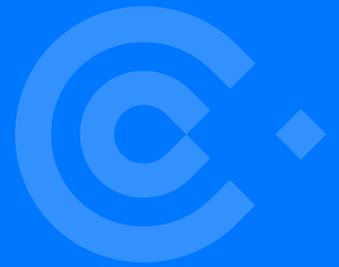


A2P Messaging Use Cases 2024 (v.3) — What's Allowed & What's Not

*A Guide to U.S. Carrier Rules and Regulations
for Common Use Cases*





Introduction

Mobile messaging is a heavily regulated space for application-to-person texts, also known as A2P or business text messaging. This includes all short code, toll-free, and long-code (10 DLC) messaging campaigns. We all benefit from this oversight in the form of a clean, direct, and effective line of communication to our audiences with a 98% open rate. But these rules and regulations do need to be carefully navigated.

It's important to know which use cases are allowed – and which aren't – before submitting the required details to the operators. This guide provides everything you need to know about U.S. carrier requirements for some common use cases, as compiled by upstream carriers.

But First, Some Disclaimers

This list of commonly allowed and disallowed use cases isn't comprehensive. Other types of use cases may result in additional questions from the direct connect aggregators (DCAs) and carriers. It's important to remember that each network is owned and operated on an individual basis. As such, the DCAs and carriers reserve the right to reject or question any specific campaign. All campaigns are subject to full review and are approved on a case-by-case basis.

Also note that *all* business messaging is considered A2P (the alternative, P2P, is person-to-person messaging sent from one individual to another) and is the only form of messaging available from a commercial provider such as Commio.

That said, let's look at the do's and don'ts (as outlined by the U.S. carriers) for the most common messaging use cases.

Allowed with Restrictions

- ✓ Age Gated Campaigns
- ✓ Bank Fraud Alerts
- ✓ Donation Campaigns
- ✓ Emergency Alerts / Time-sensitive Alerts
- ✓ Financial
- ✓ Free to End User
- ✓ Home Listings
- ✓ Insurance
- ✓ Job Alerts
- ✓ Loan Campaigns
- ✓ Location-based Services
- ✓ Non-profits / Charities
- ✓ Payment Reminders
- ✓ Political Campaigns
- ✓ Purchases Via Short Code
- ✓ Shopping Cart Reminders
- ✓ Sole Proprietor
- ✓ Sweepstakes & Contests

Disallowed

Any message content that falls into one of the following categories is strictly prohibited and can lead to suspension by the carriers, as well as potential legal action by the FCC.

- ✓ Debt Collection
- ✓ Gambling
- ✓ High Risk Loans
- ✓ Lead Generation
- ✓ "SHAFT" (Sex | Hate | Alcohol | Firearms | Tobacco/CBD/cannabis)
- ✓ Shared Short Codes

Details on both Allowed and Disallowed use cases are on the following pages.

Allowed with Restrictions

Age Gated Campaigns

Messaging content for controlled substances or distribution of adult content might be subject to additional carrier review. This type of messaging should include robust age verification (for example, electronic confirmation of age and identity).

Examples of robust age gates include:

- 'Reply with your birthdate xx/xx/xxxx'.
- A web opt-in form field which requires user to include their birthday.

Asking a user to "reply YES/AGREE to confirm they are over a certain age is not considered a robust age verification.

Bank Fraud Alerts

There is a TCPA exemption for bank fraud alerts which means that the end user's prior express consent isn't required. To qualify for this exemption, the below requirements must be adhered to:

- Must be zero-rated (FTEU).
- Must be sent only to the wireless number provided by the customer of the financial institution.
- Must state the name and contact information (e.g., phone number) of the financial institution.
- Messages cannot include marketing, advertising, or debt collection content.
- Limited to a maximum of three texts over a three-day period from a single financial institution to the owner of the affected account.
- Message must inform recipients of the ability to opt-out by replying "STOP;" which will be the exclusive means by which consumers may opt-out of such messages.
- 'Reply STOP to cancel' should be in all 'content MT' for these types of campaigns.
- Opt-out requests must be honored immediately.



Donation Campaigns

If the campaign utilizes text messaging to support, remind, suggest, request or advertise any "giving" or "donation", then it's considered a donation campaign. Important points to note:

- Commio can run the messaging but can't handle the mobile billing. The customer must already have an agreement with a mobile billing provider.
- If the donation is not taking place over the short code (sending URLs where the end user is redirected to donate), then the program should be run directly through a mobile giving aggregator as they have different vetting processes in place.

• Mobile giving outside of the approved direct carrier billing channel is not officially supported on the T-Mobile network. T-Mobile is still working on a policy/requirement that would expand the mobile giving space to include donations via texted URL. Until then, an exception approval request will be needed including an explanation of the following:

- Name of company/non-profit organization
- Tax identification (EIN)
- Official website
- Explanation of use case
- Confirmation that this will be a dedicated short code
- Expected monthly traffic volume

Emergency Alerts/Time-sensitive Alerts

A terms and conditions page must include the verbiage "wireless carriers are not liable for delayed or undelivered messages".

