CERTIFICATE OF COMPLIANCE

Nos. 19-1231, 19-1241

FEDERAL COMMUNICATIONS COMMISSION, ET AL.,

Petitioners,

v.

PROMETHEUS RADIO PROJECT, ET AL.,

Respondents.

NATIONAL ASSOCIATION OF BROADCASTERS, ET AL.,

Petitioners,

v.

PROMETHEUS RADIO PROJECT, ET AL.,

Respondents.

ON WRITS OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

As required by Supreme Court Rule 33.1(h), I certify that the Brief of the Phoenix Center for Advanced Legal & Economic Public Policy Studies as Amicus Curiae in Support of Petitioners contains 5334 words, including footnotes but excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d). In making this certification, I have relied upon the word count of the word-processing system used to prepare this Brief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the forgoing is true and correct.

Executed on November 23, 2020

Lyn

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