		Optus Direct Carrier Billing Advertising Infrin	gements and	d Actions Required
		Infringements	Severity	Actions Required
tion]	Programme	Unauthorised adult content Section 4, Optus Direct Carrier Billing Policy	1	Discontinue offer immediately
[Subscription Confirmation]		Payment pages hosted by content provider Sections 8.1 and 9.1, Optus Direct Carrier Billing Policy	1	Ensure all payment pages are hosted by aggregator or that aggregator-hosted processes are embedded on content providers' pages
	Programme	No product or service name Sections 9.2 and 14.1, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the product or service on offer
		Unclear product or service name Sections 9.2 and 14.1, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer
		No purchase button Sections 9.2 and 14.1, Optus Direct Carrier Billing Policy	1	Include a hyperlink, featuring the call-to-action, to initiate a charge
		No payment cancel option or back option Sections 9.2 and 14.1, Optus Direct Carrier Billing Policy	1	Ensure customers have option to cancel payment, or navigate to homepage or last viewed page
		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
nent		No pricing Sections 9.2, 10, and 14.1, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
One-Off Payment		Conflicting pricing Sections 9.2, 10, and 14.1, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format on all pages: \$XX.XX
One-	Pricing	Hadaar mining Coations 0.2.40 and 44.4. Ontro Direct Coming Dillion Delice.	2	Display full and correct wisins in proposited formats 6VV VV
		Unclear pricing Sections 9.2, 10, and 14.1, Optus Direct Carrier Billing Policy Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX Ensure product or service price point does not exceed \$30
		Pricing displayed within insufficient proximity to purchase button Sections 9.3 and		Display pricing within three line breaks of purchase button, directly above, below, or to
		14.1, Optus Direct Carrier Billing Policy Failure to display marketing disclosure Sections 9.2, 12.1, and 14.1, Optus Direct	1	either side, with no intervening text or graphics
	Marketing	Carrier Billing Policy Marketing disclosure displayed within insufficient proximity to purchase button	1	Clearly notify customers that continuing the purchase will opt them into marketing
		Sections 9.3, 12, and 14.1, Optus Direct Carrier Billing Policy Failure to include T&Cs hyperlink Sections 9.2 and 14.1, Optus Direct Carrier Billing	1	Display marketing disclosure directly after the payment information
	TRCs	Policy	1	Include hyperlink to T&Cs summary page*
	T&Cs	No local-charge or free-call Helpline number Sections 9.2 and 14.1, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number
ent in		Failure to display purchase confirmation page Section 14.2, Optus Direct Carrier Billing Policy	1	Display purchase confirmation page when successful purchase is completed
One-Off Payment Confirmation	Programme	Failure to inform customers purchase was successful Section 14.2, Optus Direct Carrier Billing Policy	1	Inform customers purchase was successful via a payment confirmation page or in-app notification
One-O		Failure to display \$30 spend notification Section 10.5, Optus Direct Carrier Billing Policy	1	Display \$30 spend notification on the payment confirmation page or send a \$30 spend notification message, when \$30 spend is reached on a product or service in a calendar month
		No product or service name Sections 9.2 and 14.2, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the product or service on offer
ly]+	Programme	Unclear product or service name Sections 9.2 and 14.2, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer
no gu		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
narketir		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
s with n	Pricing	No pricing Sections 9.2, 10, and 14.2, Optus Direct Carrier Billing Policy	1	Display full price prominently (including GST, if applicable) in prescribed format: \$XX.XX
Service		Conflicting pricing Sections 9.2, 10, and 14.2, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format on all pages: \$XX.XX
inued		Unclear pricing Sections 9.2, 10, and 14.2, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
One-Off Payment Confirmation continued [services with marketing only]+	Marketing	Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy Failure to display marketing tickbox [services with marketing only] Section 14.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30 Display a marketing tickbox for services with marketing
onfirma		Marketing tickbox unable to be un-ticked Section 12.2, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
ment C		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
Off Pay	T&Cs	Failure to include product download hyperlink (where applicable) Section 14.2, Optus Direct Carrier Billing Policy	1	Include a hyperlink to any products that can be downloaded and a brief explanation of this hyperlink
One-		Failure to include T&Cs hyperlink Sections 9.2 and 14.2, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
		No local-charge or free-call Helpline number Section 9.2, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number

		Optus Direct Carrier Billing Advertising Infrin	gements an	d Actions Required
		Infringements	Severity	Actions Required
Failure		Failure to display payment failure page Section 14.2, Optus Direct Carrier Billing Policy	1	Display a payment failure page when a payment fails
	Programme	Failure to inform customers payment has failed Section 14.2, Optus Direct Carrier Billing Policy	1	Inform customers payment has failed
		Failure to include reason for payment failure Section 14.2, Optus Direct Carrier Billing Policy	1	Include reason for payment failure in user-friendly terms, e.g, "You have an insufficient prepaid balance. Please recharge and try again."
