

BPA Worldwide Guide to Outbound Telemarketing Recording

Operating Guidelines for Publishing Companies and Telemarketing

Agencies Involved in the Acquisition and Requalification of

Telecommunication Requests



Purpose Statement

This guide is intended to provide media owners and telemarketing agencies with suggested operating guidelines for the acquisition and requalification of "Direct Requests" through the use of telephone interviews.

In addition, this guide is intended to help media owners establish quality assurance standards within a realistic cost and time frame, while conforming to BPA Worldwide audit standards.

Summary of BPA Worldwide Standards Relating to Telecommunication Requests

Direct Request from Recipient: Telecommunication (See BPA Standards 1-2 515 and 1-3 515)

- Telecommunications from individually qualified recipients requesting the publication may be reported as a personal telecommunications request. All outbound Direct Request: Telecommunication requests, with the exception of subscriptions to individuals who refuse to be recorded, must be recorded and made available to the auditor at the time of audit.
- Individuals who refuse to be recorded, inbound telecommunication and interactive voice response (IVR) request, must be asked a personal identifying question (PIQ), which only the individual—and not the media owner—would know. The PIQ will be used to support the request in the absence of a recording or a signature. Examples of acceptable PIQs include: month and/or date of birth; mother's maiden name; or high school graduated from.
- If the call is being recorded, the media owner may use any of the following script options to obtain the request:

Option #1

Do you wish to receive this publication?

Do you wish to continue to receive this publication?

Option #2

All that I need to do is update your address information and ask you a couple of questions to send out your free subscription. We show that the subscription should go to (address). Is that correct?

All that I need to do is update your address information and ask you a couple of questions to send out your free subscription. We show that the subscription is going to (address). Is that still the correct address?



Option #3

In order to receive your free subscription to (publication name), I just need a few moments to update some information, ok? I have your name as...

In order to continue receiving your free subscription to (publication name), I just need a few moments to verify some information, ok? I have your name as...

Option #4

Hello. This is (caller's name) for/from (publication name) calling to update the information that we have on file so that we may begin sending you a free subscription to our publication, ok?

Hello. This is (caller's name) for/from (publication name) calling to update the information that we have on file so that we may continue sending you a free subscription to our publication, ok?

Option #5

Hello. This is (caller's name) from (publication name). I'd like to start your free subscription and just need to ask you a couple of questions to be able to do so. I have your address as (address). Is this correct?

Hello. This is (caller's name) from (publication name). I'd like to renew your free subscription and just need to ask you a couple of questions to be able to do so. I have your address as (address). Is this correct?

- > A telephone interview form shall:
 - Contain adequate instructions (script) to the telephone interviewer (outbound calls) or to the recipient (inbound calls), including a statement, in accordance with local laws, that the call is being recorded;
 - Contain the name, title, company address and telephone number of the recipient;
 - Contain an acceptable request question with a personalized data question, coupled to the request for subscribers who refuse to be recorded (as defined in Section 1-2 515b). The personalized data question is required only if the telephone call is not recorded;
 - o Be consistent with the "Field Served" and "Definition of Recipient Qualification"; and
 - o When calls are recorded, it is acceptable to confirm name, address, title, email, fax, phone number, and prior-year demographic information during the telephone interview.
- (The qualified recipient's spouse may request the publication on behalf of the qualified recipient. This may be reported as "Direct Request: Telecommunication".
- The qualified recipient may request the publication for themselves and up to one other co-worker and have both requests reported as "Direct Request: Telecommunication".



