

# Billing digital services through the mobile phone bill

Onboarding, approval, website requirements and subscription rules for Direct Carrier Billing (DCB) and Premium SMS (PSMS) with Telekom, Vodafone and Telefónica (O2).

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# Basics and key terms

With Direct Carrier Billing, customers pay for digital content or subscriptions through their mobile phone bill – no credit card or bank details required. In Germany, every company and every service that wants to bill this way must be approved by the mobile network operators. This guide summarises the path to approval, the requirements your website and payment page must meet, and the rules that apply to subscriptions.

## Key terms

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### Direct Carrier Billing (DCB)

Payment via the mobile phone bill or prepaid balance. The customer confirms in the browser or app.

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### MNO / operator

Mobile Network Operator. In Germany: Telekom, Vodafone and Telefónica (O2).

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### Aggregator

The technical and contractual intermediary between service provider and operators – in this case Kanzaroo.

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### Retry

A repeated charging attempt after a failed billing, e.g. due to insufficient balance.

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### Premium SMS (PSMS)

Billing via premium-rate SMS, which also appears on the mobile phone bill.

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### Service provider

The company (legal entity) that offers and bills the digital service.

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### Double opt-in

Two-step purchase confirmation by the user, e.g. via SMS PIN or checkbox.

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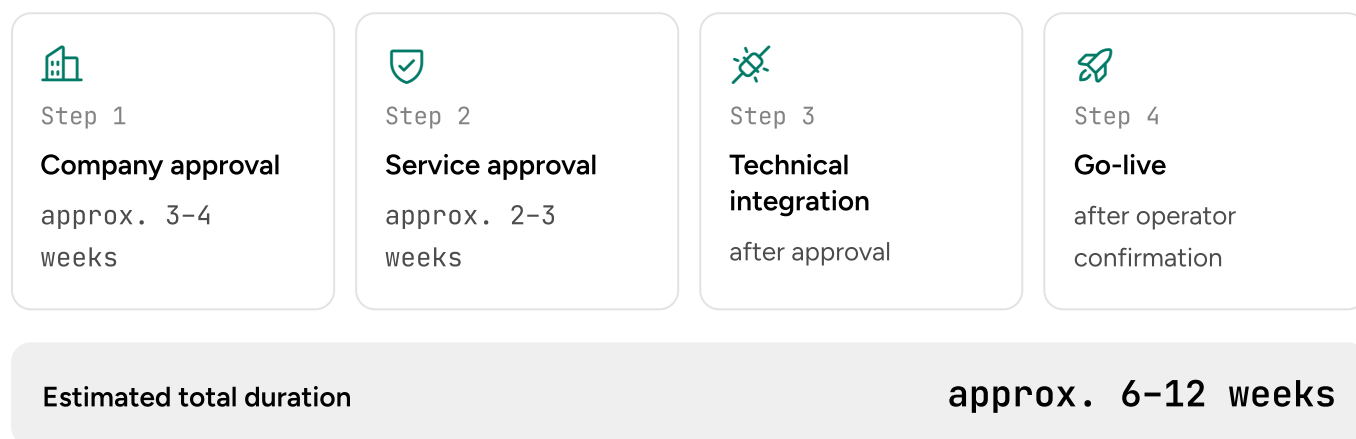
### Price cap / bill warning

Maximum amount per billing, and the amount at which the operator warns the customer.

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# Onboarding and approval process

The onboarding and approval process for launching digital content or subscription services via Direct Carrier Billing (DCB) or Premium SMS (PSMS) in Germany consists of two main phases: approval of the company and approval of the service. This process is required by all major German mobile network operators (MNOs): Telekom, Vodafone and Telefónica/O2.



