

CTIA Short Code Monitoring Program

Short Code Monitoring Handbook

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VERSION HISTORY

Version	Release Date	Details
1.5.2	October 1, 2015	The CTIA Short Code Monitoring Handbook was updated with the following: • Guiding Principles section; • Unsolicited messages definition update; • Recurring-messages Short Code program opt-in guideline update; • Program name and product description guidelines; • Free-to-end-user program requirements; and • Appendix C (Common Terms).
1.6	July 15, 2016	The CTIA Short Code Monitoring Handbook was updated with the following: • Version history for Handbook updates; • Sweepstakes and contests guidelines; • Opt-out information formatting update; • Interactive customer care chat programs guidelines; • New SHAFT (sex, hate, alcohol, firearms, or tobacco) content audit standard; and • Additional compliant program samples in Appendices A and B.
1.7	March 27, 2017	The CTIA Short Code Monitoring Handbook was updated with the following: • Version history for Handbook updates; • STOP keyword for recurring-message advertisements update; and • Positioning of the terms and conditions disclosure update.
1.8	November 15, 2020	The CTIA Short Code Monitoring Handbook was updated with the following: • Version history for Handbook updates; • Revised terminology to align certain terms with CTIA Messaging Principles and Best Practices (July 2019);¹ • Revised Introduction and “About This Handbook;” • Moved the content of Appendix C to the beginning of the Handbook (thus deleting Appendix C), retitled section Common Terms, and added additional terms; • Revised Sections A.2 (Wireless Provider Onboarding), A.3.3 (Opt-In), A.5 (Program Content), A.5.1 (Unlawful, Unapproved, or Illicit Content), A.5.2 (Controlled Substances and Adult Content), and A.12-A.13 (Political and Charitable Donation Programs); • Added Sections A.10.1 (Transitioning Recurring-Messages Programs), A.17 (Viral Messaging), A.18 (Abandoned Shopping Cart Notifications), and A.29 (Unsolicited Messaging and Deceptive Content Audit Standards); • Revised Exhibit 1 (Quick Reference Guide for Single-Message Program) and Exhibit 2 (Quick Reference Guide for Recurring-Messages Program); • Streamlined “Audit Standards and Guide;” and • Made conforming edits.

¹ CTIA Messaging Principles and Best Practices, available at <https://www.ctia.org/the-wireless-industry/industry-commitments/messaging-interoperability-sms-mms> (July 2019).

INTRODUCTION

A Common Short Code (Short Code) is a five- or six-digit number to and from which text messages can be sent from and to Consumers of all major U.S. Wireless Providers. Short Code programs offer a convenient, efficient, and innovative means to communicate with Consumers.

CTIA and its member companies aim to:

- Provide Consumers with the best possible user experience;
- Honor Consumer choices and prevent abusive messaging;
- Deliver flexible guidelines that clearly communicate compliant messaging practices;
- Enable the Short Code industry to self-regulate; and
- Facilitate enforcement measures, if necessary, to rapidly and reliably protect Consumers consistently.

CTIA reserves the right to take action against any Short Code program deemed to cause harm to Consumers, including suspension or termination.

ABOUT THIS HANDBOOK

The Short Code Monitoring Handbook (Handbook) offers stakeholders a streamlined guide to the operation and management of Short Code programs. The Handbook is intended to protect the integrity of – and Consumers' trust in – Short Code programs. Accordingly, this Handbook describes best practices for short message services (SMS), multimedia messaging services (MMS), and free-to-end-user (FTEU) programs that use Short Code. Handbook guidelines *do not* define rules for “premium” programs that bill Consumers.

Wireless Providers reserve the right to implement their own Short Code program requirements beyond the scope of this Handbook. Following this Handbook does not guarantee that a Short Code program is compliant with additional Wireless Provider requirements. However, all Wireless Providers have reviewed and accepted the Handbook's content.

The Handbook does not constitute, and is not a substitute for, legal advice. While the Handbook is intended to support efforts to comply with applicable laws and regulations, it is not intended to be a comprehensive legal or regulatory compliance guide. Message Senders are responsible for meeting all applicable legal requirements, and CTIA and its members make no representation that this Handbook is sufficient to assure legal compliance. Consultation with legal counsel is strongly recommended.

The Handbook is divided into the following sections:

- CTIA Compliance Framework
- In-Market Monitoring Guide
- Audit Standards and Guide

In addition, Appendix A and Appendix B provide sample compliant programs.

COMMON TERMS

Term	Description
Audit Notice	Report issued to noncompliant Short Code programs detailing the specific violations and actions required to bring the program into compliance.
Call-to-Action	Language encouraging or inviting a Consumer to opt into a Short Code program.
Compliance Audit	Test performed to determine the compliance of a Short Code program.
Consent	An individual subscriber's election to participate in a Short Code program.
Consumer	An individual person who subscribes to specific wireless messaging services or messaging applications.
Content Message	Text message delivering requested content or displaying instructions for how to access requested content.
Message Sender	Any service provider or other entity that uses a Short Code to originate or transmit message traffic to Consumers.
Message Platform	Application through which messages are received and sent.
Mobile Originated (MO)	Text message sent from a Consumer's mobile device.
Mobile Terminated (MT)	Text message sent to a Consumer's mobile device in response to Consumer texting a keyword.
Service Message	Text message offering details about the Short Code program, including opt-in instructions, opt-out instructions, summary terms and conditions, and support information (e.g., help).
SHAFT Content	Content that contains or promotes <u>s</u> ex, <u>h</u> ate, <u>a</u> lcohol, <u>f</u> irearms, or <u>t</u> obacco.
Short Code	A five- or six-digit number to and from which text messages can be sent to Consumers of all major U.S. Wireless Providers, to the extent that Wireless Providers agree to support a particular Short Code program.
Text Message	An SMS, MMS, or RCS message sent to or from a telephone number (i.e., an International Telecommunications Union E-164 address).
Wireless Provider	An owner or operator of radio, telephone, and data networks that offers Consumers a wide variety of wireless communications products and services, including wireless messaging services.

CTIA COMPLIANCE FRAMEWORK

UNIVERSAL COMPLIANCE PRINCIPLES

CTIA requires all Short Code programs to comply with the CTIA Compliance Framework, which is intended to promote the best possible user experience.

A.1 GUIDING PRINCIPLES

As new uses for Short Codes emerge, the Guiding Principles should be considered when implementing those new uses. Short Code programs that comply technically with the letter of a specific section but violate the letter or spirit of these Guiding Principles might be subject to enforcement action.

