



Group Content Standards and Child Protection Programme

Vodafone Group policy on bulk unsolicited communications

*ITU WSIS Thematic meeting on countering spam conference
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Introduction - bulk unsolicited communications

- Vodafone customers are exposed to an increasing volume of bulk unsolicited communications (spam) on mobile. These may include:
 - a missed or 1-ring voice call designed to solicit a premium rate response;
 - an SMS or other mobile communication to solicit a premium rate response; or
 - an SMS or e-mail delivered to a mobile handset which is advertising a service.
- mobile phones with MMS, video and internet capabilities will increase the range of bulk unsolicited messages which can be delivered to mobiles.
- where unsolicited messages have a visual component, pornographic or illegal images may disrupt customer's use of new services. This may undermine wider acceptance of new mobile communications services vital to Vodafone's future.
- this is already a considerable problem in the fixed Internet environment where, e-mail spam, including pornographic spam, has a very high profile. Unchecked, this activity can be expected to migrate to mobile.
- bulk unsolicited communications are not directed at younger customers. However, younger customers may be a flash-point for more general concerns about spam on mobile. Again, this is already the case with pornographic spam on e-mail.

National policy response

A common enabler of action against bulk unsolicited communications is a national policy consensus that these activities are illegitimate:

This means:

- outlawing of bulk unsolicited communications. Legislation which is consistent and technologically neutral so that it captures new forms of mobile services and includes effective sanctions for individuals who are convicted of such offences.
 - permission-based marketing regimes covering electronic communications. Legislation should include effective national sanctions for companies and individuals who breach these.
 - specific legal or regulatory prohibitions addressing missed calls/1-ring calls which use premium rate numbers in Calling Line Identity to solicit a premium rate response.
 - obtain regulators' support for robust commercial, technical and regulatory action against national and international senders of bulk unsolicited communications - particularly where they are soliciting a premium rate SMS or voice response.
- => Firm national regulatory support for mobile operators withholding interconnection and service provider payments where these have been generated by unsolicited messages soliciting a premium rate response.**

Review and update unsolicited communications procedures

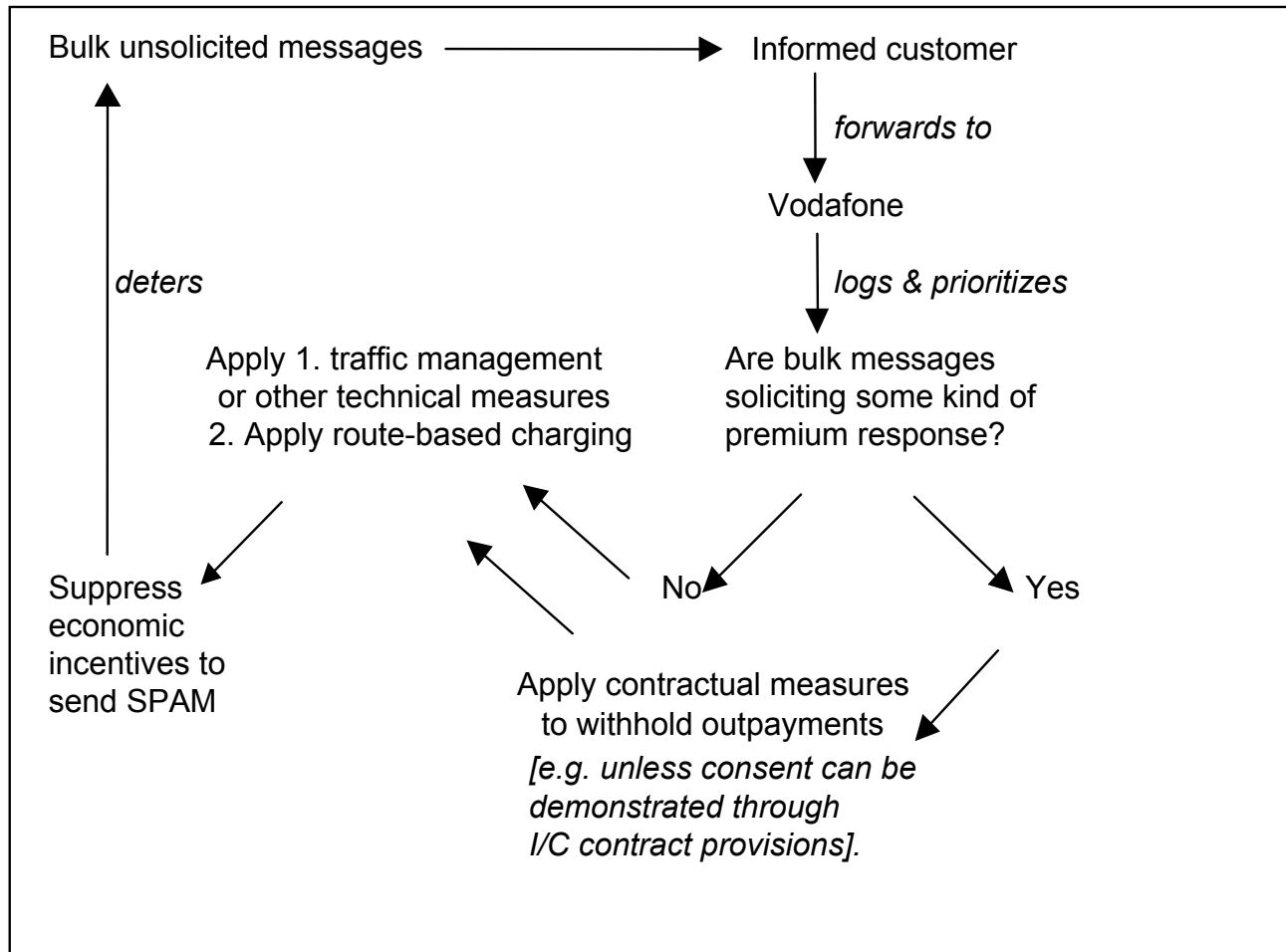
Each Vodafone Operating Company has in place procedures to combat unsolicited bulk communications.

