

Regulatory Advocacy Strategies

February 6, 2018

Jonathan Friebert
Director, External
Affairs



Nick DeSarno
Manager, Digital &
Communications Practice



Learning Objectives

What will we hopefully cover today:

- *How regulatory agencies process grassroots advocacy comments, meetings, and letters*
- *When, how, and where you can use these grassroots tactics effectively*
- *How organizations are using grassroots, grasstops and outside supporters to influence the regulatory process*
- *What it costs to make an impact at the regulatory level*
- *What creative ideas, tools or new ways of looking at regulatory advocacy*
- *Where we might be in 5 years*

The Rulemaking Process

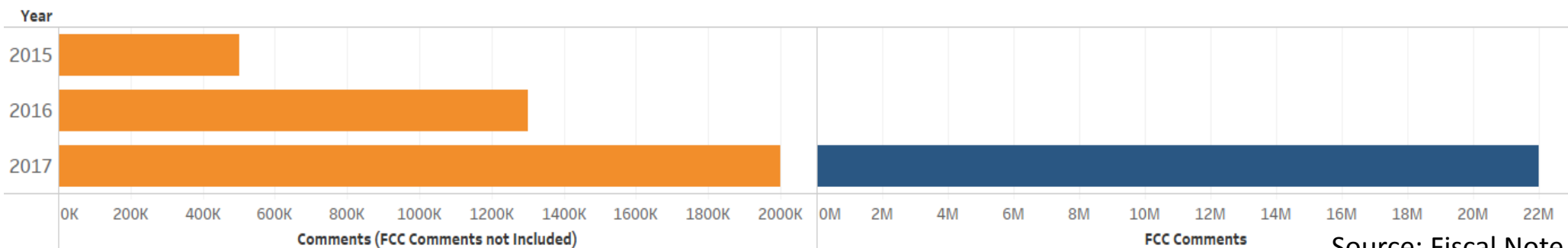
What is it?

*Congress delegates a certain amount of rulemaking authority to the U.S. government agency that is charged with enforcing a statute. The **rulemaking process** is how these agencies draft and eventually enforce their regulations.*

Important notes:

- *All U.S. agencies must go through this process*
- *Each agency handles the process differently*
- *Regulatory action has increased significantly*