The four Guiding Principles listed below provide the baseline for all requirements:

1. **Display clear calls-to-action.** All calls-to-action must be clearly and unambiguously displayed. Consumers must be made aware of what they are signing up to receive relating to a specific program.
2. **Provide applicable consent mechanisms.** Consistent with the consent requirements outlined in the CTIA Messaging Principles and Best Practices,² Short Code programs must comply with applicable Consumer consent requirements, giving Consumers sufficient control of the messages they receive.
3. **Send opt-in confirmation messages.** A Consumer's opt-in must be confirmed in the first message sent to the Consumer. For single-message programs, the confirmation message content may be part of a single message that a Message Sender sends after a Consumer has opted in. For recurring-messages programs, confirmation messages must include clear opt-out instructions.
4. **Acknowledge and honor opt-out requests.** Message Senders must acknowledge and act on all opt-out requests. Monitoring procedures confirm successful opt-out.

A.2 WIRELESS PROVIDER ONBOARDING

To respond to Consumers' needs and emerging risks, Wireless Providers may promulgate requirements that fall outside the Handbook. Message Senders should refer to Wireless Providers for onboarding information including but not limited to:

- Program certification and migration processes;
- Program details;
- Advertising of controlled substances;
- Sweepstakes approval processes; and
- Marketing to children.

A.3 CHOICE AND CONSENT

Short Code programs are expected to provide full transparency and deliver sufficient value so that Consumers are aware of the nature of, truly desire messages from, and only receive messages from Short Code programs to which they have opted in.

A.3.1 UNSOLICITED MESSAGES

Unsolicited messages may not be transmitted using Short Codes. Unsolicited messages include, but are not limited to, messages delivered without a Consumer's consent and messages sent after a Consumer has opted out. Sending the Consumer a single opt-out message acknowledging the opt-out request is the only exception to this rule.

² See Section A.3.3.

A.3.2 ACCURACY

No component of Short Code program advertising or messaging may be deceptive, including for example messaging about the underlying program's functionality, features, or content. All disclosures present in calls-to-action, advertisements, terms and conditions, and messages should remain clear and consistent throughout the Consumer experience.

A.3.3 OPT-IN

Messages must be delivered to a Consumer's mobile device only after the Consumer has opted in to receive the messages associated with that specific program. Enrolling a Consumer in multiple Short Code programs based on a single opt-in is prohibited, even when all programs operate on the same Short Code. A Consumer has opted in when he or she has provided the appropriate level of consent, consistent with the CTIA Messaging Principles and Best Practices:

Types of Messaging Content & Associated Consent Principles		
<u>Conversational</u>	<u>Informational</u>	<u>Promotional</u>
Conversational messaging is a back-and-forth conversation that takes place via text. If a Consumer texts a business first and the business responds quickly with a single message, then it is likely conversational. If the Consumer initiates the conversation and the business simply responds, then no additional permission is expected.	Informational messaging is when a Consumer gives their phone number to a business and asks to be contacted in the future. Appointment reminders, welcome texts, and alerts fall into this category because the first text sent by the business fulfills the Consumer's request. A Consumer needs to agree to receive texts for a specific informational purpose when they give the business their mobile number.	Promotional messaging is a message sent that contains a sales or marketing promotion. Adding a call-to-action (e.g., a coupon code to an informational text) may place the message in the promotional category. Before a business sends promotional messages, the Consumer should agree in writing to receive promotional texts. Businesses that already ask Consumers to sign forms or submit contact information can add a field to capture the Consumer's consent.
First message is only sent by a Consumer Two-way conversation Message responds to a specific request	First message is sent by the Consumer or business One-way alert or two-way conversation Message contains information	First message is sent by the business One-way alert Message promotes a brand, product, or service Prompts Consumer to buy something, go somewhere, or otherwise take action
IMPLIED CONSENT If the Consumer initiates the text message exchange and the business only responds to each Consumer with relevant information, then no verbal or written permission is expected.	EXPRESS CONSENT The Consumer should give express permission before a business sends them a text message. Consumers may give permission over text, on a form, on a website, or verbally. Consumers may also give written permission.	EXPRESS WRITTEN CONSENT The Consumer should give express written permission before a business sends them a text message. Consumers may sign a form, check a box online, or otherwise provide consent to receive promotional text messages.

Calls-to-action should be clear and accurate, consent must not be obtained through deceptive means, and any subsequent consumer indications of permission to send shall not be considered a substitute for valid consent. For example, opt-in details cannot be displayed obscurely in terms and conditions related to other services.

Recurring-messages Short Code programs should send a single opt-in confirmation message that displays information verifying the Consumer's enrollment in the identified program. The opt-in confirmation message

must be delivered immediately after the Consumer opts into the program.³ For point of sale (POS) and hardcopy opt-ins, the opt-in confirmation message must be delivered as soon as reasonably possible after the Consumer opts into the program. Additionally, opt-in messages must contain the program (brand) name or product description, customer care contact information, opt-out instructions, product quantity or recurring-messages program disclosure, and with the exception of Free-to-End-User programs, a “message and data rates may apply” disclosure.

Legacy double opt-in (i.e., mobile device confirmation) methods remain acceptable options for obtaining Short Code program opt-ins from the Consumer.

The opt-in for all Short Code programs must comply with all applicable legal and regulatory requirements, including for example those established under the TCPA; the CAN-SPAM Act; the Communications Act of 1934, as amended; the Federal Trade Commission Act; and implementing regulations and decisions adopted by the Federal Communications Commission and Federal Trade Commission.

A.3.4 OPT-OUT

Opt-out mechanisms facilitate Consumer choice to terminate communications from Short Code programs, regardless of whether Consumers have consented to receive the message. Message Senders should acknowledge and respect Consumers’ opt-out requests consistent with the following guidelines:

- Message Senders should ensure that Consumers have the ability to opt-out at any time;
- Message Senders should support multiple mechanisms of opt-out, including phone call, email, or text; and
- Message Senders should acknowledge and honor all Consumer opt-out requests by sending one final opt-out confirmation message to notify the Consumer that they have opted-out successfully. No further messages should be sent following the confirmation message.

Message Senders should include opt-out information in the call-to-action, terms and conditions, and opt-in confirmation.⁴ Standardized “STOP” wording should be used for opt-out instructions. However, opt-out requests with normal language (i.e., stop, end, unsubscribe, cancel, quit, “please opt me out”) should also be read and acted upon by a Message Sender, except where a specific word can result in unintentional opt-out. The validity of a Consumer opt-out should not be impacted by any *de minimis* variances in the Consumer opt-out response, such as capitalization, punctuation, or any letter-case sensitivities.