## 2.1 Company (service provider) approval

Before a product can launch, the MNOs must review and approve the legal entity providing the service.

|                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>COMPANY DETAILS</b></p> <ul style="list-style-type: none"> <li>• Completed order form (provided by us)</li> <li>• Registered company name</li> <li>• Managing director</li> <li>• Contact details (email, phone)</li> <li>• VAT ID and tax number</li> <li>• Commercial register number</li> <li>• Company website</li> <li>• Short description of the company and its business model</li> </ul> | <p><b>ASSIGNMENT DECLARATIONS</b></p> <p>For each operator (Telekom, Vodafone, Telefónica):</p> <ul style="list-style-type: none"> <li>• Provided as Word templates</li> <li>• On company letterhead and signed by the managing director</li> <li>• Scan for submission + original by post</li> </ul> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

**Purpose:** To confirm that the company is legitimate, compliant and suitable to operate digital billing services in Germany.

## 2.2 Service (product) approval

Once the company is approved, the specific service or product must go through a content approval process.

### REQUIRED DOCUMENTS

- Service name
- Service description & user journey (incl. screenshots or click flow)
- Live service URL (or demo/test access if not yet live)
- Pricing information (e.g. €4.99 weekly subscription)
- Marketing materials (landing pages, ad examples, banners etc.)

**Purpose:** To ensure that the product and user flow are transparent, meet German consumer protection standards and comply with operator guidelines.

## 2.3 Estimated timeframe

If all documents are complete and no significant changes are needed, company approval takes approx. 3–4 weeks and service approval approx. 2–3 weeks. The estimated total duration is approx. 6–12 weeks. Timings may vary depending on operator feedback, public holidays or queries.

## 2.4 Technical integration

After service approval, the partner receives the API documentation for the technical connection.

- Integration and testing are coordinated with the operator and aggregator
- The partner provides test access for review and verification

## 2.5 Go-live

After successful testing and confirmation by the operator:

- The service goes live for German users via DCB or PSMS
- Marketing campaigns and traffic activation can begin

# Website and payment page requirements

The requirements build on each other: first, the general rules for all digital offerings in the EU and Germany apply (3.1). If you use DCB as a payment method, you must also meet the requirements of the German mobile operators (3.2). Subscriptions additionally require specific mandatory information on the payment or landing page (3.3).

## 3.1 General requirements for the EU and Germany

When offering digital content or services within the EU – and in Germany in particular – websites must meet the following legal and regulatory standards.



### Data protection (GDPR)

- Full compliance with the General Data Protection Regulation (GDPR)
- A transparent privacy policy explaining what data is collected, for what purpose and how it is used
- Simple ways for users to exercise their rights (access, erasure, rectification, data portability)
- Secure processing and storage of data



### Cookie & tracking consent

- Explicit user consent must be obtained before setting non-essential cookies or tracking tools
- Users must be able to accept, reject or individually configure cookies



### Transparency & legal information

- A legally compliant imprint (Impressum) must be clearly visible on the website, including company name and legal form, registered office or address for service, managing director or authorised representative, contact details (email, phone), and VAT ID and commercial register number
- Clearly accessible terms and conditions and privacy policy
- Transparent and accurate pricing (incl. all taxes and recurring costs)



### Accessibility

- Websites should comply with EU accessibility standards (e.g. WCAG) to ensure usability for people with disabilities
- Since June 2025, this has been mandatory for most digital services under the European Accessibility Act



### Consumer protection & e-commerce

The website must clearly state:

- Accepted payment methods
- Cancellation and refund rights
- Duration and terms of subscriptions
- Any delivery or usage restrictions

Automatic renewals must be clearly labelled and require the user's explicit consent.



### Payment regulation (PSD2 / SCA)

- Payments must meet the requirements of PSD2 and Strong Customer Authentication (SCA), unless an exemption applies
- Transactions must be secure, traceable and transparent for the user

## 3.2 Additional requirements for DCB in Germany

When integrating DCB as a payment method, additional requirements from the German mobile operators apply.