- A co-worker may request the publication on behalf of two other qualified co-workers through one phone call and the two requests may be reported as "Direct Request: Telecommunication" provided the "co-worker" making the request is not also requesting for themselves (maximum two requests). Requests for multiple (three or more) persons shall be reported as Request from Recipient's Company (See 1-2 519).
- Media owners contacting a co-worker to elicit direct request: telecommunication shall comply with the same conditions concerning telecommunication requests set forth in these standards. In addition, the media owner shall obtain the full name and job title of the individual spoken with. If the recipient's name and title is not received, refer to Standard 1-2 525 Communication (Other than Request): Telecommunication.
- Telecommunication requests for a multiple of different publication brands obtained in a single telecommunication may be counted as telecommunication request circulation, provided the interviews are recorded, a separate request question is asked and answered for each of the publication brands, and such circulation is in conformance with Standards 1-2 514e and 1-2 515j.
- Prior testing of scripts, systems and procedures for soliciting telecommunications requests may be required to determine auditability.
- For incoming requests received through telecommunications, adequate records verifying the time and date of the call shall be maintained. In addition to the personalized request question, the recipient may be instructed to provide a unique identification code taken from the media owner's label.
- Media owners shall be responsible for maintaining the following records, which are to be made available to the auditor at the time of audit and/or during random visits:
 - All telephone company invoices.
 - o All computer-generated data, including summaries by date of calls received, telephone numbers of calls placed and received, and computer logs of tasks performed.
 - Recordings, where permitted and available, shall be inspected by the auditor to verify adherence to the BPA Worldwide-approved interview form and the proper recording by the interviewer of the recipient's response. Whenever conversations are recorded, the recipient shall be advised, in accordance with local laws, that he/she will be recorded. Monitoring of live interviews may also be conducted for the same purpose.
- The media owner shall be responsible for the documentation and accuracy of telecommunication requests, including those requests obtained through outside telemarketing firms.
- ➤ The auditor will compare and cross-check all records and make any other tests deemed necessary, including follow-up telephone contact and/or mail confirmations, for complete and accurate authentication of the request and qualification information. The media owner shall be billed for the extra costs incurred for any special confirmations conducted by BPA Worldwide or its agent, unless included in a current "fixed price agreement".



- All other specific standards pertaining to the use of promotional incentives for personal written request circulation or in the merging of publications' circulation apply to telecommunication requests (See 1-2 224 and 1-2 243).
- For those media owners wishing to use Short Message Service (SMS) to renew previously requested subscriptions, an outline of the program and transcript of the text message shall be submitted to BPA Worldwide for approval prior to use. BPA Worldwide's approval will be given to any renewal SMS program that meets the following conditions:
 - Media owner must have expressed consent from the subscriber to communicate via SMS.
 - The outgoing text message contains an adequate description of the nature of the request.
 - The outgoing text message contains an adequate request question and instruction to the recipient.
- The outgoing text message, or a subsequent text message sent after the recipient renews their request, provides the recipient an opportunity to update their information.
- The program captures the outgoing phone number, the phone number of the recipient, the time and date of the outgoing message, the time and date of the recipient's reply, and the recipient's message.
 - Publications must maintain proof of the initial request.
- > Documentation of the respondent's conformance to the Field Served and Definition of Recipient Qualification shall be available either through a previous request or secondary source and be current within three years of the analyzed issue.

Request from Recipient's Company: Telecommunication (See BPA Standards 1-2 519 and 1-3 519)

- ➤ Telecommunications such as telephone interviews with a co-worker at a company requesting copies of the publication for other co-workers (one person requesting for three or more persons) of that company may be reported as telecommunication request from recipient's company provided the "co-worker" making the request is not also requesting for themselves. If the latter, the respondent requesting for themselves and one co-worker are to be reported as "Direct Request", and the balance as "Request from Recipient's Company." Such calls may be eligible to be considered as Direct Request: Telecommunication provided they comply with Standards 1-2 515d and 1-2 515f.
- Media owners electing to use telecommunications for company request shall comply with the following conditions:
 - Outbound solicitations for request from recipient's company: telecommunication must be recorded and made available to the auditor at the time of audit; however, if the recipient refuses to be recorded, a personal identifying question must be asked and



answered. Some examples...To permit future verification of your request, please give us your month and/or date of birth - Month ... Day ... or mother's maiden name or high school graduated from." Other forms of personalized questions which only the interviewee and not the media owner is likely to know, may be asked as an alternate should the interviewee not provide an affirmative response to the original question.

