

CERTIFICATE OF COMPLIANCE

No. 19-1231

Federal Communications Commission, *et al.*,

Petitioners

v.

Prometheus Radio Project, *et al.*,

Respondents.

No. 19-1241

National Association of Broadcasters, *et al.*

Petitioners

v.

Prometheus Radio Project, *et al.*,

Respondents

As required by Supreme Court Rule 33.1(h), I certify that the Brief of Amicus Curiae Public Citizen contains 6017 words, excluding the parts of the brief 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 December 22, 2020.

/s/ Nandan M. Joshi