Guide to Short Code Opt-In Mockup Requirements

Recently there has been a shift in compliance requirements from several of the major US wireless carriers. They have made it a requirement for customers to attach a mock up of their short code opt-in flow to every short code application. The requirement of proper opt in is certainly not new; however, in the past, the carriers simply took it on good faith that customers would abide by these rules. Now they are taking a more proactive approach. These rules come from the CTIA Short Code Monitoring Program Handbook.

Which short codes require a mockup?

Going forward, all short code applications must have a mockup showing the picture, sign, or script showing the opt in language for your short code campaign.

Where do I upload this mockup?

On the final page of the Twilio short code application is a page that allows you to upload additional support materials. Please upload your mockup here. If you’ve already submitted your application, attach your mockup in a response to the follow-up emails sent after submission.
Required Elements

1. Program Description: A brief summary of what kinds of messages your end users will be receiving. Example: Enter your phone number here to sign up for SMS weather alerts!

2. Fee disclosure: For the US, this phrase must be “Message and data rates may apply”. For Canada, the phrase must be “Standard message and data rates may apply”.

3. Message frequency disclosure: This can be discrete (e.g., “1 message per day”) or general (e.g., “Message frequency varies depending on activity”).

4. Links to mobile Terms of Service and Privacy Policy: These links must be adjacent to the rest of the disclosure information.

5. Customer care information: Typically this is the HELP keyword, but it can be a support email address, phone number, or web page where users can get support for issues they may be having with their short code.

6. Opt-Out instructions: Typically this is the STOP keyword, but in certain cases there may be other opt-out methods.

**NOTE:** For single message short code campaigns (such as two-factor authentication) opt-out and customer care information is **not** required.
Examples of Compliant Mock Ups

Recurring Message Program Example

Enter your phone number to receive SMS weather alerts from Twilio!

Phone Number

Message and data rates may apply. You will receive one message per day. Reply HELP for help or STOP to cancel at any time.

Next Mobile Terms Privacy Policy

Single Message Program Example

Enter your phone number to receive receive your secure login code from Twilio

Phone Number

Message and data rates may apply. You will receive one message per login.

Next Mobile Terms Privacy Policy
FAQ

1. Does my website have to look exactly like my mockup?
   No. However, your website must have all of the required elements.

2. My users are opted in either over the phone or in person. What do you need from me?
   We need a script with the same details as what is listed above. For the Terms and Privacy Policy link, it is sufficient to use language along the lines of “You can find our mobile terms and privacy policy online at www.example.com”.

3. What change happened to create this new requirement?
   The requirement for a compliant opt-in process has always existed. The only change is that carriers are requiring this additional step to ensure that the process is in place as an added layer of protection against unwanted messaging...

4. I have been assured by my lawyers that my proposed opt-in process is fully TCPA compliant, but it doesn’t seem to meet the requirements outlined above, what gives?
   CTIA compliance is even more stringent than the TCPA. Because carriers have the right to control the content on their network, they have decided to apply an even more stringent standard. See the CTIA Short Code Monitoring Program Handbook.

5. I have an opt-in method that I think is compliant, but it does not seem to meet the requirements listed above. What should I do?
   Please work with your Account Manager who can put you in touch with our Short Code specialists. I’m not quite sure what my full opt-in process will look like, or my website isn’t live yet. Is it possible to just give a description of the process and then update later once my code goes live or is closer to going live? Unfortunately, no. The mock-up is a carrier requirement.

If you have further questions, please get in touch with your Account Manager.