A.4 CUSTOMER CARE

Customer care contact information must be clear and readily available to help Consumers understand program details as well as their status with the program. Customer care information should result in Consumers receiving help.

Short Code programs should *always* respond to customer care requests, regardless of whether the requestor is subscribed to the program. At a minimum, Message Senders must respond to messages containing the HELP keyword with the program name and further information about how to contact the Message Sender. Short Code programs should promote customer care contact instructions at program opt-in and at regular intervals in content or service messages, at least once per month.

³ If a Message Sender uses a MO opt-in via a Short Code keyword and implements a double opt-in approach, the Message Sender may provide the opt-in confirmation message in the first or second message it sends to the Consumer.

⁴ See Section A.10 and Exhibit 2.

A.5 PROGRAM CONTENT

All content associated with Short Code programs should promote a positive user experience. Messaging content should:

- Adhere to all applicable laws;
- Be age-gated appropriately for controlled substances and adult content;
- Follow CTIA Unwanted Messages guidelines;⁵
- Be sent via compliant opt-in to subscribers who want it; and
- Abide by all other Handbook standards.

Content that is either explicitly prohibited or has additional Wireless Provider requirements falls into the following categories: SHAFT (sex, hate, alcohol, firearms, or tobacco), gambling, and sweepstakes and contests.

A.5.1 UNLAWFUL, UNAPPROVED, OR ILLICIT CONTENT

Programs associated with Wireless Provider brands or operating on the Wireless Provider networks should not promote unlawful, unapproved, or illicit content. Such content may include, but is not limited to, the following:

- Spam;
- Fraudulent or misleading messages;
- Depictions or endorsements of violence;
- Inappropriate content;
- Profanity or hate speech; and
- Endorsement of illegal drugs.

Programs must operate according to all applicable federal and state laws and regulations. All content should be appropriate for the intended audience. Additional legal and ethical obligations apply when marketing to children under age 13, and such programs might be subject to additional review by Wireless Providers.

A.5.2 CONTROLLED SUBSTANCES AND ADULT CONTENT

All content should be appropriate for the intended audience. Messaging content for controlled substances or for distribution of adult content might be subject to additional Wireless Provider review. Messages should include robust age verification at opt-in (e.g., electronic confirmation of age and identity). Reference to the abuse of controlled substances is prohibited.

Additional legal and ethical obligations apply when marketing to children under age 13, and such programs might be subject to additional review by Wireless Providers.

A.5.3 SWEEPSTAKES AND CONTESTS

Sweepstakes are characterized by the element of chance and the awarding of a prize. Both state and federal laws regulate sweepstakes. Organizations considering a sweepstakes program are urged to consult with their legal counsel before submitting a program for Wireless Provider approval. Wireless Providers review sweepstakes individually and reserve the right to approve or reject them at their discretion. Note that sweepstakes program review might take longer than reviews of other program types. At a minimum, sweepstakes program providers should:

- Follow each Wireless Provider's process and guidelines;
- Provide the Wireless Provider with the sweepstakes rules for review;
- Include a free method of entry; and
- Consult with legal counsel.

⁵ See CTIA Messaging Principles and Best Practices at 12-22.

A.6 PRIVACY POLICY AND TERMS AND CONDITIONS

Message Senders are responsible for protecting the privacy of Consumers' information and must comply with applicable privacy law. Message Senders should maintain a privacy policy for all programs and make it accessible from the initial call-to-action. When a privacy policy link is displayed, it should be labeled clearly. In all cases, terms and conditions and privacy policy disclosures must provide up-to-date, accurate information about program details and functionality.

A.7 PROGRAM NAME AND PRODUCT DESCRIPTION

All Short Code programs are required to disclose program names, product description, or both in service messages, on the call-to-action, and in the terms and conditions. The program name is the sponsor of the Short Code program, often the brand name or company name associated with the Short Code. The product description describes the product advertised by the program.

A.8 PROGRAM RECORDS AND FUNCTIONALITY

Message Senders assume responsibility for maintaining accurate records in Wireless Provider systems and the Common Short Code Administration (CSCA) registry. Message Senders wishing to modify a program must submit changes to the Wireless Providers for review and must update relevant Wireless Provider records. Programs promoted in the market *must* match the programs approved.

A.8.1 CONSUMER RECORDS

All opt-in and opt-out requests should be retained from the time a Consumer initiates opt-in until a minimum of six months after the Consumer has opted out of a program. Message Senders assume responsibility for managing information about deactivated and recycled mobile phone numbers and must process this information within three business days of receipt.

Message Senders must track opt-in information by individual Consumers. Message Senders should not use opt-in lists that have been rented, sold, or shared to send messages. Message Senders should create and vet their own opt-in lists.

A.8.2 MO MESSAGE PROCESSING

All mandatory keywords must be processed correctly, regardless of MO message protocol (e.g., keywords must function whether sent by MMS or SMS). Message Senders must scan MO message logs regularly to identify opt-out attempts and must terminate those subscriptions, regardless of whether the subscribers used the correct opt-out keywords or methods.

USE CASES

Because Short Code programs vary greatly, depending on their intended purpose, the Handbook was designed with various use cases in mind. All Short Code programs based on the displayed use cases should comply with the Universal Compliance Principles in addition to the specific guidelines described in this section.

A.9 SINGLE-MESSAGE PROGRAMS

Single-message programs, or “one-off” programs, deliver a one-time message in response to Consumers' opt-in requests. Examples of single-message programs include, but are not limited to, the following:

- Informational alert;
- Purchase receipt;
- Delivery notification; and
- Two-factor authentication.

Exhibit 1: QUICK REFERENCE GUIDE FOR SINGLE-MESSAGE PROGRAM

Program Component ⁶	Description	Requirements
Call-to-Action	The call-to-action for a single-message program can be simple. The primary purpose of disclosures is to ensure a Consumer consents to receive a text message and understands the nature of the program.	• Product description. • Complete terms and conditions OR link to terms and conditions. • Privacy policy OR link to privacy policy. • “Message and data rates may apply” disclosure.
Terms and Conditions	Comprehensive terms and conditions may be presented in full beneath the call-to-action, or they may be accessible from a link in proximity to the call-to-action. ⁷	• Program (brand) name. • Product description. • Customer care contact information. • “Message and data rates may apply” disclosure.
Opt-In	The Consumer must actively opt into single-message programs.	Consumer’s affirmative opt-in, consistent with the CTIA Messaging Principles and Best Practices. ⁸
Message Flow	Although single-message programs are not required to display HELP and STOP keywords, they should support HELP and STOP commands, as described in the Universal Compliance Principles (Sections A.1-A.8).	Opt-In Confirmation MT • Program (brand) name OR product description. HELP MT • Program (brand) name OR product description. • Additional customer care contact information. Opt-Out MT • Program (brand) name OR product description. • Confirmation that no further messages will be delivered.