It is T-Mobile's recommendation to submit emergency notification campaigns as a FTEU (Free to End User) policy to override blacklisting and or messaging bucket limitations. Subscribers who have enabled blacklisting to their account or who have exhausted their limited text plan will not receive these timely emergency notifications.

Financial

Any campaign that has a financial component must note if it supports the ability to initiate financial transfer and it must note what kind of transfer is occurring – for example, bill payment, transfer etc.

If the service does not support the ability for a customer to initiate a financial transfer, this specific wording must be noted in the program summary: “this service will not support/initiate financial transactions/ transfers”.

Additionally, financial marketing of any type is forbidden without special carrier approval.

Free to End User

- An FTEU message is provided at no charge to the subscriber.
- FTEU short codes can only be used for FTEU (they can't run concurrently with standard services on the same network).
- “Msg&Data Rates May Apply” should not be included in MTs or on websites for FTEU programs.
- All MTs should begin with “FREE MSG”.

Home Listings

- Real estate alerts about home listings, for example apartment finder alerts, are allowed.
- Campaigns that are tied to an actual direct realtor or property management company would be more closely considered.
- End-user information must not be shared with third parties/affiliate marketers.

Insurance

- A content provider must be the direct insurer and not a reseller of insurance.

- Insurance quotes must only be for the specific direct insurer.
- End user information must not be shared with third parties/affiliate marketers.

Job Alerts

As keyword opt-in is generally not how these campaigns run, a complete description of process and/or screenshots to be reviewed must be provided.

- The content provider must be the direct hiring agency, or head-hunting firm.
- End-user information must not be shared with third parties/affiliate marketers.
- These alerts are disallowed:
 - Work-from-home programs
 - Job alerts from third party recruiting firms
 - Risk investment opportunities

Loan Campaigns

Only campaigns for the direct lender will be considered, and the message sender must be the loan originator. Please also note:

- The mobile CTA/web opt-in must be separate from the end user signing up for the application/loan.
- As keyword opt-in is generally not how these campaigns run, please provide complete description of the process and/or screenshots to be reviewed.
- Verbal opt-in is NOT allowed for loan type campaigns.
- End user information must not be shared with third parties/affiliate marketers.
- Must provide a completed loan questionnaire for review.



Non-Profits / Charities

Any organization that wishes to send messaging as a charity or other non-profit needs to ensure that their status is verifiable through the Internal Revenue Service (IRS), including a current and approved filing. More information is available [on the IRS site](#).

Payment Reminders

Alerts notifying consumers of upcoming payment reminders are allowed – for example, “your bill is due on XX/XX”.

- When submitting these types of campaigns, please include the following note in the description field within the program summary: “The alerts will be courtesy reminders to the users for payment dates. The ability to initiate a payment cannot be made via SMS and messages may not indicate an overdue/past due notice.”

Political Campaigns

Political campaigns with a donation URL component will require a CTA/opt-in policy that is clear and applied consistently.

There must be additional transparency on the political entity:

- Example MT for donation messaging, including URL
- Politician/organization name
- Politician/organization website
- FEC ID – required if candidates/organization are involved in a federal-level election. Please note that if the politician or organization doesn't have an FEC ID, then the campaign will be reviewed on a case-by-case basis. In this situation, provide a) an explanation of why a FEC ID isn't available, and b) detail which fundraising platform secures the donation – for example, ActBlue/WinRed.



- End-user information must not be shared with third parties or like-minded organizations. This should be confirmed in the privacy policy page. It is suggested to add the approved carrier language to the privacy policy page: “The above excludes text messaging originator opt-in data and consent; this information will not be shared with any third parties.”

Purchases Via Short Code

- Purchase confirmation via short code is not permitted – for example, reply BUY to purchase this item.
- A URL in the text message which will redirect the end user to a web form to complete their purchase would be permitted. This must occur every time a purchase will need to be completed and can't be used as a single authorization of recurring orders.

Shopping Cart Reminders

Any use cases that include shopping cart reminders are required to adhere to the shopping cart reminder policy listed below:

General requirements

- Call to action via website must include (within the opt-in terms and conditions details) that the message program includes a shopping cart reminder.
- Shopping cart message program must incorporate a double opt-in mechanism via text.
- Double opt-in message content must clearly inform the user that the message program includes shopping cart reminders.
- Campaign submissions must be filed as an “account information” campaign with a detailed description highlighting the message program will include shopping cart reminders.

Additional privacy policy disclosures

- Privacy policy must explicitly state how information is captured by the commerce site to determine when a consumer cart has been abandoned – for example, website cookies, plugins and so on.
- Terms and conditions must reflect the new policy.