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### Operator & product approval

- Both the company and the service or product must be approved by each German mobile operator: Telekom, Vodafone, Telefónica (see chapter 02 for the process)
- Approval ensures that the company is legitimate and the user flow meets consumer protection standards

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### Confirmation & customer information

After completing a subscription or payment, the user must receive a confirmation (by SMS or email) containing:

- Service name
- Price and billing period
- Cancellation link or cancellation instructions
- Customer support contact details

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### Language & localisation

- A German version of the website must be available for all user-relevant pages and information
- Prices must be shown in euros (€)
- Marketing materials and user flows must be understandable and compliant with local law

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### User flow & price transparency

The user journey must be fully transparent and clearly show:

- Product or service name
- Price and billing interval (e.g. €4 . 99 per week)
- Terms of the subscription or purchase

The user must actively confirm the payment (no pre-ticked checkboxes or hidden costs).

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### Refunds, cancellations & support

- Users must be able to cancel subscriptions easily at any time
- Refund requests must be handled promptly and in line with operator and consumer protection guidelines
- A support email address or hotline must be clearly available

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### Technical & security standards

- The website must ensure stable and secure connections (HTTPS)
  - Clear error handling for failed payments or connection problems
  - Test access and staging environments should be provided for operator review and approval
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### 3.3 Mandatory information on the payment page (landing page) for subscriptions

To comply with German regulatory requirements and MNO-specific rules, the payment or landing page must include the following elements:

**Clear product description**

Transparent presentation of the service with its main features and benefits

**Pricing**

Full price per billing cycle incl. VAT

**Billing interval**

Clear statement of whether billing is weekly, fortnightly or monthly

**Cancellation terms**

Easily accessible explanation of how to cancel the subscription

**Terms & privacy policy**

Linked and available in German

**Customer support**

Clearly visible contact options (email, phone etc.)

**Opt-in confirmation**

Two-step confirmation (double opt-in), e.g. via SMS PIN or checkbox

**Language requirements**

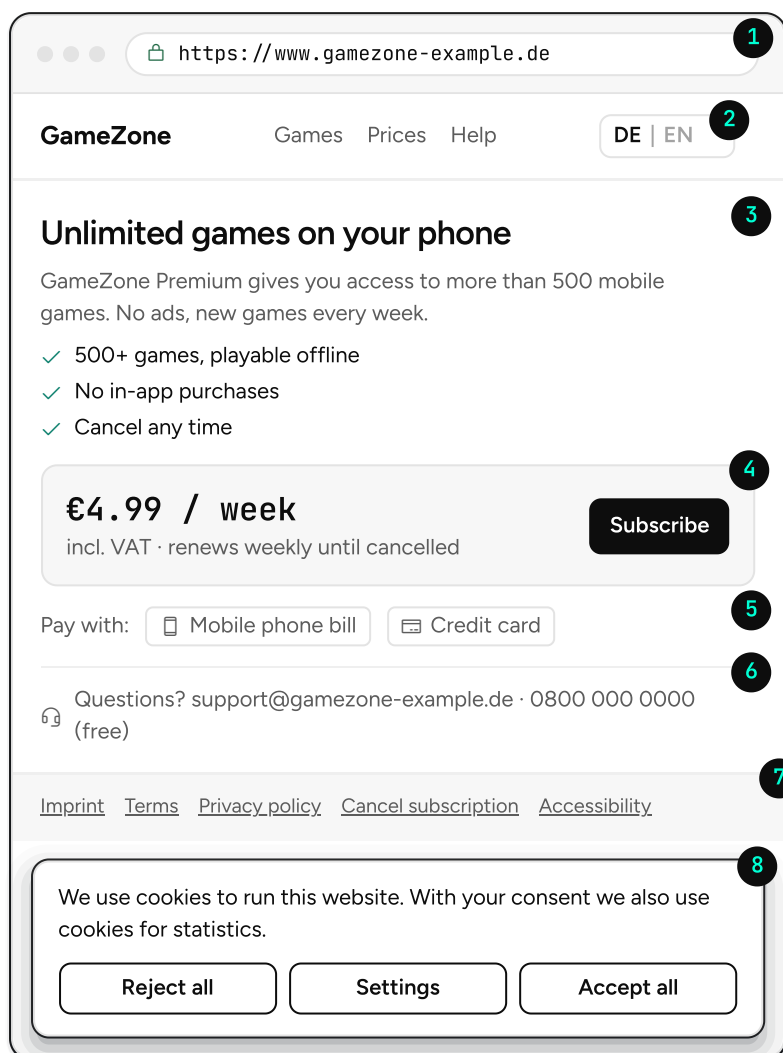
All page content must be available in German

