

Campaign Playbook

August 2013 Edition

Updated guidelines are indicated in red.

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1. Subscriber and Technology

- Prepaid and U.S. Cellular® MVNO subscribers are NOT supported.
- Mobile terminated messages must NOT exceed 160 characters.

MMS Guidelines

- There are a variety of ways for consumers to purchase and receive content, and these may evolve over time. These guidelines are provided for downloadable multimedia content, such as pictures, Video Clips, long form text etc..
- In terms of valid content offerings, the following are acceptable at time of publication
 - Commonly supported Ringtone formats
 - Commonly supported Wallpapers
 - o Commonly supported Animation
 - o Commonly supported Video Clips
- MMS Content is allowed through approved Aggregators only
 - Current Aggregators Include
 - OpenMarket
- Supported Devices
 - "Device Not Supported" is only a permissible response in the instance of signifying a specific device is not supported. It is not an acceptable response for a Service that is not supported, such as FTEU campaigns. In such case, the response should indicate "Program/Application is not available to U.S. Cellular® Customers at this time."
 - If provider service does not utilize device discovery, provider will be required to implement alternative SMS or Web discovery methods to determine device, such as customer provided information within SMS message flow or website entry.
 - o Demo/Sample downloads are NOT allowed as a substitution for device discovery.
- Message size
 - → MMS Messages shall not exceed 1 Megabyte
- Additional Billing Requirements for MMS
 - Billing events for transactional downloads cannot be triggered until content has been delivered. Any billing prior to delivery of content is considered to be out of compliance and will trigger compliance action (e.g., termination, suspension)
 - Service must deliver content Customer has requested prior to billing. No substitutions allowed.

2. Logo Usage and Advertising Standards

Aggregators and Content Providers must comply with U.S. Cellular® logo standard requirements when using the U.S. Cellular mark in advertising and marketing:

- Each and every use of U.S. Cellular trademarks must be in compliance with the U.S. Cellular Graphics Standards and Logo Requirements document.
- Each separate use of U.S. Cellular's trademarks and any and all advertising used for promotion of services (including pre and post launch advertising) MUST be submitted to U.S. Cellular for review and approval, which U.S. Cellular may grant, withhold and/or condition in its sole discretion.
- Inappropriate use of the U.S. Cellular mark may result in immediate suspension of your program(s).

General Advertising Policy for U.S. Cellular

- All material terms and conditions of the program must be clearly communicated without scrolling.
- U.S. Cellular® cannot be listed when advertised content and/or services are not available to our customers. For example, website promoting ring tones should not have U.S. Cellular® identified if only text alerts are available to our customers. U.S. Cellular® should only be listed when promoting the particular service available to our customers. This includes "splash" or "intro" pages. U.S. Cellular® can, however, be included in legal disclaimers and drop down menus on any page.
- If the campaign requires web opt-in and the website is not yet live, one of the following must be submitted with the campaign for review:
 - o A link to the staging website and any required login IDs and passwords
 - o Screenshots of the opt-in page.
- Trial periods are NOT allowed for Premium programs.
- Pricing and frequency of billing MUST be in a bold font that stands out from surrounding text.
- U.S. Cellular® will NOT support "next best" content in the event original request for content cannot be fulfilled.

3. Customer Privacy

All Aggregators and Content Providers are subject to the privacy guidelines set forth by the Mobile Marketing Association. In addition, all Aggregators and Content Providers must comply with the privacy terms and conditions agreed to and signed by both the Aggregator and U.S. Cellular in their contracts. Aggregators and Content Providers are directed to refer to the contracts entered by the parties, or to contact their primary U.S. Cellular for further information.

4. Campaign Type Support

- In the interest of timely review, activation and provisioning please advise when time-sensitive campaigns such as sweepstakes, alerts for TV shows, or the like, are submitted. They will be prioritized for timely review.
- Premium SMS/MMS content sales are allowed through one-time purchase and monthly subscription models.
- If an Aggregator or Content Provider offers campaigns with varying amounts of content (i.e. number of text alerts), then the largest amount of content per price offered to any other carrier must also be offered to U.S. Cellular subscribers.
- Free to End User (FTEU) and free messages are NOT supported.
- In the event a charge is not successful, charge re-tries are only allowed up to 7 days after the initial charge date.
- Premium SMS/MMS confirmation message after affirmative acceptance of opt-in must disclose the premium charge has been billed or deducted from the users account.
- Marketing companies must have separate short codes, campaigns and campaign records for each business client. U.S. Cellular® no longer permits shared short codes among multiple content providers and clients.

