages and ad	
		Multiple purchase confirmation messages 4.3.2	3	Refrain from sending more than one purchase confirmation message per customer request	
		No pricing 4.3.2	1	Display full, accurate pricing in prescribed format: \$XX.XX	
	T&Cs	Conflicting or unclear pricing 4.3.2	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX	
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	3	Remove the term <i>free</i>	
\$30 Expenditure Update	Programme	No local-charge or free-call Helpline number 4.3.2	3	Display local-charge or free-call Helpline number	
		Alphanumeric Helpline number 4.3.2	3	Display local-charge or free-call Helpline number entirely in numerals (no letters)	
		Failure to send \$30 expenditure update 4.3.4; 4.4.11	1	Send expenditure update each time customer incurs \$30 in mobile content fees during single calendar month	
		\$30 expenditure update sent as WAP push 4.3.4; 4.4.11	1	Send \$30 expenditure updates as standard SMS message only	
		Unapproved Optus endorsement or use of Optus name 4.3.5; 4.4.12	1	Remove Optus endorsement or Optus name	
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from \$30 expenditure update	
	Subscription	Failure to preface expenditure update with "FreeMsg" 4.3.5; 4.4.12	2	Preface all expenditure updates with "FreeMsg"	
		Failure to identify service 4.3.5; 4.4.12; 4.4.9	3	Display service name or shortcode in message body or header	
		Failure to identify service clearly 4.3.5; 4.4.12; 4.4.9	3	Display service name in message body or header and consistently among all messages and ad	
		No subscription disclosure 4.4.12	1	Disclose subscription nature of offer	
T&Cs	No local-charge or free-call Helpline number (subscription services only) 4.4.12	1	Display local-charge or free-call Helpline number		
	Alphanumeric Helpline number (subscription services only) 4.4.12	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)		
	No unsubscribe information (subscription services only) 4.4.12	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"		

