

A Guide to Compliance on the Optus, Telstra and, VHA Networks: Helpline

	No.	Infringements	Explanations of Actions Required
Helpline	T1	Helpline number nonfunctional 6.1.4	Operate fully functional Helpline 24 hours/day, 7 days/week. Callers must have access to customer assistance 24 hours/day, 7 days/week, and content providers ultimately assume responsibility for making this level of assistance readily available. A Helpline number that simply fails to function is unacceptable. Moreover, content providers relying on their aggregator to provide Helpline services must ensure the aggregator is delivering the customer assistance via a fully functional Helpline that complies with the Helpline Audit Standards. See also No. T3.
	O1 V1	Helpline number nonfunctional 6.1.4	Operate fully functional Helpline. Callers must have access to customer assistance, and content providers ultimately assume responsibility for making this level of assistance readily available. A Helpline number that simply fails to function is unacceptable. Moreover, content providers relying on their aggregator to provide Helpline services must ensure the aggregator is delivering the customer assistance via a fully functional Helpline that complies with the Helpline Audit Standards. See also No. O3 and V3.
	T2	Helpline number displayed inconsistently 6.1.4	Ensure Helpline number displayed in advertisement matches Helpline number displayed at www.19sms.com.au. To avoid confusion for callers, content providers must ensure that the Helpline number they display in their advertisements and service messages matches exactly the Helpline number of record for the associated shortcode listed at www.19sms.com.au.
	O2	Helpline number displayed inconsistently 6.1.2	Ensure Helpline number displayed in advertisement matches Helpline number displayed in OPC. To avoid confusion for callers, content providers must ensure that the Helpline number they display in their advertisements and service messages matches exactly the Helpline number of record for the associated shortcode listed at http://partnerconnect.optusnet.com.au .
	V2	Helpline number displayed inconsistently 6.1.2	Ensure Helpline number displayed in advertisement matches Helpline number displayed in MPAPS and Hermes. To avoid confusion for callers, content providers must ensure that the Helpline number they display in their advertisements and service messages matches exactly the Helpline number of record for the associated shortcode listed in MPAPS and Hermes.
	T3	Helpline unavailable outside normal business hours 6.1.4	Operate fully functional Helpline 24 hours/day, 7 days/week. Callers must have access to customer assistance 24 hours/day, 7 days/week, and content providers ultimately assume responsibility for making this level of assistance readily available. A Helpline number that fails to function outside normal business hours is unacceptable. Moreover, content providers relying on their aggregator to provide Helpline services must ensure the aggregator is delivering the customer assistance via a fully functional Helpline that complies with the Helpline Audit Standards.
	O3 V3	Helpline unavailable outside normal business hours 6.1.4	Operate functional Helpline 24 hours/day, 7 days/week for premium messaging subscription services. Callers must have access to customer assistance 24 hours/day, 7 days/week for premium messaging subscription services, and content providers ultimately assume responsibility for making this level of assistance readily available. A Helpline number that fails to function outside normal business hours is unacceptable. Moreover, content providers relying on their aggregator to provide Helpline services must ensure the aggregator is delivering the customer assistance via a fully functional Helpline that complies with the Helpline Audit Standards.

