Frequently Asked Text Compliance Questions



Version 4 - 8/30/23

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What is The Campaign Registry?

The Campaign Registry began in March 2020, with the final ruling coming from the FCC in January 2021. These regulations were enacted in March 2021 and have been modified several times. Each time they were modified, additional consumer protections were added against unwanted text messages.

As Texting occurs across the "telephony" network, all Business or Application-initiated Text messaging is subject to FCC regulations based on the Telephone Consumer Protection Act (TCPA) and Cellular Telephone Industries Association (CTIA) guidelines, particularly those involving consent to receive and message content.

The Campaign Registry (TCR) works with North American mobile operators and companies that are in the messaging business (like Bridge) and is the Reputation Authority for registering Application-to-Person (A2P) and Business-to-person (B2P) text messaging. TCR supports a sanctioned 10 Digit Long Code (10DLC) text messaging Campaign ecosystem and provides visibility into the messaging source and content, allowing mobile carriers to provide a more reliable and predictable messaging service for Campaign Service Providers (like Bridge) and their registered brands (our Customers).



Registration Process

The registration process takes approximately 4 – 6 weeks to be completed. All vetting processing is done by The Campaign Registry contractors. There are typically 3 phases to the registration process 1) Business entity verification (Legal business name, business address match to tax records etc.), at which point a Brand ID is assigned, 2) Brand Reputation Score (does the Business appear to be actual, valid email, phone, contact, website, no prior SMS complaints, etc.), at which point a Campaign ID is assigned, and 3) Physical vetting of web presence (verification of terms/use conditions, CTA (call to action) documentation (opt-in/opt-out procedures) and web opt-in or email opt-in verification.

Bridge will collect the information needed from you and submit a mixed-use case on your behalf for campaign registration. This type of registration will cover the defined use cases for the Insurance Industry, including but not limited to Transactional, Notifications, Administrative, Renewal, New Policy, Claims, and Marketing. Additional campaign registrations would be needed for agencies with over 50 text-able numbers or text marketing campaigns exceeding 2,000 messages per day.

To ensure a smooth text compliance submission, below are tips/insights to help guide you through the process. If incorrect or incomplete information is submitted, the initial Brand/Campaign registration will be denied and require a manual re-submission by the Bridge Development team. Each resubmission or appeal costs your Agency \$50. If you need clarification on the required information, please schedule an appointment through your CARE rep to meet with our Bridge Development team for best practice advice.

Brand Details

- 1) Legal company name
 - a. Required field that must match exactly to the EIN request from the SS4 Notification Letter. If you are unsure of this or don't have access to it, please see FAQ below on EIN documentation.
- 2) Doing Business As (DBA) or desired brand name
 - a. Required field. This field does not have to match the Legal Business Name.
- 3) Type of entity
 - a. Required filed. Typically Private Company
- 4) Vertical/industry
 - a. Required Field. Typically, Insurance Products and Services)
- 5) Employer Identification Number (EIN)
 - a. Required Field. It cannot be a SSN. If you are a sole proprietor, you will need to apply for an EIN. See FAQ for Requesting an EIN below.
- 6) EIN issuing Country
 - a. Required Field. Typically is the United States, but it could be Canada.
- 7) Contact Phone Number Required Field. It must be a valid number for contact/verification by auditors.
- 8) Contact Email Address Required Field. It must be a valid email for contact/verification by auditors.

Bridge Text Compliance Form

Wireless carriers require texting platforms like Bridge to register each agency with The Campaign Registry (TCR) and specify the type of messages that will be sent. Because of these rules, Bridge requires all agencies with texting enabled to submit the necessary registration information.

Texting (SMS/MMS) services will be disabled for your agency until this form has been successfully completed and processed.

All required fields (marked with *) MUST be completed BEFORE submitting the form.

| Dialid Details | |
|---|---|
| Legal Company Name as registered with IRS* | DBA or Brand Name* |
| 1 | 2 |
| Type of Organization* | Vertical Type* |
| Private Company 3 | ✓ Insurance products and services 4 |
| Employer Identification Number (EIN)* | EIN Issuing Country |
| 5 | 6 ~ |
| Contact Phone Number* | Contact Email Address* |
| 7 | 8 |
| Address that is registered with IRS* | City* |
| State* | Zip* |
| | • |
| Country* | Website |
| DUNS or GIIN or LEI number (type) | DUNS or GIIN or LEI number (value) |
| Stock Symbol | Stock Exchange |
| | ~ |
| Campaign Details | |
| Campaign Flow* | |
| End user consent is through acceptance of | f User Contract, manually opting in through website form or |
| Does your agency plan to send your office or (Ex: Please call us at 123-456-7890 so we can d | |
| Does your agency plan to send website links (Ex: Please visit www.youragency.com for more it | |
| Is affiliate marketing being used (or was used recipients)? | d in the creation of the campaign / Yes N |
| | the new text messaging rules, requires your agency to provide |

message on your agency's behalf. Your agency can submit text messages with other content as well, but The Redcliffe Group is required to provide at least one sample message when registering your agency.