Comments Submitted on Federal Regulations



Source: Fiscal Note

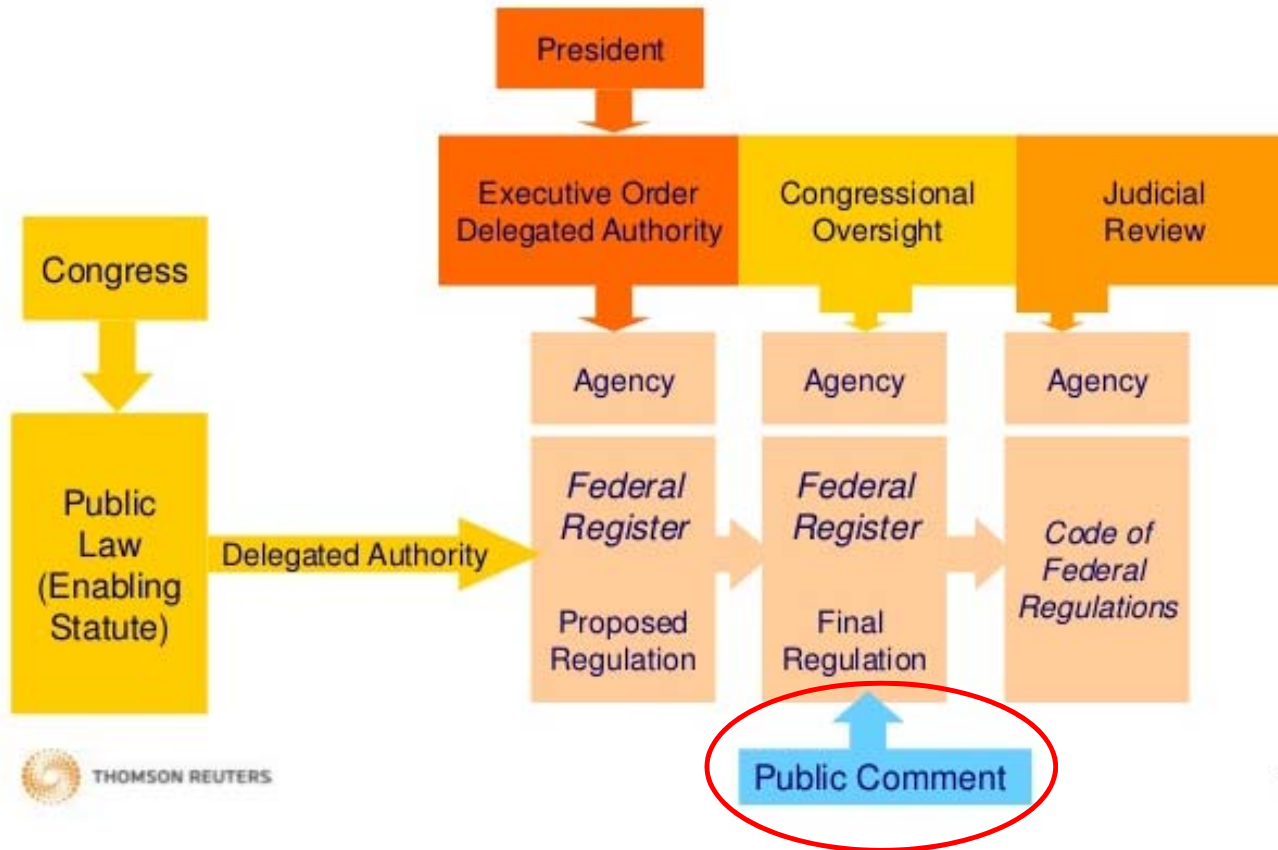
Advocacy – Getting Involved

Agencies are required to publish their plans for future rulemaking activities. Individuals and organizations generally have three main periods in which they can influence final regulations:

1. Advance Notice of Proposed Rulemaking
2. NPRM Comment Period
3. After Regulation Takes Effect



RULEMAKING PROCESS



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Grassroots Advocacy Comments

Sampling of some of the most commented issues:



Review of Certain National Monuments Established Since 1996-- Over 700k



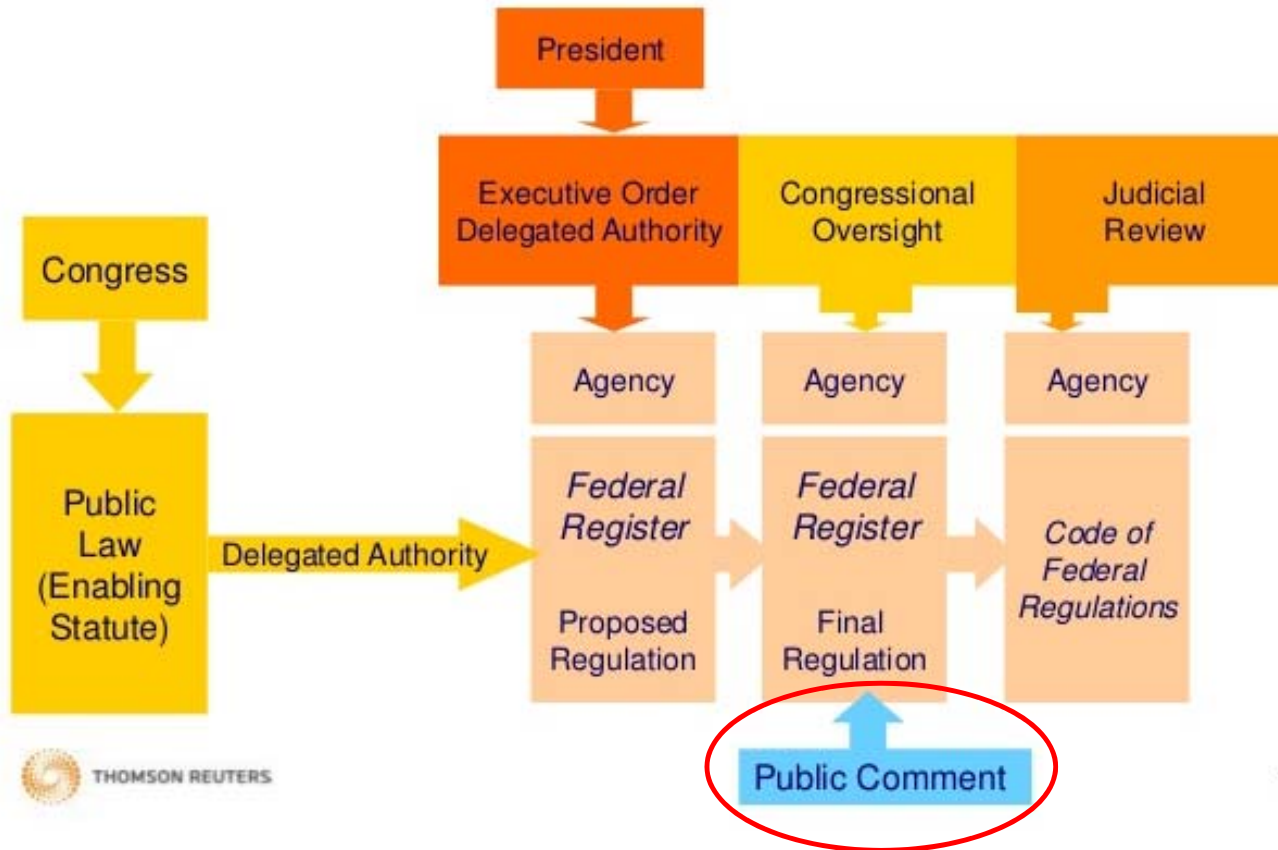
Advanced Practice Registered Nurses-- Over 200k



