

Double Opt-in

Business Rules

1. Introduction

Due to the increase in the number of customer complaints in respect of the WASP subscription services Cell C has deemed it necessary to implement measures that will help alleviate these customer complaints. In our experience of late, the biggest challenges are around customers who claim they were not aware that they were subscribing to WASP services. The new business rules are aimed at resolving this issue.

In order to eliminate any uncertainties that may exist with customers regarding subscribing to WASP services, Cell C has decided to implement a technical solution to enforce the “Double Opt-in” business rules. Double Opt-in is a two-step process which requires customers who request WASP services to confirm their request prior to delivery of content and billing.

2. Key Objectives

The Key Objectives of the Double Opt-In business rule are to:

- 2.1 ensure that customers are provided with full service details before they purchase a WASP service;
- 2.2 reduce the number of customer complaints related to WASP services and to prevent rogue operators from defrauding Cell C subscribers;
- 2.3 improve the customer experience;
- 2.4 increase the longevity of WASP services;
- 2.5 create a reactive process whereby Cell C takes action following breaches of the WASPA Code of Conduct and relevant penalties as prescribed by WASPA.

3. Double Opt-in Business Rules

In order to provide extra protection and transparency for customers who request for paid-for WASP Mobile Content and Applications, as well as those who have not requested same services but are billed, the following requirement has been identified:

- 1. Customers who request WASP services must confirm their request before they can be billed and have content passed on to them by the WASP via the Cell C Network.
- 2. This must apply for WASP services initiated via SMS, WAP, WEB, USSD, MMS or IVR channels.
- 3. A customer will send a request for a service via any of the Network channels made available to WASPs. The WASP is required to activate the service on the Double Opt-In platform by providing all required information relating to the service. This information will be used to generate a service notification which will be presented to the customer by Cell C.

4. The information relating to the service cannot contain any profanity, URLs or any variation of the word free (eg. free, Mahala, etc)
5. The service notification will include the service name, price, and frequency of charge.
6. The maximum single charge supported on Double Opt-In is R50.
7. Only the charge intervals stipulated in the Double Opt-In interface specification will be supported.
8. The customer will be required to accept or decline the service by selecting YES or NO. This is applicable to WEB and SMS Opt-in methods. These channels will be free to the customer.
9. If the customer replies YES, the WASP must be notified that the service request has been successful and only then can the WASP issue a billing request. The WASP will be responsible to notify the customer of the successful registration of service.
10. If the customer replies with anything but a YES, or fails to respond within the “opt-in period” of 24 hours, the transaction will be deemed a service request failure and the WASP will be notified as such. The WASP will not be allowed to send a billing request for that service.
11. A WASP will not be allowed to resubmit the same service activation if the transaction is pending subscriber authorisation. The WASP can use the re-notify function to remind a subscriber of the pending request.
12. Only one re-notify request will be allowed on a pending transaction in the “Opt-in” period. Note that the re-notify function is not applicable to WEB opt-in.
13. Should a customer decline a service, the WASP must not attempt to reactive the same service with a 24 hour period.
14. When a customer has confirmed their request for a subscription service, the amount, the frequency of the charge may not be increased without the explicit consent of the customer. This must be treated as a new service request.
15. The WASP must send monthly reminders to the customer within 30 days of the start of the subscription services and monthly thereafter.
16. A customer can only be subscribed to a service once, until such time that they unsubscribe in which case a customer can re-subscribe to the service.
17. Each once-off and/or subscription service requires a separate double opt-In.
18. A customer can request multiple once-off services, but billing can only take place per request as the customer confirms the request.
19. Only three failed billing attempts will be allowed per service per day.
20. Upon the cancellation of a service, the operator will notify the customer of the deactivation via SMS. This is applicable to cancellations initiated by the WASP, operator or subscriber.
21. Subscription updates from the Double Opt-In platform to the WASP will be retried once after 60 minutes in the event of a failure. The WASP has the ability to query that status of a subscription at any point. The WASPs will also be able to download a summary of all subscriptions at the end of each day.