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\$30 Expenditure Update	T&Cs	Unclear unsubscribe information [subscription services only] 4.4.12	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Incorrect unsubscribe information [subscription services only] 4.4.12	2	Display STOP as unsubscribe command
30-Day Reminder [subscription only]	Programme	Failure to send 30-day reminder 4.4.13	1	Send 30-day reminder to subscription customers who have not had occasion to receive \$30 expenditure update during single calendar month
		30-day reminder sent as WAP push 4.4.13	1	Send 30-day reminders as standard SMS message only
		Unapproved Optus endorsement or use of Optus name 4.4.14	1	Remove Optus endorsement or Optus name
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from 30-day reminder
		Failure to preface reminder with "FreeMsg" 4.4.14	2	Preface all reminders with "FreeMsg"
		Failure to identify service 4.4.14; 4.4.9	2	Display service name in message body or header
	Pricing	Failure to identify service clearly 4.4.14; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
		No pricing 4.4.14	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Conflicting pricing 4.4.14	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
		Unclear pricing 4.4.14	3	Display full, accurate pricing in prescribed format: \$XX.XX
	Subscription	Use of the term free, implying product comes without charge 3.1.14	3	Remove the term free
		No subscription charge period 4.4.14	2	Display subscription charge period
	30-Day Reminder cont.	T&Cs	Unclear subscription charge period 4.4.14	2
No local-charge or free-call Helpline number 4.4.14			1	Display local-charge or free-call Helpline number
Alphanumeric Helpline number 4.4.14			1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
No unsubscribe information 4.4.14			1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Unclear unsubscribe information 4.4.14			2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Incorrect unsubscribe information 4.4.14			2	Display STOP as unsubscribe command
Programme		Incorrect or unclear unsubscribe information 4.4.14	2	Display STOP as unsubscribe information, including "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from chat warning message
		Failure to identify service [subscription services only] 3.1.2; 4.4.9	2	Display service name in message body or header
		Failure to send chat service warning message 4.1.8	3	Send chat service warning message alerting customer to potential dangers of disclosing personal details via chat
Chat Warning	Programme	Failure to identify service clearly [subscription services only] 3.1.2; 4.4.9	3	Display service name in message body or header and consistently in all messages and ad
		Failure to alert customer to potential dangers of disclosing personal details via chat 4.1.8	3	Express in chat warning message potential dangers of disclosing personal details via chat
		Failure to send chat service welcome message 4.3.6	1	Send chat service welcome message
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from chat welcome message
	Pricing	Misrepresentation of product offering 3.1.2	2	Display references to product type accurately, consistently, among all messages and ad
		Misrepresentation of message quantity 3.1.2	1	Display actual message quantity for which customer will be billed per charge period
		Failure to identify service 4.3.6	2	Display service name
		Failure to identify service clearly 4.3.6	3	Display service name consistently in all messages and ad
		Failure to preface chat service welcome message with "FreeMsg" 4.3.6	3	Preface all chat service welcome messages with "FreeMsg"
		No pricing 4.3.6	1	Display full, accurate pricing in prescribed format: \$XX.XX
	T&Cs	Unclear pricing 4.3.6	2	Display full, accurate pricing in prescribed format: \$XX.XX
		Unclear or conflicting pricing 4.3.6	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
		Conflicting pricing 4.3.6	2	Display pricing accurately, consistently, in prescribed format among all messages and ad: \$XX.XX
Use of the term free, implying product comes without charge 3.1.14		3	Remove the term free	
No local-charge or free-call Helpline number 4.3.6		1	Display local charge or free-call Helpline number	
Alphanumeric Helpline number 4.3.6		1	Display local-charge or free-call Helpline number entirely in numerals (no letters)	
No charge period 4.3.6		3	Display charge period	
Paid	Programme	Unclear charge period 4.3.6	3	Express charge period per message or per message pair
		Failure to preface paid message with "SMsg" 5.2.8	1	Preface all paid messages with "SMsg"
Single Purch.	Programme	Failure to identify service or identify service clearly [subscription services only] 4.4.9	2	Display service name in message body or header and consistently among all messages and ad
		Failure to require customer opt-in 5.1.2	1	Require customer to send MO message to shortcode before sending billed MT
		Failure to preface paid message with "SMsg" 5.2.8	1	Preface all paid messages with "SMsg"
		Failure to preface service messages with "FREEMSG" (One Off MO charge ONLY)	1	Preface all free messages with "FREEMSG"
Reverse Char.	Programme	Misrepresentation of billed message quantity 3.1.2	1	Ensure billed message quantity in message flow reflects billed message quantity in ad
		Failure to require customer opt-in [MO-initiated services only] 5.1.2	1	Require customer to send MO message to shortcode before sending billed MT
		Failure to preface paid message with "SMsg" 5.2.8	1	Preface all paid messages with "SMsg"
Free Period	Programme	Multiple MT messages triggered by single charge 5.2.3	1	Send single MT message per charge to customer
		Failure to send message that "free" period is over 3.1.14	1	Send message notifying customer that "free" period is over and charges will commence
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from "free" period message
	T&Cs	Failure to preface "free" period message with "FreeMsg" 3.1.14	2	Preface all "free" period messages with "FreeMsg"
		No local-charge or free-call Helpline number 3.1.14	1	Display local-charge or free-call Helpline number
		Alphanumeric Helpline number 3.1.14	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
		No unsubscribe information 3.1.14	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Unclear or incorrect unsubscribe information 3.1.14	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
	Charges and Billing	Failure to disclose clearly duration of "free" period 3.1.14	3	State clearly duration of period during which service is delivered free of charge
		No mention of impending charges 3.1.14	2	Remind customer to expect impending charges and the amount in prescribed format: \$XX.XX
Marketing	Programme	Unclear or conflicting impending charges 3.1.14	3	State amount of impending charges accurately, consistently, clearly in prescribed format: \$XX.XX
		Unauthorised marketing message or messages 3.1.23	1	Refrain from sending marketing messages to customers who decline option or opt out
		Message sender not identified 3.1.17	1	Identify message sender clearly and accurately in all marketing messages (identify content provider by name)
		Unclear or inaccurate identification of message sender 3.1.17	1	Identify message sender clearly and accurately in all marketing messages (identify content provider by name)
		Unapproved Optus endorsement or use of Optus name 3.1.2	1	Remove Optus endorsement or Optus name