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Helpline continued	4	Helpline unavailable to blocked or landline number 6.1.2	Operate fully functional Helpline regardless of Party A call method. Content providers may not block Helpline services from any phone number, regardless of the method <i>Party A</i> employs in making the phone call. (<i>Party A</i> refers to the party initiating the phone call, namely the customer). Services that instruct customers to call from the mobile number used to subscribe will be considered unacceptable and will be cited for this infringement. A Helpline number that fails to function outside normal business hours also is unacceptable. Moreover, content providers relying on their aggregator to provide Helpline services must ensure the aggregator is delivering the customer assistance via a functional Helpline that complies with the Helpline Audit Standards. See also Nos. T1, O1, V1, T3, O3, and V3.
	5	Helpline number not associated with genuine source of assistance 6.1.2	Ensure helpline number connects to genuine source of assistance. Content providers may not block Helpline services from any phone number, regardless of the method <i>Party A</i> employs in making the phone call. (<i>Party A</i> refers to the party initiating the phone call, namely the customer). Services that instruct customers to call from the mobile number used to subscribe will be considered unacceptable and will be cited for this infringement. A Helpline number that fails to function outside normal business hours also is unacceptable. Moreover, content providers relying on their aggregator to provide Helpline services must ensure the aggregator is delivering the customer assistance via a functional Helpline that complies with the Helpline Audit Standards.
IVR System	6	IVR system unavailable during normal business hours 6.1.4	Operate IVR system or staff Helpline with live agent from 9:00 A.M. to 5:00 P.M. AEST, business days. Callers must be able to opt out of marketing messages and unsubscribe from services any time they choose. Therefore, content providers must ensure their Helpline operates an IVR system 24 hours/day, 7 days/week, allowing subscribers to stop marketing messages or cancel their service. However, content providers may choose to staff their helpline from 9:00 A.M. to 5:00 P.M. AEST, business days, to allow subscribers to stop marketing messages or cancel their service. See also No. 7.
	7	IVR system unavailable outside normal business hours 6.1.4	Operate IVR system or staff Helpline with live agent from 5:00 P.M. to 9:00 A.M. AEST, business days, and 24 hours/day, Saturday, Sunday, and public holidays. Callers must be able to opt out of marketing messages and unsubscribe from services any time they choose. Therefore, content providers must ensure their Helpline operates an IVR system 24 hours/day, 7 days/week, allowing subscribers to stop marketing messages or cancel their service outside, as well as during, normal business hours. However, content providers may choose to staff their helpline 24 hours/day, 7 days/week to allow subscribers to stop marketing messages or cancel their service.
	8	No option to unsubscribe by entering mobile number or leaving voicemail message via IVR system 6.1.4	Allow callers to unsubscribe by entering mobile number or leaving voicemail message via IVR system. Content providers' Helpline IVR systems must allow subscribers the option to cancel their service by simply entering their mobile number, or leaving a voicemail message, and one of these options must be fully functional 24 hours/day, 7 days/week. Further, so subscribers can be certain their service has been cancelled, content providers must send them a unsubscribe confirmation message confirming service termination. See also Nos. 9 and 21.

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	9	Attempt to unsubscribe from service via IVR system unsuccessful 6.1.4	Ensure callers can unsubscribe via IVR system. Callers must be able to opt out of subscription services any time they choose. Therefore, content providers must ensure their Helpline operates a <i>fully functional</i> IVR system 24 hours/day, 7 days/week, allowing subscribers to cancel their service. So subscribers can be certain their service has been cancelled, content providers must send them an unsubscribe confirmation message confirming service termination.
Answering Service	10	No mention that caller can leave voicemail message 6.1.4	Inform queuing callers they can leave voicemail message that will be returned. So callers are aware they can leave a message as an alternative to waiting for a live agent, content providers' Helpline IVR systems must advise them of this option, adding that their call will be returned within one business day. See also No. 13.
	T11	Caller attempt to leave voicemail message during normal business hours unsuccessful 6.1.4	Ensure callers can leave voicemail message 24 hours/day, 7 days/week. Queuing callers unsuccessful in reaching a live agent within 2 minutes, 30 seconds, must be allowed the option to leave a message, including a complaint if they wish. Content providers must return such calls within one business day.
	O11 V11	Caller attempt to leave voicemail message during normal business hours unsuccessful 6.1.4	Ensure callers can leave voicemail message during business hours if call not answered by live agent. During business hours as defined in paragraph 6.1.4(a) of the MPS Code, queuing callers unsuccessful in reaching a live agent within 2 minutes, 30 seconds, must be allowed the option to leave a voicemail message, including a complaint if they wish. Content providers must return such calls within one business day.
	T12	Caller attempt to leave voicemail message outside normal business hours unsuccessful 6.1.4	Ensure callers can leave message 24 hours/day, 7 days/week. Queuing callers unsuccessful in reaching a live agent within 2 minutes, 30 seconds, outside, as well as during, normal business hours, must be allowed the option to leave a message, including a complaint if they wish. Content providers must return such calls within one business day.
	13	Call not returned within one business day 6.1.4	Respond to all calls within one business day. Content providers are obligated to return, within one business day, all calls placed to their customer assistance Helpline.
Live Agent	14	No live agent available 6.1.4	Staff Helpline from 9:00 A.M. to 5:00 P.M. AEST, business days. Callers must have access to customer assistance 24 hours/day, 7 days/week, and the Helpline delivering this assistance must be staffed by a live agent or agents from 9:00 A.M. to 5:00 P.M. AEST, business days. Helpline numbers connecting callers to third or fourth parties that redirect their call, instead of connecting directly to a source of assistance (e.g., helpline connecting to an unrelated service and requiring callers to be placed on hold and redirected to the appropriate helpline number), are unacceptable and, hence, also will be cited for this infringement.
	15	No mention that call will be answered by live agent or that caller can leave voicemail message 6.1.4	Inform queuing callers that call will be answered by live agent or that they can leave voicemail message. Queuing callers opting to speak with a live agent must be informed that their call will be answered by a live agent, or they must be allowed the option to leave a voicemail message that the content provider must return within one business day.

