

Achieving SMS Success

Registering Your Brand(s) & Campaigns 2024 (v.5)

Welcome to Commio! We're thrilled to guide you through the process of registering your 10DLC (aka "long code") brand(s) and campaigns. The DCAs are scrutinizing campaigns more closely than ever, and approvals can take as long as 10 days. This checklist is designed to improve your chances of a smooth and successful registration process. Let's dive right in.

Key Terms

Direct Carrier Aggregators (**DCA**) and The Campaign Registry (**TCR**): Serve as intermediaries between **Brands/Campaigns** and the mobile network operators. They consolidate the vetting and registration information and ensure it meets the requirements set by the carriers.

Campaign: In the context of 10DLC, a campaign refers to a specific set of A2P messages that are sent to users. A campaign has unique attributes, such as the type of message (marketing, alerts, etc.), the sending entity (**Brand**), and the content.

Brand: In 10DLC messaging, the "brand" is the company or entity that the end user perceives as the sender of the message.

Changing Landscape

The parameters set by the **DCA** and **TCR** are subject to change due to various factors like regulatory updates, technological advancements, and shifts in carrier policies. It's crucial to stay up to date to ensure your campaigns remain compliant. At Commio, we work to provide updates as we hear about them.

If you encounter terms or requirements that you're unfamiliar with during the registration process, please don't hesitate to reach out to us for clarification. We're here to help you navigate this ever-shifting landscape.

DCA & TCR Fee Summary

Note: All fees are charged per attempt (by the DCA and/or the TCR), not based on successful registration.

Brand Registration	Campaigns	Campaign Vetting
Cost: \$4	Standard: \$10/month	DCA Review Fee: \$15 (One-time)
(One-time,	Low Volume: \$1.50/month	Optional Brand Vetting:
per attempt)	Specialty: Varies	\$40-\$95 (One-time for higher throughput)

Registration Checklist

1. Ensure you have an acceptable use case

Content prohibited on 10DLC by the DCA/Mobile Operators: Please review the list of prohibited content carefully, as Brand/Campaigns/Content will result in rejection by the TCR/DCA. "SHAFT" (Sex|Hate|Alcohol|Firearms|Tobacco) and other use cases are <u>defined</u> <u>here</u>, or download our <u>Use Cases eBook</u>.

2. Brand Registration Checklist & Tips

Tax ID Validation

 Ensure the tax ID/EIN matches the legal company name and business type for verification. TCR's automated system needs an exact match.

EIN INFO	Commio inc.
Submission	
Commio	X
Commio incorporated	X
Commio LLC	X
Commio inc	X
Commio inc.	1

🗋 You are registering a Brand, not an Agency

 It's crucial to accurately register the Brand mentioned in the messages. For instance, if the message content references "Solar City," then "Solar City" should be the Brand registered, not the agency "Solar Advertising" that may be handling the Campaign.

- The EIN is exclusive to this Brand and cannot be used to register multiple brands. If you feel you have an exception, please speak with Support.
- □ If you are NOT using an EIN, please contact Support for assistance.
- As part of TCR's new Authentication+ system, brands associated with for-profit / publicly traded companies must also provide a related email address that will trigger an email request from TCR for authentication. This address must share the same domain as the brand; it cannot be a general/group address (e.g., "sales@brand.com") or a personal/free email address.

The brand contact has up to seven (7) days to respond, after which you'll need to resubmit your request. If the email isn't validated within 30 days, the entire brand will need to be resubmitted.

Important Notes

- Brands are reviewed by TCR's automated system, so you can expect status updates within minutes.
- Unverified Status: If your Brand is marked as 'unverified,' ensure your company information is an EXACT match with your EIN before resubmitting. If necessary, make edits to your Brand information and resubmit; the system will automatically re-review your submission.
- Authentication+ is being rolled out in stages, and *only* publicly traded companies are required to provide an email address. Other segments will be added over time.
- If you're at a publicly traded company and your brand is already registered, your existing campaigns will continue to be sent. However, if you wish to create a new campaign, you will need to submit an email address and go through the authentication process.

3. Campaign Registration Checklist

a. Campaign Overview

- □ You've verified that the campaign isn't on a restricted list (<u>listed here</u>).
- □ The message body includes the Brand name.
 - The Brand matches the EIN and TCR Brand.

□ You have a detailed and Complete Call-To-Action Field:

• You've explained when, where, and how opt-ins are being collected.