		Failure to inform customers no charge has been applied to their accounts Section 14.2, Optus Direct Carrier Billing Policy	1	Inform customers that no charge has been applied to their accounts when a payment fails
One-Off Payment Failure		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
Off Pay		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
One-C	Marketing	Marketing tickbox unable to be un-ticked Section 12.2, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
	T&Cs	Failure to include content provider's homepage hyperlink Section 14.2, Optus Direct Carrier Billing Policy	1	Include hyperlink to content provider's homepage
		Failure to include T&Cs hyperlink Sections 9.2 and 14.2, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
		No pricing Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
		Conflicting pricing Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format throughout payment flow: \$XX.XX
	Pricing	Unclear pricing Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30
		Pricing displayed within insufficient proximity to purchase button Sections 9.3 and 16.1, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
		No subscription disclosure Section 9.2, Optus Direct Carrier Billing Policy	1	Disclose subscription nature of offer by displaying word subscribe or subscription on purchase button or start of the product or service disclosure
음	Subscription	No charge period Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	1	Display charge period
Subscription Sign-up		Unclear charge period Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	2	splay charge period accurately and consistently
scriptio		Failure to indicate free products or services are included Section 9.2, Optus Direct Carrier Billing Policy	1	State clearly that free products or services will be provided
SqnS	Free Period or Products	Failure to display length of free period Sections 9.2 and 16.1, Optus Direct Carrier Billing Policy	1	State clearly the period of time during which products or services will be delivered free of charge
		Failure to display quantity of free products or services Section 16.1, Optus Direct Carrier Billing Policy	2	State clearly the number of free products or services that customers will receive
	Marketing	Failure to display marketing disclosure Sections 9.2, 12.1, and 16.1, Optus Direct Carrier Billing Policy	1	Clearly notify customers continuing the purchase will opt them into marketing
		Marketing disclosure displayed within insufficient proximity to purchase button Sections 9.3, 12, and 16.1, Optus Direct Carrier Billing Policy	1	Display marketing disclosure directly after the payment information
	T&Cs	Failure to include T&Cs hyperlink Sections 9.2 and 16.1, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
		Unclear, Incorrect, or no unsubscribe information	1	Display STOP as unsubscribe information, including "Text [Send, SMS, or Reply] STOP to [shortcode]"
		No local-charge or free-call Helpline number Sections 9.2 and 16.1, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number
with	Programme	Failure to display subscription confirmation page Section 16.2, Optus Direct Carrier Billing Policy	1	Display subscription confirmation page when successful subscription purchase is completed
ervices \		Failure to inform customers purchase was successful Section 16.2, Optus Direct Carrier Billing Policy	1	Inform customers purchase was successful
nued [s		Failure to inform customers of recurring charge Section 16.2, Optus Direct Carrier Billing Policy	1	Inform customers a recurring charge will be applied to their prepaid balances or their mobile phone bills until unsubscribed
Subscription Confirmation continued [services with marketing only]		Failure to display \$30 spend notification Section 10.5, Optus Direct Carrier Billing Policy	1	Display \$30 spend notification on the subscription confirmation page or send a \$30 spend notification message, when \$30 spend is reached on a service in a calendar month
onfir m		No service name Section 16.2, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the subscription service on offer
ription		Unclear service name Section 16.2, Optus Direct Carrier Billing Policy Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the subscription service on offer Increase point size to at least 6
onpsci				·
		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline

