

August 24, 2018

Mark Langer
Clerk
United States Court of Appeals
For the District of Columbia Circuit
E. Barrett Prettyman
U.S. Courthouse and
William B. Bryant Annex
333 Constitution Ave., NW
Washington, DC 20001

RE: *Mozilla Corporation, et al v. Federal Communications Commission , et al., Case No. 18-1051, consolidated with Case Nos. 18-1052, 18-1053, 18-1054, 18-1055, 18-1056, 18-1061, 18-1062, 18-1064, 18-1065, 18-1066, 18-1067, 18-1068, 18-1088, 18-1089 and 18-1105.*

National Association of Regulatory Utility Commissioners and the National Association of State Consumer Advocates Endorsement of the August 20, 2018 filed “Brief of Government Petitioners.”

Dear Mr. Langer:

The National Association of Regulatory Utility Commissioners (NARUC) and the National Association of State Utility Consumer Advocates (NASUCA) were party to the negotiations that led to the June 20, 2018 filing of the *Motion by Petitioners and Intervenors in Support of Petitioners Setting Forth a Proposed Briefing Format and Schedule* in this proceeding.

After several conference calls, all the *Government Intervenors*, i.e., NARUC, NASUCA, and the City and County of San Francisco, agreed to drop any advocacy for a separate “government intervenor” brief.

Instead, all the *Government Intervenors* requested permission to sign on to the *Government Petitioner's* brief. The *Governmental Petitioners* permitted the City and County of San Francisco to join the brief. However, several *Government Petitioners* would not agree to allow NARUC or NASUCA to also sign the brief.

Instead they suggested we should, in lieu of signing briefs, file short letters indicating support for arguments in the Government Petitioners' and the Non-Government Petitioners' briefs.

This was reflected in footnote 8 on page 5 of the referenced June 20, 2018 motion.

This is that letter.

Founded in 1889, NARUC is a quasi-governmental nonprofit organization incorporated in the District of Columbia that represents government officials in the fifty States, the District of Columbia (D.C.), Puerto Rico, and the Virgin Islands, charged with the duty of regulating the intrastate operations of utilities. NARUC is a "trade association" as defined in Rule 26.1(b). One of our member commissions, the California Public Utilities Commission, is a signatory to the August 21, 2018 *Brief of the Government Petitioners*.

NASUCA is a voluntary association of 44 consumer advocate offices in 41 States and D.C., incorporated in Florida as a non-profit corporation. NASUCA's members are designated by State laws to represent the interests of utility consumers before State and federal regulators and in the courts. Members operate independently from NARUC's member commissions as advocates for ratepayers. Associate and affiliate members of NASUCA also serve utility consumers but are not created by state law or do not have statewide authority. Neither NARUC nor NASUCA has a parent company, subsidiary, or affiliate that has issued securities

to the public. Nor does any publicly traded company own any equity interest in either.

In lieu of signing the “Brief of Governmental Petitioners, both NARUC and NASUCA file this letter specifically endorsing the arguments outlined therein.

Respectfully Submitted,

/s/ David C. Bergmann

/s/ James Bradford Ramsay

David C. Bergmann
LAW OFFICE OF
DAVID C. BERGMANN
3293 Noreen Drive
Columbus, OH 43221
(614) 771-5979
david.c.bergmann@gmail.com

James Bradford Ramsay
GENERAL COUNSEL
Jennifer Murphey
ASSISTANT GENERAL COUNSEL
National Association of Regulatory
Utility Commissioners
1101 Vermont Avenue NW, Suite 200
Washington, DC 20005
Telephone: (202) 898-2207
Fax: (202) 898-2213
jramsay@naruc.org

*Attorney for Intervenor National
Association of State Utility
Consumer Advocates*

*Attorneys for Intervenor National
Association of Regulatory Utility
Commissioners*

August 24, 2018

CERTIFICATE OF SERVICE

I, David C. Bergmann, hereby certify that on August 24, 2018, I caused the foregoing to be electronically filed with the Clerk of the Court for the United States Court of Appeals for the District of Columbia Circuit using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the appellate CM/ECF system.

/s/ David C. Bergmann
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