Your opt-in process is clearly demonstrated by your examples; see details and samples in section C below.

b. Compliant Website

Every brand that wishes to send messaging campaigns needs to have a live, compliant website:

- Website Validation Ensure you have a live, valid, and secure (valid SSL certificate) company website that matches the name of the Brand. You'll need to include your URL and the DCA will check it!
- □ Your privacy policy and terms & conditions *must* be on your website, clearly labeled, and easy to find from the home page (regardless of whether you collect opt-ins directly on the site). They must be accurate, up to date, and contain full details about your messaging program. And, you must include the direct URLs in your campaign submission to TCR in the URL boxes provided.
- Privacy Policy Cannot include any language about sharing, renting, or selling personal information, including phone number, with any third party or affiliate, without this disclosure: "All the above categories exclude text

Your privacy policy must have a mobile section that clearly and explicitly states you do not share data with any third-party services.

messaging originator opt-in data and consent; this information will not be shared with any third parties." The privacy policy must include a **mobile** sharing section that explicitly states you do not share data with third-party services.

- 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 support 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.
- Show an example of the language in your campaign submission.
- Terms & Conditions / Terms of Service The following SMS program disclosures must be included:
 - Program (brand) name
 - Message frequency disclosure (not required for single message programs)
 - Product description
 - Customer care contact information
 - Opt-out information (not required for single message programs)
 - "Message and data rates may apply" disclosure
 - 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.

c. Subscriber Opt-In Process

All 10DLC campaigns require that every messaging subscriber on your list has opted in to receive texts from you. Your campaign submission must document

how subscribers opted in, including examples.

Note: All mobile subscriber opt-ins / consent must be verifiable upon request by any DCA or mobile carrier. Failure to All mobile subscriber opt-ins / consent must be verifiable upon request by any DCA or mobile carrier.

provide proof of consent may result in campaign and/or brand suspension.

Implied Consent:

If a consumer initiates a text message exchange and you only respond with relevant information, no verbal or written permission is expected and no additional permission is necessary.

- The workflow needs to clearly state that the customer initiated contact with your 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."
- □ The first message must always be sent by the customer: It must be stated that the customer initiated contact with the business to provide implied consent.

Express Consent.

Other than in the rare case of implied consent, a consumer must provide express permission before a business sends them a text message. Consumers may do this via text, on a form, on a website, in writing, or verbally. Express consent must be documented as described below, particularly websites.

Non-Website Opt-ins:

If your opt-ins are from sources other than your website, the process must be documented and included in your campaign submission as follows:

- ☐ You must include evidence (screenshots, files, or forms) of the opt-in process in the multimedia section where possible.
- You must thoroughly explain the opt-in process in the "Call-To-Action" section of the campaign submission, include links to the Privacy and Terms & Conditions pages (if not already provided), and explain how these are shared with each person who opts in. These include:
 - Brand name
 - HELP keyword
 - STOP keyword
 - Message frequency
 - Msg&data rates
 - Terms
 - Privacy Policy

We strongly encourage you to do a double opt-in (explanatory follow-up text with option of opting out) to every person who opts in, but especially those who opt in through non-website options.

- Example: After Hours Urgent Care will be collecting opt-ins verbally from patients. 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 verbally informed that "message and data rates may apply" and that "message frequency varies." They are also informed that they can text HELP for support instructions and more information, or STOP to unsubscribe. Staff 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 a 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."
- There must be a separate opt-in for each use case.
- Texts: If a customer opts in by texting a specific keyword to a designated phone number, the documented workflow must include both the exact keyword and the designated phone number. Example: "Customer opt-in by sending "WELCOME" to phone number 123456789."
- Verbal Opt-in: A customer can provide verbal consent to opt in, either in person or on the phone. You must clearly outline the scenarios in which the customer is giving their consent, and provide the script used to ensure that they are informed about the Call-to-Action elements listed above.
- Email Opt-in: Provide the script used to ensure that they are informed about the Call-to-Action elements listed above.
- Paper Forms: If a customer provides consent via a paper form, a copy of the specific form must be attached to the campaign submission for verification

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

Website Opt-in Pages:

All opt-in page(s) on your website that collect phone numbers must be secure (valid SSL certificate) and include the required opt-in language:

- Messaging consent forms must stand alone. They should either link directly to complete privacy policy and terms & conditions pages, or include the information directly. The form can be a pop-up page, as long as you document this in your campaign submission. Pop-up pages for terms & conditions are not acceptable.
- Consent to receive messaging campaigns should be titled as such, and not tied to consent for any other type of communications such as email, phone calls, etc.
 - Required phone numbers are generally not acceptable as they're considered "forced opt-ins." If a form requires a phone number, it cannot be used for opt-ins unless there is a checkbox for optional SMS opt-in.
 - If the phone number is optional and the opt-in language is exclusively for texting, a separate SMS opt-in checkbox is not currently required but is strongly encouraged.
- Consent must be obtained for *each* use case.
- The page(s) must also include:
 - Message & data rate disclosures: "Messaging and data rates may apply."
 - Message frequency disclosures.
 - HELP and STOP; full opt-out information may be in the terms & conditions.
 - 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). Privacy Policy [link] & Terms [link]."