**Legal notices**

All legal notices and consumer information required by the operator

## 3.4 Example: a compliant service website

The example below shows a simple service website that meets the requirements in 3.1 and 3.2. Each number in the example matches an item in the checklist on the right. "GameZone" is a fictitious service used for illustration only.



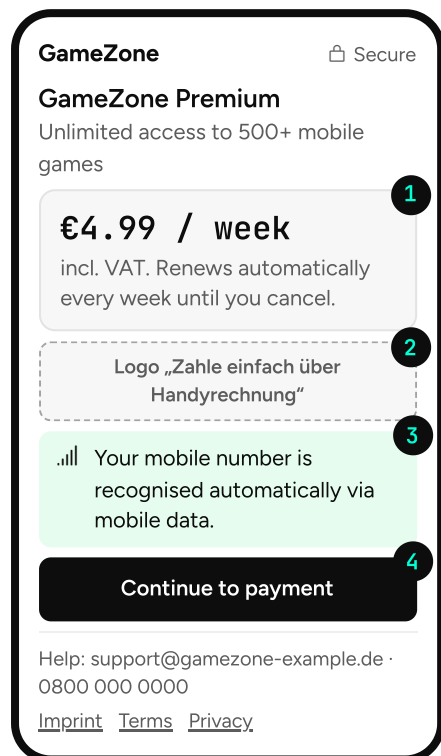
- 1 Secure connection 3.2**  
The whole website runs on HTTPS.
- 2 German version 3.2**  
All user-relevant pages are available in German.
- 3 Clear product description 3.1**  
Say what the service is and what the customer gets.
- 4 Full price and renewal 3.1**  
Price incl. VAT, billing interval and automatic renewal next to each other.
- 5 Payment methods 3.1**  
List every accepted payment method.
- 6 Customer support 3.2**  
Email and phone clearly visible.
- 7 Legal pages 3.1**  
Imprint, terms, privacy policy and cancellation linked on every page.
- 8 Cookie consent 3.1**  
No non-essential cookies before consent. Reject is as easy as accept.

Shown in English for readability. The live website must be available in German and meet EU accessibility standards (readable contrast, text alternatives for images, keyboard navigation).

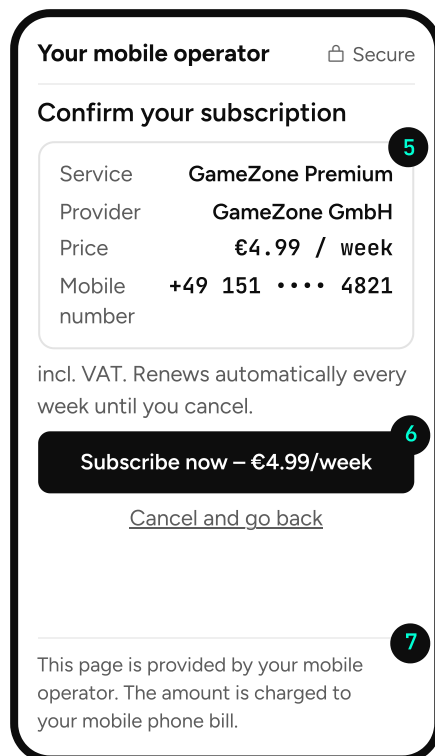
## 3.5 Example: DCB subscription (click flow via the operator)

In the click flow, the customer's mobile number is detected automatically while they are on mobile data (e.g. 4G/5G). The customer is then redirected to their mobile operator (MNO), confirms the subscription on the operator's page and receives a confirmation SMS. The numbers match the checklist below the screens.

