Common Short Codes Infractions Guide

Version 1

September 2023

Canadian Telecommunications Association

Table of Contents

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About this guide

The Canadian Telecommunications Association[1] ("the Association") is committed to promoting adherence to and enforcing compliance with the Canadian Common Short Code Compliance Policies. With this goal in mind, the purpose of this guide is to encourage proper management of Common Short Codes (CSC) programs in Canada, incentivize compliance and swift resolution of infractions, and clearly outline the consequences for non-compliance.

The processes and penalties referenced within this guide will take effect as of December 1, 2023.

Note: While this guide outlines the presumptive enforcement procedure and actions for incidents of non-compliance, all final decisions remain at the discretion of each individual wireless carrier. Wireless carriers are encouraged to align their enforcement actions with this guide wherever possible, but are not required to do so.

About Common Short Codes

Short Codes are five- or six-digit numbers that consumers can use to interact via text message with media outlets, brands, retailers, governments and various other organizations. Common Short Codes are also often used by brands to communicate with its customers or users. A Short Code becomes a "Common Short Code" (CSC) when the same code is activated across two or more wireless carrier networks, which greatly extends its reach to many more mobile customers.

CSCs can be used for a range of programs, use cases, and actions, such as suspected fraud alerts or payment reminders from financial institutions, two-factor authentication for various online services, flight updates from airlines, or appointment reminders from doctors and other service providers. All those using CSCs are required to follow the Canadian Common Short Code Compliance Policies[2].

[1] The Canadian Telecommunications Association was formerly named the Canadian Wireless Telecommunications Association.
[2] The Common Short Code Compliance Policies were formerly named the Common Short Code Application Guidelines.

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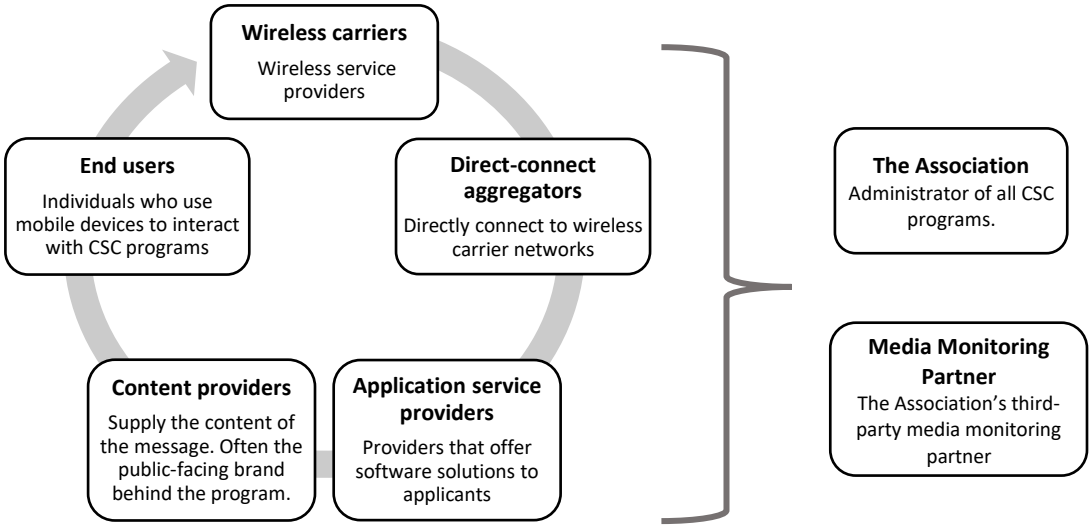
How Common Short Codes are managed and monitored

The CSC program ecosystem involves multiple parties, each with its role in promoting and ensuring compliance with the Canadian Common Short Code Compliance Policies.



Wireless carriers

Wireless carriers are the wireless service providers on whose networks CSCs are activated and used. They are responsible for setting CSC rules and policies, which are then published by the Association on https://www.txt.ca/en/.