□ Multiple Opt-In Pages

- If multiple pages collect phone numbers, each one must have all the necessary opt-in language.
- You need to include the URL of all opt-in pages with your campaign submission.

d. Messaging

Messaging examples an end user might receive during the campaign should be included with your submission. In addition to the messages related to your use case(s), three specific message samples are required: opt-in confirmation, help, and opt-out.

Opt-in Confirmation Message

This message *must* include:

- Brand identification / product description (ideally at the beginning of all messages)
- Confirmation of opt-in
- HELP and STOP details
- Message frequency statement
- Data rates statement

(*Note*: This message must also be sent to a subscriber if the keyword JOIN is sent to the 10DLC number approved for the campaign.)

Example - Commio: You have been successfully opted-in to receive SMS notifications from Commio. Please note that you can opt-out any time by responding with STOP. For help, reply with HELP or call 919-890-0000. Message frequency may vary. Message and Data rates may apply.

Typical Messages Subscribers Will Receive - These need to include the brand name / product description, and in most cases include HELP and STOP

information. Although single-message campaigns are not required to include HELP or STOP, they need to support those commands.

Example 1 - Commio: Dear customer. This is a reminder that your FUSF and Tax Exempt forms must be completed and returned by March 1st, 2024. Please contact support at <u>support@commio.com</u> if you have questions. STOP

Example 2 - Commio: If you are planning on attending the ITEXPO in Fort Lauderdale this year and would like to schedule a meeting with us, please visit xxxxxx or call 919-890-0000. Stop2end

Help Message (HELP) - This needs to include your brand name / product description, plus the email address and/or phone number for customer support.

Example - Commio: For assistance, please call 919-890-0000 or email <u>support@commio.com</u>. We also have live chat at <u>commio.com</u> if you need immediate assistance.

□ Opt-out Message (STOP)

TCPA rules allow for one final confirmation message to be sent to subscribers who opt-out of receiving text messages from the brand. It needs to include your brand/product description, confirm that they've been unsubscribed, and state that they won't receive any more messages from you. The opt-out cannot include any solicitation like "call us" or "go to xxxxxxx.com."

Example - Commio: You have been successfully unsubscribed and will receive no further messages.

Special Use Cases:

- SHAFT Age Gates (if applicable) Messaging content for controlled substances or distribution of adult content may be subject to additional carrier review (please see our Use Cases eBook). This type of messaging should include robust age verification (for example, electronic confirmation of age and identity). Examples of robust age gates include:
 - Document Upload (Government ID)

- Third-Party Identity Verification Services
- Credit Card Verification
- Reply with your birthdate xx/xx/xxxx

• A web opt-in form field that requires a user to include their birth date Important Note: Asking a user to "reply YES/AGREE" to confirm they are over a certain age is not considered a robust age verification.

Political Messaging Campaigns - Political campaigns should strongly consider including political / organization name and website. Political campaigns using 10DLC in the US may be subject to verification and restrictions to limit who can send out political messaging. When you create a brand for the political use case, in some cases it may be necessary to go through a vetting process with an external provider such as CampaignVerify.com.

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.

- Donation Scenario 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.
- Test Campaigns Test campaigns are supported, but they must be low volume and meet all compliance requirements.

Some Real-life Examples

Good opt-in language

- □ I provide my ESIGN consent to receive SMS/MMS text messages, from an automated dialing system, to my cell number provided above for account notifications and alerts from [COMPANY]. I understand that I am not required to provide my consent as a condition of purchasing any products or services. I understand that I can opt-out of receiving text messages at any time by responding with STOP. I can reply with HELP to get help. I understand that message and data rates may apply depending on my mobile carrier and that T- Mobile and other mobile carriers are not liable for delayed or undelivered messages.
- □ I provide my ESIGN consent to receive SMS/MMS text messages, from an automated dialing system, to my cell number provided above for marketing promotions from [COMPANY]. I understand that I am not required to provide my consent as a condition of purchasing any products or services. I understand that I can opt-out of receiving text messages at any time by responding with STOP. I can reply with HELP to get help. I understand that T- Mobile and data rates may apply depending on my mobile carrier and that T- Mobile and other mobile carriers are not liable for delayed or undelivered messages.
- I consent to receive SMS text messages to my cell number provided above for accountrelated notifications and alerts from [COMPANY]. I understand that I am not required to provide my consent as a condition of purchasing any products or services. I understand that I can opt-out of receiving text messages at any time by responding with STOP. I can reply with HELP to get help. Message and data rates may apply depending on your mobile carrier. T- Mobile and other mobile carriers are not liable for delayed or undelivered messages.
- I consent to receive SMS text messages to my cell number provided above for marketing promotions from [COMPANY]. I understand that I am not required to provide my consent as a condition of purchasing any product or service. I understand that I can opt-out of receiving text messages at any time by responding with STOP. I can reply with HELP to get help. Message volume varies. Message and data rates may apply depending on your mobile carrier. T. Mobile and other mobile carriers are not liable for delayed or undelivered messages.