Hello, this is AGENCY NAME, and we are your insurance agent. Please contact us to discuss your policy.

By submitting this form, you certify that you are authorized to make decisions on behalf of the entity named in the Legal Company Name field above, and that you acknowledge the Redcliffe Group Text Messaging Terms & Conditions.

Cancel

Save Brand & Campaign Details

- 9) Full address that is registered with the IRS
 - a. Required Field. Must be Full address that is registered with the IRS and/or State Business License Bureau.

10) City

a. Required Field. Part of address

11) State

a. Required Field. Part of address

12) Zip code

a. Required Field. Part of address

13) Country

a. Required Field. Part of address

14) Website

a. Optional field. But the Brand Reputation Score will suffer if not submitted.

15) DUNS / GIN / LEI number type

a. Optional Field. If applicable, it would boost Brand Reputation score.

16) DUNS / GIN / LEI number

a. Optional Field. It is required if DUNS / GIN / LEI number type is selected and would boost Brand Reputation score.

17) Stock Symbol

a. Optional Field. It is required if Publically Traded Company type was selected.

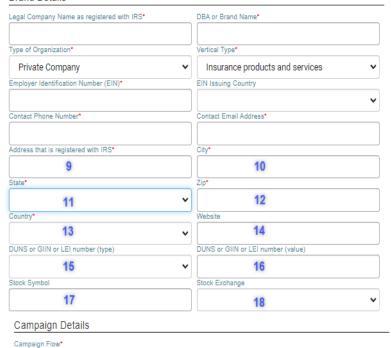
Bridge Text Compliance Form

Wireless carriers require texting platforms like Bridge to register each agency with The Campaign Registry (TCR) and specify the type of messages that will be sent. Because of these rules, Bridge requires all agencies with texting enabled to submit the necessary registration information

Texting (SMS/MMS) services will be disabled for your agency until this form has been successfully completed and processed.

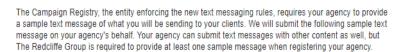
All required fields (marked with *) MUST be completed BEFORE submitting the form.

Brand Details



End user consent is through acceptance of User Contract, manually opting in through website form or Does your agency plan to send your office or other phone number(s) in text messages? (Ex: Please call us at 123-456-7890 so we can discuss your policy.) Does your agency plan to send website links in text messages?

(Ex: Please visit www.youragency.com for more information.) Is affiliate marketing being used (or was used in the creation of the campaign /



Hello, this is AGENCY NAME, and we are your insurance agent. Please contact us to discuss your policy.

By submitting this form, you certify that you are authorized to make decisions on behalf of the entity named in the Legal Company Name field above, and that you acknowledge the Redcliffe Group Text Messaging Terms & Conditions.

Cancel

recipients)?

Save Brand & Campaign Details

() No

18) Stock Exchange

a. Optional Field. It is required if Publically Traded Company Type was selected

Campaign Details

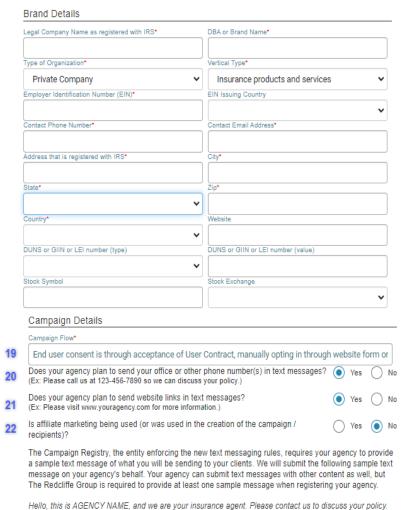
- 19) Campaign Flow
 - Required Field. Predefined Use case. If you feel you need to modify, please reach out to your CARE team rep to set up a call with our dev team.
- 20) First Text use example Does your agency plan to send your office or other phone number(s) in text messages?
 - a. Required Field. Common defined use for the Insurance Industry. We recommend it be set to Yes.
- 21) Second Text Use example Does your agency plan to send website links in text messages?
 - a. Required Field. Common defined use for the Insurance Industry. We recommend it be set to Yes.
- 22) Third Text Use example Is affiliate marketing being used (or was it used in the creation of the campaign/recipients)?
 - a. Required Field. Common defined use for the Insurance Industry. We recommend it be set to No.
 - b. Checking Yes will cause the Multi Campaign Use Type to be rejected. If you will be doing Affiliate Marketing,