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Marketing	Programme	Contains adult-related language or concepts 3.1.17	1	Remove adult-related language or concepts from all marketing messages
		Failure to preface marketing message with "FreeMsg" 3.1.17	2	Preface all marketing messages with "FreeMsg"
		Implies message is personal or suggests false imperative 3.1.17	2	Refrain from implying marketing message is personal or suggesting false imperative
		Multiple marketing messages sent per week 3.1.18	2	Refrain from sending more than one marketing message per week
		Failure to clearly disclose marketing of any type (Internal and External)	2	Clearly disclose if any marketing messages will be associated to the programme
Marketing cont.	Pricing	No pricing 3.1.22	1	Display full, accurate pricing in prescribed format: \$XX.XX
		Use of the term <i>free</i> , implying product comes without charge 3.1.14	2	Remove the term <i>free</i>
	T&Cs	No unsubscribe information 3.1.17	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
Error	Programme	Unclear or incorrect unsubscribe information 3.1.17	2	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
		Failure to send error message 5.1.9; 5.1.10	1	Send message promptly informing customer that message has not been recognised
		Failure to preface error message with "FreeMsg" 5.1.9; 5.1.10	2	Preface all error messages with "FreeMsg"
		Failure to confirm error 5.1.9; 5.1.10	2	Inform customer message has not been recognised
	T&Cs	Failure to identify service clearly 5.1.9; 5.1.10	3	Display service name consistently in all messages and ad
Unsubscribe Confirmation Message (Subs. only)	Programme	No local-charge or free-call Helpline number 5.1.9; 5.1.10	1	Display local-charge or free-call Helpline number
		Failure to respond within one business day to customer message to STOP service 7.2.5	1	Send message promptly informing customer that service has been terminated and that no more messages will be sent
		Customer STOP message not recognised 7.2.4	1	Treat as STOP request any message containing the word "stop"
		Unapproved Optus endorsement or use of Optus name 3.1.2	1	Remove Optus endorsement or Optus name
		Contains unauthorised marketing elements 3.1.23	1	Remove unauthorised marketing elements from unsubscribe confirmation message
		Failure to preface unsubscribe confirmation message with "FreeMsg" 7.2.6	2	Preface cancellation confirmation message with "FreeMsg"
		Failure to confirm service termination 7.2.5	2	Inform customer that service has been terminated
		Failure to identify service 4.4.9; Optus PSPP	2	Display service name in message body or header
Failure to identify service clearly 4.4.9; Optus PSPP	3	Display service name in message body or header and consistently in all messages and ad		
General Conduct	Programme	Unauthorized subscription request message within the unsubscribe confirmation message	3	Remove unauthorized subscription request
		Full service is not available to Optus, and this is not explained in the T&C's	3	Fully disclose around services that are available to Optus customers in the T&C's
		Service must match what is provisioned in OPC	2	Service name, service description, and pricing must match OPC
		Parental consent must be documented in writing for any image of minors linked to a PSMS/DCB offer	1	Provide documented authorisation
		Offer incentivized by disapproved promotions, content, products or services ◊	1	Discontinue offer immediately
		Offer incentivized by unrelated promotions, content, products or services ◊	1	Discontinue offer immediately
		Content is achieving value for money	2	Customer is receiving a reasonable amount of content for cost of product. Customer is to receive the maximum benefit from the service.
		Failure to bill the correct incurred charges	1	Ensure that all charges billed to the end user match the program
Member service content is inaccessible/non-functional	1	Ensure that member content is available		

Optus Message Flow Infringements and Actions Required rev 1.12

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► ◊ Subject to immediate escalation to Optus.

⚡Affiliate marketing – Refers to, in most instances, the use of 3rd party advertisements presented within the same flow as an approved program. Also known as, but not limited to, "Stacked Marketing," "Partner Programs," or "Referral Programs". The scope of the definition may broaden depending on the facts of each particular case, in which instance, it is Optus' discretion to broaden the definition accordingly.

µCross-Selling – A series of unrelated offers (same or different sponsors) in close succession within the same online user flow. The scope of the definition may broaden depending on the facts of each particular case, in which instance, it is Optus' discretion to broaden the definition accordingly.