Shopping Cart Reminders (*continued*)

Delivery and content restrictions

- Text reminders must be sent within a 48-hour period and limited to one alert per unique abandoned cart.
- An abandoned cart notification must not result in the ecommerce site completing the transaction on behalf of the consumer.
- An abandoned cart notification must not collect payment information or accept approval for purchase via keyword confirmation from the consumer.
- The consumer must complete the transaction by processing payment themselves via a direct URL link to the e-commerce website.

Sole Proprietors

Sole proprietor campaigns are designed for smaller companies without an EIN, who have limited messaging needs, and are accepted under some circumstances. However, because this category is often abused by illicit senders, many providers (such as Commio) do not allow these campaigns.

Sweepstakes & Contests

A **sweepstake** is a legal game that includes a prize, and a game of chance. No consideration is allowed. (Sprint's definition of a sweepstake includes anything with a prize component regardless of the method of prize delivery.)

A **contest** is a promotional mechanism that includes a prize, and a game of skill. Consideration is allowed, but there cannot be any element of chance. Some details to note:

- For sweepstakes, you must provide a copy of all official rules and guidelines and the 'in market' call to action that was used.
- Services viewed as sweepstakes/contests include: any service where points or prizes are awarded/ reverse auction/skills games (Sprint)/IVR voting (Sprint).



- Sweepstakes and contest rules must be present on the website and must include (but not limited to):
 - Rules must be prominently located on the website associated with the sweepstakes
 - Rules cannot be generic – that is, covering multiple sweepstakes of a type that may run in connection with a program – but must relate to an actual sweepstakes
 - Name and contact information for sponsor
 - Any eligibility restrictions applicable to participate or winners, such as state of residence
 - Description of means of entry
 - Date(s) the prizes will be awarded
 - Description of prize(s) Method of awarding prize(s)
 - Description of how the winner(s) will be contacted and method for obtaining a list of winners.
 - Who is eligible for sweepstakes and how the winner is selected?
 - Age restrictions
 - Free method of entry

Disallowed

Now for the disallowed use cases. Any campaigns related to phishing, fraud, or scams such as malware; deceptive marketing including pyramid schemes; and unlawful or illicit content are not permitted. Below are some common examples. As a reminder, each DCA or carrier has the right to reject a campaign, and this list is not all-inclusive. For example, "Camp Lejeune" has been frequently targeted in spam campaigns and will typically be rejected.

Debt Collection

Although debt collection messages are conditionally allowed under TCPA, they are forbidden by most carriers. This includes:

- Debt forgiveness
- Loan/debt consolidation
- Debt reduction
- Credit repair programs

Gambling

Technically gambling is allowed with numerous restrictions around age-gating and lottery programs. However, due to the questionable nature of most related messaging, the majority of DCAs and providers do not allow this content, including Commio.

High-Risk Loans

Messaging related to high-risk loans is not permitted. This includes but is not limited to:

- Auto loans by a third party
- Mortgage loans by a third party
- Payday loans
- Short-term high interest loans
- Student loans
- Tax refund loans

Lead Generation

Any campaigns that are used for lead generation or indicate the sharing of collected information with third parties are not permitted.



SHAFT

S – Sex, including pornography, human/sex trafficking, and prostitution

H – Hate, including but not limited to abuse, discrimination, violence, harassment.

A – Alcohol

F – Firearms, including ammunition

T – Tobacco, including vaping, cannabis, & CBC products

The regulations on cannabis and CBD vary from state to state and from federal to state level, and there is no way to maintain accurate representation of opted-in users' states. Therefore, related messaging is not supported by any of the US carrier networks.

Shared Short Codes

Shared short codes are not permitted. Long story short, the carriers want more control and visibility of the traffic on their networks. They want to phase out P2P long codes and shared short codes to increase security, deliverability and to protect the messaging ecosystem. Dedicated 10-digit long codes and short codes are the main numbers to use for business messaging.

Need Help? Commio is Here for You

Messaging campaigns have gotten more complicated in the past couple years, but they're still the best way to reach your customers with a 98% open rate. We hope this use case overview helps you make more informed decisions for your messaging campaigns.

At Commio, our goal is to help you get your campaigns approved the first time, every time. For more information, including a variety of webinars on these topics, visit [Commio.com/blog/](https://commio.com/blog/). And as always, feel free to [contact our messaging experts](#) with your specific questions — we're happy to help.



About Commio

If you're building apps and services to engage and delight customers, Commio is the uniquely customizable, cloud-based communications API platform that makes it easy to deliver integrated voice and text messaging.

Our flexible, developer-friendly Messaging API makes it easy to deliver high-capacity text messaging. From brand & campaign registration to sending SMS/MMS through every major gateway, if you can dream it, we can send it.

Intelligent call routing with multiple layers of redundancy mean less worry and more happy customers. See beyond the Voice API to gain visibility into every conversation. Take control of routes and carriers to improve call delivery and quality.

Direct-to-carrier pricing and intelligent call routing ensures that you always pay a great rate for your communications, and our U.S.-based support is responsive and always there when you need us.



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