These scenarios are no longer accepted:

- Marketing Company has short code 12345
- Business client ABC has campaign ID and record 12345_0001
- Business client DEF has campaign ID and record 12345_0002
- Business client GHI has campaign ID and record 12345_0003

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The same applies to broadcasting groups, school alert distribution companies, and the like. Examples:

- Parent Alert Corp. has short code 67890
- Chicago Elementary School has campaign ID and record 67890_0001
- New York Elementary School has campaign ID and record 67890_0002
- Acme Broadcasting Group has short code 54321
- WABC-TV Chicago has campaign ID and record 54321_0001
- KNYC-TV New York has campaign ID and record 54321 0002

a. Subscriptions

- Only monthly subscriptions will be available, weekly or daily subscriptions are NOT allowed.
- Message frequency should be before Stop and Help in alerts.
- Pricing and "billed to cell" copy should be placed before Stop and Help in confirmation MTs for premium campaigns.

b. **Spending Caps and Limits**

- \$30.00 is the maximum allowable rate of a single billing event and for a monthly subscription charge.
- The U.S. Cellular universal subscriber monthly cap per phone number is \$50, managed through Valista by U.S. Cellular. This is an aggregate cap applying to all 3rd party content purchased by the phone number. The cap is reset on the first day of the calendar month.

c. Category Classification Requirements

Sweepstakes

- U.S. Cellular® does NOT support Premium campaigns of solely sweepstakes content.
- Campaigns that feature a sweepstakes as a secondary portion to a campaign (i.e. text alerts) are reviewed and approved at U.S. Cellular®'s sole discretion.
- Standard rated sweepstakes are reviewed and approved at U.S. Cellular®'s sole discretion.
- Products from U.S. Cellular® competitors cannot be offered as prizes in sweepstakes.
- Poorly written and/or incomplete sweepstakes rules can, and will, result in delays in approval and/or outright rejection.

d. Virtual Good Campaign Records

- Partner IDs should be included.
- Provide a link to or further description of the Campaign Provider to provide more insight into the content available for purchase.
 Example:
 - For BUZZTIME_3001, a link to NTN Buzztime's website or content page should be included.
- Bill Descriptions must include the short code.
- For instances where a Campaign Provider has terms and conditions specific to a game, music service, etc., those T&Cs should be attached to the record for review.

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Charitable Donations

The following outline the different record entry scenarios, dependant upon how an aggregator has structured the campaign on their end and with the chairtable campaign provider and/or charity(ies).

Preferred Option

Record Scenario #1: One short code per individual charity, multiple donation price points Example:

- Charity A and only Charity A has short code 12345; Charity B and only Charity B has short code 67890; Charity C and only Charity C has short code 54321
- o Multiple donation price points: \$5.00, \$10.00, \$15.00, \$20.00, \$25.00
- The result would be five records/campaign IDs for each donation price point for each individual charity:
 - Charity A, short code 12345 = five records/campaign IDs
 - Charity B, short code 67890 = five records/campaign IDs
 - Charity C, short code 54321 = five records/campaign IDs

Record Scenario #2: One short code assigned to multiple charities, multiple donation price points

Example:

- o Charity A, Charity B and Charity C share short code 12345
- Multiple donation price points: \$5.00, \$10.00, \$15.00, \$20.00, \$25.00
- The result would be five records/campaign ID for short code 12345, one for each donation price point:
 - MBMSG 12345 MM12345 500
 - MBMSG 12345 MM12345 1000
 - MBMSG_12345_MM12345_1500, and etc.
- In each record, include the individual keywords for each charity

Record Scenario #3: Each individual charity has multiple short codes, multiple donation price points

Example:

- Charity A has short codes 12345, 67890, and 54321
 - Multiple donation price points: \$5.00, \$10.00, \$15.00, \$20.00, \$25.00
- Charity B has short codes 09876, 13579 and 24680
 - Multiple donation price points: \$5.00, \$10.00, \$15.00, \$20.00, \$25.00
- The result would be five records/campaign IDs/per donation price point, per short code, per charity, or 15 records per charity

Political Campaign Contributions

- Campaign records must include proof of proper Federal Election Commission (FEC) registration.
- Campaigns cannot run on shared short codes. CSCA receipts must be attached to all records to confirm proper leasing of the short code to the individual political campaign.
- Contribution campaigns must be set up as one-off. One contribution confirmation MT is permitted.