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Live Agent continued	16	Caller unable to reach live agent or leave voicemail message 6.1.4	Answer all calls within 2 minutes, 30 seconds. Queuing callers opting to speak with a live agent must be greeted by a live agent within 2 minutes, 30 seconds, or they must be allowed the option to leave a message that the content provider must return within one business day. Simply looping queuing callers through a series of voicemail messages as they wait for a live agent constitutes an inadequate response
	17	Caller wait for live agent exceeds 2 minutes, 30 seconds 6.1.4	Answer all calls within 2 minutes, 30 seconds. Queuing callers opting, via a content provider's Helpline IVR system, to speak with a live agent must, indeed, be greeted by a live agent within 2 minutes, 30 seconds. Simply looping queuing callers through a series of voicemail messages as they wait more than 2 minutes, 30 seconds, for a live agent constitutes an inadequate response.
	18	Agent fails to identify content provider in greeting 6.1.4	Ensure agent identifies content provider in greeting. Live agents greeting callers to customer assistance Helplines must identify the relevant content provider or, as appropriate, the aggregator. Services whose Helpline agent or agents fail to do so will be cited for this infringement.
	19	Attempt to unsubscribe from subscription service via live agent unsuccessful 6.1.4	Ensure callers can unsubscribe from subscription services via live agent. Callers must be able to cancel subscription services any time they choose. When rendering customer assistance, live agents must take whatever action is necessary to discontinue the services. Telling callers to effectively do it themselves by "sending STOP to the shortcode" will be regarded as unhelpful. Further, so subscribers can be certain their service has been cancelled, content providers must send them an unsubscribe confirmation message confirming service termination. Agents may confirm service termination verbally, but an unsubscribe confirmation message must ensue.
	20	Opt-out from marketing messages via live agent unsuccessful 6.1.4	Ensure callers can opt out of marketing messages via live agent. Content providers must allow subscribers the option to stop marketing messages. When rendering customer assistance, live agents must take whatever action is necessary to discontinue the marketing messages. Telling callers to effectively do it themselves by "sending STOP to the shortcode" will be regarded as unhelpful. So subscribers can be certain the marketing messages will cease, content providers must send a STOP message confirming marketing message termination. Agents may confirm the marketing message termination verbally, but a marketing STOP message must ensue.
Unsubscribe	21	Failure to send unsubscribe confirmation message within one business day 7.2.5	Send message promptly informing customer that service has been terminated and that no more messages will be sent.
	22	Failure to preface unsubscribe confirmation message with "FreeMsg" 7.2.6	Preface unsubscribe confirmation message with "FreeMsg." The unsubscribe confirmation message must always be sent at no charge to the customer. The fact that the customer incurs no charge is indicated clearly by prefacing the message with "FreeMsg."

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	No.	Infringements	Explanations of Actions Required
Unsubscribe Confirmation Message	23	Failure to confirm service termination 7.2.5	Inform customer that service has been terminated. Customers must be left in no doubt that their service has been cancelled, that they will receive no more messages associated with the cancelled service, and that no more charges associated with the cancelled service will appear on their mobile phone bill. Acceptable language for confirming service termination includes “You have unsubscribed”; “You are unsubscribed”; “You are now unsubscribed.” Examples of failure to confirm service termination include “Your details have been removed from our database”; “You have stopped”; “We’re sorry to see U go. U’ve lost all yr credits”; “Service is discontinued”; “UR no longer a Club member”; “To restart, reply FUN.”
	24	Failure to identify service Optus PSPP; Telstra rule; VHA rule	Display service name. Because a customer might opt into more than one service within a small space of time, thereby triggering multiple message flows for different products, services, or both, content providers must indicate clearly in their message flows the name of the related service. Moreover, the service name must not contradict the nature of the product or service on offer. See also No. 25.
	25	Failure to identify service clearly Optus PSPP; Telstra rule; VHA rule	Display service name consistently in unsubscribe confirmation message and ad. Content providers must ensure that they display the service name consistently throughout all messages and the ad from which the flow was generated. A message flow that displays the service name alternatively as, for example, “Giant Ringtone Bonanza,” “GRB, and “GRB club” will be cited for this infringement. At the same time, a message flow that displays the service name consistently throughout, yet fails to display the same service name that appears in the ad from which the message flow was generated, also will be cited for this infringement. All references to service name must be consistent throughout the message flow and the associated ad. Moreover, the service name must not contradict the nature of the product or service on offer.
	26	No content provider contact details 4.4.9	Display content provider contact details in Australia. Messages sent by a content provider as part of a subscription service should contain sufficient information to enable the customer to identify and contact the content provider or content supplier. Because the number of characters permitted in a message is limited, the most practical expression of content provider contact details, approved by the carriers, is a local-charge or free-call Helpline number.