Direct-connect aggregators

Aggregators are third parties that connect messaging applications to participating carrier networks so messages can be delivered between consumers and content providers (or brands). Aggregators are expected to fully cooperate with the Association to resolve CSC compliance issues quickly and completely. This may include complying with requests from the Association to address incidents of non-compliance.

Application service providers

Application service providers offer network-based or downloadable software solutions that enable the business logic behind mobile marketing initiatives.

Content providers

Often the public-facing brand behind the A2P program, content providers supply the content of the message and are responsible for the sending of the message itself. Content providers are also often the organizations that apply for the CSC, and acknowledge their adherence and compliance with all terms and conditions, including the CSC Compliance Policies, by signing the final copy of the CSC application form. Any Severity 1 level infractions are tracked and counted against the content provider/message sender.

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Applicants

An applicant is the party that applies for the Common Short Code, is listed within the CSC application form as the "Applicant Company", and is also agreeing to adhere to the CSC Terms and Conditions. Letters of Approval/Cancellation and Letters of Infraction are addressed to the Applicant company and contact on the approved application form.

End users

End users are the individual mobile subscribers who interact with brands through CSCs.

Canadian Telecommunications Association

The Association administers all CSC programs and is mandated with investigating and acting on violations of the Common Short Code Compliance Policies on behalf of carriers and in the best interests of CSC end users. The Association conducts regular audits of CSC programs, investigates complaints and self-reported infractions, and maintains infraction history and records against the CSC applicant and aggregator(s).

Third-party media monitoring

The Association uses a third-party media monitoring partner. It supports the Association's monitoring and auditing activities and reports on infractions. Infractions found by the media monitoring partner are managed through its portal ("the portal"), of which the Association and all direct-connect aggregators have access.

Self-reporting

The Association encourages content providers and aggregators to proactively audit their own CSC programs. In the event an infraction is discovered, they are encouraged to take any required remedial actions and self-report the infraction(s). Self-reporting will be taken into consideration by the carriers who may, at their discretion, elect not to impose an enforcement measure on a self-reported infraction.

Dealing with infractions: Notification process and enforcement measures

Infractions are categorized as Severity 1, 2, 3, or 4 with Severity 1 being the most severe. The sections below include a list of infractions, separated by severity, and their associated notification processes and enforcement measures.

For a list of all infractions, along with their associated severity level, please refer to Appendix A. To view the penalties and enforcement measures per-severity-level, please refer to the quick guide in Appendix B.

Note that at any time, the wireless carriers, in their sole discretion, reserve the right to:

- Modify the severity level associated with an infraction
- Identify an infraction not included on these lists
- Impose penalties not outlined in this Guide

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Severity 1 (Most Severe)

The following infractions are considered the most severe and are classified as Severity 1:

- Sending unsolicited messages or spam
- Phishing for end users' information through malicious links
- Promotion of and/or sending messages containing content related to hate speech, profanity, depictions and endorsements of violence, or any unlawful content
- Promotion of and/or sending messages containing unapproved age-restricted content
- Unauthorized use of Premium SMS or direct-carrier-billing
- Re-assigning, re-selling, or subleasing a CSC without approval
- Unauthorized transfer of consent

Notification process

When the Association becomes aware of a Severity 1 infraction, it will send an infraction notification by email, either directly or via the Association's third party media monitoring partner's portal (depending on how the issue was found), to the associated direct-connect aggregator. The notification will include the following information:

- CSC program name and number in violation
- Infraction description and severity level
- Names of involved parties on file (applicant, brand, content provider, application service provider(s) and aggregator(s))
- Request for the traffic associated with the CSC to be suspended immediately (no longer than within 24 hours)
- History of Severity 1 Infractions against content provider
- Request for a root-cause analysis (RCA)
- Issue resolution process and timeline

Wireless carriers will also receive email notification of the infraction.