An example of a compliant single-message program and associated message flow appears in Appendix A.

A.10 RECURRING-MESSAGES PROGRAMS

Because they reach out to Consumers on an ongoing basis, recurring-messages programs require additional disclosures. Examples of recurring-messages programs include but are not limited to the following:

- Content or informational alert subscriptions (e.g., horoscopes, news, weather);
- Flight status notifications (multiple messages); and
- Marketing and loyalty promotions.

⁶ Where feasible, Message Senders may combine multiple program components (e.g., call-to-action and terms and conditions).

⁷ Popups are not a method for displaying terms and conditions.

⁸ See Section A.3.3.

Exhibit 2: QUICK REFERENCE GUIDE FOR RECURRING-MESSAGES PROGRAM

Program Component ⁹	Description	Requirements
Call-to-Action	The primary purpose of disclosures is to ensure the Consumer consents to receive text messages and understands the nature of the program.	• Product description. • Message frequency disclosure. • Complete terms and conditions OR link to complete terms and conditions. • Privacy policy OR link to privacy policy. • STOP keyword.¹⁰ • “Message and data rates may apply” disclosure.
Terms and Conditions	Comprehensive terms and conditions might be presented in full beneath the call-to-action, or they might be accessible from a link in proximity to the call-to-action. ¹¹	• Program (brand) name. • Message frequency disclosure. • Product description. • Customer care contact information. • Opt-out information. • “Message and data rates may apply” disclosure.
Opt-In	The Consumer must actively opt in to recurring-messages programs. Recurring-messages programs must send one message confirming opt-in consent. Double opt-in is optional.	Consumer’s affirmative opt-in, consistent with the CTIA Messaging Principles and Best Practices. ¹²
Message Flow	Recurring-messages programs confirming opt-in with a single text message MUST state explicitly to which program the Consumer enrolled and provide clear opt-out instructions in the Opt-In Confirmation MT.	Opt-In Confirmation MT • Program (brand) name OR product description. • Opt-out information. • Customer care contact information. • Message frequency disclosure. • “Message and data rates may apply” disclosure. HELP MT • Program (brand) name OR product description. • Additional customer care contact information. Opt-Out MT • Program (brand) name OR product description. • Confirmation that no further messages will be delivered.

⁹ Where feasible, Message Senders may combine multiple program components (e.g., call-to-action and terms and conditions).

¹⁰ Opt-out information may appear in the terms and conditions.

¹¹ Popups are not a method for displaying terms and conditions.

¹² See Section A.3.3.

Program Component ⁹	Description	Requirements
Program Message	Program Messages are sent in the normal course of the Short Code program, <i>after</i> the Consumer has received an opt-in confirmation.	Opt-out instructions must be provided at regular intervals and at least once per month.

An example of a compliant recurring-messages program call-to-action and associated message flow appears in Appendix B.

A.10.1 TRANSITIONING RECURRING-MESSAGES PROGRAMS

To protect and preserve Consumers' trust in Short Code programs, Message Senders must disclose when a recurring-messages program will transition from one Short Code to another Short Code.¹³

To transition a recurring-messages program,¹⁴ the following steps should be followed:

1. On the old Short Code, send a final Service Message to Consumers enrolled in the recurring-messages program. The final Service Message must disclose:
 - The number for the new Short Code that will be used for the recurring-messages program;
 - The recurring-messages program's name or product description;
 - Opt-out information; and
 - Other important details regarding the transition (e.g., customer care contact information).

Message Senders are encouraged to send this Service Message at least one week before messages will be sent from the new Short Code.

2. Transition the existing opt-in list to the new Short Code.
3. Discontinue the recurring-messages program on the old Short Code.¹⁵
4. On the new Short Code, send an initial Service Message to Consumers enrolled in the recurring-messages program that discloses:
 - The recurring-messages program's name or product description;
 - Opt-out information;
 - Customer care contact information;
 - Message frequency disclosure; and
 - "Message and data rates may apply" disclosure.

Once the transition is complete, Message Senders should resume regular messaging on the new Short Code.

¹³ The Handbook does not constitute, and is not a substitute for, legal advice. Message Senders are responsible for meeting all applicable legal requirements and are therefore encouraged to consult with an attorney.

¹⁴ While the steps described in this section apply to recurring-messages programs that transition from one Short Code to another, they represent best practices and are therefore recommended when a Message Sender transitions from any type of Message Platform to another (e.g., Short Code, ten-digit long code).

¹⁵ Once the recurring-messages program on the old Short Code has been discontinued, Message Senders should obtain the applicable opt-in consent from additional Consumers (i.e., Consumers who subscribe after the transition) using the new Short Code. See Section A.3.3.

A.11 MACHINE-TO-MACHINE PROGRAMS

Machine-to-machine (M2M) Short Code programs should never interact with Consumers. For M2M Short Code programs, Message Senders need only an updated program brief on file with the CSCA and the Wireless Providers.

A.12 POLITICAL DONATION PROGRAMS

Short Code programs that solicit political donations are subject to additional best practices, available at <https://www.ctia.org/the-wireless-industry/industry-commitments/guidelines-for-federal-political-campaign-contributions-via-wireless-carriers-bill>. Such best practices include but are not limited to:

- The Consumer must have a U.S.-based mobile number;
- Federal candidates, political committees, or political parties soliciting political donations must be registered with the Federal Election Commission (FEC);
- Only one Short Code may be used by each participating federal candidate, political committee, or political party; and
- Intermediaries acting on behalf of federal candidates, political committees, or political parties agree to abide by all best practices to run political Short Code campaigns.

Political donation programs also should conform to the political messaging guidelines in the CTIA Messaging Principles and Best Practices (July 2019).

Message Senders engaging in political donation programs should reach out to Wireless Providers on an individual basis.

A.13 CHARITABLE DONATION PROGRAMS

Short Code programs that solicit charitable donations are subject to additional regulations, available at <https://www.ctia.org/the-wireless-industry/industry-commitments/mobile-giving-via-wireless-carriers-bill>. Requirements include but are not limited to:

- Only charitable organizations qualified as tax-exempt under Section 501(c)(3) of the Internal Revenue Code are eligible;
- Charitable organizations must be accredited by at least one arm's-length, disinterested non-profit accreditation organization (e.g., Better Business Bureau Wise Giving Alliance, Charity Navigator);
- Charitable organizations must receive separate opt-in for informational and solicitation messages if they provide both types of messages under the same Short Code;
- Charitable organizations may not use the Short Code program for lotteries, sweepstakes, raffles, or recurring donations; and
- No entities involved in the donation campaign, aside from the charitable organization itself, may use any part of the mobile subscriber data collected.

