

Sinch and Carrier Compliance Immediate Actions & Audits: Definitions & Outline of Responsibilities

Summary:

It is the goal of this document to concisely outline the actions and activities that must be taken by Sinch and the associated CSP or Partner or Brand once an Audit is received. Sinch initiated alerts bear the same concerns and weight as any Wireless Carrier/Mobile Network Operator (MNO) or CTIA (Cellular Telecommunications Industry Association) initiated alert. The basis/definitions for the Severity Levels can be referenced in Section 7.2.4 of the [CTIA Messaging Principals and Best Practices](#) with further descriptive definitions (for each) in section 4.3 of the [CTIA Short Code Handbook](#).

1. ****Severity-0 Alert** (Initiated by MNO or CTIA)**

- a. Upon receipt of the Severity -0 Alert from the MNO(s), the Compliance team will make an effort to communicate this Alert to the Partner or the Brand within or less than 4 hours of receipt from MNO(s).
- b. Sinch will immediately Suspend the number(s) (Short Code, 10DLC, TFN) associated with the campaign on all MNO networks.
- c. All Severity – 0 Alerts require the completion of an RCA (time-period will be communicated)
- d. RCA must be submitted to the Sinch Compliance team within the time period and will be reviewed for completion (please submit in Word format).
- e. RCA will be submitted back to the MNO(s) to determine if the campaign may be turned back on again.

2. ****Sinch - Immediate Action Needed** (Initiated by Sinch)**

- a. Immediate action alerts are such that Sinch has found a Severity-0 infraction before the MNO(s). In most cases, the CSP or Brand must immediately take action to remediate. Depending on the infraction Sinch may have Suspended all traffic on the Brand or Campaign (which will in turn alert the MNO's). The status will be clear in the ticket.
- b. Immediate Action Alerts may require the completion of an RCA (time-period will be communicated)
- c. RCA must be submitted to the Sinch Compliance Team within the time period and will be reviewed for completion (please submit in Word format) for Brand/Campaign reinstatement.
- d. RCA must outline the corrective actions that are suggested by the Compliance team.
- e. If RCA is not submitted within the prescribed timeframe, Sinch may at its discretion Suspend all traffic and Deprovision any Numbers associated with the Campaign.

3. **Sinch **Proactive Alert** (Initiated by Sinch, MNO or CTIA)**

- a. Proactive alerts are initiated by Sinch as an alert to the CSP Brand or Campaign owner when it is determined that the Campaign is unhealthy. This could be in relation to Messaging Content, Registration elements, opt-out percentage or 7726/7727 complaint volume etc. Campaign health is an MNO, CTIA and ecosystem wide contractual obligation. Poor health will trigger the attention of MNOs. The Brand should review this alert for correction immediately.
- b. Sinch will communicate to the Brand and or Partner about the specifics of each action suggested.



- c. The CSP or Brand will be given a specific time period to rectify said situation or take corrective action.
- d. An RCA is NOT required for a Proactive Alert, however action by the Brand or Partner is required.

4. Sinch **Opt-in Consent Audit (Initiated by Sinch, MNO, CTIA or Sinch)**

- a. Proactive alerts that may be initiated by a MNO, CTIA, or Sinch. These require immediate attention from the CSP or Brand when it is determined that the messaging content, registration, opt-out percentage or 7726/7727 complaint volume etc. has triggered the attention of the MNOs or Sinch Compliance Team.
- b. Actions require that Sinch and CSP or Brand immediately investigate both inbound and outbound messaging logs for opt-in red flags. This may be an excessive amount of opt-outs, negative sentiment received as MOs, etc.
- c. A summary of the issue must be completed using the Sinch provided Opt-in Consent Audit Form that will be attached to the ticket. Corrective Actions are required.