Enforcement measures

The enforcement measures for Severity 1 infractions depend on how many violations have been reported against the same content provider as reflected in their infraction record (discussed below). Recurring violations may be subject to additional measures imposed at the discretion of the wireless carriers.

1. **CSC program suspension**
    a. As referenced in the "Notification process" section above, the Association will issue a notice of suspension, requiring the direct-connect aggregator to suspend the CSC program (that is, remove it from public access) within 24 hours.
        i. Note that content providers and aggregators may still accept MO messages to honour any opt-out requests that occur during the suspension period.

2. **Root-cause analysis**
    a. The aggregator must complete an RCA, using the standardized RCA template form provided by the Association (see Appendix C).
    b. The RCA must be submitted to the Association within 3 business days.

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c. The carrier will use commercially reasonable efforts to review the RCA within 5 business days and determine the appropriate action:
    i. Require CSC program/application updates
    ii. Dismiss the infraction
    iii. Maintain traffic suspension for fixed period of time
    iv. Deprovision the CSC program
d. Once a carrier decision has been reached, the Association will send a Letter of Infraction, addressed to the Applicant on file, with the aggregator copied. If a penalty has been imposed (e.g. ongoing traffic suspension or CSC deprovisioning), the Applicant will be informed of their right to appeal the carrier decision.

3. **Appeal** (if applicable)
    a. All Severity 1 penalties may be appealed, in whole or in part. In the Letter of Infraction, sent by the Association, details of the appeal process, including deadlines to submit the appeal, will be outlined.
    b. Once the appeal has been received, the carriers will use commercially reasonable efforts to review the appeal within 5 business days and determine the appropriate action:
        i. Uphold the original decision/penalty
        ii. Amend or alter initial decision regarding penalty (e.g. reducing or dismissing penalty)
    c. A response to the appeal will be sent by the Association to the applicant and aggregator.
    d. All decisions regarding appeals are final and no further appeals will be considered by the wireless carriers.

4. **CSC program suspension lifted**
    a. The aggregator may only lift the suspension after receiving confirmation from the Association that:
        i. Required program/application updates have been completed and approved by the wireless carriers, and any required pre-launch testing has been completed
        OR
        ii. The infraction has been dismissed

Escalation Severity 1: CSC program deprovisioning

If the CSC program is not suspended by the aggregator within 24 hours of receiving the suspension notice or the RCA is not submitted by the aggregator to the Association within 3 business days, the CSC program may be deprovisioned by the wireless carriers (that is, permanently deactivated). A wireless carrier may also deprovision a program at its own discretion even if the above two conditions are met. In case of deprovisioning, the Association will issue a Letter of Cancellation to the applicant and aggregator indicating the date of deprovisioning. On that date, the wireless carrier(s) will deprovision the CSC program from their networks.

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REPEATED VIOLATIONS:

In the event of repeated severity 1 infractions against the same content provider/message sender, the process noted above applies, however, wireless carriers may choose to impose additional penalties, such as:

1. **CSC cancellation**
    a. In the event of repeated Severity 1 violations (e.g., 3 over the course of 12 consecutive months, as determined by the wireless carriers in their sole and absolute discretion), each individual wireless carrier reserves the right to withdraw their participation from other Common Short Codes tied to that content provider/message sender.

2. **Content provider ban**
    a. In the event of repeated Severity 1 violations (e.g., 3 over the course of 12 consecutive months, as determined by the wireless carriers in their sole and absolute discretion), each individual wireless carrier reserves the right to indefinitely ban the offending content provider/message sender from leasing new CSCs in the future.

3. **Optional wireless carrier escalation**
    a. Wireless carriers may, in their sole and absolute discretion, reduce transactions per second (TPS) and/or traffic throughput by a fixed percentage on the aggregator partners of content providers, application service providers, or other aggregators partners that have had repeated Severity 1 infractions (e.g., exceeding 4 in 12 consecutive months).