Charitable donation programs should conform to the non-profit messaging guidelines in the CTIA Messaging Principles and Best Practices (July 2019).

A.14 FREE-TO-END-USER PROGRAMS

Free-to-end-user (FTEU) programs are subject to almost all of the same requirements as SMS Short Code programs. FTEU programs must display a clear call-to-action, capture Consumers' affirmative opt-in, send an opt-in confirmation message, and abide by Consumers' requests to opt-out. However, all FTEU programs are exempt from displaying "message and data rates may apply" in advertisements, terms and conditions, and messages.

A.15 MMS PROGRAMS

MMS programs are subject to the same requirements as SMS Short Code programs.

A.16 INTERACTIVE CUSTOMER CARE CHAT PROGRAMS

Because rapid and direct communication between Consumers and customer care representatives is important, many organizations now offer interactive customer care chat programs. Such communication makes obtaining assistance with minimal delay easier and more convenient for Consumers. For example, Consumers replying with the HELP keyword to a Short Code can be routed quickly to customer care, where they can chat directly with a representative, without ever leaving their messaging application. Increasing prevalence of this communication practice makes understanding the guidelines and limitations surrounding such programs more important than ever for Wireless Providers. For organizations wishing to implement interactive customer care chat, such programs may:

- Operate on dedicated Short Codes only;
- Be used for communication with customer care representatives only; and
- Not be used for marketing.

A.17 VIRAL MESSAGING

Viral messaging is a process by which a Consumer: (1) receives a message; (2) identifies one or more other Consumers as likely interested in receiving a similar message; and (3) initiates a process by which the other Consumers will receive the message. For example, Consumer A may input Consumer B's phone number into an app to send a message to Consumer B via Short Code.

A Message Sender may send viral messaging via Short Code. To do so, the mechanism by which a Message Sender sends viral messaging must require a Consumer to: (1) verify that the Consumer has obtained each message recipient's consent to send the message; (2) individually identify and select each message recipient; and (3) confirm that each message will be sent on the Consumer's behalf. Additionally, any viral messaging must state why the recipient has received the message, including identifying the Consumer sending the message and the purpose of the message. Message Senders must honor all opt-out requests from message recipients by opting the message recipient out of all messages sent through the viral messaging application, software, or program. Additionally, Consumers sending viral messaging may not receive anything of value for using the viral messaging application, software, or program.

Consistent with the Handbook's goals, these requirements will honor Consumer choice, help prevent abuse of messaging platforms, and facilitate transparency.

A.18 ABANDONED SHOPPING CART NOTIFICATIONS

A Message Sender must obtain applicable consent before sending an abandoned shopping cart notification (ASCN).¹⁶ The act of placing a good or service in an online shopping cart does not constitute consent. The call-to-action must disclose that the message is an ASCN, and a Message Sender must disclose in the applicable Terms and Conditions how it will link, correlate, or identify a Consumer's telephone number to an abandoned shopping cart (e.g., use of cookies). A Message Sender may send no more than one ASCN per shopping event to a Consumer and must send the ASCN within 48 hours after the shopping cart is abandoned.

ASCNs must include an opt-out notice to the Consumer. ASCNs shall not permit a Consumer to complete an order by sending a text message (e.g., credit card information sent via SMS, "text PURCHASE to fulfill order"). Instead, Consumers must complete an order through the Message Sender's online store.

¹⁶ See Section A.3.3.

IN-MARKET MONITORING GUIDE

COMPLIANCE AUDITS

The CTIA Compliance Assurance Solution employs data gathered via in-market monitoring. When programs are deployed in market, the live programs are captured and audited. This method is more effective than program brief review or routine keyword testing because compliance audits reflect the user experience that actual Consumers encounter when they interact with Short Code programs in market.

CTIA issues compliance audits weekly for standard rate Short Codes leased with the CSCA. Compliance audits performed by CTIA are available to all major U.S. Wireless Providers, and CTIA compliance metrics can be incorporated into individual Wireless Provider compliance policies.

A.19 AUDIT NOTICES

Each audit notice displays a unique audit number, Short Code, Message Sender, aggregator or aggregators, notice date, and cure date at the top. Violations are based on the compliance guidelines outlined in the CTIA Compliance Framework section of the Handbook (Sections A.1-A.18). Taking the severity level of the gravest violation cited, a failed audit must be resolved in the appropriate timeframe (i.e., before or on the cure date).

CTIA compiles and generates audit notices each Monday for audits performed the previous week, and audits are published Tuesday morning. The official notice date from which the cure date is calculated is 12:00 P.M. ET each Tuesday.

A.20 SEVERITY LEVELS

All audit notices are assigned severity levels based on the extent to which the associated findings might harm Consumers. Cure dates and penalties vary based on severity, as detailed in Exhibit 3.

Exhibit 3: AUDIT NOTICE SEVERITIES DESCRIPTION

	Definition	Cure Date	Penalties
Severity 0	Extreme Consumer harm	Immediate	CTIA: Immediate registry suspension. Wireless Providers: Vary by case; immediate suspension or termination possible.
Severity 1	Serious Consumer harm	5 business days	CTIA: Unresolved audits; possible registry suspension. Wireless Providers: Vary by case.
Severity 2	Moderate Consumer harm	5 business days	CTIA: Vary by case. Wireless Providers: Vary by case.

A.21 CTIA COMPLIANCE CARE TEAM COMMUNICATION

On receiving an audit notice, Message Senders may communicate with the CTIA Compliance Care Team (Care Team) by leaving a comment on the audit notice or contacting us.support@wmcglobal.com. The Care Team responds promptly to all messages. Although Care Team specialists are unable to preapprove compliant designs, they try to assist Message Senders as much as possible with understanding how to resolve violations and close audits.

A.22 RETESTS

Within the prescribed period following issuance of an audit notice, the responsible aggregator or Message Sender must confirm on the audit notice that it has made changes to or has removed from market the offending advertisement or message flow. Should the Care Team fail to receive confirmation or should the Message Sender fail to take the actions required, the Short Code is subject to further action.

For TV and print advertisements with longer run cycles, aggregators and Message Senders may request a retest. Retest requests must be made in good faith, with a clear explanation of the changes implemented. Audits at this status are categorized as Pending Retest.