Subscription Confirmation continued [services with marketing only]	Pricing	Infringements No pricing Section 16.2, Optus Direct Carrier Billing Policy	Severity	Actions Required
d [services with marketing only]	Pricing	No pricing Section 16.2. Optus Direct Carrier Billing Policy	Ī	1m, , ,, ,,, ,, ,, , , , , , , , , , , ,
d [services with marketing	Pricing		1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
d [services with mark		Conflicting pricing Section 16.2, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format on all pages: \$XX.XX
d [services with n		Unclear pricing Section 16.2, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
d [services w		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30
d [service	Subscription	No charge period Section 16.2, Optus Direct Carrier Billing Policy	1	Display charge period
es] pe	oubscription	Unclear charge period Section 16.2, Optus Direct Carrier Billing Policy	2	Display charge period accurately and consistently
a de	Marketing	Failure to display marketing tickbox [services with marketing only] Section 16.2, Optus Direct Carrier Billing Policy	1	Display a marketing tickbox for services with marketing
on contir		Marketing tickbox unable to be un-ticked Section 12.2, Optus Direct Carrier Billing Policy Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing	1	Allow customers to decline marketing option by un-ticking a tickbox
mati		Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
n Confir		Failure to include product download hyperlink (where applicable) Section 14.2, Optus Direct Carrier Billing Policy	1	Include a hyperlink to any products that can be downloaded and a brief explanation of this hyperlink
scription	T&Cs	Failure to include T&Cs hyperlink Sections 9.2 and 16.2, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
Sut		No local-charge or free-call Helpline number Section 9.2, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number
		Failure to display subscription payment failure page Section 16.2, Optus Direct Carrier Billing Policy	1	Display a payment failure page when a subscription payment fails
		Failure to inform customers payment has failed Section 16.2, Optus Direct Carrier Billing Policy	1	Inform customers payment has failed
	Programme	Failure to include reason for payment failure Section 16.2, Optus Direct Carrier Billing Policy	1	Include reason for payment failure in user-friendly terms, e.g, "You have an insufficient prepaid balance. Please recharge and try again."
	Ū	Failure to inform customers no charge has been applied to their accounts Section 16.2, Optus Direct Carrier Billing Policy	1	Inform customers that no charge has been applied to their accounts
ŧ		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
Subscription Payment Failure		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
riptic		Unauthorised opt-in to marketing Section 12.1, Optus Direct Carrier Billing Policy	1	Refrain from opting customers in to marketing if a purchase fails
Subsc	Marketing	Marketing tickbox unable to be un-ticked Sections 12.2 and 12.4, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
	T&Cs	Failure to include content provider's homepage hyperlink Section 16.2, Optus Direct Carrier Billing Policy	1	Include hyperlink to content provider's homepage
E		Failure to include T&Cs hyperlink Sections 9.2 and 16.2, Optus Direct Carrier Billing Policy Marketing tickbox unable to be un-ticked Sections 12.2 and 12.4, Optus Direct Carrier	1	Include hyperlink to T&Cs summary page* Explain payment has failed previously, when customers attempt to access the subscriptio
iptio ter fail.)		Billing Policy	1	product or service page
Subscription (after pay.fail.)	Programme	No subscription signup retry option Section 16.3, Optus Direct Carrier Billing Policy	1	Invite customers to retry subscription signup when they attempt to access the subscription product or service page, after payment failure
	Programme	No product or service name Sections 9.2 and 15.1, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the product or service on offer
		Unclear product or service name Sections 9.2 and 15.1, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer
		No purchase button Sections 9.2 and 15.1, Optus Direct Carrier Billing Policy	1	Include a hyperlink, featuring the call-to-action, to initiate a charge
nent		No payment cancel option or back option Sections 9.2 and 15.1, Optus Direct Carrier	4	Ensure customers have option to cancel payment, or navigate to homepage or last viewed