Severity 2

The following infractions are classified as Severity 2:

- Sending unapproved message content and/or supporting unapproved program types
- Promotion of and/or sending messages containing unapproved carrier promotion or endorsement
- Political campaign contains prohibited content/messaging
- Missing requirements for CSC programs involving purchased debt collection
- Promotion of and/or sending messages related to unauthorized charity services and/or donation solicitation
- Unapproved use of a General Use or Shared Short Code
- Open access through a self-serve messaging model or free trial
- Demo or test CSC programs used for internal testing found to be provisioned in a production environment
- Missing an age verifier for an approved age-restricted program
- Failure to acknowledge or respond to STOP and/or ARRET
- Unapproved use of implied consent method of opt-in
- Commercial launch of a program without passing mandatory Pre-launch Testing
- MT response to an MO (keyword) is returned from a different sender number, whether CSC, Toll-free, or 10DLC

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Notification process

When the Association becomes aware of a Severity 2 infraction, it will send an infraction notification by email, either directly or via the Association's third party media monitoring partner's portal (depending on how the issue was found), to the associated direct-connect aggregator. The notification will include the following information:

- CSC program name and number in violation
- Infraction description and severity level
- Names of involved parties on file (applicants, brand, content provider, application service provider(s) and aggregator(s))
- Issue resolution process and timeline
- On a case-by-case basis, and depending on the nature of the issue, a request for the traffic associated with the CSC to be suspended within 24 hours
- On a case-by-case basis, and depending on the nature of the issue, an RCA may be required
- Wireless carriers will also receive email notification of the infraction.

Enforcement measures

Severity 2 violations must be addressed or resolved within **7 business days** of the notification.

In the event that an issue is not resolved by the deadline provided, the Association will request that traffic on the code in non-compliance be suspended, by the aggregator, until the issue has been resolved, as confirmed by the Association.

1. **CSC program suspension** (if applicable)
    a. the Association will issue a formal notice of suspension, requiring the aggregator to suspend the CSC program (that is, remove it from public access) within 48 hours.
    b. The applicant will receive a copy of the notice.

2. **Root cause analysis** (if applicable)
    a. The aggregator will complete an RCA, using a standardized RCA template form.
    b. The applicant will review and approve the RCA, then submit it to the Association and the carrier within 5 business days.
    c. The carrier will review the RCA within 7 days and determine the appropriate response:
        i. Require CSC program/application updates
        ii. Dismiss or resolve the infraction
        iii. Deprovision the CSC program

3. **Appeal** (if applicable)
    a. All Severity 2 penalties may be appealed, in whole or in part. In the Letter of Infraction, sent by the Association, details of the appeal process, including deadlines to submit the appeal, will be outlined.
    b. Once the appeal has been received, the carriers will use commercially reasonable efforts to review the appeal within 5 business days and determine the appropriate action:
        i. Uphold the original decision/penalty

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ii. Amend or alter initial decision regarding penalty (e.g. reducing or dismissing penalty)

c. A response to the appeal will be sent by the Association to the applicant and aggregator.
d. All decisions regarding appeals are final and no further appeals will be considered by the wireless carriers.

4. **CSC program suspension lifted** (if applicable)
   a. The aggregator may lift the suspension after receiving confirmation from the Association that:
      i. Updates have been completed and approved by the carrier, and any required pre-launch testing has been completed
      OR
      ii. The infraction has been dismissed or resolved

Escalation Severity 2: CSC program deprovisioning

If the CSC program is not suspended by the aggregator within 24 hours of receiving the suspension notice or the requested RCA is not submitted to the Association and the carriers within 5 business days, the CSC program may be deprovisioned by the wireless carriers (that is, permanently deactivated). A carrier may also deprovision at program at its own discretion even if the above two conditions are met. In case of deprovisioning, the Association will issue a Letter of Cancellation to the aggregator and the applicant indicating the date of deprovisioning. On that date, the wireless carrier(s) will deprovision the CSC program from their networks.

