

2degrees

TCF Mobile Messaging Service Code - Feedback

Please find below some questions and feedback from the Mobile Messaging Service Code Draft.

Historically customers have been able to participate to a range of services tariffed at the billed at the "Standard Charge" having a very low amount of complains about it.

The idea of extending the Rules previously used to "Premium Services" to All Chargeable service could affects negatively the "Standard Charge" services by restricting the usage due to the amount of requisites like advertisement rules, Free phone, etc.

This type of services are mostly promotional and do not aim to collect money, hence could reduce the viability our Partners and their customers to run this type of services.

Charity Service (Donation) actually falls onto Chargeable Non subscription service. Most of this Charities are MO Chargeable which across the operators – this makes hard to implement the use of a Valid (Unique) keywork to express the intention to donate (since customer is charged for anything they text in) – The spirit of this MO billing model was to help charities in case misspelled from the donor and also to reduce credit issues.

Shall a different model or set of rules been developed to support "Donation Services" specifically?

20.5 Example 3 . We suggest to send a message at not cost for the customer with all the possible command for the services (As per the "Invalid Customer Request"). Otherwise the customer could be cancelling services that they are willing to continue creating a bad customer experience.

23.1.4 The \$30Notification for a Non Subscription Service sounds a little excessive – The customer is already notified on each message of the cost of the Service either was inform before entering to the service.

32.1.2 To whom "Unsolicited Messages" complains shall be directed to ? Does it fit into "Message Content"?

18.3 b) Shall be clarified that the IVR mechanism to Pot in can Only Subscribe to the MSISND that is calling and no other? - To avoid subscribing someone else Mobile (as per stated on 18.3 a))

Page 7 - On the definition of "Expenditure" it could be interpreted that the definition apply to MT only.

In regard to the Legal implication and Complaints handling the document was submitted to the respective departments and we will report on this as their report is finished.

Best regards,

Martin

Martin Loire

Product Liaison

Two Degrees Mobile Limited

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(M) +64 22 000 7000

(P) +64 9 919 7000

www.2degreesmobile.co.nz



Two Degrees Mobile Limited | 131 Khyber Pass Rd | Newmarket | Auckland | New Zealand |
PO Box 8355 | Symonds Street | Auckland 1150 | New Zealand | Fax +64 9 919 7001