Payr		Billing Policy Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	page Increase point size to at least 6
e.		Tox point 3/20 too smail occition 3.0, option billion carrier billing 1 only		increase point size to diffeast o
er-V		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
Initial Pay-per-View Payment		No pricing Sections 9.2, 10, and 15.1, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
Ē		Conflicting pricing Sections 9.2, 10, and 15.1, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format throughout payment flow: \$XX.XX
	Pricing	Unclear pricing Sections 9.2, 10, and 15.1, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30
		Pricing displayed within insufficient proximity to purchase button Sections 9.3 and		Display pricing within three line breaks of purchase button, directly above, below, or to
		15.1, Optus Direct Carrier Billing Policy	1	either side, with no intervening text or graphics

		Optus Direct Carrier Billing Advertising Infring	germeme am	a rionono rioquiroa
		Infringements	Severity	Actions Required
	Marketing	Failure to display marketing tickbox Sections 9.2, 12.1, and 15.1, Optus Direct Carrier Billing Policy	1	Display a marketing tickbox instead of a marketing disclosure to allow customers the option of purchasing the service without receiving marketing
Initial Pay-per-View Payment		Marketing tickbox displayed within insufficient proximity to purchase button Sections 9.3, 12, and 15.1, Optus Direct Carrier Billing Policy	1	Display marketing tickbox directly after the payment information
r-View F		Marketing tickbox unable to be un-ticked Sections 12.2 and 12.4, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
Pay-pe		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
nitia .	T&Cs	Failure to include T&Cs hyperlink Sections 9.2 and 15.1, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
=		No local-charge or free-call Helpline number Sections 9.2 and 15.1, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number
		Failure to reauthorise customer for new PPV session Section 15.2, Optus Direct Carrier Billing Policy	1	Display the initial PPV payment page for each new PPV session a customer commences
		No product or service name Section 9.2, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the product or service on offer
			0	
	D	Unclear product or service name Section 9.2, Optus Direct Carrier Billing Policy No purchase button Section 9.2, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer Include a hyperlink, featuring the call-to-action, to initiate a charge
	Programme	<u> </u>	ı	include a hyperinik, leaturing the call-to-action, to mittate a charge
		No payment cancel option or back option Section 9.2, Optus Direct Carrier Billing Policy	1	Ensure customers can cancel payment, or navigate to homepage or last viewed page
		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
View		The state of the s		
ber-		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
Subsequent Pay-per-View		No pricing Sections 9.2, 10, and 15.2, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
dne				Display pricing accurately, consistently, in prescribed format throughout payment flow:
esqr		Conflicting pricing Sections 9.2, 10, and 15.2, Optus Direct Carrier Billing Policy	1	\$xx.xx
જ	Pricing			
		Unclear pricing Sections 9.2, 10, and 15.2, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30
		Pricing displayed within insufficient proximity to purchase button Sections 9.3 and 15.2, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
	T&Cs	Failure to include T&Cs hyperlink Section 9.2, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
		No local-charge or free-call Helpline number Section 9.2, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number
	Programme	Failure to display payment failure page Section 15.3, Optus Direct Carrier Billing Policy	1	Display a payment failure page when a pay-per-view payment fails
		Failure to inform customers payment has failed Section 15.3, Optus Direct Carrier Billing Policy	1	Inform customers payment has failed
		Failure to include reason for payment failure Section 15.3, Optus Direct Carrier Billing	<u>'</u>	Include reason for payment failure in user-friendly terms, e.g, "You have an insufficient
_		Policy Failure to inform customers no charge has been applied to their accounts Section	1	prepaid balance. Please recharge and try again."