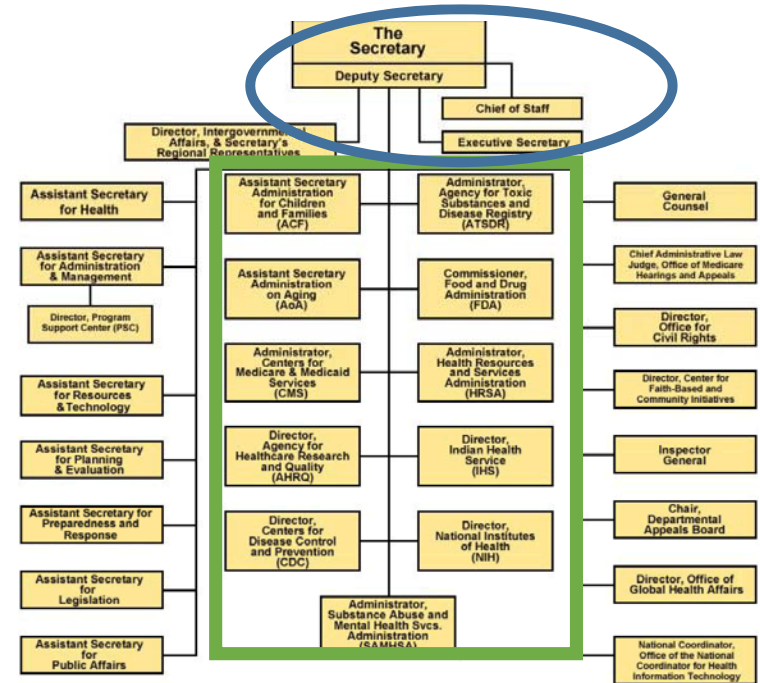
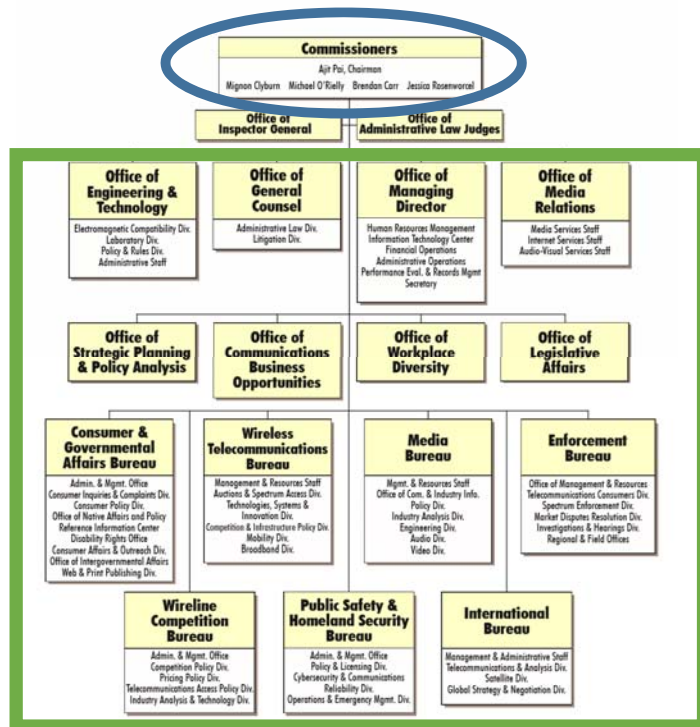
Payday, Vehicle, Title and Certain High-Cost Installment Loans – Over 150k



