



HONOR ALL REASONABLE OPT-OUT REQUESTS

Action required: Ensure that consumers **can revoke consent through any reasonable method**, including responding to texts with universal keywords like "stop," "revoke", "quit," "end," "cancel," "opt out," or "unsubscribe," asking an agent on the phone, or unsubscribing online.

Reason: The FCC requires that businesses honor revocation requests made in any reasonable manner, as long as the consumer clearly expresses a desire not to receive further communications.



APPLY OPT-OUTS ACROSS THE ENTIRE ORGANIZATION

Action required: When a consumer opts out, **update all systems so that the choice applies across every channel**, department, and business unit. No selective opt-outs by program or department are allowed.

Reason: All future communications for that customer must respect the revoked consent, preventing accidental messaging after opt-out.



PROCESS REVOCATION REQUESTS WITHIN TEN BUSINESS DAYS

Action required: **Set up systems and workflows to acknowledge and fully implement opt-out requests** within ten business days.

Reason: This ensures compliance with the FCC's timing requirements and demonstrates respect for consumer preferences.



PROVIDE CLEAR UNSUBSCRIBE INSTRUCTIONS IN ALL COMMUNICATIONS

Action required: **Include prominent opt-out instructions** in every non-emergency message, making it easy for consumers to revoke consent.

Reason: Clear instructions reduce confusion and ensure that customers can exercise their rights easily.



MAINTAIN COMPREHENSIVE CONSENT AND REVOCATION RECORDS

Action required: **Keep detailed records of consent** and opt-outs for at least four years.

Reason: Accurate records help with audits, regulatory reviews, and internal compliance tracking.



DISTINGUISH EMERGENCY FROM NON-EMERGENCY COMMUNICATIONS

Action required: Review all message types to clearly define which are **emergency communications** (e.g., outages, life-safety alerts) and which are not (e.g., bill reminders, energy efficiency tips). Document your approach.

Reason: Emergency alerts are exempt from TCPA consent requirements, while non-emergency messages must comply with opt-out rules.



PREPARE FOR CROSS-CHANNEL OPT-OUT LOGIC IN 2026

Action required: Update systems to automatically apply a single opt-out to all future automated communications across calls, texts, and other channels. **Test workflows before the April 2026 deadline.**

Reason: The FCC's updated rules require that one opt-out stops all communications, eliminating ambiguity or partial opt-outs.



TRAIN STAFF AND COORDINATE VENDORS

Action required: **Train employees on the new rules**, update internal processes, and ensure all third-party vendors comply with cross-channel revocation logic.

Reason: Utilities often communicate across multiple business units and systems, so staff readiness and vendor alignment are critical.



AUDIT AND MONITOR COMPLIANCE REGULARLY

Action required: Periodically review communication programs, system logs, and revocation handling to **confirm adherence to TCPA** rules and identify areas for improvement.

Reason: Continuous monitoring ensures ongoing compliance and strengthens trust with customers and regulators.

Learn how you can enforce compliance with Convey.

This checklist is for informational purposes only and does not constitute legal advice. Organizations should consult their legal counsel to ensure full compliance with the TCPA and related regulations.