ilure		15.3, Optus Direct Carrier Billing Policy	1	Inform customers that no charge has been applied to their accounts
t Fa		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
men				
Pay-per-View Payment Failure		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
ž	Marketing	Unauthorised opt-in to marketing Section 12.1, Optus Direct Carrier Billing Policy	1	Refrain from opting customers in to marketing if a purchase fails
۲- pe		Marketing tickbox unable to be un-ticked Sections 12.2 and 12.4, Optus Direct Carrier		
Ъ		Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing		
		Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
	T&Cs	Failure to include content provider's homepage hyperlink Section 15.3, Optus Direct Carrier Billing Policy	1	Include hyperlink to content provider's homepage
		Failure to include T&Cs hyperlink Sections 9.2 and 15.3, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
nen		No product or service name Sections 9.2 and 17.1, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the product or service on offer
Payr	Programme	Unclear product or service name Sections 9.2 and 17.1, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer
- Bu		L	_	Include a hypotlink featuring the pall to getien to initiate a charge
pp Billing I		No purchase button Sections 9.2 and 17.1, Optus Direct Carrier Billing Policy	1	Include a hyperlink, featuring the call-to-action, to initiate a charge
In-App Billing Payment		No payment cancel option or back option Sections 9.2 and 17.1, Optus Direct Carrier		
In-App Billing I			1	Ensure customers can cancel payment, or navigate to homepage or last viewed page

		Optus Direct Carrier Billing Advertising Infrin	gements an	d Actions Required
		Infringements	Severity	Actions Required
		No product quantity Section 17.1, Optus Direct Carrier Billing Policy	1	Disclose product quantity
		Unclear product quantity Section 17.1, Optus Direct Carrier Billing Policy	2	Disclose actual product quantity (per credit, if appropriate)
	Programme	Misrepresentation of product quantity Section 17.1, Optus Direct Carrier Billing Policy	1	Display product quantity accurately, consistently, among all messages and ad
		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
		Incorrect Ontire Large Applies on both Coption 0.4. Ontire Direct Coppies Billing Bollow	2	Display official Ontro long and tooling
		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
		No pricing Sections 9.2, 10, and 17.1, Optus Direct Carrier Billing Policy	1	Display pricing within three line breaks of purchase button, directly above, below, or to either side, with no intervening text or graphics
Ę		The prioring decisions 3.2, 10, and 17.1, optics briefly during 1 only		Display pricing accurately, consistently, in prescribed format throughout payment flow:
yme.	Pricing	Conflicting pricing Sections 9.2, 10, and 17.1, Optus Direct Carrier Billing Policy	1	\$XX.XX
g Pa		3		
£		Unclear pricing Sections 9.2, 10, and 17.1, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
B dd		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30
In-App Billing Payment		Pricing displayed within insufficient proximity to purchase button Sections 9.3 and		Display pricing within three line breaks of purchase button, directly above, below, or to
		17.1, Optus Direct Carrier Billing Policy	1	either side, with no intervening text or graphics
		Failure to display marketing disclosure Sections 9.2 and 12.1, Optus Direct Carrier		
	Marketing	Billing Policy	1	Clearly notify customers continuing the purchase will opt them into marketing
		Marketing disclosure displayed within insufficient proximity to purchase button		Disabet and the disabet and the disable at the second time.