RULEMAKING PROCESS



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Agency Advocacy
Know Your Audience
Political vs. Staff Level

Opening Quote

January 15, 2000

- Well, first, I am thankful and grateful to be here, especially because it gives me an opportunity to share some good news with you. At the end of the last debate I talked about the situation of Thomas and Jim Navarro, folks who were looking for a way to get the **FDA** to stand aside so they could get the best treatment for Thomas, who was a 4-year-old dying of aggressive brain cancer, a brain tumor. And I would like to report to you that -- I told you that I was preparing a letter for the **FDA** -- well, I am pleased to say that all but one of my colleagues have signed onto that letter. We will hopefully get the other signature soon. We will be sending it on to Donna Shalala.





FDA allows controversial doctor to treat boy

By **Todd Ackerman** Published 5:30 am, Friday, April 27, 2001

NEWS



RED TAPE KILLING KID – CANCER BOY DENIED TREATMENT BECAUSE OF FDA BUREAUCRACY

By **Steve Dunleavy**

August 25, 2000

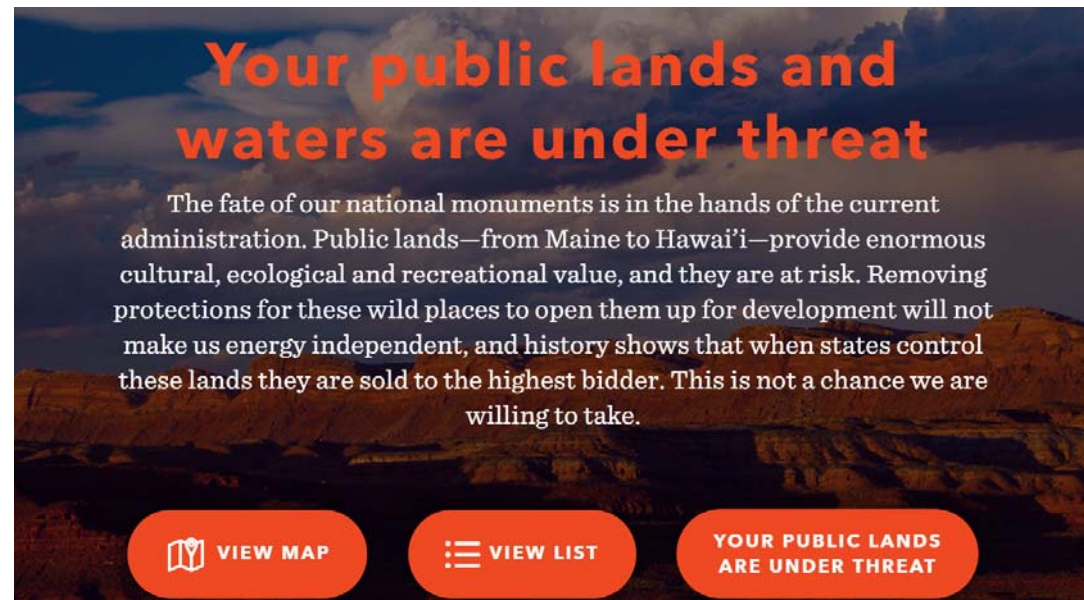
“Right to Try” FDA

Advocacy – Getting Involved

Patagonia – US Parks Service

Important notes:

- Patagonia's campaigns drove more than 500,000 advocates to publicly comment or engage over social media.
- More than 100,000 tweets were sent to Pres. Trump, Sec. Zinke in 3 days by Patagonia supporters after Trump announced the reduction in size of the Utah monuments
- Organizations can now use a software platform that integrates with Regulations.gov and other regulatory agencies, such as the FCC, there are numerous options now out there.