- Once a particular personal identifying question is used and the answer is stored, a different question shall be used for future request questions.
- o The names and titles and/or functions of the employees shall be provided.
- The name and title and/or function of the requestor shall be provided along with the company, address, and telephone of the company.
- A question of a co-worker approximating the following shall be stated during the telecommunication: "Do you want this publication sent to any other employees? Yes ... No ...
- o In the case of a requalification effort, the co-worker may be asked, "May we continue to send (name of publication) to (name of qualified subscriber)."
- "All I need to do is update the address information and ask a few quick questions and we'll be able to continue (name of qualified subscriber's) subscription for another year, ok?"
- o Other options:

Option #1

- Do you wish to confirm (name of qualified subscriber) should receive this publication?
- Do you wish to confirm that (name of qualified subscriber) should continue to receive this publication?

Option #2

- All that I need to do is update the address information and ask you a
 couple of questions to send out a free subscription to (name of qualified
 subscriber). We show that the subscription should go to (address). Is that
 correct?
- All that I need to do is update the address information and ask you a
 couple of questions to send out a free subscription to (name of qualified
 subscriber). We show that the subscription is going to (address). Is that
 still the correct address?



Option #3

- In order for (name of qualified subscriber) to receive a free subscription to (publication name), I just need a few moments to update some information, ok? I have his/her name as...
- In order for (name of qualified subscriber) to continue receiving a free subscription to (publication name), I just need a few moments to verify some information, ok? I have his/her name as...

Option #4

- Hello. This is (caller's name) for/from (publication name) calling to update
 the information that we have on file so that we may begin sending (name
 of qualified subscriber) a free subscription to our publication, ok?
- Hello. This is (caller's name) for/from (publication name) calling to update
 the information that we have on file so that we may continue sending
 (name of qualified subscriber) a free subscription to our publication, ok?

Option #5

- Hello. This is (caller's name) from (publication name). I'd like to start a
 free subscription for (person's name) and just need to ask you a couple
 of questions to be able to do so. I have the address as (address). Is this
 correct?
- Hello. This is (caller's name) from (publication name). I'd like to renew a
 free subscription for (name of qualified subscriber) and just need to ask
 you a couple of questions to be able to do so. I have the address as
 (address). Is this correct?
- Multi-Copies to the Same Addressee circulation where the employer at the point of redistribution has agreed to accept a specified number of copies for redistribution to qualified employees. The requester must, in a recorded interview, agree to the redistribution. The requester shall indicate the specific quantities requested, as well as the date requested. Agreements shall be obtained for no less than 95% of all points of redistribution, and for no less than 95% of the copies to be distributed.
- All other conditions in sections 1-2 515 and 1-2 525, except in conditions specified for "personal request" telecommunications, shall be followed.

Direct Request vs. Company Request

In December 2015 the BPA Worldwide Board of Directors voted to amend standards to simplify who can make "direct" requests on behalf of a targeted recipient.



Responding to a changing marketplace, the Board voted to amend the request definitions. Direct Request is now defined objectively by numbers — not subjectively by the subscriber's job title or function. This approach changes the definitions from qualitative to quantitative.

The rules stipulate that in the case of a single phone call when a person is making a request for themselves and **one** other co-worker (regardless of their job title or function) both shall be a Direct Request source.

In the case when an individual makes a request for **two or more** co-workers, the person spoken to would be sourced as a Direct Request, while the co-worker copies would be reported as Company Request. If the person spoken to does not request a copy for themselves, the two co-worker copies would be reported as Direct Request. The "spousal" allowance as a "direct request" remains unchanged.

As a reminder, media owners and telemarketing companies must be acutely aware of the following BPA rules:

1-2 515 (1-3 515) Direct Request: Telecommunication

(f) The qualified recipient's co-worker may request the publication on behalf of two qualified recipients through one phone call and be reported as "Direct Request: Telecommunication". Requests for multiple (three or more) co-workers shall be reported as Request from Recipient's Company (see rule 1-2 519 / 1-3 519).