A.23 APPEALS

Aggregators and Message Senders that believe they have a valid claim may challenge an audit by contacting us.support@wmcglobal.com before the cure date noted on the audit notice. The email message should explain why the Message Sender deems the audit incorrect. Appeals must pertain to the application of violations cited on the specific audit in question.

AUDIT STANDARDS AND GUIDE

The following pages display tables of audit standards by use case. Advertising audit standards apply to all advertisements hosting calls-to-action for Short Code programs. Message flow audit standards apply to required service messages.

Message categories for which specific standards apply are marked with an “x” in the tables. Refer to the glossary below for help with unfamiliar terms.

Opt-In Confirmation	Short Code programs should send a single opt-in confirmation message displaying information verifying the Consumer’s enrollment in the identified program and describing how to opt out. The opt-in confirmation message must be delivered immediately after the Consumer opts into the Short Code program, except as indicated in this Handbook for certain programs using a double opt-in approach. Additionally, opt-in messages must contain the program (brand) name or product description, customer care contact information, message frequency disclosure, and the “message and data rates may apply” disclosure.
HELP	Message Senders send a HELP message after Consumers text the HELP keyword. Short Codes should reply with additional contact information to Consumers’ requests for help.
Opt-Out	Message Senders send an opt-out message after Consumers text a keyword indicating they wish to opt out (e.g., STOP, END, CANCEL, QUIT, UNSUBSCRIBE). The opt-out message confirms that the Consumer has been opted out of the program.
Violation	Specific breach of the CTIA Compliance Framework, including the Universal Compliance Principles and all principles that apply to particular use cases (e.g., single-message programs, recurring-messages programs). Auditors check program advertisements and service messages against lists of violations to identify noncompliance.
Severity	Number representing the impact to a Consumer associated with a violation. Severity 0 violations are most severe; Severity 2 violations are least severe.
Action Required	Action or actions the responsible Message Sender must take to correct the associated violation.

The audit standards listed on the following pages distill the principles listed in the narrative portion of the Handbook into test scripts for monitoring. Advertising audit standards apply to media displaying Short Code calls-to-action. Message flow audit standards apply to required service messages.

SINGLE-MESSAGE PROGRAMS

A.24 SINGLE-MESSAGE PROGRAM ADVERTISING AUDIT STANDARDS

Violation	Severity	Action Required
Contains SHAFT (sex, hate, alcohol, firearms, or tobacco) content that is federally illegal	0	Remove call-to-action and disable keyword associated with SHAFT content
Contains or promotes SHAFT content that is not federally illegal, but exists without a functioning age gate	0	Add a functioning age gate to associated SHAFT content
Contains SHAFT content that has been flagged as hateful, violent, or sent with the intention to incite violence	0	Remove call-to-action and disable keyword associated with SHAFT content
Messaging sent without a valid opt-in; the sharing of opt-ins across Short Codes is prohibited	0	Disable all messaging for content provider over cited Short Code
No product or service description	1	Describe product or service
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry
No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy
No link to comprehensive terms and conditions	1	Display link to comprehensive terms and conditions
No mention that message and data rates may apply	2	Disclose that message and data rates may apply
If text message is an abandoned shopping cart notification (ASCN), no disclosure in the call-to-action that the message is an ASCN	2	Disclose that text message is an ASCN
If text message is an ASCN, terms and conditions do not disclose how Message Sender will link, correlate, or identify Consumer's telephone number to an abandoned shopping cart	2	Disclose in terms and conditions how Message Sender will link, correlate, or identify telephone numbers to abandoned shopping carts

A.25 SINGLE-MESSAGE PROGRAM MESSAGE FLOW AUDIT STANDARDS

Violation	Severity	Action Required	Applicable Message		
			Opt-In Conf.	HELP	Opt-Out
Contains or promotes SHAFT content that is federally illegal	0	Remove call-to-action associated with SHAFT content	X	X	X
Contains or promotes SHAFT content that is not federally illegal, but exists without a functioning age gate	0	Add a functioning age gate to associated SHAFT content	X	X	X
Contains SHAFT content that has been flagged as hateful, violent, or sent with the intention to incite violence	0	Remove call-to-action and disable keyword associated with SHAFT content	X	X	X
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	X	X	X
Unsolicited message delivered	1	Cease all messaging associated with program	X	X	X
Incorrect response to STOP command	1	Terminate all of Consumer's active programs after he or she texts STOP, and send one opt-out message			X
No product or program name	2	Display program or product name	X	X	X
Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information (e.g., a toll-free helpline or email address)		X	
If text message is an ASCN, send more than one ASCN per shopping event	2	Cease sending more than one ASCN per shopping event	X	X	X
If text message is an ASCN, send ASCN outside of 48-hour window	2	Begin sending ASCNs within the permitted 48-hour window	X	X	X
If text message is an ASCN, ASCN permits Consumer to complete order via text message following receipt of ASCN	2	Remove Consumer's ability to complete order via text message	X	X	X

RECURRING-MESSAGES PROGRAMS

A.26 RECURRING-MESSAGES PROGRAM ADVERTISING AUDIT STANDARDS

Violation	Severity	Action Required
Contains SHAFT (sex, hate, alcohol, firearms, or tobacco) content that is federally illegal	0	Remove call-to-action and disable keyword associated with SHAFT content
Contains or promotes SHAFT content that is not federally illegal, but exists without a functioning age gate	0	Add a functioning age gate to associated SHAFT content
Contains SHAFT content that has been flagged as hateful, violent, or sent with the intention to incite violence	0	Remove call-to-action and disable keyword associated with SHAFT content
Messaging sent without a valid opt-in; the sharing of opt-ins across Short Codes is prohibited	0	Disable all messaging for content provider over cited Short Code
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry
No clear indication of privacy policy	1	Display privacy policy or clearly labeled link to privacy policy
No link to comprehensive terms and conditions	1	Display link to comprehensive terms and conditions
No product or service description	1	Describe product or service
Improper use of the term “free”	1	Remove the term “free”
Failure to display STOP keyword	1	Display STOP keyword ¹⁷
No mention that messages are recurring	2	State that messages are recurring
No mention that message and data rates may apply	2	Disclose that message and data rates may apply
No customer care contact information ¹⁸	2	Display toll-free helpline, email address, or HELP keyword

¹⁷ Opt-out information may appear on a separate page in the terms and conditions.

¹⁸ Customer care contact information may appear on a separate page in the terms and conditions.

