

FTC Quietly Reopens Click to Cancel Rulemaking in Response to Petition

[Gonzalo E. Mon](#), [Donnelly L. McDowell](#), [Aaron J. Burstein](#)

December 22, 2025

The FTC may be quietly reviving its controversial Click-to-Cancel rule — and companies with subscription or auto-renewal programs should take notice. After the Eighth Circuit vacated the original rule on procedural grounds, consumer groups petitioned the FTC to reopen the rulemaking, and the Commission has now invited public comment, signaling that federal scrutiny of cancellation practices is far from over. For legal, compliance, and marketing teams, this development underscores the ongoing risk around negative-option offers and the need to evaluate enrollment disclosures and cancellation flows now, not later.

Hosted by Simone Roach. Based on a blog post by [Gonzalo E. Mon](#), [Donnelly L. McDowell](#), and [Aaron J. Burstein](#).