5. Customer Experience

a. Opt-In

- If, at any time, the user discontinued service and is now "re-subscribing" they are considered a First Time user and must be presented with applicable Double Opt-in message flow.
- A confirmation MT is required. The confirmation MT must include notification that the charge will be on the customer's bill and opt out instructions including both STOP and HELP commands.
- All alcohol marketing campaigns must include a question prompting the user to verify that they are 21 years of age or older.
- Double opt-in age verification is required for hard alcohol and tobacco programs.
- For credit card, debit card, or banking alerts provide links or attach screenshots of the opt-in process.
- For casino-related alerts of any kind a double opt-in should be included in accordance with gaming age restrictions.

b. Opt-Out

- When a subscriber attempts to opt out of a short code in which they are signed up for multiple services, if the subscriber sends another opt-out message after the discovery message and does not indicate a specific service, the message must be treated as an opt-out of all messages.
- All instances of Stop and Help must be bold on advertising page, and preferably in the terms and conditions.

c. Customer Support

- All campaigns must supply a toll-free support number clearly disclosed in the program details.
- Where an IVR is used as part of the user support model, the initial greeting of the IVR must provide the commercial name of the company and/or service name(s) along with the hours of operation.
- The billing description on a customer's statement must include the Short Code, Campaign Name and Customer Support Phone Number or Customer Support Web URL.

6. Migrations

Campaigns being migrated from a different aggregator must have the migration letter and CSCA receipt attached to the campaign when submitted for review. The file size of the letter should not exceed 3MB or the tool will not accept it. Ensure CSCA receipts are current at time of submission.

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7. Chat Guidelines

In "Chat" services, a user is invited to join a Chat service. This includes but is not limited to Operator, Peer-to-Peer or Operator Moderated Group. "Chat" is inclusive of services such as Tarot, Astrology, "What a star would say", etc. The following must be taken into consideration for Chat services:

- Monthly subscription with unlimited are the preferred billing option. Per message charges are not allowed for chat programs through U.S. Cellular® UNLESS they are at a 1:1 ratio (One [1] message received per one (1) message sent].
- Operator chat applications CANNOT "self-generate" MT's.
- All Chat programs classified as 18+ must include a question prompting the user to verify that they are 18 years of age or older.

Group/Community Chat

The following items are required:

- These services can only be offered under Monthly Subscription models as with all valid chat services with U.S. Cellular. Per message premium Group Chat is not allowed.
- Operator and/or "Chat Bot" enabled Group Chat is strictly prohibited; only services that include a legitimate group of subscribers are allowed.

Chat Behavior

The following chat guidelines must be adhered to:

- Your application must ensure minors do not chat with adults. All chat programs must be moderated AT ALL TIMES. This should happen with a tiered approach:
 - Chat monitoring software MUST be used at all times, with a reaction time of no more than 60 minutes.
 - All Chat Campaigns must also be spot monitored by at least one human monitor, no less than two times per week.
 - If issues continue to arise with a particular Chat program, U.S. Cellular® reserves the right to require that a human monitor observes and moderates said campaign at all times.
 - If this policy is not strictly observed, U.S. Cellular® reserves the right to terminate the Chat campaign in question.
- All public content must be monitored and screened per U.S. Cellular®'s Campaign Playbook, section 7, Inappropriate Content. Service must show that it has human monitoring for adult language and content, as well as illegal activities.
- Subscribers can report other subscribers who behave inappropriately, this information should be made available in the campaign's terms and conditions.
- Service has clear guidelines for when and how inappropriate subscribers are removed from the service (e.g., 3 complaints and you are banned from the service).
- Subscribers can block other subscribers; this information should be made available in the campaign's terms and conditions.

8. Inappropriate Content

The use of inappropriate content in SMS campaigns is not permitted. The text below describes U.S. Cellular's definition and position on inappropriate content. Campaigns that offer inappropriate content may be terminated at the discretion of U.S. Cellular®.

U.S. Cellular Reserves the right to classify any material as inappropriate.

