



FCC REVISES TCPA “REVOKE ALL” RULE

The Federal Communications Commission (“FCC”) announced yesterday that it approved new rules implementing the Telephone Consumer Protection Act (“TCPA”), overriding rules promulgated in 2024 that had yet to go into effect. See [Fact Sheet and Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 02-278](#).

The new Order will allow callers to interpret a revocation request as applying only to the specific category of calls to which the revocation was directed. For example if a revocation request comes in response to a telephone solicitation, the caller may treat the revocation request as applicable only to solicitation calls. In such a situation the caller may still make informational servicing calls to the consumer (unless and until the consumer revokes consent for those calls). The 2024 rules would have required callers to apply a consumer’s revocation request to all categories of calls that consumer receives. Thus under the 2024 rules if a consumer initiated a revocation request in response to a solicitation call, the caller would have had to apply that revocation request to both solicitation and informational servicing calls.

The FCC’s shift in position is not unexpected. The 2024 rules were initially intended to enter effect on April 11, 2025. However on April 7, 2025, the FCC granted a waiver delaying the effective date of the “revoke all” portion of the new rule until April 11, 2026. In October 2025 the FCC sought comment on ways “to modify the requirement that a caller must treat an opt-out request made in response to one type of call to be an opt-out request for *all* types of calls or to modify it to give consumers greater control over their right to stop unwanted calls.” Several commenters requested a further extension of the 2024 rule’s effective date, which the FCC granted. The 2024 rules were set to go into effect in January 2027 until this latest announcement.

In addition to the change to the revocation requirements, the new rule would: (i) allow callers to designate an exclusive means to revoke consent and (ii) modify the exemption from the consent requirement for financial institutions to allow them to more easily alert customers to fraudulent activity on their account.

An accompanying notice of proposed rulemaking seeks comment on updating other portions of the TCPA rules, including

revisiting the timeframe for callers to honor revocation requests, requiring two-way texting functionality to allow for revocation via reply text, requiring callers to provide a method to revoke consent to all robocalls, and the treatment of affiliates.

The new rule becomes effective 30 days after publication in the Federal Register.

The TCPA is in a constant state of flux, but the new rules appear to better align with the priorities of the industry and the goals of the current FCC. Nevertheless, we will continue to monitor the status of the new rule. □

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