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The FCC Changes Certain Consent Revocation Rules

On September 30, 2026, the Federal Communications Commission (FCC) adopted a Report and Order and Further Notice of Proposed Rulemaking (2026 Order) concerning certain aspects of the Telephone Consumer Protection Act. The 2026 Order contains two components: a modification to existing rules and proposed additional rulemaking.

First, the FCC has modified its existing rules concerning how callers are to treat revocation requests in response to robocalls/texts. The current rule (issued in 2024) is that consumers can revoke consent for robocalls/texts "by any reasonable means" and bars callers from designating a specific, exclusive means by which consumers can revoke consent. A second aspect of the current rule, whose implementation was delayed until January 31, 2027, requires callers to treat a revocation request to an *informational* call/text as being applicable to all future robocalls/texts from that entity (known as the "revoke all" rule). The 2026 Order changes both rules (effective 30 days after *Federal Register* publication, which has not yet occurred).

1. **Changes to the "By Any Reasonable Means" Rule.** Under the 2026 Order, a calling party may designate one of the following as its exclusive method by which a called party can revoke consent: (a) using an automated opt-out mechanism, (b) replying to an incoming text with any of seven standard responses (stop, quit, end, revoke, opt out, cancel, or unsubscribe), or (c) designating a phone number or website to process opt-out requests. Importantly, callers designating any of these methods as the exclusive means to revoke consent are not required to process revocation requests that are made by other means. If a calling/texting party does not designate one of the three exclusive methods, then the "by any reasonable means" rule still applies to consent revocation requests.
2. **Changes to the "Revoke All" Rule.** Under the 2026 Order, callers/texters may interpret a revocation request in response to an *informational* call/text as applying only to the specific category of informational calls/texts to which the revocation was directed. This change does not apply to revocation requests in response to a telemarketing robocall/text. The calling party must continue to treat such revocations as revoking consent for all future *telemarketing* robocalls/texts (but may continue making informational calls/texts).

Callers/texters should examine and potentially modify their processes and procedures in light of these upcoming revisions.

Second, through the proposed rulemaking aspect of the 2026 Order, the FCC seeks comment on (a) whether the 10-business-day rule to honor revocation requests should be reduced, (b) how revocation requests apply to affiliates and separate divisions of a company, and (c) requiring two-way texting in order to facilitate revocation in response to text messages. Currently, senders may send a one-way text provided the text discloses that two-way texting is not available and provides an alternative means to opt out. The rulemaking will also consider whether to require callers/texters to provide a "revoke all" method in their robocalls/texts.

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