

Telstra Shortcode Infringements and Actions Required			
	<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
<i>Programme</i>	Unauthorised adult services ^ψ Telstra rule	1	Discontinue offer immediately
	Unauthorised charity services ^ψ Telstra rule	1	Discontinue offer immediately
	No age limit for restricted services Telstra rule	1	Disclose that users must be age 18 or older to access restricted services
	No product or service disclosure 4.1.3	1	Disclose accurately, above fold in main body of ad, nature of product or service on offer
	Product or service disclosure illegible 4.1.3	1	Increase point size, alter colour scheme to improve contrast, or both
	Product or service disclosure displayed inside graphic 4.1.3	1	Display product or service disclosure above fold in main body of ad and unobscured by graphic
	Product or service disclosure displayed below fold [online @ 1024 x 768] 4.1.3	1	Display product or service disclosure above fold in main body of ad
	Product or service disclosure displayed only in summary T&Cs 4.1.3	1	Disclose accurately, above fold in main body of ad, nature of product or service on offer
	Disclaimer displayed only in summary T&Cs, disclaimer unlinked to offer by asterisk or other symbol, or both 3.1.3	1	Display disclaimer in main body of ad adjacent to associated offer, or link disclaimer clearly to offer by asterisk or other symbol
	Disclaimer inconsistent with offer's principal message 3.1.4	1	Remove inconsistent disclaimer and conditions it imposes
	Message quantity displayed only in summary T&Cs 3.1.2	1	Display accurately, above fold in main body of ad, actual message quantity for which customer can expect to be billed per charge period
	Offer constitutes a scam 3.1.15	1	Discontinue offer immediately
	Unapproved Telstra endorsement or use of Telstra name 3.2.1	1	Remove Telstra endorsement or Telstra name
	Misrepresentation of product offering 3.1.11	2	Display references to product type accurately, consistently, among main body of ad, call-to-action, and summary T&Cs
	Misrepresentation of product quantity 3.1.11	2	Display only actual product quantity per charge period (e.g., 15 ringtones/month)
	Offer confusing, misleading, or deceptive with respect to target audience 3.1.11	2	Clarify offer's principal elements in language target audience likely will understand
	Advertising to children 3.1.16	2	Discontinue advertisement in any medium or format that targets minors specifically
	Insufficient details regarding limited offer 3.1.5	2	Disclose clearly limited time period, limited quantity, and limited class of customers, as appropriate
	Insufficient details regarding special offer 3.1.6	2	Disclose special offer's principal elements, conditions and limitations [e.g., limited time period when discount applies], and start and end dates
	Failure to display shortcode for at least 10 uninterrupted seconds [TV] 3.2.2	2	Display shortcode for at least 10 uninterrupted seconds in main body of ad
Unclear product quantity 3.1.11	2	Disclose actual product quantity (per credit, if appropriate)	
No product quantity 3.1.11	2	Disclose product quantity	
No product quantity for Telstra customers 4.1.3	3	Disclose product quantity for Telstra customers	
Insufficient details regarding prize draw date 4.1.3	3	Display prize draw date	
Offer or elements of offer expired [e.g., competitions, voting services] 3.1.12	3	Remove outdated material	
<i>Pricing</i>	No pricing 3.1.2 ; 3.2.3	1	Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics
	No Telstra pricing 3.1.2 ; 3.2.3	1	Display Telstra pricing in main body of ad
	No pricing (voiceover) [TV, services exceeding \$2.00] Telstra rule	1	Convey pricing in voiceover as well as displaying in video

^ψSubject to immediate escalation to Telstra.

Telstra Shortcode Infringements and Actions Required rev 1.05
01/03/2011

TELSTRA PROPRIETARY AND CONFIDENTIAL

► Yellow highlights indicate all changes and additions since the previous revision.

Telstra Shortcode Infringements and Actions Required <i>continued</i>			
	<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
<i>Pricing continued</i>	Pricing illegible 3.1.2; Telstra rule	1	Increase point size, alter colour scheme to improve contrast, or both
	Signup cost illegible 3.1.2; Telstra rule	1	Increase point size, alter colour scheme to improve contrast, or both
	Pricing displayed only in summary T&Cs 3.1.2; 3.2.3	1	Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics
	Pricing displayed at improper attitude 3.1.2	1	Display pricing in same orientation and direction as shortcode or primary purchase mechanism
	Unclear pricing 3.1.2	1	Display full and correct pricing in prescribed format: \$XX.XX
	Unclear Telstra pricing 3.1.2; 3.2.3	1	Specify Telstra pricing individually
	Complete pricing displayed only in summary T&Cs 3.1.2	1	Display complete pricing, including signup cost if applicable, in main body of ad
	Pricing displayed within insufficient proximity to call-to-action or MSISDN-submit field§ 3.1.2; 3.2.3	1	Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics
	Incomplete pricing 3.2.4; 3.3.3	1	Disclose complete MO and MT pricing
	Pricing point size too small [print] 3.2.3	2	[shortcode point size is 24 to 48] Increase pricing point size to at least 25% as large as shortcode point size [shortcode point size is larger than 48] Increase pricing point size to at least 12
	Pricing point size too small [online and TV] 3.2.3	2	Increase pricing point size to at least 50% as large as shortcode point size
	Pricing display time too brief [TV] 3.1.2; 3.2.3	2	Display pricing for at least 10 uninterrupted seconds or for as long as shortcode is displayed, whichever is longer
	Pricing displayed below fold [online @ 1024 x 768] 3.1.2; 3.2.3	2	Display pricing above fold in main body of ad
	Telstra pricing displayed only in summary T&Cs 3.1.2; 3.2.3	2	Display Telstra pricing in main body of ad
	Conflicting pricing 3.1.2	2	Display pricing accurately, consistently, in prescribed format throughout ad: \$XX.XX
Use of <i>free</i> , <i>complimentary</i> , or similar term implying product that comes with purchase is without charge 3.1.9	2	Remove <i>free</i> , <i>complimentary</i> , or other such term	
<i>Subscription</i>	No subscription disclosure 3.3.3	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in main body of ad
	No subscription disclosure (voiceover) [TV] 3.3.3	1	Convey subscription nature of offer in voiceover as well as displaying in video
	Subscription disclosure illegible 3.3.3	1	Increase point size, alter colour scheme to improve contrast, or both
	Subscription disclosure displayed below fold [online @ 1024 x 768] 3.3.3	1	Display subscription disclosure above fold in main body of ad
	Subscription disclosure displayed only in summary T&Cs 3.3.3	1	Disclose subscription nature of offer by displaying word <i>subscribe</i> or <i>subscription</i> in main body of ad
	Subscription disclosure displayed at improper attitude 3.1.2	1	Display subscription disclosure in same orientation and direction as shortcode or primary purchase mechanism
	No charge period 3.3.3	1	Display charge period in main body of ad