Bridge Text Compliance Form

Wireless carriers require texting platforms like Bridge to register each agency with The Campaign Registry (TCR) and specify the type of messages that will be sent. Because of these rules, Bridge requires all agencies with texting enabled to submit the necessary registration information

Texting (SMS/MMS) services will be disabled for your agency until this form has been successfully completed and processed.

All required fields (marked with *) MUST be completed BEFORE submitting the form



- By submitting this form, you certify that you are authorized to make decisions on behalf of the entity
- named in the Legal Company Name field above, and that you acknowledge the Redcliffe Group Text Messaging Terms & Conditions.

Cancel

Save Brand & Campaign Details

obtaining an additional campaign would be the better route.

- 23) Certification Box
 - a. Required Field You must check the box to certify that you are authorized to submit on behalf of the Agency.
- 24) Save Brand & Campaign Details
 - a. You will have the ability to submit once. If an error occurs, you will need to reach out to your CARE rep and set a time to meet with our Bridge Development Team. Each resubmission or appeal costs your Agency \$50.

Most Common Rejections for Campaign Registration Failures

Each re-submission or appeal costs your Agency \$50. If you need clarification on the required information, please schedule an appointment through your CARE rep to meet with our Bridge Development Team for best practice advice.

- 1. Incorrect or No EIN
 - a. Must match <u>SS4 Notification Letter</u> exactly and Cannot be an SSN. Sole Proprietors must apply for an EIN to become text-compliant. <u>See EIN FAQ below for additional</u> information.
- 2. Incorrect Legal Business Name
 - a. Must match the <u>SS4 Notification Letter</u> exactly. ie. Punctuation, Abbreviations, Spelling etc.
- 3. No reference to Opt-in or CTA (terms of use) on website
 - a. Due to changes to A2P and B2P communication requirements, all Businesses must have Terms of Use for text uesage visible on their Public website. It cannot be behind client portal access. See <u>Call to Action</u> or <u>Web Opt-In FAQ</u> for additional information
- 4. Using a Facebook page as a website or non-working website
 - a. This will severely downgrade the Brand Reputation Score.
- 5. Using a Non-business email address (gmail, yahoo etc.)
 - a. This will severely downgrade the Brand Reputation Score.
- 6. Entering a PO Box for a business address or an incorrect business address.
 - a. Business addresses must match IRS or State Business License Bureau records.
- 7. Using N/A or a Registered National Brand for Brand Name.
 - a. All Campaigns must have an associated Brand Name with the Business submitting the application. Using N/A or an affiliated National Brand will significantly decrease Brand Reputation. Farmers Insurance, and Allstate Insurance, etc. are registered national campaign brands that are affiliated with other business EINs
- 8. Checking the box for affiliated marketing.
 - a. Affiliated Marketing activities cannot be done under a Mixed Use Campaign. <u>A separate campaign must be set up for each affiliate marketing program</u>.
- 9. More than 50 DIDs
 - a. Requires a secondary process to obtain a Campaign Sub ID
- 10. SHAFT content
 - a. For example, Cannabis listing on the website is not permitted. SHAFT Content requires
 the use of age-gated campaigns which are not permitted with A2P or B2P texting.
 Cannabis Insurance denials may be appealed with documentation explaining the
 presence on website.

EIN Application / Lost Misplaced EIN Requests

For Sole Proprietors to apply for an EIN if they don't have one.

https://www.irs.gov/businesses/small-businesses-self-employed/apply-for-an-employer-identification-number-ein-online

For lost or misplaced EINs.

https://www.irs.gov/businesses/small-businesses-self-employed/lost-or-misplaced-your-ein

EIN Confirmation Letter CP-575 / EIN Verification Letter 147C

An EIN Confirmation Letter CP-575 (Form: SS4) or an EIN Verification Letter (147C) is required for manual vetting through The Campaign Registry (TCR). See below for SS4 notification letter examples.