		Sections 9.2 and 12, Optus Direct Carrier Billing Policy	1	Display marketing disclosure directly after the payment information
		Failure to include T&Cs hyperlink Sections 9.2 and 17.1, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*
	T&Cs	No local-charge or free-call Helpline number Sections 9.2 and 17.1, Optus Direct	'	Include hyperinik to 1803 summary page
		Carrier Billing Policy	1	Display local-charge or free-call Helpline number
		Failure to inform customers purchase was successful Sections 14.2 and 17.2, Optus		Inform customers purchase was successful via a payment confirmation page or in-app
		Direct Carrier Billing Policy	1	notification
				Display \$30 spend notification on the payment confirmation page or send a \$30 spend
		Failure to display \$30 spend notification Section 10.5, Optus Direct Carrier Billing		notification message, when \$30 spend is reached on a product or service in a calendar
		Policy	1	month
	Programme	No product or service name Sections 9.2, 14.2, and 17.2, Optus Direct Carrier Billing		
		Policy	1	Disclose accurately the name of the product or service on offer
		Unclear product or service name Sections 9.2, 14.2, and 17.2, Optus Direct Carrier	2	Disclose contrately and consistently the name of the number of section on affect
		Billing Policy Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer Increase point size to at least 6
		Text point size too small dection 3.0, Optus birect carrier billing i olicy		increase point size to at least o
		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
Ë				
Billing Confirmation		No pricing Sections 9.2, 10, 14.2, and 17.2, Optus Direct Carrier Billing Policy	1	Display full price prominently (including GST, if applicable) in prescribed format: \$XX.XX
ju o	Pricing			
ng C		Conflicting pricing Sections 9.2, 10, 14.2, and 17.2, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format on all pages: \$XX.XX
<u>=</u>		Ulandara ariaina Castiana C.O. 40. 44.0 and 47.0 Catas Direct Castian Dillian Ballan	0	Disable fill and assess addition in according to the Africa to CVV VV
In-App		Unclear pricing Sections 9.2, 10, 14.2, and 17.2, Optus Direct Carrier Billing Policy Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	2	Display full and correct pricing in prescribed format: \$XX.XX
호		, , , , , , , , , , , , , , , , , , ,	'	Ensure product or service price point does not exceed \$30
		Failure to display marketing tickbox [services with marketing only] Sections 14.2 and 17.2. Optus Direct Carrier Billing Policy	1	Display a marketing tickbox for services with marketing
	Marketing	Marketing tickbox unable to be un-ticked Section 12.2, Optus Direct Carrier Billing	-	
		Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing		
		Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold
		Failure to include product download hyperlink (where applicable) Sections 14.2 and		Include a hyperlink to any products that can be downloaded and a brief explanation of this
		17.2, Optus Direct Carrier Billing Policy	1	hyperlink
	T&Cs	Failure to include T&Cs hyperlink Sections 9.2, 14.2, and 17.2, Optus Direct Carrier		
		Billing Policy	1	Include hyperlink to T&Cs summary page*
		No local-charge or free-call Helpline number Section 9.2, Optus Direct Carrier Billing	1	Display local charge or free call Helpline number
	Programme	Policy Font size less than six points Section 9.6, Optus Direct Carrier Billing Policy	2	Display local-charge or free-call Helpline number Present all pages with a minimum font size of six points
lure		state on point occasion only		F-300 mm a minimum mark area of any bound
In-App Billing Payment Failure		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
neni	Marketing	The second secon		
Рауг		Unauthorised opt-in to marketing Section 12.1, Optus Direct Carrier Billing Policy	1	Refrain from opting customers in to marketing if a purchase fails
ing		Marketing tickbox unable to be un-ticked Sections 12.2 and 12.4, Optus Direct Carrier		
B		Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox
-Apr		Pre-ticked marketing tickbox below the fold Section 12.2, Optus Direct Carrier Billing		
≐		Policy	2	Ensure any pre-ticked marketing tickboxes are above the fold

	Optus Direct Carrier Billing Advertising Infringements and Actions Required					
		Infringements	Severity	Actions Required		
Unsubscribe	Programme	Failure to provide unsubscribe page Section 13, Optus Direct Carrier Billing Policy	1	Ensure customers can unsubscribe via the service's mobile Internet page or by sending STOP to a shortcode		
		Failure to advise customers will forfeit remainder of subscription charges or will have access to service until expiry date Section 16.5, Optus Direct Carrier Billing Policy	1	Advise customers they will forfeit the remainder of the subscription charges or will have access to the service until the expiry date		
