



Center for Technology, Innovation and Competition

Gerald Adams L'22, a 2020 CTIC Public Interest Fellow, on his experience at the Federal Communications Commission



My time at the FCC, in the Office of Commissioner Geoffrey Starks, included working on several engaging projects spanning communications law, administrative law, and privacy law. I grew significantly as a lawyer over the summer through my responsibilities, which included drafting research memoranda and open meeting statements, coordinating with the engineering and bureau staffs on policy strategy, and participating in meetings with outside entities. My experience allowed me to combine my technical background with my developing legal skills, and I was able to solidify the area of law I hope to pursue as a career.

I had the unique experience of being the sole intern within the Commissioner's Office to work on the final stages of the Ligado Order, evaluating and providing my input on the significant number of ex-parte filings and petitions for reconsideration. Outside of the net neutrality orders, Ligado is likely the most famous and controversial FCC proceeding—it has spanned nearly 17 years and has caused a series of inquiries into how we should evaluate spectrum interference and liberal spectrum licenses. It was a rewarding experience to work firsthand on a matter that was so polarizing. I learned how to clearly articulate and justify a position, as we met with organizations which strongly disagreed with the Order. The Ligado Order also presented my first experience with administrative law, particularly the process created by Congress and the Executive Branch to have the FCC and the NTIA (who oversees spectrum use for federal agencies) coordinate spectrum use. This coordination has largely failed with respect to Ligado. As a result, I was able to see the complications of having so many administrative agencies, and how a uniform policy response is not guaranteed.

I also spent a significant amount of time on some of the Commission's more technical projects and policy initiatives. The first, was the Supply Chain Order which integrated provisions of the recently enacted Secure and Trusted Communications Network Act and prohibited Universal Service funds from being used to finance untrustworthy network equipment—most notably Huawei and ZTE. It was an engaging experience working with engineers and economists to analyze the economic impact of a more robust network infrastructure market and the security concerns of this foreign equipment. I also performed research on the proposed improvement, O-RAN, and drafted a potential future Op-ed for the Commissioner. The second, was working on the Digital Opportunity Data Collection. There is a significant partisan divide within the

Commission regarding whether the current broadband maps accurately demonstrate broadband availability and how they should be changed. Through this project I was able to see the power of strong advocacy skills as we drafted memoranda and speech items detailing why our office believe the broadband maps were insufficient and articulating a best method for improvement.

Last, the final two weeks of my internship culminated in coordinating with several congressional offices on a discovered practice of consumer phone tracking using mobile bidstream data (the data exchange that results in advertisements showing up on mobile platforms). These actions built on a prior practice within the FCC's jurisdiction, to which the FCC had condemned and fined cellular carriers. Our research and inquiries resulted in a formal filing by the congressional offices with the Federal Trade Commission (FTC) to investigate the mobile ad industries. Our release was also followed by an Apple iOS update that removed the mobile advertising identifier completely from user devices.

I thoroughly enjoyed my experience at the FCC. I was able to work on a series of engaging and interesting assignments that allowed me to develop my legal skills. I am honored and grateful to have been a CTIC Summer Public Interest Fellow and for the opportunities it provided me.

CTIC's Summer Public Interest Fellowships fund internships with public interest or government organizations doing work relevant to CTIC's focus on technology policy, intellectual property, cyber law and privacy. These Fellowships are open to Penn Law 1Ls and 2Ls and give students the opportunity to gain experience in technology law that might not otherwise be available to them. A Call for Applications for next summer will take place in early 2021.