Severity 3

The following infractions are classified as Severity 3:

- Falsely guaranteeing a prize or reward
- Selecting a contest winner based on criteria other than skill or random chance
- Failing to include a “no purchase necessary” method of contest entry
- Guaranteeing text message delivery
- Missing pricing disclosure on call-to-action or point of opt-in/mobile number entry for standard rated services (e.g. “Standard msg rates may apply”)
- Missing requirements for transferring a subscriber list
- Pre-populating a user's mobile number in data entry fields
- Terms and conditions are unclear, obscured, or hidden
- Terms and conditions and/or consent box automatically pre-checked
- Advertising content in a misleading way
- Conveying a false sense of urgency for an offer
- Using the term “free” for standard rated programs
- Missing requirements for urgent alerts in terms and conditions

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- Missing timestamps for CSCs involving time-sensitive information (e.g., breaking news, stock updates, critical communications)
- Advertising a program as an "emergency" alerting service or tool
- Failure to respond to HELP, AIDE or INFO
- Missing program/brand name in HELP, AIDE, and/or INFO MTs
- Missing requirements for transferring a subscriber list
- Missing data rate disclosure in a message that contains a URL
- Missing a handset verified for subscription programs when required

Notification process

When the Association becomes aware of a Severity 3 infraction, it will send an email audit notice from the Association's third party media monitoring partner's portal to the associated aggregator. The notification will include the following information:

- CSC program name and number in violation
- Infraction description and severity level
- Names of involved parties on file (applicants, application service providers and aggregators)
- Issue resolution process and timeline

The Association will work closely with aggregators to resolve Severity 3 infractions promptly and will provide aggregators with summary reports to help them resolve open audits.

Enforcement measures

Severity 3 violations must be addressed or resolved within **20 business days** of the notification.

In the event that an issue is not resolved by the deadline provided, the Association will request that traffic on the code in non-compliance be suspended, by the aggregator, until the issue has been resolved, as confirmed by the Association.

Severity 4

The following infractions are classified as Severity 4:

- Missing message frequency in HELP and/or AIDE MT (for subscription programs only)
- Missing customer support contact information in HELP, AIDE, and/or INFO MTs
- Missing opt-out information in HELP and/or AIDE MT
- Missing pricing disclosure in HELP and/or AIDE MT
- Failure to adhere to mandatory keyword language requirements
- Failure to reference the five mandatory keywords in block/capital letters
- Exceeding 160 characters for mandatory keywords
- Missing pricing disclosure, message frequency, and/or opt-out information from the handset verifier
- Phone number in the HELP/AIDE/INFO MTs is not toll-free when it is the only method of customer support contact
- Exceeding the 320 character limit for messages

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- Not retuning a valid response to promoted keywords (e.g. an 'error or invalid' message, or no response at all)

Notification process

When the Association becomes aware of a Severity 4 infraction, it will send an email audit notice from the Association's third party media monitoring partner's portal to the associated aggregator. The notification will include the following information:

- CSC program name and number in violation
- Infraction description and severity level
- Names of involved parties on file (applicants, application service providers and aggregators)
- Issue resolution process and timeline

The Association will work closely with aggregators to resolve Severity 4 infractions promptly and will provide aggregators with summary reports to help them resolve open audits.

Enforcement measures

Severity 4 violations must be addressed or resolved within **30 business days** of the notification.

In the event that an issue is not resolved by the deadline provided, the Association will request that traffic on the code in non-compliance be suspended, by the aggregator, until the issue has been resolved, as confirmed by the Association.

FOR ALL SEVERITY 3 and 4 VIOLATIONS:

1. **Addressing of the infraction**
    a. Notice of the infraction and required remedial action will be sent to the applicant and the aggregator.
    b. The applicant must update or remove the webpage in violation, update messaging, and/or submit an amended or revised CSC application to the Association.

2. **Validation**
    a. The audit will be tested or re-tested within 3 business days.
        i. If the test passes, the audit will be closed in the Aegis portal.
        ii. If the test fails, the applicant must update and re-submit within 5 business days for re-testing.

