

FCC Delays “Revoke-All” Again

Prepared by PossibleNOW's sister company, CompliancePoint

In January, the Federal Communications Commission (FCC) announced that it is delaying for a second time the implementation of the so-called “revoke-all” element of its TCPA consent revocation rule.

Originally set to take effect in April 2025, then pushed to April 2026, the compliance date has now been extended to January 31, 2027.

Why the delay?

The FCC says it needs more time to review industry concerns and public comments submitted in response to its Further Notice of Proposed Rulemaking (FNPRM) which was published in the Federal Register in December and is proceeding on a parallel track.

In the FNPRM, the FCC has signaled that it may modify the “stop-one = stop-all” approach before it ever takes effect. The agency appears to be attempting to balance robust consumer protections with the practical realities of allowing businesses to continue sending essential informational messages, such as fraud alerts, appointment reminders, or healthcare notices, without unintended disruption.

What’s the “Revoke-All” Rule?

The FCC’s “revoke-all” provision (in 47 C.F.R. §64.1200(a)(10)) would require businesses to treat a consumer’s opt-out as applying to all robocalls and robotexts from that sender, not just the campaign that triggered the opt-out. The January 6 order makes clear that this delay applies only to this part of the rule. Other TCPA revocation obligations remain fully in effect.

The Overlooked Rule That’s Already Live

What is often missed in discussions about “revoke-all” is that § 64.1200(a)(12) has been enforceable since April 4, 2024—and in some respects, seems more consequential.

Section 12 permits a single confirmation or clarification text following an opt-out, but only if all of the following conditions are met:

- The message contains no marketing or promotional content
- It is the only message sent after the opt-out
- It is sent within five minutes of the opt-out (presumed compliant). Messages sent later require a showing that the delay was reasonable

If a consumer previously consented to multiple categories of texts, the confirmation message may ask for clarification. But here's the critical point: if the consumer does not respond, under section 12, the business must stop all consent-based messages. In this context, § 64.1200(a)(12) already creates a functional "revoke-all" outcome.

For many organizations, this raises a practical question: Is asking for clarification worth it? In many cases, the answer may be no. Requesting clarification adds operational complexity and, if unanswered, leads to a complete shutdown of all consent-based messaging anyway.

Key Takeaways

Despite the delay, businesses should continue to:

- Honor opt-outs expressed through any reasonable means, and do so as quickly as possible. While the rule allows up to 10 business days, plaintiffs have sued over texts sent just one, two, or three days after an opt-out. Many companies have opted to settle these cases rather than pay to litigate what timeframe is "reasonable."
- Accept opt-outs using any words, phrases, or even emojis that reasonably indicate a desire to stop messages (e.g., "STOP," "QUIT," "END," or even a thumbs-down emoji).
- Avoid—at least for now—requiring consumers to use a single, exclusive opt-out method, as this approach remains legally risky.

Want to Weigh In?

The FCC is still considering changes to these rules. Stakeholders who want a voice in how consent revocation ultimately works can submit comments through the FCC's electronic filing system while the FNPRM remains open.

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