No content (in the context of language) may be provided that includes the following:

- Explicit sexual language
- Crude words or profanity

- Repeated mild expletives
- Language intended to incite violence
- Hate speech, including promotion of racial, religious, gender, disability, ethnic, sexual orientation or gender identity-based hatred
- Attempts to obscure crude words or profanity that continue to leave a clear image of the profanity (e.g. f**k)

Violence

- Sexual violence/rape
- Blood and gore
- Killing
- Deliberate injury and unusual methods of causing injury or pain
- Criminal acts
- Extreme violence including sadism, torture
- Infliction of severe pain or physical harm (possible exceptions: artistic, education, sports)
- Violence involving use of weapons by human figures or fantasy characters that is realistic enough to be considered promotion of violence
- Repeated sustained violence (including kicking, hitting, stabbing) that amounts to cruel or unusual behavior

Drug Use

 Any reference to the abuse of alcohol, drugs, tobacco or other controlled substances is strictly prohibited. This includes verbal and non verbal actions in which a person could conclude that promotion of drug use is intended.

Sexual Content

- Content of adult nature is NOT allowed. Adult nature includes textual or pictorial communications that are sexually graphic.
- Any controlled communications between a campaign and subscriber must not contain content that could be considered sexually graphic or explicit.
- Situations of this nature may be handled on a case by case basis and generally include, but are not limited to, communication between unwilling or unfamiliar parties and involve one or more of the following:
 - Acts of or acts pertaining to sexual intercourse or sexual arousal
 - Suggestive, insinuating or otherwise attempts to secure sex from an unwilling or unfamiliar subscriber or agent thereof
 - Any attempt to intimidate or otherwise negatively affect any U.S. Cellular subscriber by using any of the aforementioned situations or by using sex as a tool by which to do so
 - Rape, bestiality, incest, child pornography
 - Language specifically describing afore-mentioned behavior. This includes verbal and non verbal actions by which a person could conclude that promotion of this behavior is intended.

Copyright Notice

 It is U.S. Cellular's policy to respond to clear notices of alleged copyright infringement.

Private and Confidential Information:

 U.S. Cellular® does not allow the unauthorized publishing of people's private and confidential information, such as credit card numbers, Social Security Numbers, and driver's and other license numbers.

Impersonation:

 U.S. Cellular® does not allow impersonation of others through our services in a manner that is intended to or does mislead or confuse others.

Unlawful Use of Services:

 U.S. Cellular's products and services should not be used for unlawful purposes or for promotion of dangerous and illegal activities. Your campaign will be terminated and you will be reported to the appropriate authorities.

SPAM, Malicious Codes, Malware, and Viruses:

U.S. Cellular® does not allow spamming or transmitting malware and viruses.

Other

- Promotion of criminal acts
- Promotion of weapons use
- Material that violates the law
- Illegal gambling-related
- Vandalism.

9. Billing

- Periodic Reminders
 - The periodic reminder must state that the service is a recurring subscription.
 - o The periodic reminder must indicate the billing interval and fee structure.
 - The periodic reminder must provide opt-out instructions.
- Subscription Periods
 - There is no minimum period for any subscription service (subscriptions may be canceled at any time);pro-ration not required.
- Presentment
 - Charges on bill must match bill face description for approved program. Support numbers must not be listed on bill face.
 - Charges must be listed separately for each transaction that content was successfully delivered.
- Content Delivery Confirmation
 - There must be no charges for content that is not delivered.
- Miscellaneous Charges
 - There must be no premium charges for administrative type messages such as setting up a subscriber profile, help or opt out.
 - o There must be no premium charge for opt-out acknowledgement message.

10. Campaign Compliance

U.S. Cellular may terminate any campaign at any time without notice if the campaign fails to comply with this policy. Furthermore, U.S. Cellular® may terminate any campaign at any time without notice if in U.S. Cellular's reasonable judgment if the campaign does not meet the goals of the program or is not in the best interests of U.S. Cellular or its customers.

Campaign Violations

U.S. Cellular® must be notified immediately of non-compliant campaigns, especially those containing inappropriate content as outlined under U.S. Cellular's Campaign Playbook, section 7, Inappropriate Content. Such campaigns should immediately be suspended pending investigation.

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For short code release and re-activation to occur U.S. Cellular® requires a detailed letter outlining at a minimum:

- The nature of the violation
- How many campaigns under the short code were in violation, if multiple campaigns exist under the short code
- When the violation was discovered and the length of time it took to resolve the issue
- The steps taken to address the violation
- What steps can be or were taken to ensure the violation does not occur in the future
- As a carrier, why should we risk further incidents by continuing to partner with them going forward? Is it worth the risk to continue to run their campaigns?

Depending on the nature of the violation, U.S. Cellular® may require additional information outside of what is requested above.