

FCC's New Consent Revocation Rule Set to Take Effect in April 2025

Article By:

Alexis M. Buese

Stephen Parsley

The Federal Communications Commission (FCC) has a new rule under the TCPA for revocation of consent for robocalls and text messages set to go into effect on **April 11, 2025**. This rule is designed to give consumers greater control over their ability to withdraw consent for marketing communications. Businesses that use text messaging and robocalls to communicate with customers should be reviewing their policies to ensure readiness with the new requirements.

Key Provisions of the New Rule

The FCC's regulation prevents businesses from requiring consumers to use a specific method to revoke consent. Instead, consumers must be able to withdraw consent using any reasonable means that clearly conveys their request to stop receiving further calls or messages.

To provide clarity, the FCC has identified several standardized keywords — including “stop,” “quit,” “revoke,” “opt out,” “cancel,” “unsubscribe,” and “end” — that must be honored as explicit revocation requests. Additionally, the regulation establishes that opt-out requests submitted via automated or interactive voice response systems are presumed valid unless proven otherwise.

Burden of Proof on Businesses

When a consumer uses a method outside of those listed in the order to revoke consent, a rebuttable presumption is created that the consumer's request is valid unless the sender can demonstrate otherwise. If a business's texting system does not support reply messages, it must clearly disclose this limitation in each message and offer an alternative, reasonable method for revocation.

Shortened Compliance Timeframe

Previously, companies had more flexibility in processing opt-out requests, but the new rule mandates compliance within 10 business days of receiving a revocation request. Additionally, the rule expands the definition of consent revocation, specifying that withdrawing consent for one type of robocall or text message applies to all robocalls and texts from that sender.

Confirmatory Opt-Out Texts Allowed

One aspect of the rule has already gone into effect: Businesses may send a single confirmation text acknowledging the consumer's opt-out request, provided that it contains no promotional content and is sent within five minutes of the revocation request. In cases where consumers have signed up for multiple types of messages, businesses may ask for clarification about which messages they wish to discontinue. However, if the consumer does not respond, the request must be interpreted as revoking consent for all robocalls and texts from that sender.

What Businesses Need to Know

At the moment, there are no legal challenges to this forthcoming FCC rule. Organizations — especially those engaged in business-to-business (B2B) outreach — should start preparing for compliance with these upcoming changes. The 10-day compliance window and the broad scope of revocation requests mean that companies may need to adjust existing consent management practices to remain in compliance with TCPA regulations.

With the new rule set to take effect soon, businesses should review their opt-out procedures, update their compliance policies, and ensure their customer communication platforms can accommodate these regulatory changes to avoid potential penalties.

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