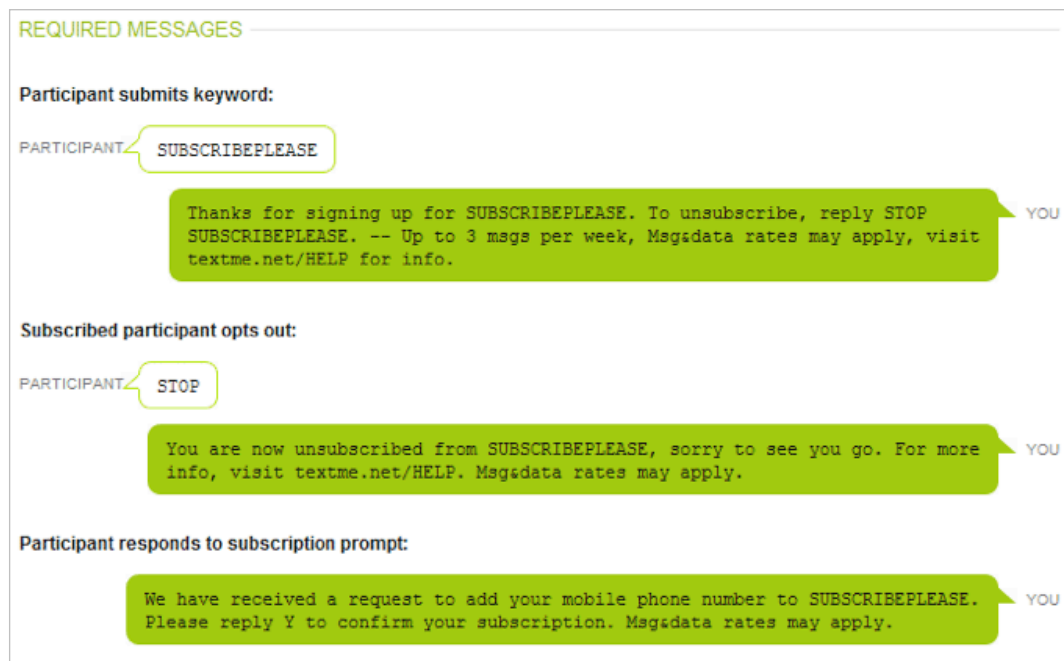


## Introduction

Marketers seeking to take advantage of the mobile channel to engage their customers must recognize that mobile is a permission-based medium. Specifically, text message interactions require that consumers provide permission to communicate with them in this manner by first opting into the conversation via text. In other words, consumers must subscribe to your program before receiving messages. This makes it essential that marketers drive consumers into text message programs by advertising their availability, or if interest in text messaging is obtained through other means, permission is confirmed at the consumer's handset.

Even if you already have received authorization to send emails or simply communicate with your customers proactively, you must separately validate their intent to receive text messages. This occurs when a consumer submits a text message to you opting into your program, essentially registering their handset as ready to receive messages until such time as the consumer decides to opt out.

Following is a message flow from our Customer Engagement Platform illustrating this process, which accounts for cases when a consumer directly opts into your program ("Participant submits keyword") as well as when you may have obtained permission elsewhere and need confirmation ("Participant responds to subscription prompt").



Possessing or purchasing lists of mobile telephone numbers, even ones tagged as opted in to text message communications, is insufficient to execute text message programs. This includes cases when numbers are obtained during the course of online transactions, such as purchases.

In the event you verbally obtain permission and/or add an opt in checkbox to an online form, it is necessary to follow this single opt in with a double opt in step whereby a text message requests confirmation. While seemingly inconvenient from a marketer's point of view, this protects consumers from spam text messages which could target purchased lists of mobile subscriber numbers.

Note as well that confirmation of a Subscription includes notice of the number of messages a consumer can expect to receive. Marketers should configure this frequency based on how often their products or services are consumed and the relevancy of offers given these attributes of their business.

