KAUFMAN DOLOWICH LLP

FCC Revises TCPA Consent-Revocation Rul Before November 25, 10-30-2026

Businesses that use automated calls and text messages to communi ahead of November 25, 2026, when revised rules under the Telepho

The Federal Communications Commission (FCC) published its Report and Order on Octobe restrictions on how businesses handle requests to stop automated opt-out requests, designate specific methods for withdrawing con certain fraud-related alerts.

The November 25 effective date replaces the previously scheduled consent-revocation requirements.

Background

Under the TCPA, businesses generally must obtain appropriate con certain automated text messages. Consumers also have the right t

The FCC previously adopted rules requiring businesses to process framework, a request to stop one category of informational commu other categories. The revised rules address concerns that this a still wanted.

What Is Changing?

Opt-Out Requests No Longer Necessarily Apply to All Informational Messages

The revised rules permit businesses to interpret a consumer's re texts to which the request was directed, rather than automatical

For example, a customer who opts out of automated payment remind reminders or account security notifications.

This change applies only to informational communications. Reques telemarketing continue to revoke consent for all future automate

Businesses Can Designate Exclusive Methods for Revoking Consent

Under the earlier framework, businesses were required to honor c even if they preferred a different process.

The revised rules allow businesses to designate certain exclusiv

- Automated telephone opt-out mechanisms;
- Standardized text-message responses, such as replying "STOP";
- A designated website or telephone number.

Businesses must clearly and conspicuously disclose their designa exclusive opt-out method may disclose a single standardized keyw recognized standardized keywords.

Businesses that designate one of these authorized exclusive meth requests submitted through other means. Those that do not design any reasonable means. Existing opt-out requirements for certain

Financial Institutions Have More Flexibility to Send Fraud Alerts

Previously, financial institutions relying on a TCPA exemption f limited to numbers provided directly by customers.

The revised rules allow financial institutions to use wireless t or other family member authorized on the account, a number obtai another financial institution.

This change facilitates communications concerning suspected frau Financial institutions must still comply with the exemption's co out requests.

What Businesses Should Consider

Although the revisions impose no new compliance obligations, bus communications, process category-specific opt-outs and disclose messaging vendors should ensure their systems can accurately imp

Consent-revocation requests generally must be honored within a r financial-institution exemption must be honored immediately. Exi communications remain in place.

Authors:

Richard J. Perr
Monica M. Littman
Graeme E. Hogan
Shera Anderson
Anna M. Holloway
Kristen Hacker
Dominic Borelli

© 2026 Kaufman Dolowich. All Rights Reserved. |