Bad opt-in language

Explore your funding options.

What's the next step? Tell us more about your business and we'll let you know how much you qualify for, your payment options and rates.

Why choose

has provided over \$2 billion to thousands of small businesses in the United States.

Will this affect my credit? Checking your options won't affect your credit score. Your social security number or EIN is not required.

First Name	Last Name
Business Name	
Phone	
Email	
Average Monthly Sales 0	
Select option Request a	Free Quote

Bad Privacy Policies: Cannot share personal information

DISCLOSURE OF PERSONAL INFORMATION

We share your Personal Information with third parties who provide various products and services. We will only share this Personal Information as set forth below:

- When we believe in good faith that disclosure is necessary to protect or enforce our legal rights to property, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- To our subsidiaries or affiliates,
- To provide information about your transactions, creditworthiness and experiences;
 To provide you with information relating to products or services that we believe you may find of interest, including working capital or financing solutions from third parties if we cannot fulfill your needs. In these cases, we will only share basic information, such as your contact information, company name, and the amount of funds you requested;
- As required by law, such as in response to a subpoena, summons or similar legal process in general;
- To third parties who support us in providing products and services to you such as customer service, credit checks, bank account verification, secure data storage, transfer or payment or similar services. These third parties will be authorized to use your personal information only as necessary to provide services to us;
- · To our investors, partners, lenders and/or auditors during their review or audit of our business;
- To a buyer or successor entity in the event of a merger, acquisition or sale. You will be notified via email and/or a prominent notice on our Websites of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information;
- To an asset purchaser for an asset sale.

Third parties who have access to your Personal Information are required to adhere to privacy standards at least as stringent as those set forth in this Privacy Policy.

II Corporate Affiliates

We may disclose Personal Information to our corporate affiliates, including LLC, to provide our Service or to use for marketing or promotional purposes.

Rejection: Compliant privacy policy is required on website if used to collect mobile

numbers

This language appears to suggest sharing personal information with third parties.

Third-Party Offers

We may arrange to have marketing and promotional information of other companies sent to you that we think might be of interest.

Rejection: Compliant privacy policy is required on website if used to collect mobile numbers

Saturday: 9am-3pm ET Life insurance Agents				
Saturday: 9am-3pm ET Life insurance Agents	15.74	Services	Company	Call us at: (1997 2006-007
Life insurance Agents	550	Health insurance	Us	Monday – Friday: 9am-5pm ET
	ACTO	Life insurance	Agents	
Complementary Insurance Contact us		Complementary Insurance	Contact us	o 😯 in
Plans for Undocumented Opt-out preferences		Plans for Undocumented	Opt-out preferences	

Rejection: No privacy policy on website; opt-out preferences are not the same as a privacy policy

THERE WAS A PROBLEM WITH YOUR SUBMISSION. PLEASE REVIEW THE FIELDS BELOW.	Save a life	< Personal information
	every single Jumuah.	First name
Name '	You can extinguish your sins every Friday and help save lives with your sadaqah.	Last name
This field is so when d		Email address
This field is required.	uh 🛛 👘 🖓 👘 🖓 👘	Phone number ③
Email *	***	Donate as an organization ③
This field is required.	NE	Donate anonymously ??
	Jumuah Weekly Sadaqah 🤎	🗹 Subscribe to our mailing list
Phone *	Automatically set up giving sadaqah weekly. This could be anything from food for families who are struggling to	
	make ends meet, to clothes for refugees who have fled	
Phone format: (###) ###-#### This field is required.	their homes with nothing but the clothes on their backs. This also includes our new Mosque Fund.	
Message *		Donate \$199/week
	Manage Your Donation	
		And the second s
This field is required.		
I'm not a robot		

Prohibited use cases

The reCAPTCHA was invalid. Go back and



We're Here to Support You

At Commio, your success is important to us. If you have any questions or issues with your 10DLC brand and campaign registrations, please contact us:

> Phone: (919) 890-0000, option 1 Email: <u>support@commio.com</u> Website: <u>support.commio.com</u>