Media owners contacting a co-worker to elicit direct request: telecommunication shall comply with the same conditions concerning telecommunication requests set forth in these rules. In addition, the media owner shall obtain the full name and job title of the individual spoken with. If the recipient's name and title is not received, refer to rule 1-2 525 / 1-3 525 Communication from Recipient or Recipient's Company (Other than Request): Telecommunication.

1-2 532 (1-3 532) QUESTIONNAIRE DESIGN

Whenever a questionnaire is used to elicit information from a recipient, the questionnaire and attendant material *shall not improperly lead the recipient to give the desired qualification data* in order to receive the publication.

BPA Worldwide Telecommunication Source Testing Procedures

Standard BPA practice is to verify all subscribers that appear on the randomly selected auditor's test.

For telecommunication source names selected on the audit test, the media owner shall provide BPA with the teleservice company call log information including: subscriber name, date of call, time of call, duration of call (2 digit minutes; 2 digit seconds), and all applicable demographics. If the recording is refused by the subscriber, the data should also include the personal identifying information (PIQ) and the name of the person spoken with.

With the exception of those individuals who refuse to be recorded, the media owner shall provide BPA with recordings for 100% of the interviews from the audit test selection; these can be sent in any format.



BPA will examine the call data provided by the media owner, compare the teleservice call log information to the qualified circulation list, and listen to the selected calls. In addition, BPA will call several of the test names to verify authenticity. All test records that refused to be recorded will be called to verify the original request.

Costs of listening to recordings and other associated confirmation costs are included in BPA's basic audit fees. Any time required to provide service in excess of the allocated hours shall be charged at the standard hourly rate applicable at the time of the audit.

Recordings that do not comply with the rules may result in audit adjustments requiring a printed audit report.

Operating Guidelines for the Acquisition and Requalification of "Direct Requests"

Planning and Implementing an Effective Telemarketing Campaign

Properly planning a telemarketing campaign prior to the commencement of the actual calls will result in a more successful campaign in terms of the quantity, quality, and cost. In an effort to assist both media owners and telemarketing agencies, the following guidelines are suggested:

1. Communicate Frequently

- Frequent communication between a media owner and their telemarketing agency is essential for the success of any campaign.
- Media owners should request daily reports regarding the ongoing results of their campaigns.
- In a situation where a media owner is using multiple source lists, daily communication is essential to determine which lists are providing the best results.

2. Reserve Time in Advance

- Media owners should reserve time with their agencies to ensure that the required resources will be available when needed.
- The most important planning tool that a media owner can offer its agency is a schedule of the upcoming year's campaigns. The schedule should include the name of the publication, the time frame in which the interviews will be conducted, and the estimated number of qualified subscribers that are to be obtained.

3. Allow Ample Calling Time

 There is an inverse relationship between the length of time assigned to a telemarketing campaign and the quantity, quality and cost of the subscribers obtained.



- Media owners should anticipate lower costs and higher conversion rates by allowing more time for a campaign. The opposite is true if they wait until the last minute.
- Allowing ample time for the job not only increases productivity by maximizing the learning curve
 and allowing time for call backs, but it also provides media owners with the opportunity to review
 results and determine if a change of strategy is needed to meet desired demographic goals.

4. Employ Data/Agency Testing

- With a list size of 10,000 names or more, it is recommended testing be conducted by the agency prior to roll out to determine the cost per name and the quality of results. Too often volume targets are compromised due to the poor quality of data provided.
- If testing multiple agencies, each agency should be testing different sample selections from the same list.
- The test should be representative of the data to be telemarketed in order to ensure similar results in the roll out. The names included in the test should be randomly selected from the data (nth selection) and should be a representative percentage of the file. The list to be rolled out should be the remainder of the file.