EIN Confirmation Letter CP-575

To the right is an example of an EIN Confirmation Letter CP-575 (Form: SS4).



WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN . This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

When filing tax documents, payments, and related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear off stub and return it to us.

A limited liability company (LLC) may file Form 8832, Entity Classification Election, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, Election by a Small Business Corporation. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3076 (TTY/TDD 1-800-829-4059) or visit your local INS office.

IMPORTANT REMINDERS:

- Meep a copy of this notice in your permanent records. This notice is issued only
 one time and the TRS will not be able to generate a duplicate copy for you. You
 may give a copy of this document to anyone asking for proof of your EIN.
- Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- * Refer to this EIN on your tax-related correspondence and documents.

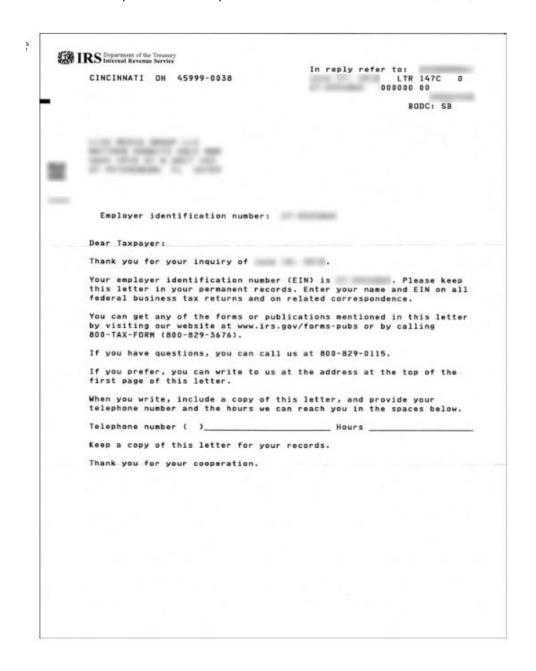
If you have questions about your EIN, you can call us at the phone number or write to us at the address shown at the top of this notice. If you write, please tear off the stub at the bottom of this notice and send it along with your letter. If you do not need to write us, do not complete and return the stub.

Your name control associated with this EIN is CAME. You will need to provide this information, along with your EIN, if you file your returns electronically.

Thank you for your cooperation.

EIN Verification Letter 147C

Below is an example is an example of an EIN Verification Letter (147C)



Call to Action

Effective January 1st, 2023, a clear, conspicuous description of how an end user signs up to receive messages is required that is visible on a publicly accessible space on a website. This terms of use policy cannot be obscured behind a customer portal. Opt-in must be 1 to 1, can't be shared with third parties, and can't be implied. It also can't be obscured within the Terms & Conditions or other agreements. Opt-in consent can be collected through web-based or offline mediums such as email. Opt-in consent via text messages can only be utilized when the end user initiates the text conversation.

[Agency Name] Text Messaging Opt-In Process

The client ("You") consents to receive text messages from [Agency Name] (the "Agency") or others acting on the Agency's behalf. As part of this consent, You represent and warrant the following:

- (1) The Agency or others acting on the Agency's behalf may send text messages in various formats and with different contents, including but not limited to text messages about insurance policies and other transactions initiated by You or marketing the products and services offered by or through the Agency.
- (2) You are the owner or authorized user of the mobile phone number submitted. You will notify us immediately if you are no longer the owner or authorized user of the mobile phone number that you requested opt-in for.
- (3) You are solely responsible for any message and data charges associated with such text messages.
- (4) The Agency has made its Text Messaging Terms and Conditions ("Terms and Conditions") available to You on our website at [Agency Website]. We will provide You with a hardcopy of the Terms and Conditions upon request. By accepting the opt-in request, you agree to these Terms and Conditions.
- (5) To Opt_in, send a text to your Agency Rep and reply YES to the initial text message from the mobile number you wish to communicate through.
- (6) To Opt-out, send a text with STOP to your Agency Rep and you will be removed from our opt-in list.

Please schedule an appointment through your CARE rep to meet with our Bridge Development team for best practice advice on implementing a web Call To Action (CTA) document. Each declined submission requires an appeal, costing your Agency \$50.

