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**In the Supreme Court of the United States**

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CITY OF EUGENE, OREGON, ET AL.,  
*Petitioners,*  
*v.*

FEDERAL COMMUNICATIONS COMMISSION  
AND THE UNITED STATES OF AMERICA,  
*Respondents.*

**CERTIFICATE OF COMPLIANCE**

As required by Supreme Court Rule 33.1(h), I certify that the Reply Brief for the Petitioners in the above-captioned case contains 2,838 words, excluding the parts of the document that are exempted by Supreme Court Rule 33.1(d).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2022.

Respectfully submitted,

/s/ Tillman L. Lay

Tillman L. Lay

*Counsel of Record for Petitioner City of  
Eugene, Oregon*