

Important “Robocall” Regulatory Updates: FCC Extends Waiver of TCPA “Revoke All” Rule and Publishes Changes to Robocall Mitigation Database Rules

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The Federal Communications Commission (FCC) kicked off the new year with back-to-back actions on “robocalls,” illustrating that this likely will continue to be an area of focus for the agency in 2026.

These announcements, summarized below, will impact businesses throughout the calling and texting ecosystem, including voice service providers, texting platforms and vendors, and companies that conduct outbound call and text campaigns to reach their target audiences. We encourage our clients to contact the authors of this post or their regular Kelley Drye attorney for more details.

Waiver Extension of the “Revoke All” Requirement. On January 6, 2026, the FCC’s Consumer and Governmental Affairs Bureau (CGB) issued an [order to extend](#) a limited waiver of the new consent revocation rule adopted pursuant to the Telephone Consumer Protection Act (TCPA). This rule, adopted in 2024, allows consumers to revoke consent for calls and texts “using any reasonable method to clearly express a desire not to receive further calls or text messages from the caller or sender.” The rule is controversial because, as written, it would apply to revocation requests for both marketing and informational calls and texts that require TCPA consent. Last April, the CGB issued a [one-year waiver](#) of the so-called “revoke all” requirement on the basis that businesses would need more time to come into compliance. And then in October, the FCC announced that it is considering modifying or eliminating the consent revocation rule in response to concerns that it unduly restricts consumers’ ability to receive wanted calls and texts.

In this latest order, the CGB found that good cause exists to extend the waiver of the “revoke all” mandate until **January 31, 2027**. The CGB acknowledged the current proceeding to reconsider the consent revocation rule and noted that a further extension would “allow the Commission to fully assess the record” and “avoid premature and potentially unnecessary compliance efforts and costs” for businesses. Additional information about the pending proposal to modify the consent revocation rule can be found [here](#).

As with the original waiver order, the CGB waived the consent revocation rule only “to the extent the rule requires callers to treat a request to revoke consent made by a called party in response to one type of informational message as applicable to all future robocalls and robotexts from that caller on unrelated matters.” It also is clear that this action “does not alter the status quo relating to any other

prior Commission rules or rulings addressing revocation of consent.” This would include other elements in the consent revocation rule, including honoring specific text keyword responses – “stop,” “quit,” “end,” “revoke,” “opt out,” “cancel,” or “unsubscribe” – that the FCC deemed as reasonable *per se*, and honoring reasonable opt-out requests in no more than ten business days.

Robocall Mitigation Database Changes. On the same day, the FCC published in the Federal Register a summary of a Report and Order (R&O) which established new rules and requirements for the Robocall Mitigation Database (RMD), where all providers of voice services in the U.S. must register and outline the steps they take to avoid carrying unlawful robocall traffic on their networks. Through the R&O, the FCC sought to shore up provider compliance by requiring providers to recertify their RMD filings by March 1 annually, as well as update information on an ongoing basis within ten business days of any changes. It also imposes higher monetary penalties on companies whose filings contain false or inaccurate information. The R&O further directs the FCC’s Wireline Competition Bureau to establish a “dedicated reporting mechanism for deficient filings,” which will enable state and local regulators and attorneys general, consumers, public interest groups, providers, and others to “easily notify the Commission that it may need to re-check certain filings and take action to require prompt corrections from providers.” Reports will be referred to the FCC’s Enforcement Bureau for investigation. The R&O is set to take effect on **February 5, 2026**. However, several of the underlying rules, including the annual certification requirement, will be delayed indefinitely due to procedural requirements such as review by the Office of Management and Budget and notice to Congress.