If an applicant, application service provider or aggregator requires more time to resolve an open Severity 3 or 4 audit, or would like a special exception to avoid CSC suspension, an exception request must be submitted to the Association, via email to sc_audit@canadatelecoms.ca, in advance of the above noted deadlines. The request will be reviewed by the Association and may also be reviewed by the carriers. In some cases, an amended/revised CSC application may be required, and an updated timeline may be provided by the Association. The Association in its sole discretion has the right to deny an extension or an exception request.

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Infraction record

The Association maintains an infraction record for all CSC program participants to track compliance with the CSC Compliance Policies. The infraction record lists all non-compliant parties, outlines key details of the infractions and notes the severity level for each infraction.

All parties will start with a clear infraction record as of the Effective Date of this Guide. All infractions will be logged in the infraction record tracker, which will be provided to carriers on a regular basis. A party may request its current infraction record from the Association at any time by emailing sc_audit@canadatelecoms.ca.

If a party's infraction record does not include a Severity 1 infraction for a period of 12 consecutive months, the Association may clear that party's infraction record.

For more compliance resources and reference documents, please visit https://www.txt.ca/en/compliance-documents/.

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Appendix A

List of Infractions (all severity levels):

Violation	Severity Level	Policy Section Reference
Sending unsolicited messages or spam	1	1.1
Phishing for end users' information through malicious links	1	3.2.3
Promotion of and/or sending messages containing content related to hate speech, profanity, depictions and endorsements of violence, or any unlawful content	1	1.1
Promotion of an/or sending messaging containing unapproved age-restricted content	1	1.1
Unauthorized use of Premium SMS or direct-carrier-billing	1	Appendix B
Unauthorized transfer of consent	1	3.1.5
Re-assigning, re-selling, or subleasing a CSC without approval	1	1.1
Sending unapproved message content and/or supporting unapproved program types	2	3.1.5
Promotion of and/or sending messages containing unapproved carrier promotion or endorsement	2	3.4.3
Political campaign contains prohibited content/messaging	2	3.5.4.5
Missing requirements for CSC programs involving purchased debt collection	2	3.5.4.4
Promotion of and/or sending messages related to unauthorized charity services and/or donation solicitation	2	3.5.3
Unapproved use of a General Use or Shared Short Code	2	3.5.4.1
Open access through a self-serve messaging model or free trial	2	3.5.4.1
Demo or test CSC programs used for internal testing found to be provisioned in a production environment	2	3.2.4
Missing an age verifier for an approved age-restricted program	2	3.5.4.3
Unapproved use of implied consent method of opt-in	2	3.1.2
Failure to acknowledge or respond to STOP and/or ARRET	2	3.2.2
Commercial launch of a program without passing mandatory Pre-launch Testing	2	3.3
MT response to an MO (keyword) comes in from a different number (CSC, Toll-free, or 10DLC)	2	1.1
Falsely guaranteeing a prize or reward	3	B4.1
Selecting a contest winner based on criteria other than skill or random chance	3	3.5.1
Failing to include a "no purchase necessary" method of contest entry	3	3.5.1
Guaranteeing text message delivery	3	3.5.4.1