5		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6		
		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline		
		Failure to display unsubscribe confirmation pag Section 16.5, Optus Direct Carrier Billing Policy	1	Display unsubscribe confirmation page, hosted by aggregator, when customers unsubscribe via the mobile Internet site		
		Failure to advise customers were successfully unsubscribed Section 16.5, Optus Direct Carrier Billing Policy	1	Advise customers they have successfully unsubscribed		
_	Programme	Failure to advise charges will no longer be applied to customer accounts Section 16.5, Optus Direct Carrier Billing Policy	1	Advise customers that charges will no longer be applied to their accounts		
atio.		No service name Section 16.5, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the subscription service		
<u>Ë</u>		Unclear service name Section 16.5, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the subscription service		
Sonf		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6		
Unsubscribe Confirmation		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline		
Unsub	Marketing	Marketing tickbox unable to be un-ticked Section 16.5, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a tickbox		
		Marketing tickbox pre-ticked Section 12.4, Optus Direct Carrier Billing Policy	1	Ensure marketing tickbox is not pre-ticked, unless customer has previously opted in		
	T&Cs	Failure to include content provider's homepage hyperlink Section 16.5, Optus Direct Carrier Billing Policy	1	Include hyperlink to content provider's homepage		
		Failure to include T&Cs hyperlink Sections 9.2 and 16.5, Optus Direct Carrier Billing Policy	1	Include hyperlink to T&Cs summary page*		
	Programme	Failure to display content provider's trading name or operating name Section 9.5, Optus Direct Carrier Billing Policy Failure to display content provider's registered address Section 9.5, Optus Direct	1	Display content provider's trading name or operating name		
2		Carrier Billing Policy	1	Display content provider's registered address		
nma		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6		
Terms and Conditions Summary	T&Cs	Failure to include payment and service T&Cs Section 9.5, Optus Direct Carrier Billing Policy	1	Include T&Cs for the payment and the service		
d Condit		Failure to include payment page hyperlink Section 9.5, Optus Direct Carrier Billing Policy	1	Include hyperlink to allow customers to return to the payment page		
anc		Failure to clearly disclose marketing of any type (Internal and External)	2	Disclose if any marketing messages will be associated to the programme		
in in		Failure to disclose content provider within the summary T&C's	2	Display the Content Providers name within the summary T&C's		
ĭ		No local-charge or free-call Helpline number Section 9.5, Optus Direct Carrier Billing Policy	1	Display local-charge or free-call Helpline number		
	Charges and Billing	No carriage fee disclosure Section 9.5, Optus Direct Carrier Billing Policy	1	Disclose that carriage fees might apply		
		Failure to indicate in the banner advertisments that a charge will apply	1	Include a disclaimer stating a subscription or fees apply to participate		
		(DCB Subscription Advertising) Failure to include payment and service T&Cs within content URL homepage	2	Include payment and service T&C's throughout the entire flow		
		Failure to provide the Content Provider's name within the OPC	2	Include Content Provider's name within the OPC		
General Conduct		Failure to disclose that full service is not available to Optus, and this is not explained in the T&C's	3	Fully disclose around services that are available to Optus customers in the T&C's		
al C	a C	Service must match what is provisioned in OPC	2	Service name, service description, and pricing must match OPC		
Gener	General Conduct	Parental consent must be documented in writing for any image of minors linked to a PSMS/DCB offer	1	Provide documented authorisation		
		Offer incentivized by disapproved promotions, content, products or services	1	Discontinue offer immediately		
		Offer incentivized by unrelated promotions, content, products or services	1	Discontinue offer immediately		
		Content is achieving value for money	2	Customer is receiving a reasonable amount of content for cost of product. Customer is to receive the maximum benefit from the service.		

Optus Direct Carrier Billing Infringements and Actions Required rev 1.1

Mar-16

OPTUS PROPRIETARY AND CONFIDENTIAL

 $\blacktriangleright \ \ \mbox{Yellow highlights indicate all changes and additions since the previous revision}.$