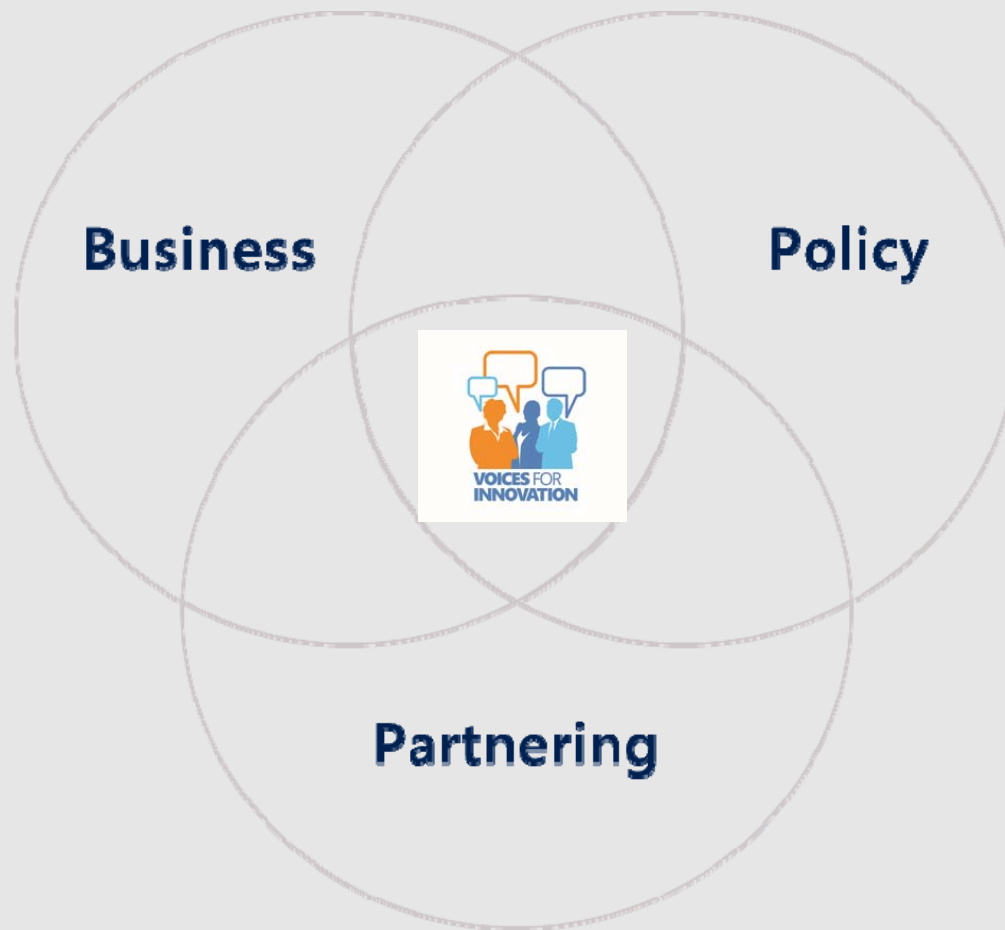


"Our mission is to empower every person and every organization on the planet to achieve more."

Satya Nadella
CEO, Microsoft

A large group of approximately 30 people, mostly in business attire, are posed for a group photo in a grand room with high ceilings, wood-paneled walls, and bookshelves. The group is arranged in several rows, with some individuals standing in the front and others behind. The room is lit by warm, yellow light from a central chandelier and wall sconces. The text "Empowerment through Engagement: Solving technology challenges through public policy" is overlaid in white, sans-serif font across the center of the image.

Empowerment through
Engagement:
Solving technology challenges
through public policy





