

FAQ for AT&T Short Code SMS / MMS Code of Conduct dated 10/17/2018

The Recently released Code of Conduct generated a lot of questions. To make sure interpretation of the Code of Conduct is communicated consistently, I have compiled questions from multiple sources and answered them here with clarifying comments.

More Background/Information

- Will there be an online resource or additional information from AT&T?
 - Not from AT&T

Shared Codes

- What constitutes a shared short code?
 - Shared, as intended in the policy, is fundamentally a short code that acts as a sub aggregator or reseller. Typically, there are many message senders on that code and message content varies widely.
 - Shared codes that are acceptable are codes where there is a Single Message Sender and message content is within the same vertical – message content is consistent.
- If a customer sends restaurant coupon alerts but for different restaurants is that considered “shared” short code?
 - No – not if there is a single message sender and the campaign content is consistent with restaurant coupons.
- Does this apply to 2FA and OTP (one-time password) “shared” short codes?
 - No – not if there is a single message sender responsible for all the 2FA and OTP messaging
- What is the reason for removing shared short codes?
 - Shared short codes that are managed by “re-sellers” and/or have multiple message senders are almost exclusively responsible for all unwanted massaging, Phishing, and malware
 - 10 DLC A2P when commercialized will be an economical alternative for smaller enterprises to run legitimate A2P campaigns

Timing

- What does it mean that "All existing shared short codes will be terminated at a future date"? Will messaging just stop on these codes, will there be a notice that messaging has been stopped? Can these codes be converted to a single client? How will clients be able to appeal termination?
 - Shared Short codes, as further defined above, will be issued a termination date that is likely to coincide with the commercial availability of 10DLC.
 - There will be ample notice of a termination date of 3 months prior to any termination
 - Codes can be converted to a single client / message sender by written appeal and updates to the existing information in our Campaign Management System
- How far out is "future date"?
 - TBD
- What does this mean? "commercial availability of 10DLC A2P messaging". Isn't 10DLC A2P messaging already commercially available?
 - No - 10DLC, or Long Codes, is not a sanctioned, supported, or recognized A2P messaging channel. It is currently in market and is considered a grey route to the carriers.
 - AT&T is working to build a Commercial 10DLC program to recognize long codes as a legitimate / sanctioned A2P SMS channel. 10DLC will be held to the same Code of Conduct.
- What will determine when/if AT&T enforces these penalties? Is there a warning or notice if they're looking at a code?
 - These are not penalties – These are policy changes
 - Prohibited Campaigns as outlined in the Code of Conduct on shared codes will be blocked / terminated as of 01/01/2019
 - Dedicated codes running Prohibited Content on will be terminated on 02/01/2019
 - Effective immediately, no New Shared Short Codes or Prohibited Content will be provisioned. Please do not submit any for provisioning.
 - Shared Short Codes that are not controlled by a single message sender and /or the message content is not of a single vertical will no longer be accepted for provisioning-effective immediately
 - Shared Short Codes that are not controlled by a single message sender and /or the message content is not of a single vertical will be prohibited / terminated once the 10DLC messaging channel is commercially available.

Message Content

- Can you please provide clarification on what steps AT&T will take in determining if an A2P messaging is affiliate-related?
 - AT&T will look to aggregation partners to manage this at the client level.
 - Affiliate run campaigns are often identified by customer reported complaints

- Is it okay for messages to be sent in regard to **existing** customer loans as long as it's not an advertisement?
 - Yes – assuming the message sender is the loan originator
- Prohibited messaging includes malware or app downloads from non-secure locations... does this mean that customers who now have an app download link in their message content will have to ensure that it is HTTPS instead of HTTP
 - Yes – AT&T recommends that app down loads come from Google Play or IOS if possible, otherwise it should be HTTPS
 - This is an effort to minimize the access to potential malware
- If a customer runs a shared short code currently and wants to leave one specific customer on the code as a “dedicated code” for that customer do, we need to file an amendment and get recertified?
 - Yes

Exceptions

- What are the conditions for exception granting?
 - All exceptions will come through the aggregators to AT&T for written approval
- What are the situations where shared short codes will still be allowed?
 - The intent is to prohibit reseller or sub – aggregated short codes with multiple message senders having access to that code. Single messaging sender per leased code.
 - Message content should be of a single vertical and message content. Do not mix appointment reminders; 2FA; coupons; marketing campaigns on the same short code
- Can a single short code be used for multiple businesses if there is a single owner? E.g. Restaurants, Real Estate
 - Yes
- Will platforms that leverage SMS for sending crisis messages be able to leverage a shared code across multiple clients?
 - Yes - if it is a single message sender / owner of the code and is specific to Crisis / emergency alerts
- What are the specific enterprise use cases that will allow exceptions to be granted?
 - Specific examples that were submitted and would be considered exceptions – assuming there is a single message sender:
 - Emergency notifications
 - 2FA/OTP
 - Transit alerts
 - Job Postings – if the message sender is the one doing the hiring
 - Charities

Long Codes

Note: Long Codes or 10DLC messaging will be addressed with an updated/expanded code of conduct when it is closer to commercial availability. The Code of Conduct currently applies to short codes only. The current code of conduct will be expanded to address issues specific to Long code A2P messaging

Opt In

As per CTIA, subscribers would have to re-opt in to a new short code, would there be an exception to this rule for switching to long code?

- That is a decision of the specific business enterprise and their legal team.