

# Financial Industry Concerns Cause FCC to Delay Implementation of Broad Consent Revocation Requirement under TCPA

Article By:

Ted Huffman

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On April 11, 2025, a controversial new rule by the Federal Communications Commission (FCC) was set to take effect to modify consent revocation requirements under the Telephone Consumer Protection Act (TCPA). But each of the rule's mandates, as codified at 47 CFR § 64.1200(a)(10), did not go into effect on that date. Just four days before, the FCC issued an Order delaying the rule's requirement that callers must "treat a request to revoke consent made by a called party in response to one type of message as applicable to all future robocalls and robotexts . . . *on unrelated matters.*" See [FCCOrder, Apr. 7, 2025](#) (emphasis added).

The plain language of the rule is generally broad. It states that consumers may use "any reasonable method" to revoke consent to autodialed or prerecorded calls and texts, and that such requests must be honored "within a reasonable time not to exceed ten business days." The rule then goes on to delineate certain "per se" reasonable methods by which consumers may revoke consent. For example, if a consumer responds to a text message with the words "stop," "quit," "end," "revoke," "opt out," "cancel," or "unsubscribe," then the consumer's consent is "definitively revoked" and the sender is thereafter barred from sending any "additional robocalls and robotexts."

Many industry participants—especially the banking industry—have been critical of the rule. One major concern is its sprawling effect. For example, under the rule, if a consumer were to respond to a marketing communication with the word "unsubscribe" or the like, then the sender *and all of its business units* may be forced to cease unrelated forms of communication on issues such as the provision of account notices or other informational matters.

The banking industry has taken issue with the burdens imposed by the rule as well. That include concerns about "numerous challenges" financial institutions face in attempting to modify existing call platforms to comply with the rule, with "substantial work" being required by "larger institutions with many business units with separate caller systems." See FCC Order ¶ 6. The bank industry has also raised challenges faced by financial institutions in "designing a system that allows the institution . . . [to] not apply a customer's revocation to a broader category of messages than the customer intended." See FCC Order ¶ 9.

The banking industry's concerns ultimately appear to be what persuaded the FCC to stay the

implementation of Section 64.1200(a)(10) in part earlier this month. The new rule is now set to not go fully into effect until April 11, 2026. For the time being, that means banks and other companies receiving a consent revocation request from a consumer in response to one type of message may not necessarily be prohibited from communicating with the consumer using “robocalls and robotexts from that caller *on unrelated matters*.” The FCC nonetheless suggests—albeit vaguely—that it will enforce any additional obligations required under the new Section 64.1200(a)(10), so companies engaging in TCPA-regulated communication practices should take heed accordingly.

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