## Oversight

This step is so important that the mobile marketing trade group, the Mobile Marketing Association (MMA), prescribes opt in as part of its best practices (<http://mmaglobal.com/policies/code-of-conduct>). According to the MMA:

*"Mobile Marketers ask for and obtain consent by obtaining an explicit opt-in from the user for all mobile messaging programs. This can be accomplished via an SMS or MMS opt-in process, a voice response, website registration, other MMA recognized methods or other legitimate methods."*

**Translation:** You must have permission to communicate via text message, just as you do for email.

*"Mobile Marketers must implement consent (opt-in) for a specific messaging program. Consent is not carried into other programs unless the user has consented to such communications either 1) when they consented to the initial program or 2) upon the commencement of a subsequent messaging program."*

**Translation:** Permission is tied to a specific program only, unless it's made clear that future text messages may be sent as a result of opting into the program (e.g. "Thanks for joining our Mobile Club, you may receive up to 3 messages per month").

*"Mobile Marketers must implement a simple termination (opt-out) process so that users can stop receiving messages, and users must be able to exercise their opt-out choice from any message. This opt-out must be functionally equivalent to the method used to obtain the opt-in and must be easily discoverable by users. Explanations on how to opt-out of multiple messaging programs must be provided on a reasonably frequent basis."*

**Translation:** Customers must be able to unsubscribe from text message communications at any time; this is provided typically within the footer of messages (e.g. "text STOP to 12345 to unsubscribe"). Our Customer Engagement Platform provides this "out of the box" as well as a web-based Preferences Center that customers can access directly at any point to unsubscribe.

Mobile network carriers monitor text messages sent through their systems to ensure compliance, and may penalize those who violate opt in and permissions standards. This has consequences for the marketer as well as the mobile marketing services company used to execute the communication, and could result in indefinite, restricted access to the particular carrier's subscribers. Moreover, customers have come to expect permission based marketing and therefore may punish companies who fail to observe this now expected courtesy by taking their business elsewhere.

To get it "right" the first time, there are several best practice approaches we recommend that marketers consider when developing a permission-based list of mobile customers.

## Opt In versus Double Opt In

Opt in is an attribute you must understand about your customers before engaging them in mobile interactions, but it is also a fundamental part of any text message. This step renders itself in the form of first having a customer respond to a call to action by sending a text message to you expressing interest in your program. As noted, double opt in is considered necessary to verify the customer's handset when permission is provided outside of a text message interaction — such as in person when asked or upon checking an opt in box on a website form.

## Obtaining Permission

Marketers can begin creating a list of customers interested in receiving text message communications at any time. It's important to remember that an expression of permission obtained outside a text interaction must be verified on the customer's handset before the onset of a program. Common approaches to obtaining this type of permission includes:

- Drive your opt in email list members to a form on your website requesting permission along with a mobile telephone number.
- Add an attribute to any form on your website which allows customers to subscribe to mobile communications and ensure you capture their mobile telephone number.
- Have contact center representatives and point of sale employees log customer permission for mobile interactions.

In all of these cases, permission must be confirmed via verification of the customer's handset before the marketer's message can be delivered. Once opt in is confirmed, marketers can confidently execute their plans knowing they are in compliance with industry standards.

In addition to these more passive forms of obtaining permission, there are more active approaches which can be leveraged when using our Engagement Platform. These include:

- Leverage our Platform's web forms to allow customers to directly populate the system with their attributes including, but not limited to, opt in permission and mobile phone numbers. Other attributes such as location and product preference -- potentially useful in segmenting your list to develop more relevant interaction strategies -- can also be appended to customer records in this fashion.
- Many businesses are taking aggressive steps to simultaneously obtain permission and achieve their marketing objectives by advertising mobile programs in traditional media such as the web, magazines, billboards, radio and television. With a text message interaction used as a call to action across various media, along with unique keywords associated with each, our Platform allows marketers to gauge the direct response effectiveness of display media buys.

As more businesses obtain permission from their customers to receive text message communications, marketers need to keep these guidelines in mind. New capabilities in our Platform, such as the ability to upload a list of mobile subscribers, allow you to more quickly begin engaging your customers. Just be certain that (1) you document consumer consent to receive SMS text messages and (2) you use a system such as our Platform which generates messages confirming consumer permission by verifying that the handset matches the consumer subscriber.