5. Determine Realistic Goals

- Agencies should not accept work if it has been determined that the desired results are unachievable based upon the test results and/or the amount of time allowed for the campaign.
- Media owners should set realistic goals prior to commencement of any telemarketing campaign, and should communicate these goals to the telemarketing agency. Media owners should be prepared to provide sufficient leads to achieve the targeted goals that have been set.

6. Adhere to Governing Legal Restrictions

- Regarding compliance with any privacy or data protection regulation, BPA members should take note that such regulation supersedes BPA standards. From time to time, BPA may update its standards and provide cautionary advisories as BPA becomes aware.
- Both media owners and agencies should be aware of their legal responsibilities outside of the scope of BPA Worldwide.
- The teleservices agency is responsible for alerting media owners to those who request to be taken
 off a telemarketing list. It is the media owner's responsibility to adhere to this request.



Media Owners Checklist for Managing a Telemarketing Campaign

Media owners are ultimately responsible for the accuracy of the list they provide to BPA Worldwide. In an effort to assist media owners and their staff to effectively and efficiently conduct a telemarketing campaign, the following suggestions are offered:

- 1. Ascertain that the telemarketing agency has experience working with BPA-audited publications. Verify the telemarketing agency has recording capabilities and will be able to meet the BPA audit requirements. Obtain references from other media owners.
- 2. A proposal describing the agency's' experience in conducting a telemarketing campaign for the acquisition or renewal of a qualified subscriber should be requested. The proposal should also include all pricing considerations.
- 3. Determine who are the agency's contact persons, as well as their roles and responsibilities as they relate to the media owner's campaign.
- 4. To allow the agency to gain an understanding of your publication and the market that it serves, the following materials should be provided:
 - BPA Brand Report
 - Media kit
 - Sample issues of the publication
 - Scripts previously approved by BPA Worldwide
 - Audit issue date and corresponding qualification date range
 - Direct mail materials
 - Background information on company and industry served by publication
 - List of benefits for subscribing to publication
 - Information on list source, including titles, business and other relevant demographic data
- 5. Communicate and discuss campaign objectives and how these objectives are to be accomplished.
 - Determine the targeted number of requalifications and/or new acquisitions to be obtained
 - Employ testing procedures to determine the quantity of leads to be provided and the timing of their delivery
 - Provide the qualifying parameters (i.e., job title, job function, and other relevant demographic data)
 - Provide non-qualifying responses
 - Determine which questions are mandatory and which are optional
 - Provide record layout for incoming data and output formats
 - Develop an interview script and obtain BPA approval
 - Provide instructions for handling replacement names
 - Determine the number of call attempts that should be made prior to considering a lead a "No Contact"
 - Determine when return data is needed
 - Determine if pass-along names are wanted. If yes, determine if specific titles are required



- 6. Communication and reporting procedures
 - Determine the frequency of reports to be received
 - Agree on the format and components of the reports, including which type of negative dispositions (i.e., left company, disconnected numbers, does not qualify, etc.) are to be obtained
 - Determine how reports are to be received (e-mail, web, etc.)
 - Campaign summary report
- 7. Determine the output requirements, as well as the timing and format of the output deliveries
 - Determine the required output format and compatibility with fulfillment systems
 - Determine which abbreviations are acceptable
 - Determine the timing and quantity of all output deliveries
 - Determine where output deliveries should be sent (media owner or fulfillment house)
 - Determine if transmittal form is required with each package sent
- 8. Determine the invoicing and payment procedures
 - Agree on all pricing considerations prior to commencement of any campaign
 - Determine how often invoices will be generated and mailed to the media owner
 - Determine where invoices should be sent and to whose attention
 - Determine payment terms

Media Owners Checklist for Managing the Quality Control of A Telemarketing Campaign

The following quality control considerations are offered in an attempt to help media owners oversee the quality control measures that their agency employs:

- 1. Ensure that the telemarketing agency is knowledgeable about BPA audit rules that govern "Telecommunication Requests," including the ability to record interviews.
- 2. Ensure that clear communication has taken place in terms of the campaign's objectives, reporting requirements and output requirements.
- 3. Gain an understanding of how the agency compensates its interviewers.
- 4. Require the telemarketing agency to thoroughly explain all of the quality control procedures it has in place to ensure the integrity of their work.
- 5. Gain an understanding of how the agency trains and manages the interviewers who will be conducting the subscriber interviews.
- 6. Gain an understanding of the agency's procedures for handling disgruntled or uncooperative subscribers. Agree on the procedures to be employed on a campaign.



