



Ensure your Brand has 1-to-1 Consent

Verbal Call To Action (CTA) Best Practices

As of January 27, 2025, the Federal Communications Commission (FCC) requires one-to-one consent for all telemarketing / robocalls and robotexting / text messaging campaigns. Specifically, the FCC has expanded the Telephone Consumer Protection Act (TCPA) to state that companies must have 1. Prior 2. Express and 3. Written or digital (e-sign) consent from a consumer before they can market to or communicate with them. Although an initial verbal consent is acceptable, there must be verifiable confirmation. At Commio we recommend the following scenario:

Did You Know?

Verbal consent must still meet the same requirements as those with digital or written consent! All consent interactions should include:

- ✓ Brand identification
- ✓ Use-case specific language
- ✓ Data Rates disclosure
- ✓ Message frequency disclosure
- ✓ Opt-out (STOP), Help disclosures
- ✓ "No third-party sharing" disclosure

1. A mobile subscriber visits a brand in person or via phone.
2. A brand employee asks the subscriber if they would like to receive text messages for specific use case(s) (2FA/OTP, Account Alerts, Marketing Promotions, etc.) and recites mandatory disclosures:

Jared, would you like to receive text messages from [BRAND] for account alerts and 2FA security purposes? Please note that Message and Data rates may apply and Message Frequency may vary. You can opt-out at any time by replying with STOP to any message. You can get help by replying with HELP. Also note that we will not share your message consent with any third parties.

3. The subscriber responds with "yes."
4. Best Practice - Brand will send the subscriber a double opt-in confirmation:

[BRAND]: Please confirm your consent to receive account alerts and 2FA security text messages from [BRAND] by responding with YES. Message and Data rates may apply and message frequency may vary. You can opt-out at any time by replying STOP to any message. You can get help by replying with HELP.

5. The subscriber replies with "yes."
6. Brand sends the subscriber an opt-in confirmation message.

[BRAND]: You have been successfully subscribed. Reply STOP to end.

We're Here to Support You

At Commio, your success is important to us. You can [download a complete brand and campaign registration checklist here](#). If you have any questions or issues with your messaging campaigns, please contact us:

Phone: (919) 890-0000, option 1

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