

Optus Direct Carrier Billing Advertising Infringements and Actions Required

		<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
[Subscription Confirmation]	Programme	Unauthorised adult content Section 4, Optus Direct Carrier Billing Policy	1	Discontinue offer immediately
		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
One-Off Payment	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
	Pricing	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
		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
		Unclear pricing Sections 9.2, 10, and 14.1, 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 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
	Marketing	Failure to display marketing disclosure Sections 9.2, 12.1, and 14.1, Optus Direct Carrier Billing Policy	1	Clearly notify customers that continuing the purchase will opt them into marketing
		Marketing disclosure displayed within insufficient proximity to purchase button Sections 9.3, 12, and 14.1, 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 14.1, 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 14.1, Optus Direct Carrier Billing Policy		1	Display local-charge or free-call Helpline number	
One-Off Payment Confirmation	Programme	Failure to display purchase confirmation page Section 14.2, Optus Direct Carrier Billing Policy	1	Display purchase confirmation page when successful purchase is completed
		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
		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
One-Off Payment Confirmation continued [services with marketing only] +	Programme	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
		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
		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
	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
		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
		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
		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30
	Marketing	Failure to display marketing tickbox [services with marketing only] Section 14.2, Optus Direct Carrier Billing Policy	1	Display a marketing tickbox for services with 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 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
		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

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One-Off Payment Failure	Programme	Failure to display payment failure page Section 14.2, Optus Direct Carrier Billing Policy	1	Display a payment failure page when a payment fails	
		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	
		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	
	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*	
Subscription Sign-up	Pricing	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	
		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	
	Subscription	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	
		No charge period Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	1	Display charge period	
		Unclear charge period Sections 9.2, 10, and 16.1, Optus Direct Carrier Billing Policy	2	Display charge period accurately and consistently	
	Free Period or Products	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	
		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	
	Subscription Confirmation continued [services with marketing only]	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
			Failure to inform customers purchase was successful Section 16.2, Optus Direct Carrier Billing Policy	1	Inform customers purchase was successful
			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
			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
No service name Section 16.2, Optus Direct Carrier Billing Policy			1	Disclose accurately the name of the subscription service on offer	
Unclear service name Section 16.2, Optus Direct Carrier Billing Policy			2	Disclose accurately and consistently the name of the subscription service on offer	
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	

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Subscription Confirmation continued [services with marketing only]	Pricing	No pricing Section 16.2, 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
		Conflicting pricing Section 16.2, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format on all pages: \$XX.XX
		Unclear pricing Section 16.2, 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
	Subscription	No charge period Section 16.2, Optus Direct Carrier Billing Policy	1	Display charge period
		Unclear charge period Section 16.2, Optus Direct Carrier Billing Policy	2	Display charge period accurately and consistently
	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
		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 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
		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*
		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
Subscription Payment Failure	Programme	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
		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."
		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
		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
	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
		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
		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*
	Subscription (after pay.fail.)	Programme	Marketing tickbox unable to be un-ticked Sections 12.2 and 12.4, Optus Direct Carrier Billing Policy	1
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
Initial Pay-per-View Payment	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
		No payment cancel option or back option Sections 9.2 and 15.1, 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
	Pricing	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
		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
		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 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

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Initial Pay-per-View Payment	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
		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
		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 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	
Subsequent Pay-per-View	Programme	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
		Unclear product or service name Section 9.2, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer
		No purchase button Section 9.2, 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 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
		Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
	Pricing	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
		Conflicting pricing Sections 9.2, 10, and 15.2, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format throughout payment flow: \$XX.XX
		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
	Pay-per-View Payment Failure	Programme	Failure to display payment failure page Section 15.3, Optus Direct Carrier Billing Policy	1
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 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 15.3, Optus Direct Carrier Billing Policy			1	Inform customers that no charge has been applied to their accounts
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
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
		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 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*	
In-App Billing Payment	Programme	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
		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
		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
		No payment cancel option or back option Sections 9.2 and 17.1, Optus Direct Carrier Billing Policy	1	Ensure customers can cancel payment, or navigate to homepage or last viewed page