- 7. Gain an understanding of the agency's procedures relative to calling back a subscriber who has already been interviewed (i.e., missing or incomplete information, questionable responses, etc.).
- Gain an understanding of the procedures that the agency employs when it determines that an
 interviewer has been fraudulently or improperly conducting an interview. Expect 100% callbacks or
 alternate action to ensure media owner does not receive any subscribers through interviews
 conducted improperly.
- 9. Gain an understanding of the agency's procedures for calling back a certain percentage of subscribers and re-interviewing them to ensure the integrity of the work conducted.
- 10. Monitor the interviews conducted on behalf of the publication by sampling recorded calls to ensure the script is being followed and all requirements are met. Live call monitoring is also recommended.
- 11. Call back a sample of completed interviews and compare the results to those of the agency.
- 12. Gain an understanding about whether the agency outsources any of the work to another agency. If it does, the agency must:
 - Notify the media owner about the portion of work that is outsourced.
 - Tell the media owner to whom it is being outsourced to and give company credentials, references and contact information for monitoring.

Minimizing Recording Objections

BPA's Teleservices Advisory Committee members have experienced a few objections to the recording requirement. They recommend building a level of engagement and trust before advising the subscriber of the recording; do not begin the conversation with "This call will be recorded..." Test multiple script versions to determine which script works best for your publication.

<u>Personal Identifying Questions (PIQ) – Only for Incoming Requests</u> or Subscribers Who Refuse to be Recorded

- Personal Identifying Questions (PIQ) information must relate to the individual being interviewed. The question asked should be personal and verifiable.
- ➤ PIQs should not seek information that is overly sensitive to the recipient (i.e., social security number, children's names, mother's maiden name, etc.).
- > An alternative question should be available in case of a recipient's refusal to answer the PIQ asked.
- A refusal to answer a PIQ does not automatically disqualify a recipient. The percentage of refusals during a campaign must be kept to an absolute minimum.



- The PIQ is not required if the telephone conversation is recorded. Permission to record must be asked and granted at the outset of the conversation. The balance of the entire conversation must be recorded.
- > PIQs must be changed annually and used only once every three years.

Sample Personal Identifier Questions

- > State of birth
- Month of birth
- Day of birth
- > Town of birth
- Year of birth
- High school attended

BPA Certified Partner Program Overview

Telemarketing agencies are eligible to participate in the BPA Certified Partner Program.

Introduction

The BPA Certified Partner Program was introduced to industry partners with the goals of improving quality, elevating trust, and enhancing the media audit process for all parties.

What Organizations Are Eligible?

Organizations serving the media industry, including subscription management services, data management companies, email management companies, teleservice companies, and others can apply to the BPA Certified Partner Program.

Certification Process

Company management will gather and/or prepare documentation to support the company's policies, processes, personnel, technology, reporting capabilities and controls as they relate to supporting BPA audited media.

BPA iCompli will review the documentation, interview product managers and staff, request process and control demonstrations, test transactions/events and gather evidence to support the certification opinion.

Program Deliverables

Companies will receive a comprehensive management report indicating performance against key metrics, including recommendations for improvement, if necessary.



Upon successful completion of the engagement, BPA will issue an Audit Opinion Letter and the BPA Certified Partner Seal. Both may be used in marketing and promotions.

BPA will accept audited data directly from BPA Certified Partners to make the audit process more efficient and effective for all participants. Successfully completing the program means certified telemarketing vendors do not need to provide recordings at the time of the BPA audit.