A.27 RECURRING-MESSAGES PROGRAM MESSAGE FLOW AUDIT STANDARDS

Violation	Severity	Action Required	Applicable Message		
			Opt-In Conf.	HELP	Opt-Out
Contains SHAFT (sex, hate, alcohol, firearms, or tobacco) content that is federally illegal	0	Remove call-to-action associated with SHAFT content	X	X	X
Contains or promotes SHAFT content that is not federally illegal, but exists without a functioning age gate	0	Add a functioning age gate to associated SHAFT content	X	X	X
Contains SHAFT content that has been flagged as hateful, violent, or sent with the intention to incite violence	0	Remove call-to-action and disable keyword associated with SHAFT content	X	X	X
Fails to match approved program in CSC registry	1	Remove unapproved program elements or update CSC registry	X	X	X
Unsolicited message delivered	1	Cease all messaging associated with program	X	X	X
Failure to display STOP keyword	1	Display STOP keyword	X		
Incorrect response to STOP command	1	Terminate all of Consumer's active programs after he or she texts STOP, and send on opt-out message			X
No indication that program is recurring	2	State that program is recurring	X		
No product or program name	2	Display program or product name	X	X	X
No mention that message and data rates may apply	2	Disclose that message and data rates may apply	X		
No customer care contact information	2	Display toll-free helpline, email address, or HELP keyword ¹⁹	X		
Failure to reply to HELP keyword	2	Reply to HELP keyword with additional contact information (e.g., a toll-free helpline or email address)		X	
Failure to properly disclose transition of a recurring-messages program to new Short Code	2	Send Service Message to enrolled Consumers that discloses name or product description, opt-out information, HELP keyword, message frequency disclosure, and "Message and Data Rates May Apply" disclosure	X	X	X

A.28 MACHINE-TO-MACHINE PROGRAM AUDIT STANDARDS

M2M programs, which should never interact with Consumers, only need keep an updated program brief on file with the CSCA and the Wireless Providers. If an M2M program is found to be advertising to Consumers, it is subject to immediate enforcement action.

Violation	Severity	Action Required
Failure to match approved program in CSC registry	1	Remove unapproved program elements or update program details in CSC registry

¹⁹ Customer care URLs are also acceptable.

A.29 UNSOLICITED MESSAGING AND DECEPTIVE CONTENT AUDIT STANDARDS

The audit standards below are intended to protect Consumers from abusive messaging and deceptive advertising. Wireless Providers monitor Short Code traffic to identify and investigate threats as well as monitor Consumer complaints.

Violation	Severity	Action Required	Applicable Program Component		
			Single Message	Landing Page	Interaction or Download
Contains or promotes content associated with phishing activity	0	Cease all messaging associated with program	X	X	X
Contains or promotes content associated with malware	0	Cease all messaging associated with program	X	X	X
Contains or promotes content impersonating a third-party entity or brand	0	Cease all messaging associated with program	X	X	X
Promotes illegal activity	0	Cease all messaging associated with program	X	X	X
High volumes of unsolicited message complaints reported	1	Verify opt-in process to ensure compliance and disseminate opt-out information to all subscribers	X		

APPENDIX A:

SAMPLE COMPLIANT SINGLE-MESSAGE PROGRAM

Exhibit A1: Sample Compliant Single-Message Advertisement and Service Messages

A Web Page

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Coupon Brand

Text COUPON to 12345 for 50% off your next purchase!

Message and data rates may apply.

[Terms of Use](#) [Privacy Policy](#)

Opt-In Confirmation Message:

"Coupon King: Show this text at the register for 50% off your next purchase!"

HELP Message:

"Thanks for texting Coupon King! Call 1-800-123-4567 for support."

Opt-Out Message:

"Coupon King: You will receive no further messages."

Exhibit A2: Sample Compliant Single-Message Advertisement and Service Messages

A Web Page

← → X ↶ http:// 🔍



To confirm your account, enter your mobile number:

You'll receive one message with a passcode.
Message and data rates may apply.

[Terms of Use](#) [Privacy Policy](#)

Opt-In Confirmation Message:

"Mobile Confirm: Your passcode is 9876. Enter it online to confirm your account."

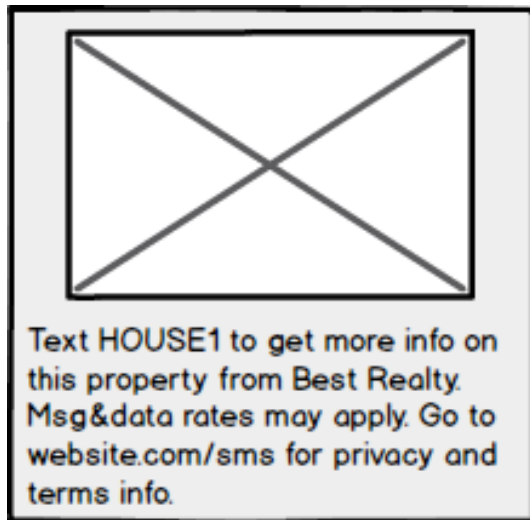
HELP Message:

"You recently created or modified an account online. Enter your passcode to confirm. Call 1-800-123-4567 for Mobile Confirm support."

Opt-Out Message:

"Mobile Confirm: You will receive no further messages from Short Code 12345."

Exhibit A3: Sample Compliant Single-Message Print Advertisement and Service Messages



Opt-In Confirmation Message:

"Best Realty: Go to bestrealty.com/house1 for more info on this property."

HELP Message:

"For Best Realty property info help, contact smshelp@bestrealty.com."

Opt-Out Message:

"You're opted out and will no longer receive Best Realty property info alerts."

Exhibit A4: Sample Compliant Single-Message Verbal Opt-In and Service Messages

Would you like a one-time reminder of your upcoming flight? We'll text the mobile number you provide with the flight status 24 hours before your scheduled departure. Message and data rates may apply. You can visit our website at flights.com/sms for privacy and terms information.

Opt-In Confirmation Message:

"Reminder: Your flight leaves tomorrow at 4:05 P.M. from Gate 1."

HELP Message:

"For assistance with Flight Reminder messages, call 1-888-123-4567."

Opt-Out Message:

"You are now opted out and will receive no further Flight Reminder messages."

Exhibit A5: Sample Compliant Single-Message Hardcopy Opt-In and Service Messages

Lifetime Trip - Enrollment Form

Enter your name and mobile number to receive a one-time alert when a spot opens up on our waiting list.

Message and data rates may apply. Go to website.com/sms for privacy and terms info.

Name _____

Mobile Number _____

Opt-In Confirmation Message:

"A spot just opened up on the Lifetime Trip waiting list. Contact your travel agent to sign up today!"

