

In the
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES TELECOM	)	
ASSOCIATION, <i>et al.</i> ,	)	
<i>Petitioners,</i>	)	
v.	)	No. 15-1063 (and
FEDERAL COMMUNICATIONS	)	consolidated cases)
COMMISSION and UNITED STATES	)	
OF AMERICA,	)	
<i>Respondents.</i>	)	

**NOTICE OF INTENTION OF OPEN INTERNET CIVIL
RIGHTS COALITION TO FILE BRIEF AS *AMICUS*
CURIAE IN SUPPORT OF RESPONDENTS**

Pursuant to Circuit Rule 29(b), the Open Internet Civil Rights Coalition (OICRC) gives notice of its intent to file a brief as *amicus curiae* in support of Respondents Federal Communications Commission and United States of America in these consolidated cases. All Petitioners, Respondents and Intervenors in this case have consented to the filing of this brief. OICRC will limit its brief to no more than 4000 words, and will comply with the briefing schedule issued by this Court.

In recognition of this Court's desire that parties should join in a single brief to the extent practicable, the members of OICRC have determined that they have common interests and that they should file a single brief addressing the issues in these cases. However, given the nature of these cases and the large number of

issues raised in the briefs of the Petitioners, Intervenor and the eleven *amici curiae* supporting Petitioners, there are a number of other parties with which counsel has been in contact who have different interests and are likely to file separate *amicus curiae* briefs. It is impracticable for all of these diverse parties to collaborate in a single brief. Moreover, in the circumstances of this case, the Court will benefit from the presentation of additional arguments on behalf of both Petitioners and Respondents.

OICRC is an ad hoc coalition formed for the purpose of this filing. It has six members:

National Hispanic Media Coalition

18MillionRising.org

Presente.org

Media Action Grassroots Network

Center for Media Justice

Common Cause

The members of OICRC are civil rights organizations, each of which has participated in Federal Communications Commission proceedings, including the matter under review, to promote the values of diversity inherent in the public interest standard of the Communications Act of 1934 and the First Amendment.

Their participation will bring additional useful perspective to this Court's consideration of the issues in this case.

Respectfully submitted,

/s/Andrew Jay Schwartzman

Andrew Jay Schwartzman
Room 312
600 New Jersey Avenue, NW
Washington, DC 20001

September 3, 2015

CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 26.1 of the Federal Rules of Appellate Procedure, and Rule 26.1 of this Court, the Open Internet Civil Rights Coalition (OICRC) respectfully submits this Corporate Disclosure Statement:

OICRC is an ad hoc coalition of civil rights organizations formed for the purpose of submitting a brief as amicus curiae in *United States Telecom v. FCC*, No. 15-1063 (and consolidated cases). It is not incorporated and has no other formal legal status. None of the members of OICRC have issued shares to the public. Its members are as follows:

National Hispanic Media Coalition

18MillionRising.org

Presente.org

Center for Media Justice

Common Cause

Media Action Grassroots Network

All of the members of OICRC except Media Action Grassroots Network are 501(c)(3) corporations and have no parent companies. Media Action Grassroots Network is unincorporated. None of the members of OIRC have issued shares to the public.

Respectfully submitted,

/s/Andrew Jay Schwartzman

Andrew Jay Schwartzman
Room 312
600 New Jersey Avenue, NW
Washington, DC 20001

September 3, 2015

CERTIFICATE OF SERVICE

I, Andrew Jay Schwartzman, hereby certify that I have this 3rd day of September, 2015, electronically filed the foregoing *Notice of Intention of Open Internet Civil Rights Coalition to File Brief as Amicus Curiae in Support of Respondents* with the Clerk of Court for the United States Court of Appeals for the District of Columbia Circuit by using the CM/ECF system, which served a copy on all counsel of record in these cases.

/s/ Andrew Jay Schwartzman