Web Opt-In

If web-based collection of opt-in consent is desired, a concise description of the process (CTA) that an end user follows to sign up to receive messages, along with a clear form specifying what the end user is consenting to receive. This process must be visible in a publicly accessible space on a website; it cannot be obscured behind a customer portal. Opt-in consent must be 1 to 1, not be shared with third parties, and can't be implied. It also can't be obscured within the Terms & Conditions or other agreements.

Please schedule an appointment through your CARE rep to meet with our Bridge Development team for best practice advice on implementing a web opt-in process. Each declined submission requires an appeal, costing your Agency \$50.

Text Messaging Opt-In Form with [Agency Name]

The undersigned client ("You") consents to receive text messages from [Agency Name] (the "Agency") or others acting on the Agency's behalf. As part of this consent, You represent and warrant the following:

- (1) The Agency or others acting on the Agency's behalf may send text messages in various formats and with different contents, including but not limited to text messages about insurance policies and other transactions initiated by You or marketing the products and services offered by or through the Agency.
- (2) You are the owner or authorized user of the mobile phone number identified below. You will notify us immediately if you are no longer the owner or authorized user of the mobile phone number specified below.
- (3) You are solely responsible for any message and data charges associated with such text messages.
- (4) The Agency has made its Text Messaging Terms and Conditions ("Terms and Conditions") available to You on its website at [Agency Webpage] and will provide You with a hardcopy of the Terms and Conditions upon request. By signing this opt-in form, You agree to the Terms and Conditions.
- (5) If you submit this opt-in form, <u>You</u> will receive an initial text message to the mobile phone number below asking You to confirm your consent with a YES response.
- (6) You may OPT OUT of text message communications with our office by texting STOP from your mobile phone number at any time and you will be removed from our approved texting list.
- (7) If you do not wish to receive text messages from the Agency or others acting on the Agency's behalf or do not agree to the Terms and Conditions, You should not submit this form.

| I hereby agree to opt-in use of my mobile number for communications with [Agency Name]. | | | | |
|---|------------|----------------|--|--|
| First Name: | Last Name: | Mobile number: | | |
| Submit | | | | |

Common Terms & Definitions Involved with Text Compliance

Application-to-person (A2P) or Business-to-person (B2P): As defined by the CTIA, all commercial or business messaging is now considered A2P/B2P traffic, whereas person-to-person (P2P) is reserved for mobile end user exchange only.

10 Digit Long Code (10DLC): The traditional long code phone number which can be utilized for both voice and messaging. Historically, it's been used for P2P communication but in the past few years more businesses have begun to utilize these numbers to send messages.

The Campaign Registry (TCR): The newly conceived third-party central hub designated by AT&T and T-Mobile for registering A2P 10DLC messaging campaigns. The Campaign Registry was chosen by AT&T and T-Mobile to register application-to-person (A2P) text messaging campaigns.

Mobile Number Operator (MNO): An MNO is a provider of wireless communications services that owns or controls the infrastructure necessary to sell and deliver mobile phone services to end users. Could also be identified as a carrier. A key defining characteristic of a mobile network operator is that an MNO must own or control access to a radio spectrum license from a regulatory or government entity. AT&T, TMobile, Verizon, etc are examples of MNO.

Direct Connect Aggregator (DCA): A company that has a direct connection to a Mobile Network Operator (MNO) Gateway and transmits messages on behalf of its customers or "content providers". Bandwidth is an example of a DCA.

Campaign Service Provider (CSP): The primary user of TCR. A CSP works with multiple brands to create and launch SMS messaging campaigns. A customer supporting a large number of different brands may find it easier to work directly with TCR. Customers with fewer brands may want to use Bandwidth as their CSP. Bridge is an example of a CSP.

Reseller: According to TCR, a reseller is a company that supports multiple brands and resells the services of the DCA. Bridge is an example of a Reseller

Content Provider: The actual brand/entity that is crafting the message content payload to the subscriber. Our customers are examples of Content Providers.

Brand: The company or entity initiating messages to the consumer.

Campaign: A collection of information used to identify use case and CTIA compliance for carrier evaluation. A campaign requires details such as message examples and industry vertical

Additional Information

Use the links below if you would like additional information on The Campaign Registry right from the source. But... keep in mind, Bridge has simplified the registration process for our customers. Many of the items discussed have been done for you under the covers. For clarity sake, Bridge is the CSP and LCA in the documents liked below. Many of the FAQs address items that CSPs (like Bridge) handle.

https://www.campaignregistry.com/what-is-campaign-registry/