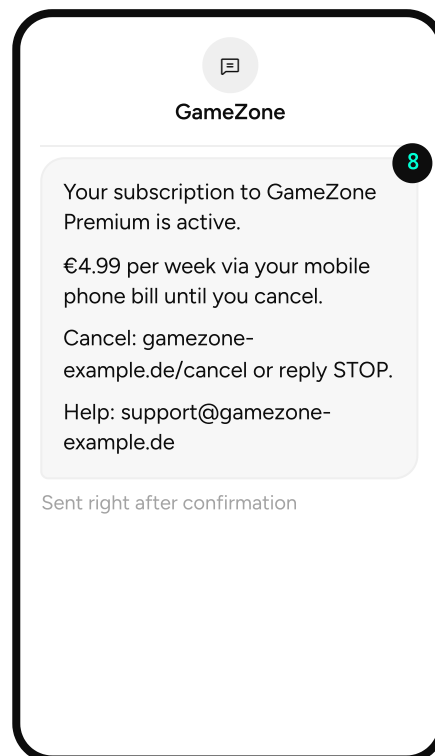
### STEP 1 · SERVICE PAGE



### STEP 2 · OPERATOR



### STEP 3 · CONFIRMATION SMS



- 1 Product and price 3.3**  
Service name, price incl. VAT, interval and automatic renewal.

- 4 Continue button 3.2**  
Leads to the operator page. Nothing is charged yet.

- 7 Operator notice 3.2**  
Makes clear who provides the page and how billing works.

- 2 Payment logo 3.2**  
The “Zahle einfach über Handyrechnung” logo shows the payment method.

- 5 Operator page 3.2**  
The operator shows service, provider, price and mobile number.

- 8 Confirmation SMS 3.2**  
Service name, price and period, how to cancel, support contact.

- 3 Automatic number detection**  
Works on mobile data only. On Wi-Fi, use the PIN flow (3.6).

- 6 Confirmation on the operator page 3.3**  
The customer confirms the paid subscription with the operator.

## 3.6 Example: PSMS payment (PIN flow)

In the PIN flow, the customer enters their mobile number and confirms the purchase with a code sent by SMS. Used for Premium SMS and whenever the number cannot be detected automatically, e.g. on Wi-Fi.

### STEP 1 · PAYMENT PAGE

**GameZone** Secure

**GameZone Premium**

Unlimited access to 500+ mobile games

**€4.99 / week**

incl. VAT. Renews automatically every week until you cancel.

**Mobile phone bill**

Charged to your Telekom, Vodafone or O2 bill.

Logo „Zahle einfach über Handyrechnung“

+49 Your mobile number

☐ I accept the [Terms](#) and the [Privacy policy](#).

**Subscribe now – €4.99/week**

Cancel any time at [gamezone-example.de/cancel](#) or send STOP to 12345.

Help: [support@gamezone-example.de](#) · 0800 000 0000

[Imprint](#) [Terms](#) [Privacy](#)

### STEP 2 · CONFIRM WITH CODE

**GameZone** Secure

**Enter your code**

We have sent a 4-digit code by SMS to +49 151 \*\*\*\* 4821.

4 8

**GameZone Premium**

€4.99 / week

Weekly subscription, cancel any time

**Confirm and pay**

No code received? [Send again](#)

Help: [support@gamezone-example.de](#) · 0800 000 0000

### STEP 3 · SMS

**GameZone**

Welcome to GameZone Premium.

You pay €4.99 per week via your mobile phone bill until you cancel.

Cancel: [gamezone-example.de/cancel](#) or reply STOP.

Help: [support@gamezone-example.de](#)

Received right after confirmation

**1 Product name and description** 3.3  
The customer sees exactly what they are buying.

**2 Price, interval and renewal** 3.3  
Full price incl. VAT, weekly/monthly, renews automatically. Large and next to the button, never in small print.