Consumer expectations

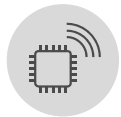


Pace of innovation



Digitally-native competition

The world we live in is increasingly **complex**



Connected devices

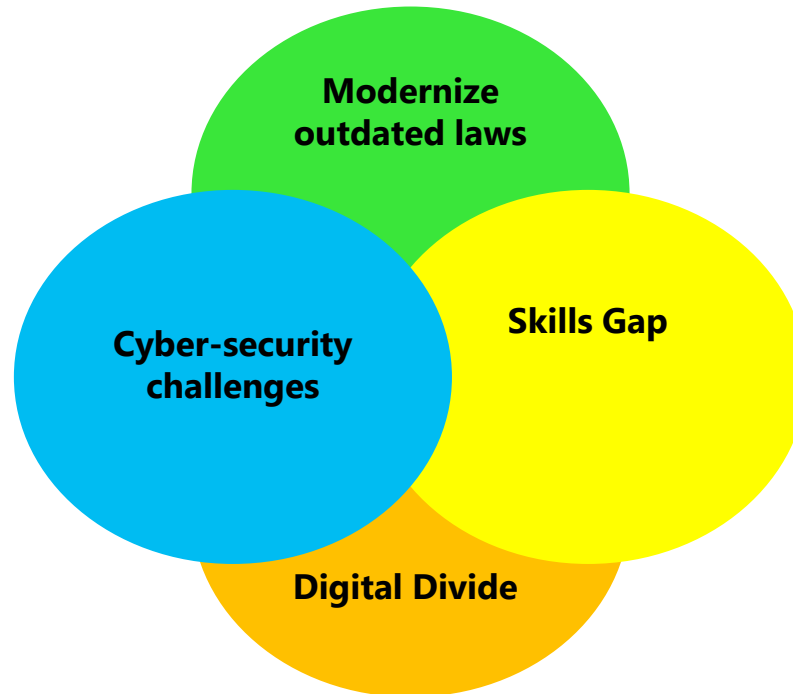


Workplace mobility



Laws and regulations

If public policy is not a focus—you are not fully engaging



Empowered Business Leaders: Real People Making a Real Difference

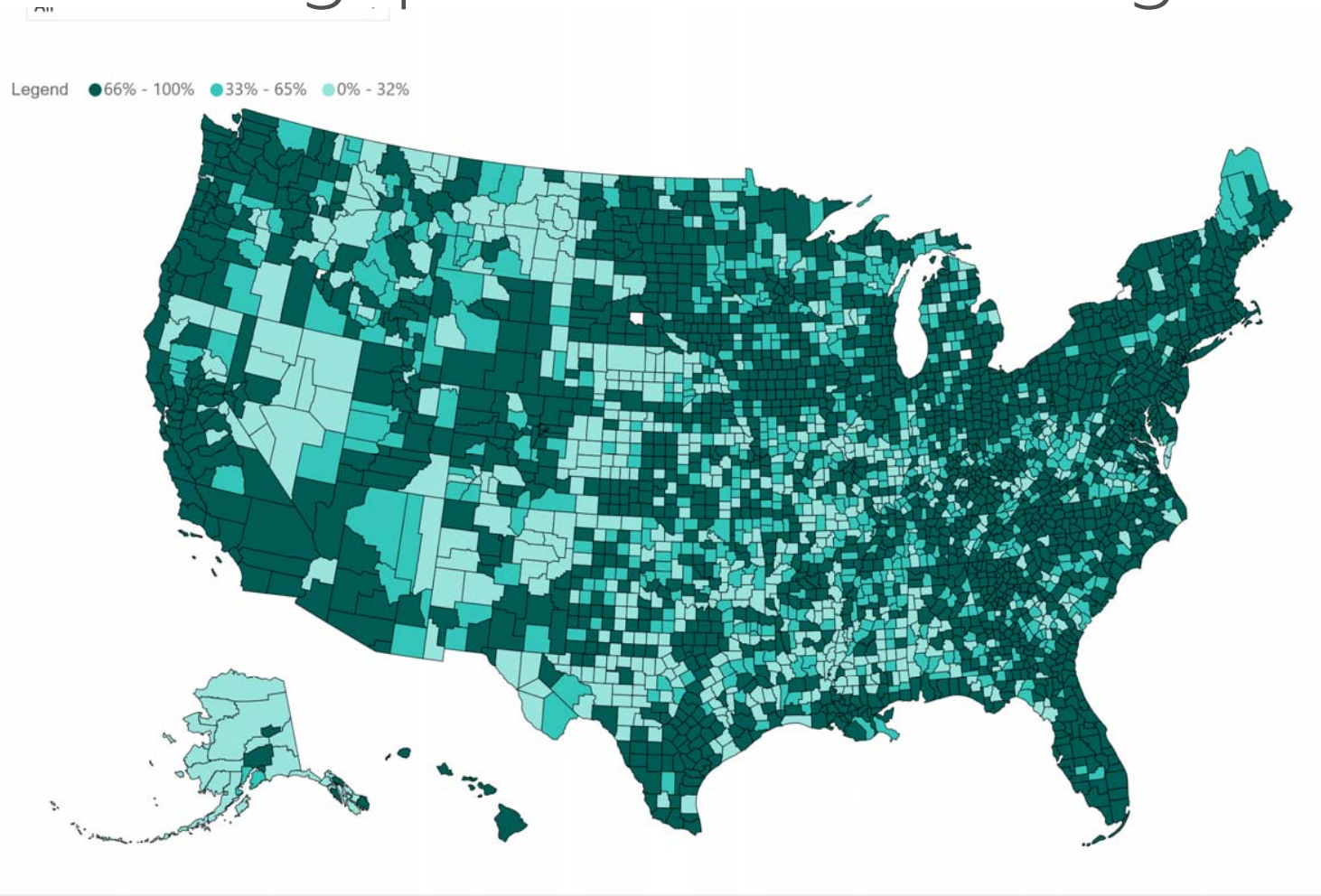
- Focused Advocacy
- Civic Engagement
- Authentic Conversations
- Impact
- Uniqueness
- It's FREE!



