10DLC Vetting Manual

Summary to Vetting Procedures and Standards

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Summary Version:

A Call-to-Action (CTA) ensures that consumers consent to receive text messages and understand the nature of the messaging program. The CTA must include:

- **Program name/product description**
- **Message frequency disclosure**
- **"Message and Data Rates May Apply"**
- **STOP keyword for opting out**
- **Terms and conditions or a link to them**
- **Privacy policy or a link to it**
- **Opt-in language specific to text messages only, not email or phone calls**

For compliance, include all necessary URLs (terms and privacy policy) and use clear opt-in mechanisms like keywords, forms, or verbal consent. It's important to use robust age verification for select content.

Key Principles:

1. **Implied Consent: No additional permission is needed if the consumer initiates the text. Sending an express consent prompt (double opt-in) is recommended.**
2. **Express Consent: Consumers must explicitly opt-in via text, form, website, or verbally, with details like the program name and opt-out instructions.**
3. **Opt-in Confirmation: A confirmation message should always follow opt-in, with clear information on how to opt-out and program details.**

Best Practices:

- **Ensure transparency in messaging programs so consumers only receive messages they've opted into.**
- **Acknowledge and act on all opt-out requests.**
- **Comprehensive terms and privacy policies must include program details, message types, frequency, and any potential data sharing, with robust privacy protection in place.**

In conclusion, compliance in SMS campaigns hinges on clear, transparent consent mechanisms, comprehensive terms, and proper handling of consumer data, ensuring a smooth and legal communication experience.

Overview of 10DLC Campaign Vetting at Tychron:

The use of 10DLC enables businesses to send application-to-person / Non-Consumer to Consumer (A2P) messages through standard 10-digit long codes. Tychron, in collaboration with carriers, implements a rigorous vetting process to ensure all messaging campaigns are in line with the industry's compliance requirements and avoid violations such as spam, deception, or abuse.

Key Vetting Criteria for Campaign Approval

1. Call-to-Action (CTA):
   - All campaigns must include clear Call-to-Action (CTA) language to ensure consumer consent. The CTA should inform users of the nature of the program and the frequency of messages, as well as providing opt-in and opt-out instructions.
   - A direct link to the terms and conditions if applicable and/or privacy policy must be included under the CTA, ensuring transparency and regulatory compliance.

2. Business Verification:
   - Tychron requires all businesses to submit proof of identity, including legal business documentation, for validation and/or have the brand verified in The Campaign Registry. This ensures that only credible entities can send A2P messages using Tychron's 10DLC services.

3. Opt-In Consent:
   - Campaigns must include evidence of explicit consumer consent before sending any messages. Opt-ins can occur through web forms, text messages, or verbal agreements, but must be documented and compliant with TCPA guidelines.
   - All opt-in processes must be voluntary, meaning businesses cannot force customers to provide their phone number for texting as a mandatory field, however, phone numbers can be required for non-marketing purposes provided proper carrier disclosers are presented in the CTA.

4. Content Review:
   - Tychron's team reviews the content of all messaging campaigns to ensure it meets carrier requirements. Content promoting illegal, deceptive, or inappropriate material as outlined in the carrier code of conduct will not be approved.

5. Opt-Out Mechanism:
   - All campaigns must provide users with a clear opt-out mechanism, typically by replying with "STOP." This should be included in both the opt-in message and any subsequent communications.

Campaign Vetting Workflow

1. Campaign Submission:
   - Businesses submit their campaign details and documentation through Tychron's dedicated - vetting platform or API. This includes messaging templates, consent collection methods, and business verification details.

2. Initial Vetting:
   - Tychron's vetting team conducts a preliminary review of the submission to ensure completeness and initial compliance with 10DLC standards. Missing or incomplete information will result in the campaign being flagged for further review / clarification.

3. Detailed Content and Consent Review:
   - The review team analyzes the message content for clarity, accuracy, and compliance. Additionally, opt-in and opt-out mechanisms are scrutinized for proper implementation.

4. Approval or Denial:
   - Campaigns that meet all vetting standards are approved and can begin messaging upon final approval from the DCA or carriers. Campaigns that fail to meet the criteria are denied, with

businesses receiving detailed feedback on what needs to be corrected before resubmission.

Compliance Monitoring and Auditing

Tychron maintains ongoing monitoring of all approved 10DLC campaigns to ensure they remain compliant over time:
- Audits: Random audits are conducted to ensure that campaign content continues to comply with the standards set during vetting.
- Violations: Campaigns found in violation of compliance standards may be suspended, and businesses may be required to undergo re-vetting before resuming messaging.

Data Privacy and Security

As a part of the vetting process, Tychron ensures that all businesses comply with data privacy regulations as required by the Mobile Network Operators (MNOs):
- Privacy Policy: Businesses are required to provide a clear privacy policy detailing how consumer data, including SMS opt-in consent, is handled.
- Data Sharing Restrictions: SMS opt-in data may not be shared with third parties unless explicitly related to the services offered by the messaging campaign. Data sharing for unrelated services is strictly prohibited.

Appeals and Re-Submission Process

Should a campaign be denied, Tychron offers an appeals process where businesses can address the reasons for denial:
1. Appeal Submission:
   - Businesses can submit an appeal through the vetting portal, providing additional documentation or clarifying previous submissions.
2. Re-evaluation:
   - The Tychron vetting team will re-evaluate the campaign based on the appeal and provide a final decision generally within 5 business days.

Conclusion

The Tychron 10DLC campaign vetting process ensures that businesses can leverage SMS messaging responsibly and in compliance with industry regulations. By following this guide, businesses can streamline their campaign approval process and confidently engage with their customers through 10DLC messaging.

Have More Questions?

We're here to assist! connect with one of our industry experts to get the insights you need. Communication can be challenging — Tychron makes it simple.

Messaging Resources

Gain a better understanding of the mobile messaging landscape to improve your messaging strategy and stay compliant with industry standards.

A selection of helpful resources for an informed messaging strategy.

- **AT&T Code of Conduct**
- **T-Mobile Code of Conduct**
- **CTIA - Messaging Principles and Best Practices**
- **CTIA - Short Code Monitoring Handbook**
- **CTIA - Political Text Messaging: Engaging and Organizing Voters While Protecting Consumers**
- **10DLC Use Case Selection Guide**
- **M3AAWG Best Practices**
- **M3AAWG Mobile Messaging Best Practices for Political Programs in the United States**
- **Telephone Consumer Protection Act (TCPA) Omnibus Declaratory Ruling (FCC 15-72)**
- **FCC Small Entity Compliance Guide**
- **FTC Truth in Advertising**
- **Canada Anti-Spam Legislation**
- **Canada Short Code Guidelines**