HELP Message:

"For Lifetime Trip waiting list help, call 1-888-123-4567."

Opt-Out Message:

"You're now opted out and will no longer receive Lifetime Trip wait list alerts."

Exhibit A6: Sample Compliant Single-Message POS Advertisement and Service Messages



To receive a message with a link to your receipt, enter your mobile number:

Sign Up!

Message and data rates may apply. Visit website.com/sms for privacy and terms info.

Opt-In Confirmation Message:

"For a copy of your receipt, click here: shorturl.com/eu38re8w."

HELP Message:

"For Store Receipt help, call 1-888-123-4567."

Opt-Out Message:

"You're opted out and won't receive any more Store Receipt messages."

APPENDIX B:

SAMPLE COMPLIANT RECURRING-MESSAGES PROGRAM

Exhibit B1: Sample Compliant Recurring-Messages Web Advertisement and Service Messages²⁰

A Web Page

http://



To subscribe to Weather Alerts, enter your mobile number:

*Message and data rates may apply.
Text STOP to opt out or HELP for help.*

[Terms of Use](#) [Privacy Policy](#)

Advertisement

Although opt-out instructions are not required on the advertisement itself, they must appear in the terms and conditions.

Terms and Conditions

Complete terms and conditions should include customer care contact information, complete opt-out instructions, a recurring message disclosure, a product description, and a program (brand) name. Some program types (e.g., sweepstakes) have additional requirements Wireless Provider by Wireless Provider.

Opt-In Confirmation Message:

"You're now subscribed to daily Weather Alerts. Reply STOP to cancel at any time. Call 1-800-123-4567 for support. Message and data rates may apply."

HELP Message:

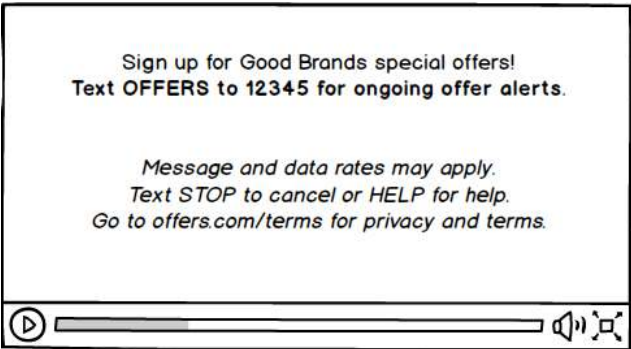
"Contact us at 1-800-123-4567 with questions about Weather Alerts."

Opt-Out Message:

"You have opted out of Weather Alerts and will receive no further messages."

²⁰ Opt-out information no longer needs to appear in bold typeface.

Exhibit B2: Sample Compliant Recurring-Messages TV Advertisement and Service Messages



Advertisement

Although opt-out instructions are not required on the advertisement itself, they must appear in the terms and conditions.

Terms and Conditions

Complete terms and conditions should include customer care contact information, complete opt-out instructions, a recurring message disclosure, a product description, and a program (brand) name. Some program types (e.g., sweepstakes) have additional requirements Wireless Provider by Wireless Provider.

Opt-In Confirmation Message:

"You'll now receive special offers from Good Brands! Reply STOP to opt-out. Email help@goodbrands.com with questions. Msg&Data rates may apply."

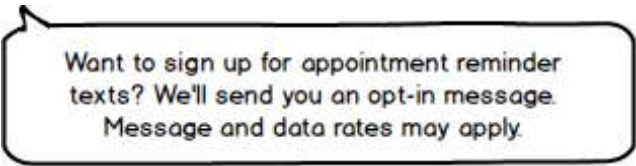
HELP Message:

"Good Brands Special Offers. Email help@goodbrands.com or call 1-888-123-4567 for support."

Opt-Out Message:

"Good Brands. You will receive no further messages from Short Code 12345."

Exhibit B3: Sample Compliant Non-Marketing Recurring-Messages Opt-In and Service Messages



Recurring-Messages Appointment Reminder

Service representative records customer's request for messages and customer's phone number. Program terms and conditions, including complete opt-out information, and privacy policy are available from the representative.

Opt-In Confirmation Message:

"Doctor Message thanks you for enrolling! You'll now receive appointment reminders. Text HELP for help. Reply STOP to cancel. Msg&Data Rates May Apply."

HELP Message:

"Email help@doctormessage.com for support with appointment reminders service. Reply STOP to cancel."

Opt-Out Message:

"You are now opted out of Doctor Message appointment reminders. You will receive no further messages."

Exhibit B4: Sample Compliant Recurring-Messages Web Keyword Advertisement and Service Messages

A Web Page

← → × ↶ http:// 🔍

Text COUPONS to 12345 for weekly deals!

*Message and data rates may apply.
Text STOP to opt out or HELP for help.*

[Terms of Use](#) [Privacy Policy](#)

Opt-In Confirmation Message:

"You're now subscribed to weekly deal alerts from Good Brands! Reply STOP to cancel. Msg&data rates may apply. Contact help@goodbrands.com for customer support."

HELP Message:

"For Good Brands weekly deal alerts support, email help@goodbrands.com or call 1-888-123-4567."

Opt-Out Message:

"You're opted out and will no longer receive Good Brands deal alerts."

Exhibit B5: Sample Compliant Recurring-Messages POS Advertisement and Service Messages



To receive periodic Good Brand sale alert messages,
enter your mobile number:

Sign Up!

Message and data rates may apply.

Text STOP to opt out and HELP for help.
Visit website.com/sms for privacy and terms info.

Opt-In Confirmation Message:

"You're subscribed to Good Brand sale alerts! Msg&data rates may apply. Reply STOP to opt out. Contact help@goodbrands.com with questions."

HELP Message:

"For Good Brands sale alerts support, email help@goodbrands.com or call 1-888-123-4567."

Opt-Out Message:

"You're opted out and will no longer receive Good Brands sale alerts."

Exhibit B6: Sample Compliant Recurring-Messages Hardcopy Advertisement
and Service Messages



Best Realty Sign-In Form

Please enter your name and mobile number to receive weekly open house alerts.

Message and data rates may apply. Go to website.com/sms for privacy and terms info. Text STOP to opt out and HELP for help.

Name _____

Mobile Number _____

Opt-In Confirmation Message:

"You're now subscribed to receive Best Realty weekly open house alerts. Msg&data rates may apply. Text STOP to opt out. Text HELP for more info."

HELP Message:

"For Best Realty open house alerts help, email help@bestrealty.com or call 1-888-123-4567."

Opt-Out Message:

"You're opted out of open house alerts and will no longer receive messages from Best Realty."