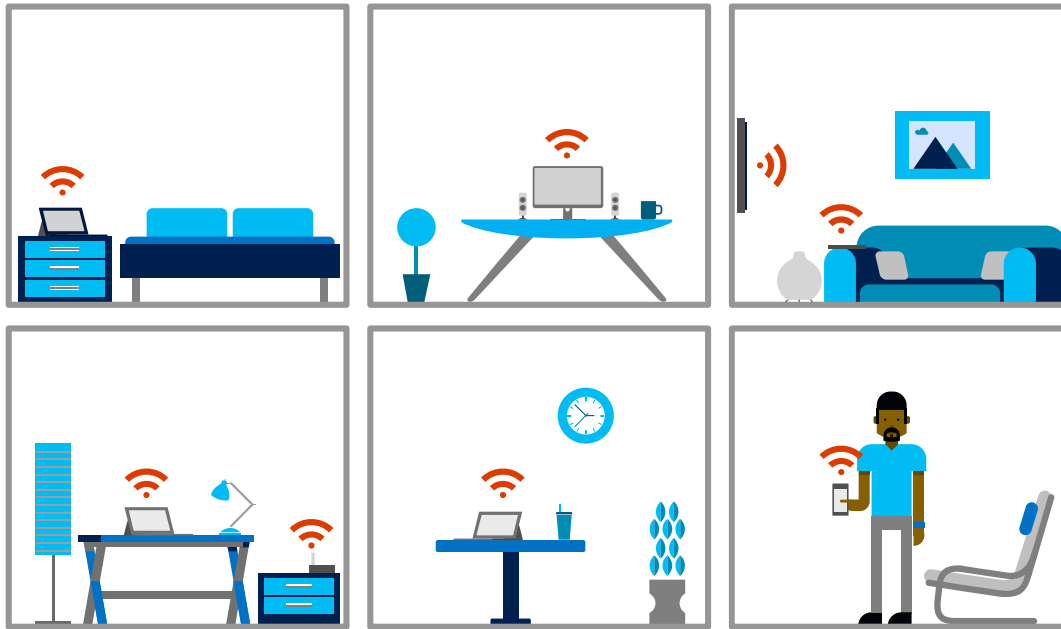
We need to move
technology forward,
without leaving
people behind



Broadband gap in US enhances digital divide



Why use TV white space technology

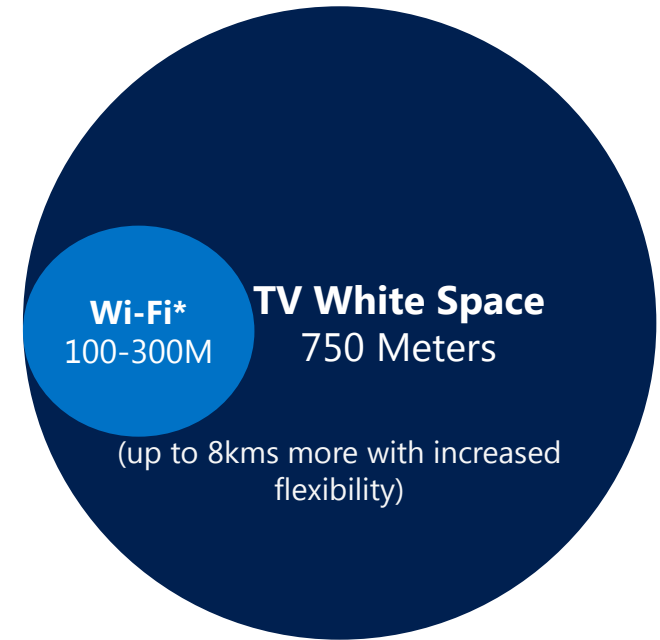


In a typical home, a Wi-Fi signal can penetrate **up to 2 walls**.

A **TV white spaces signal** can penetrate through more walls and obstacles, enabling whole home media distribution.

