IN THE SUPREME COURT OF THE UNITED STATES

No. 23-456

CONSUMERS' RESEARCH, et al.,

Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION, et al.,

Respondents.

CERTIFICATE OF COMPLIANCE

I, Corbin K. Barthold, counsel for *amicus curiae* TechFreedom and a member of the Bar of this Court, certify under Supreme Court Rule 33(g) and (h) that *amicus*'s brief complies with the word limits imposed by those rules. According to the word-processing software used to prepare the brief (Microsoft Office 365), the brief's word count is 4,061 excluding the cover, table of contents, table of authorities, and signature block.

Corbin K. Barthold

TECHFREEDOM

1500 K Street NW

Washington, DC 20005

(771) 200-4997

cbarthold@techfreedom.org

Solis K Butll

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