§The "MSISDN-submit field" in mobile premium services advertisements is the box designated for entry of the customer's mobile phone number. The action required "Display pricing within three line breaks of call-to-action or MSISDN-submit field, directly above, below, or to either side, with no intervening text or graphics" means the pricing must appear immediately adjacent to the call-to-action or the MSISDN-submit field and must not be displayed in a graphic, such as a starburst or bubble. Therefore, if a content provider chooses to display the pricing in a paragraph, the *complete pricing details* must appear in the line of text *closest* to the call-to-action or the MSISDN-submit field. Three line breaks refers to three physical line breaks the point size of the pricing rather than to an HTML line break. In other words, the space between the pricing and the call-to-action or the MSISDN-submit field must be insufficient in which to display more than two lines of text.

Telstra Shortcode Infringements and Actions Required <i>continued</i>			
	<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
<i>Subscription continued</i>	Charge period illegible 3.1.2	1	Increase point size, alter colour scheme to improve contrast, or both
	Charge period displayed only in summary T&Cs 3.3.3	1	Display charge period in main body of ad
	Subscription disclosure point size too small [print] 3.3.3	2	[shortcode point size is 24 to 48] Increase subscription disclosure point size to at least 25% as large as shortcode point size [shortcode point size is larger than 48] Increase subscription disclosure point size to at least 12
	Subscription disclosure point size too small [online and TV] 3.3.3	2	Increase subscription disclosure point size to at least 50% as large as shortcode point size
	Subscription disclosure display time too brief [TV] 3.3.3	2	Display subscription disclosure for at least 10 seconds or for as long as shortcode is displayed, whichever is longer
	Unclear charge period 3.3.3	2	Display charge period accurately, consistently, among main body of ad, call-to-action, and summary T&Cs
	Minimum subscription period 5.1.6	2	Remove stipulation for minimum subscription period
<i>T&Cs</i>	Summary T&Cs illegible 3.2.4	1	Increase point size and alter colour scheme to improve contrast
	No local-charge or free-call Helpline number 3.1.2; 4.1.6; 6.1.1	1	Display local-charge or free-call Helpline number
	Alphanumeric Helpline number 3.1.2; 4.1.6; 6.1.1	1	Display local-charge or free-call Helpline number entirely in numerals (no letters)
	No unsubscribe information 3.3.3; 4.1.6	1	Display unsubscribe information as "Text [Send, SMS, or Reply] STOP to [shortcode]"
	Unclear unsubscribe information 3.3.3; 4.1.6	2	Associate unsubscribe command with shortcode and preface with "Send," "Text," "SMS," or "Reply" (e.g., Send STOP to 19XXXX)
	Incorrect unsubscribe information 3.3.3; 4.1.6	2	Display <i>STOP</i> as unsubscribe command
	Unsubscribe information too small [TV] 3.3.3; 4.1.6	2	Increase unsubscribe information point size to at least as large as promotional font
	Failure to display time-accuracy statement [publications with shelf-life of 3 months or more] Telstra rule	2	State that T&Cs were correct on publication as well as publication date; disclose if charges increase during life of promotion
	No instructions for opting out of marketing, prompt, or inducement messages 3.2.5	2	Display instructions or link for opting out of marketing, prompt, or inducement messages
	Unclear instructions for opting out of marketing, prompt, or inducement messages 3.2.5	2	Articulate instructions clearly or display link labeled clearly for opting out of marketing, prompt, or inducement messages
	No account holder authorisation disclosure [under age 18] 3.1.16	2	Disclose clearly that customers under age 18 must have account holder's permission
	No end date [e.g., competitions and voting services] 4.1.3	3	Display end date
	No refund arrangements [e.g., competitions and voting services] 4.1.3	3	Display refund arrangements
<i>Charges and Billing</i>	No mention that carriage fees might apply [content downloads only] 4.1.3	2	Disclose that carriage fees might apply