FCC Delays Key Part of New Consent Revocation Rule Until 2026

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Last year, the FCC adopted new rules under the Telephone Consumer Protection Act (TCPA) designed to expand consumers' rights to revoke consent to receive robocalls and text messages. As we noted in a prior post, these changes were set to take effect on April 11, 2025, and would require businesses to treat any valid opt-out request as revoking consent for *all* robocalls and texts from that sender — even if the message concerned a different line of business.

However, that all went out the window yesterday. The FCC issued a new order granting a **limited one-year delay** for this particular requirement, pushing the effective date for this portion of the rule to **April 11, 2026**.

1. What's Being Delayed?

The specific rule in question would have required businesses to treat a consumer's opt-out request as applying to all future robocalls and texts from that sender, even if the messages originated from different business units or covered unrelated subjects. For example, a consumer may want to opt out of marketing text messages from the promotions department but still receive essential communications such as appointment reminders from the scheduling department or fraud alerts from the security team.

With yesterday's order, the FCC has delayed implementation of this rule **only as it relates to this broad application of opt-outs across unrelated communications**. The rest of the new TCPA rule — including requirements to honor common opt-out keywords and process revocations within 10 business days — is still on track to go into effect on **April 11, 2025**.

2. Why the Delay?

The FCC referred to concerns from financial institutions that implementing this part of the rule would pose significant operational and technical challenges. Industry commenters explained that it can be difficult to design systems that appropriately apply a single opt-out request across different departments or business units without overreaching or violating customer intent.

For example, a consumer may want to opt out of text messages from one department but still receive necessary communications from another. Without additional system upgrades, institutions risk either failing to honor revocation requests or overly restricting communications the consumer still wants.

The FCC found that these concerns require more time for the industry to address, and a limited extension will serve the public interest by allowing organizations to adopt compliance solutions in a cost-effective and customer-friendly way.

3. What This Means for Businesses

Companies in the financial services industry should take note:

- The **April 11, 2025** deadline remains in effect for most parts of the rule, including the requirement to honor common opt-out terms and the 10-business-day response time.
- The **requirement to treat opt-out requests as applying across all unrelated robocalls and texts** from a sender is **now delayed until April 11, 2026**.
- This extension provides a window for organizations to upgrade communication platforms, clarify revocation scopes with customers, and align business units to handle these revocations appropriately.

Businesses should continue to monitor FCC guidance and work to ensure compliance with consent management procedures in advance of the 2025 and 2026 deadlines.

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National Law Review, Volume XV, Number 98