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Missing pricing disclosure on call-to-action or point of opt-in/mobile number entry for standard rated services (e.g. “Standard msg rates may apply”)	3	3.4.2
Missing requirements for transferring a subscriber list	3	3.1.8
Pre-populating a user's mobile number in data entry fields	3	3.4.2.2
Terms and conditions are unclear, obscured, or hidden	3	3.1.3
Terms and conditions and/or consent box automatically pre-checked	3	3.1.3
Advertising content in a misleading way	3	1.1
Conveying a false sense of urgency for an offer	3	B3.2
Using the term “free” for standard rated programs	3	3.4.1
Missing requirements for urgent alerts in terms and conditions	3	3.5.4.2
Missing timestamps for CSCs involving time-sensitive information (e.g., breaking news, stock updates, critical communications)	3	1.1
Advertising a program as an “emergency” alerting service or tool	3	3.1.1
Failure to response to HELP, AIDE, or INFO	3	3.2.2
Missing program/brand name in HELP, AIDE, and/or INFO MTs	3	3.2.2
Missing data rate disclosure in a message that contains a URL	3	3.2.3
Missing a handset verifier for subscription programs when required	3	3.1.6
Missing message frequency in HELP and/or AIDE MT (for subscription programs only)	4	3.2.2
Missing customer support contact information in HELP, AIDE, and/or INFO MTs	4	3.2.2
Missing opt-out information in HELP and/or AIDE MT	4	3.2.2
Missing pricing disclosure in HELP and/or AIDE MT	4	3.2.2
Phone number in the HELP/AIDE/INFO MTs is not toll-free when it is the only method of customer support contact	4	1.1
Failing to adhere to mandatory keyword language requirements	4	3.2.2
Failing to reference the five mandatory keywords in capital letters	4	3.2.2
Exceeding the 160-character limit for mandatory keywords	4	3.2.2
Missing pricing disclosure, message frequency, and/or opt-out information from the handset verifier	4	3.1.6
Exceeding the 320-character limit for messages	4	1.1
Not retuning a valid response to promoted keywords (e.g. an 'error or invalid' message, or no response at all)	4	3.4.2.1

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Appendix B

Infraction quick guide:

Severity Level	Action required
1	Immediate traffic suspension Fix and root-cause analysis within **3 business days** Carrier option to deprovision or lift suspension after review of RCA Option for Content Provider to appeal, and Carriers to re-review imposed penalty **Strike against Content Provider / Message sender**
2	Fix required in **7 business days** *Traffic suspension may be required* *Root-cause analysis may be required (within 5 business days)* If not resolved, traffic suspension
3	Fix required in **20 business days** If not resolved, traffic suspension
4	Fix required in **30 business days** If not resolved, traffic suspension
In all cases, request for traffic suspension will come from the Association, acting on behalf of the wireless carriers, and will be addressed to the Direct-connect Aggregator.	
Direct-connect Aggregators will be expected to act upon the request from the Association. Should Aggregators not take action, issue will be escalated to the carriers, who may suspend or choose to deprovision and re-provision the code in question on their schedule.	
In the event of repeated Severity 1 infractions (e.g. 3 over the course of 12 consecutive months, as determined by the carriers in their sole and absolute discretion), each individual carriers reserve the right to withdraw their participation from other Short Codes tied to that Content Provider / Message sender.	
In the event of repeated Severity 1 infractions (e.g. 3 over the course of 12 consecutive months, as determined by the carriers in their sole and absolute discretion), each individual carrier reserves the right to indefinitely ban the offending Content Provider / Message sender from leasing new CSCs in the future.	

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Appendix C

Common Short Code Root-Cause-Analysis (RCA) Form

Top section to be completed by the Association and sent to the Direct-connect Aggregator upon Infraction notification. Information requested may vary from the template below based on the specific infraction.

To be completed by Canadian Telecommunications Association	
Infraction identification date:	
Common Short Code (CSC):	
Program name:	
Content Provider(s):	
ASP(s) (if applicable):	
Indirect Aggregator (if applicable):	
Direct-connect Aggregator:	
Summary of issue:	
Supporting materials (e.g. screenshots):	
To be completed by Content Provider	
Date submitted:	
The period of time that the CSC has been associated with this issue (e.g. phishing messages):	
The number of MSISDNs associated with these alerts:	
If possible, provide list of affected MSISDNs by carrier:	
How was access to the CSC ascertained?	
What corrective measures and/or safeguards have taken place, or have been into place, to prevent this from happening in the future?	
Applicable to Shared CSCs only **Please advise how many brands/clients are currently using the CSC:**	

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