Vodafone's immediate target is unsolicited SMS soliciting a premium rate response.

Vodafone will:

- provide accessible information to customers on how to respond to bulk unsolicited communications - and what we will do to suppress them.
- provide customers with an automated reporting facility for unsolicited bulk communications which they receive on their mobiles. This should:
 - operate as a single, dedicated Vodafone short code to which unsolicited bulk SMS can be forwarded free of charge: example - vspam (87726) or spam (7726);
 - support new mobile messaging: MMS/video messaging spam reporting on the same code.
- log bulk unsolicited communications reported by customers or detected by network management tools to identify intensity, trends and priority actions to counteract spam.
- where through reports or other monitoring Vodafone detects unsolicited SMS or other messages soliciting a premium rate response this should be targeted by priority action to make such scams economically unviable.

Stamp out SMS spam - by making it uneconomic



Avoid spreading spam to new mobile services

Implementation of new Vodafone mobile services with economic and service characteristics which make them intrinsically resistant to spam

Adoption of calling party pays will limit spam on new mobile services.

- Vodafone Group will generally seek to offer calling party pays commercial approaches to new forms of mobile call and message services to its customers.
- These commercial approaches should suppress bulk unsolicited communications and with avoid fixed e-mail experience where spam now dominates message volumes and is creating an increasingly costly “*arms-race*” between ISPs and spammers.
- New mobile services such as MMS, video clips, video telephony etc. should also not repeat the approach of SMS (launched without a well-founded commercial regime in place - notably for international communication between MNOs).
- This will reduce spam on new mobile services to the status of an irritant. This will still need to be addressed through an appropriate permissions based regime - but will not act as a barrier to widespread personal and commercial service use.
- Positive customer experiences will support and encourage wider take up of new mobile services which Vodafone is developing.

Invest in group-wide deployment of technical solutions

Where commercial or regulatory solutions are not available or effective Vodafone must rely on technical solutions - entering the spam “*arms race*”.

These will involve technical capabilities for Vodafone brand e-mail and handsets. Following proof of concept, these should be deployed group-wide.

- **Network-based** detection and suppression of bulk unsolicited communications where it is not realistically possible to apply per message charging. A key example is e-mail offered by Vodafone KK of Japan.
- Such Vodafone brand e-mail services must offer the type of anti-spam protection which is already established good practice in the fixed internet - or we will fail to meet customers’ expectations and will lose ground.
- **Handset-level** approaches which provide customers with greater control of exposure to malicious and unsolicited communications by allowing the examination of CLI or sender’s address **before** opening/downloading a message.

In summary:

There is no single solution which will address all examples of unsolicited communications.

Effective solutions must embrace a combination of measures:

- National and international legislation against malicious communications and spam.
Practical support from data protection / communications regulators for direct action against unsolicited communications soliciting a premium rate response.
- Re-visiting our internal processes to ensure that Vodafone understands and reacts effectively to malicious communications and spam.
- Prioritizing action against customer complaints received: currently mobile SMS spam is the no1 target. Vodafone's strategy is to make this form of spam uneconomic.
- Ensuring that new Vodafone mobile services have economic and service characteristics which make them intrinsically resistant to spam.
- As fixed services (such as e-mail) migrate on to mobile ensure Vodafone services adopt the lessons from the fixed environment – be prepared for the filtering arms race.