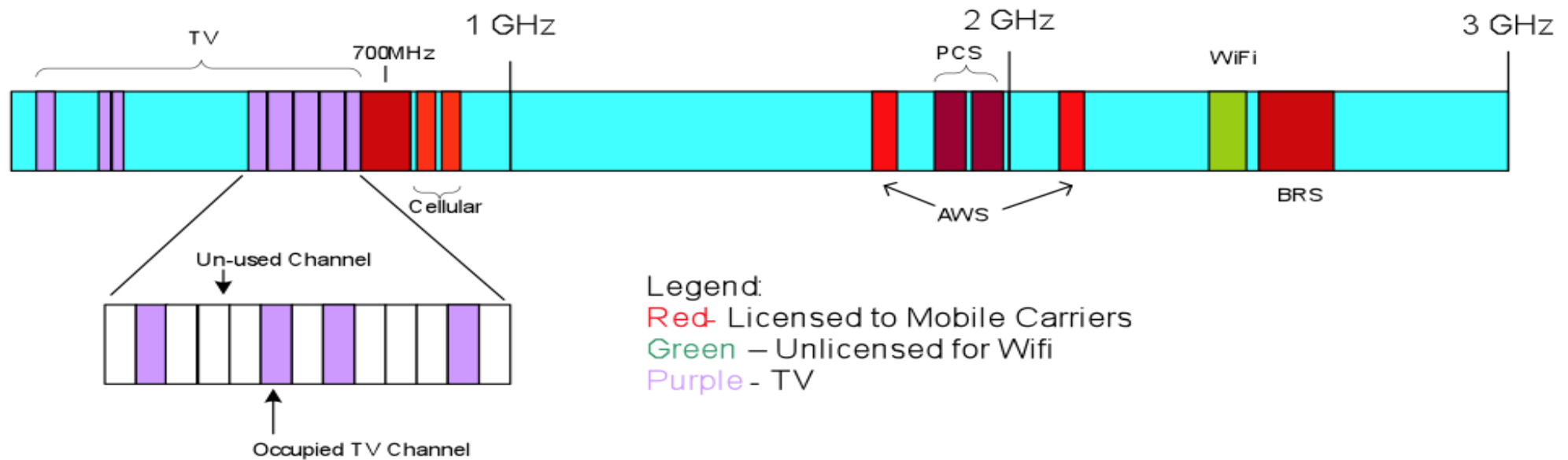
This will **simplify and enrich** in-home/in-building networking opportunities

Range in meters:



4X the distance, 16X the area covered.
Same power comparing 2.4GHz to 600 MHz. The result is **more coverage, lower network costs, and lower power consumption**

What are TV White Spaces?



- TV band white spaces are gaps left between broadcast channels
- They occur in different places on different channels



Challenge: Get Non-
Technical Advocates to FCC



AUGUST 21, 2017

Allocating TV White Spaces Channels for High-Speed Wireless Broadband

GN Docket No. 12-268; ET Docket No. 14-165; MB Docket No. 15-146

Chairman Ajit Pai

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Brendan Carr

FCC Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Mignon Clyburn

FCC Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Michael O'Rielly

FCC Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Jessica Rosenworcel

FCC Commissioner
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Tech Voices Push for White Spaces

Say it could connect 34 million to broadband



By [John Eggerton](#)

[eggerton](#)



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Twitter



More

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A group of tech company execs banding together as Voices for Innovation have raised their voices **in support of a proposal** by **Microsoft** that the **FCC** reserve channels in the so-called white spaces of the broadcast TV band for unlicensed devices as a way to promote rural broadband deployment.

VFI Meets with FCC Commissioners

October 18, 2017



GN Docket 12-268; ET Docket 14-165; MB Docket 15-146

TV White Spaces Spectrum

Chairman Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

The Honorable Brendan Carr
FCC Commissioner Federal Communications Commission
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The Honorable Jessica Rosenworcel
FCC Commissioner Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Dear Chairman Pai and Commissioners
Carr, Clyburn, O'Rielly, and Rosenworcel:**

As business members of Voices for Innovation, a community of technology supporters, we are writing to urge the Federal Communications Commission (FCC) to preserve in all U.S. markets three channels of TV white spaces spectrum for wireless high-speed internet.

This innovative technology will open the doors for bringing affordable broadband to 34 million Americans, mostly in rural communities, who lack internet access.

To encourage private sector investment in this long-distance broadband technology, the FCC must establish supportive TV white spaces rules. Using this spectrum, wireless connectivity will be able to reach many miles, compared to Wi-Fi's approximately 100-325 yards.



Questions and Discussion

Contact me:
Nick DeSarno
ndesarno@pac.org
202.787.5971