July 29, 2026

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation, *In the Matter of Advanced Methods to Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Dismissal of Outdated or Otherwise Moot Robocalls Petitions*, Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59, Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97, Further Notice of Proposed Rulemaking in CG Docket No. 02-278, and Public Notice in CG Docket No. 25-307 (rel. Oct. 29, 2025)

Dear Ms. Dortch,

On July 27, 2026, Jonathan Thessin of the American Bankers Association (ABA),[1] Patrick Crotty of the National Consumer Law Center (NCLC),[2] and Michael Pryor of Brownstein Hyatt Farber Schreck, LLP, on behalf of ACA International,[3] met with Danielle Thumann, Senior Counsel to Chairman Brendan Carr.

ABA, NCLC, and ACA International share a common goal to ensure that consumers' revocations of consent to receive autodialed or prerecorded voice calls and text messages under the Telephone Consumer Protection Act (TCPA) are accurately and efficiently processed. During the meeting, we expressed our concern that aspects of the Report and Order (Order) released by the Federal Communications Commission (Commission) on February 16, 2024[4] may undermine that goal and discussed the attached revisions that our organizations proposed on June 30, 2026.[5] We

[1] The American Bankers Association is the voice of the nation's $26.1 trillion banking industry, which is composed of small, regional and large banks that together employ over 2 million people, safeguard $20.5 trillion in deposits and extend $13.7 trillion in loans.
[2] Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has worked for consumer justice and economic security for low-income and other disadvantaged people in the U.S. through its expertise in policy analysis and advocacy, publications, litigation, expert witness services, and training.
[3] ACA International (ACA) represents approximately 1,400 members, including credit grantors, third-party collection agencies, asset buyers, attorneys, and vendor affiliates, in an industry that employs more than 113,00 people worldwide.
[4] *In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Report and Order and Further Notice of Proposed Rulemaking, 39 FCC Rcd 1988 (2024).
[5] Letter from Am. Bankers Ass'n, Nat'l Consum. L. Ctr., & ACA Int'l, to Brendan Carr, Chairman, Fed. Commc'ns Comm'n, *et al.* (filed Jun. 30, 2026), https://www.fcc.gov/ecfs/document/26109961847/1. The revisions respond to the Commission's request for comment on certain aspects of the Order. *See In the Matter of Advanced Methods to*

explained that the proposed revisions were the product of numerous discussions among our three organizations and had been reviewed by a group of bank in-house TCPA counsel and separate attorneys who advise NCLC.

The proposed revisions allow the caller to interpret a revocation request as applying only to the category of messages to which the revocation was directed, while also requiring the caller to provide notice of how revocation will be construed and a means for the consumer to revoke consent with respect to all messages requiring consent. The revisions also allow a caller to designate a prescribed list of exclusive, reasonable means of revocation in the message sent to the called party.

We believe this language effectuates the objective of the Order's provisions governing revocation of consent, while better ensuring that consumers are not inadvertently cut off from all communications from the companies with whom they do business based on sending a single "stop" message in response to one type of message from that company.

The current effective date of the provisions governing revocation of consent is January 31, 2027.[6] During the meeting, the organizations asked the Commission, if it revises the Order, to extend the effective date of those revisions to 12 months after the revisions are finalized. This limited extension would promote the public interest by providing a reasonable period of time for banks and other callers to design and implement processes to comply with the revised rule.[7]

Thank you for your consideration of these proposed revisions to the Order.

Sincerely,

American Bankers Association
National Consumer Law Center
ACA International

Target and Eliminate Unlawful Robocalls, Call Authentication Trust Anchor, Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, Dismissal of Outdated or Otherwise Moot Robocalls Petitions, Ninth Further Notice of Proposed Rulemaking in CG Docket No. 17-59, Seventh Further Notice of Proposed Rulemaking in WC Docket No. 17-97, Further Notice of Proposed Rulemaking in CG Docket No. 02-278, Public Notice in CG Docket No. 25-307, ¶¶ 101-04 (Oct. 29, 2025).

[6] *See In the Matter of Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991*, CG Docket No. 02-278, Order (Jan. 6, 2026).

[7] *See* 47 C.F.R. § 1.3 (providing the Commission with authority to suspend, revoke, amend, or waive provisions in its regulations "for good cause shown"); *Northeast Cellular Tele. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (holding that waiver of the Commission's rules must "serve[] the public interest").

APPENDIX

Proposed Revised Revocation Rule

64.1200(a):

(10) A called party may revoke prior express consent, including prior express written consent, to receive calls or text messages made pursuant to paragraphs (a)(1) through (3) and (c)(2) of this section by using any reasonable method to clearly express a desire not to receive further calls or text messages from a caller or sender, except that the caller or sender may designate one or more of the following as the exclusive means to revoke consent if such means has been clearly and conspicuously disclosed to the called party in the message:

(i) During an artificial or prerecorded voice call, through an automated, interactive voice or key press-activated opt-out mechanism that includes brief explanatory instructions on how to use such mechanism or by providing a phone number at which the called party can opt out, provided the telephone number may not be a 900 number or any other number for which charges exceed local or long distance transmission charges[8];

(ii) In a text message, by using one of the following words identified in the text message: “stop,” “quit,” or “end,” sent in reply to an incoming text message; and

(iii) When a message using an artificial or prerecorded voice is left on an answering machine or on a voicemail service, by providing a telephone number designated by the caller to process opt out requests, provided the telephone number may not be a 900 number or any other number for which charges exceed local or long distance transmission charges.

All requests to revoke prior express consent or prior express written consent made following the procedures described in this section must be honored within seven business days from receipt of such request, unless the caller demonstrates that processing a revocation beyond seven business days is reasonable.

(11) A caller or sender may designate a website or other method that provides consumers with the ability to determine how they will receive communications from the caller or sender, whether by voice call, text message, e-mail, or some other method, without waiving the caller’s or sender’s ability to designate one or more exclusive methods to revoke consent under subsection (a)(10).

(12) A caller or sender may specify the scope of calls and text messages to which a revocation will apply as long as the caller or sender informs the recipient of an option, including in a separate call or message, to revoke consent with respect to all calls and text messages requiring consent. A text message or call confirming a request to revoke

[8] *Note: NCLC, ABA, and ACA International also ask the Commission to make clear in its Order implementing revisions to the “revoke all” rule that a caller may not require the consumer to listen to an advertisement as a condition of opting out of calls requiring consent.*

consent or informing the called party of the option to revoke consent with respect to all calls and text messages requiring consent, sent within a reasonable time not to exceed the end of the next business day, does not violate paragraphs (a)(1) or (2) of this section as long as the confirmation text(s) or call(s) does not include any marketing or promotional information. If the called party does not respond to a confirmation text message or call, then the initiator must construe the revocation as applying to all types of messages for which consent is required unless the initiator has clearly and conspicuously disclosed that the revocation will not apply to all types of messages for which consent is required and provides an automated method to revoke consent for all types of messages.

(13) ***Affiliates and separate lines of business or divisions.*** If an entity operates through separate affiliates, lines of business or divisions, obtains a separate consent and holds itself out to the called party throughout all calls and texts with the called party as that particular affiliate, line of business or division rather than as the entity of which such affiliate, line of business or division is a part, then such affiliate, line of business or division will be deemed a separate caller or text sender for the purposes of this section.