**3 Payment method** 3.2  
Say that the amount is charged to the mobile phone bill.

**4 Unticked checkbox** 3.2  
Terms and privacy policy linked. The box is never pre-ticked.

**5 Clear pay button** 3.2  
The button states the price and that the order is paid. In German, e.g. "Jetzt kostenpflichtig abonnieren".

**6 Cancellation terms** 3.3  
How to cancel, shown before purchase.

**7 Support and legal links** 3.3  
Contact details, imprint, terms and privacy policy.

**8 Double opt-in** 3.3  
Second confirmation with an SMS code. The price is repeated on this screen.

**9 Confirmation SMS** 3.2  
Service name, price and period, how to cancel, support contact.

#### ⚠ Common reasons for rejection

- Pre-ticked checkboxes
- Hidden or unclear recurring costs
- No cancellation instructions
- Price or renewal only in small print
- Missing German version
- Missing imprint or support contact

# Subscription rules by mobile operator

Each mobile network operator defines its own price caps, billing intervals and rules on how often a failed charge may be retried and when a subscription must be deleted. The table gives an overview of the differences; details follow below.

|                       | TELEKOM                                | TELEFÓNICA (O2)                          | VODAFONE                                                |
|-----------------------|----------------------------------------|------------------------------------------|---------------------------------------------------------|
| Price cap             | €10                                    | €20                                      | €50<br>€5 for e.g. ringtones, adult videos, HTML5 games |
| Bill warning          | €20                                    | €20                                      | €20                                                     |
| Billing intervals     | at least 7 days or longer              | 7 days, 14 days, monthly                 | 7 days, monthly                                         |
| Retries               | 8 attempts within 60 days              | 5 per billing period (max. 90 days)      | max. 4 per month, over max. 2 months                    |
| Subscription deletion | after two unsuccessful months          | after 90 days without successful billing | after two unsuccessful months                           |
| Retroactive billing   | current + immediately preceding period | not specified                            | current cycle only                                      |
| Trial subscriptions   | Allowed                                | Not allowed                              | By agreement                                            |

## Telekom

Annex 6 to the non-factoring agreement for value-added services DAB and Mediator, as of 19 June 2012

### RULES

- 8 charging attempts permitted within 60 calendar days
- After successful billing, the current and the immediately preceding billing period may be charged retroactively
- Earlier periods cannot be charged retroactively
- Failed charges must be based on error codes according to the XTC specification
- If no successful billing occurs within the permitted attempts, the subscription must be deleted

### TRIAL PERIOD

- Free or discounted trials are allowed
- After the trial, the customer must reconfirm the paid subscription
- If there is no confirmation after three requests, the trial subscription must be deleted

## Telefónica (O2)

InternetQ\_Payment agreement 8.0 (signed on 17 October 2021)

### RULES

- 5 retries permitted per billing period
- After 90 days without successful billing, the subscription must be terminated
- The MNO does not assert payment claims and does not acquire receivables from failed subscriptions

### TRIAL PERIOD

- Trial subscriptions are not allowed

## Vodafone

Vodafone DCB agreement of 1 February 2021, § 4, section "ABO-Dienste", item 14

### RULES

- Maximum of 4 billing attempts per month within a period of 2 months
- Retroactive billing allowed only for the current billing cycle
- No cumulative retroactive billing across multiple cycles
- If all billing attempts fail within two months, the subscription must be deleted
- Price cap €50; a cap of €5 applies to certain content such as ringtones, adult videos or HTML5 games

### TRIAL PERIOD

- Trial subscriptions may be allowed
- Individual pricing must be agreed with Vodafone IT

# Summary

The regulatory framework for mobile subscription services in Germany is clearly structured and subject to strict requirements regarding retry mechanisms, subscription management and price caps. Each mobile network operator defines its own processes for retries, price limits and the handling of failed transactions, as well as different rules on trial subscriptions.

Service providers must strictly comply with these requirements to ensure compliant operation and avoid conflicts with end customers or mobile operators. In addition, payment pages must meet high standards of transparency, legal compliance and technical implementation in order to obtain MNO approval and avoid objections during the product approval process.



Your reliable provider for payment solutions