

FTC Consumer Protection Orders: The Case for a New Sunset Policy

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Partner [John Villafranco](#) and associate [Andrea deLorimier](#) authored *FTC Consumer Protection Orders: The Case for a New Sunset Policy*, published by the [Washington Legal Foundation](#). The white paper makes the case for reforming how long businesses are bound by Federal Trade Commission consent orders, typically 20 years for administrative orders or indefinitely for court orders. While these orders were originally designed to protect consumers, John and Andrea argue that lengthy terms are out of step with today's business and regulatory environment. They highlight how current practices can stifle innovation, impose heavy compliance burdens, and offer little opportunity for early termination, even for companies with strong track records of compliance.

"Consent order violations generally occur within the first few years after order entry," the authors write. "Yet companies are routinely bound for decades, with no viable path to petition for relief."

The paper outlines three alternative approaches the FTC could adopt: a flexible sunset period based on case-specific facts, a standardized five-year term, or a ten-year model with selective expiration of certain provisions. Each aims to better align consumer protection goals with modern business realities.

Read the full paper [here](#).