

# FTC Quietly Reopens Click to Cancel Rulemaking in Response to Petition

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December 8, 2025

In July, the Eighth Circuit [vacated](#) the FTC's "Click to Cancel Rule." Since then, the FTC has continued to challenge cancellation practices under other authority. For example, in September, the FTC announced a \$7.5 million [settlement](#) with an ed tech provider over cancellation practices under the Restore Online Shoppers' Confidence Act (or "ROSCA").

In November, the FTC received a petition from the Consumer Federation of America and the American Economic Liberties Project requesting that the agency reopen the rulemaking on the Click to Cancel Rule. Last week, the FTC [published](#) the petition to reopen that rulemaking in the Federal Register.

The [petition](#) argues that the "FTC's Click to Cancel rule was a crucial, commonsense regulation to protect consumers against a widespread deceptive practice." It further asserts that because "[t]he Eighth Circuit's decision vacating the rule did not address the merits of that approach, only purported procedural infirmities, . . . the Commission [should] restart and swiftly conduct its rulemaking based on the language it proposed in its earlier notice of proposed rulemaking.

Given that FTC Chairman Andrew Ferguson dissented from the original rule and that the recent petition was quietly published without any fanfare, it remains to be seen whether the petition will get any traction. FTC Staff had previously commented that they were evaluating the Eighth Circuit decision invalidating the rule and deciding how to proceed. Companies that are interested in submitting comments have until January 2, 2026 to do so.