



**Innovative Payments Association**  
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Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: Proposed Rule: Advanced Methods to Target and Eliminate Robocalls - 47 CFR Part 64**  
[CG Docket Nos. 17-59, 02-278, 25-307; WC Docket No. 17-97; FCC 25-76; FR ID 319452]

The Innovative Payments Association (“IPA”)<sup>1</sup> appreciates the opportunity to share our comments with the Federal Communications Commission (“FCC” or “Commission”) in regard to the agency’s proposed rule concerning Advanced Methods to Target and Eliminate Robocalls (the “Proposed Rule”). The IPA applauds the Commission’s decision to release its Proposed Rule to consider feedback from the public on various aspects of communications sent and received by the public, including, but not limited to, *More Recent Rules That Might Harm Consumers*.

As you know, a key provision in the Telephone Consumer Protection Act (the “Act” or “TCPA”) is set to take effect in April 2026. While the rest of the ruling is still going to go into effect, we appreciate the fact that the portion of the rule requiring callers to stop all calls for all purposes across all business units has been put on hold until April 2026. We hope the Proposed Rule is an opportunity to review and improve the implementing regulations for TCPA.

Per the current regulations, the Commission is aware that once an account-holder revokes consent to receive autodialed or prerecorded voice calls or text messages under the TCPA the caller may

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<sup>1</sup> The IPA is a trade organization that serves as the leading voice of the electronic payments sector, including prepaid products, mobile wallets, and person-to-person (P2P) technology for consumers, businesses, and governments at all levels. The IPA’s goal is to encourage efficient use of electronic payments, cultivate financial inclusion through educating and empowering consumers, represent the industry before legislative and regulatory bodies, and provide thought leadership. The comments made in this letter do not necessarily represent the position of all members of the IPA.



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no longer send the consumer any calls or text messages that require consent. Our members and companies in the broader payment community work diligently to honor customer requests to opt out of receiving autodialed or prerecorded voice calls or text messages.

However, if read broadly, the pending regulations could be interpreted to mandate that a consumer who replies “stop” to receive one type of message (ex: future autodialed past-due text messages) could in fact stop receiving all future communications from that financial institution by phone or text on unrelated matters including, but not limited to, fraud alerts, low balance or overdraft alerts, multi-factor authentication messages, or warnings about suspicious account activity.<sup>2</sup> This could be the case even if that were not the accountholder’s intent when they revoked their consent to receive certain messages from the financial institution.

Requiring companies to provide an all-in-one opt out may appear to be beneficial as a convenience for individuals, but it may potentially do more harm than good, especially for any individual who previously opted into multiple communications (calls and texts) for services which they are receiving.

This is also true for many financial institutions in the human capital management context (“HCM”). HCM companies provide multiple lines of services to their clients and employees. In some cases, an employee of a business client may also be a consumer of services. For example, an individual may be employed part time by two of the HCM company’s clients and receiving calls or texts from both about their payroll, shift work opportunities, weather alerts or other relevant work information.<sup>3</sup>

In brief, a financial institution’s accountholders could be potentially at risk if they stop receiving critically important communications from their financial institution because they unknowingly revoked consent to receive all consented-to messages by replying “stop” to an unrelated message from the institution.

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<sup>2</sup> Fraud alerts may be exempt from the TCPA’s prior express consent requirement. However, the Commission has imposed a number of conditions that institutions must meet to place calls or texts under the exemption. Consequently, the exemption may be of limited value, and institutions may feel compelled to place fraud alerts only with the prior express consent of the called party.

<sup>3</sup> These individuals might not realize that these are different services coming from different departments/divisions within a company (and short codes) in the case of texts. The only way to ensure that these individuals continue to receive the calls and texts that they want as the above illustrates while allowing them to opt out of what they don’t want is to give them visibility into what they opted into such as via a preference center so they understand both what they opted into and the ramifications in each case of opting out.



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The IPA believes the current rules, as constructed, unduly restrict consumers' ability to receive wanted critical communications such as fraud or scam alerts, low account balance or general updates regarding account activity. Further, we believe that an exception to the TCPA's general exception requirement is needed for fraud alerts and similar communications, which are beneficial to the consumer, regardless of opt-in/opt-out status. The ability to communicate, share information, or receive information in real time with a customer before a potential scam scheme is completed, can mean the difference between protecting someone's life savings or being hit with life changing fraud.

While we do not agree that an all-in-one opt out would ultimately benefit individuals, constraining the opt-out methods available would likely lead to lower complexity and thus increased operational compliance by companies.

The current standard of, "any reasonable way" is so broad that by its very nature creates unintended complexity resulting in at least some operational compliance failures and the associated burden, time and expense of investigating and correcting them for everyone involved. Limiting the allowable opt out methods to a very few that are most commonly used and most practical to both individuals and companies (taking into account how individuals communicate and how clients manage data) is reasonable and adds operational certainty without removing any individual rights and would benefit everyone involved.

Accordingly, our member companies are aware of the agency's concerns regarding misdirected communications, however, we believe that there are currently strong incentives in place, chief among them protecting customers' privacy, to make sure they have the most accurate information available to them when they are communicating sensitive information with their customers.<sup>4</sup>

If the pending rules remain unchanged, financial institutions would be required to process a revocation message by the accountholder in response to one business unit's call or text so that all business units cease placing calls or texts to the accountholder. This conversion involves substantial work, particularly for large institutions with many business units with separate calling systems.

Since financial institutions often partner with third parties to communicate with customers on behalf of the financial institutions for specific issues, the current rule would require complicated

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<sup>4</sup> See The Right to Financial Privacy Act, and Gramm-Leach-Bliley Act.



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coordination to ensure that all communications stop. Smaller financial institutions face additional challenges, as any changes to their communications systems often require extensive manual labor.

Lastly, the IPA strongly urges the FCC to conduct a cost-benefit analysis of the work institutions would perform before moving forward with the consent revocation provisions of the pending rules including the specific impact on small financial institutions, to comply with the “revoke all” provision of the pending rules.<sup>5</sup> Additional issues with coming into technical compliance with the “revoke all” provisions of the pending rule include the fact that financial institutions face significant challenges designing a system that allows the institution, when receiving an account-holder’s revocation, to clarify the scope of revocation, so that the institution does not apply a customer’s revocation to a broader category of messages that are designed to protect the account-holder.

We appreciate your consideration of our comments. We also would welcome a full dialogue with all stakeholders impacted by this section of the TCPA. If you have any questions or wish to discuss this letter in-person, please do not hesitate to contact me at: [btate@ipa.org](mailto:btate@ipa.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Tate", is written over a horizontal line.

Brian Tate  
President and CEO

IPA

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<sup>5</sup> See Order, supra note 2 (App. B, Final Regulatory Flexibility Analysis, ¶ 17).