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In-App Billing Payment	Programme	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)	
		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 Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline	
	Pricing	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	
		Conflicting pricing Sections 9.2, 10, and 17.1, Optus Direct Carrier Billing Policy	1	Display pricing accurately, consistently, in prescribed format throughout payment flow: \$XX.XX	
		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	
		Price point exceeds \$30 Section 10.2, Optus Direct Carrier Billing Policy	1	Ensure product or service price point does not exceed \$30	
	Marketing	Pricing displayed within insufficient proximity to purchase button Sections 9.3 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	
		Failure to display marketing disclosure Sections 9.2 and 12.1, 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 9.2 and 12, 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 17.1, 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 17.1, Optus Direct Carrier Billing Policy		1	Display local-charge or free-call Helpline number	
In-App Billing Confirmation	Programme	Failure to inform customers purchase was successful Sections 14.2 and 17.2, Optus Direct Carrier Billing Policy	1	Inform customers purchase was successful via a payment confirmation page or in-app notification	
		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, 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 Billing Policy	2	Disclose accurately and consistently the name of the product or service on offer	
		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	
	Pricing	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	
		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	
		Unclear pricing Sections 9.2, 10, 14.2, and 17.2, 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	
	Marketing	Failure to display marketing checkbox [services with marketing only] Sections 14.2 and 17.2, Optus Direct Carrier Billing Policy	1	Display a marketing checkbox for services with marketing	
		Marketing checkbox unable to be un-ticked Section 12.2, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a checkbox	
		Pre-ticked marketing checkbox below the fold Section 12.2, Optus Direct Carrier Billing Policy	2	Ensure any pre-ticked marketing checkboxes are above the fold	
	T&Cs	Failure to include product download hyperlink (where applicable) Sections 14.2 and 17.2, Optus Direct Carrier Billing Policy	1	Include a hyperlink to any products that can be downloaded and a brief explanation of this hyperlink	
		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 Policy	1	Display local-charge or free-call Helpline number	
	In-App Billing Payment Failure	Programme	Font size less than six points Section 9.6, Optus Direct Carrier Billing Policy	2	Present all pages with a minimum font size of six points
			Incorrect Optus logo, tagline, or both Section 9.4, Optus Direct Carrier Billing Policy	2	Display official Optus logo and tagline
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	
		Marketing checkbox 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 checkbox	
		Pre-ticked marketing checkbox below the fold Section 12.2, Optus Direct Carrier Billing Policy	2	Ensure any pre-ticked marketing checkboxes are above the fold	

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		<i>Infringements</i>	<i>Severity</i>	<i>Actions Required</i>
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
		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
Unsubscribe Confirmation	Programme	Failure to display unsubscribe confirmation page 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
		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
		No service name Section 16.5, Optus Direct Carrier Billing Policy	1	Disclose accurately the name of the subscription service
		Unclear service name Section 16.5, Optus Direct Carrier Billing Policy	2	Disclose accurately and consistently the name of the subscription service
		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
	Marketing	Marketing checkbox unable to be un-ticked Section 16.5, Optus Direct Carrier Billing Policy	1	Allow customers to decline marketing option by un-ticking a checkbox
		Marketing checkbox pre-ticked Section 12.4, Optus Direct Carrier Billing Policy	1	Ensure marketing checkbox 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*
Terms and Conditions Summary	Programme	Failure to display content provider's trading name or operating name Section 9.5, Optus Direct Carrier Billing Policy	1	Display content provider's trading name or operating name
		Failure to display content provider's registered address Section 9.5, Optus Direct Carrier Billing Policy	1	Display content provider's registered address
		Text point size too small Section 9.6, Optus Direct Carrier Billing Policy	2	Increase point size to at least 6
	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
		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
		Failure to clearly disclose marketing of any type (Internal and External)	2	Disclose if any marketing messages will be associated to the programme
		Failure to disclose content provider within the summary T&Cs	2	Display the Content Providers name within the summary T&Cs
	Charges and Billing	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
General Conduct	General Conduct	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 advertisements 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&Cs throughout the entire flow
		Failure to provide the Content Provider's name within the OPC	2	Include Content Provider's name within the OPC
		Failure to disclose that full service is not available to Optus, and this is not explained in the T&Cs	3	Fully disclose around services that are available to Optus customers in the T&Cs
		Service must match what is provisioned in OPC	2	Service name, service description, and pricing must match OPC
		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

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► Yellow highlights indicate all changes and additions since the previous revision.