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New Federal Program: Free Internet for Low-Income Families

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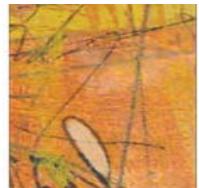
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New Federal Emergency Internet Discount Program for Low-Income Households

By John W. Pestle

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Varnum Law Firm

- One of Michigan's largest law firms - - 133 years old
- Large corporate firm with communications, municipal and utility practice, including at Federal Communications Commission
- For 25 years:
 - Representing property owners on cell tower leases
 - Including sales of over 100 leases, future leasing rights
 - For 35 years representing municipalities on cable, telecommunications and cell tower matters
 - Offers model cell tower and antenna leases, drafted from property owners' perspective at www.varnumlaw.com/lease
 - Cell tower blog (www.varnumlaw.com/pestle-publications_and_scroll_to_bottom_of_page)

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John Pestle

- Over 30 years' experience in communications, utility and energy law
- Chair of Varnum's Telecommunications Practice Group
- Graduate of Harvard College, Yale Graduate School and the University of Michigan Law School
- Admitted in Arizona and Michigan, Member Federal Communications Bar
- Actively involved on 1996 Telecommunications Act, 47 USC §§253, 332
- Past Chair of Municipal Lawyers Section of Michigan Bar and Legal Section of American Public Power Association
- Held FCC license to work on radio, TV, ship radar transmitters
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Outline of Presentation

1. Origins of Program, FCC Implementation Order
2. One Page Summary
3. Discounts Described
4. What Households are Eligible for Discounts
5. Who Provides Discounts
6. How to Obtain Discounts
7. When are Discounts Available, for How Long

Part 1 -- Origins of Program, FCC Order

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Origins of Program, FCC Order

- Created by Congress in year-end 2020 Federal stimulus/COVID relief bill, Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, 134 Stat. 1182 (2020) (“Act”)
 - In general to provide Internet discounts to low-income households
 - Due to importance of broadband access during pandemic for distance learning, telecommuting and telehealth, among other things
 - Appropriated \$3.2 billion, set general framework
- Federal Communications Commission (“FCC”) released Order (“Order”) implementing program on February 26
 - <https://docs.fcc.gov/public/attachments/FCC-21-29A1.pdf>
 - Order has detailed discussions, explanations of rules, why they were adopted, alternatives which were considered and rejected, and why

Origins of Program, FCC Order (cont'd)

- Order is 94 pages long, 160 numbered paragraphs, so these slides are only a summary
 - But to aid those who will be involved in using it, and their attorneys, to go into more detail, the slides provide citations -- e.g., Order ¶ 6 -- to paragraphs supporting specific points
- In package for today's program, you should have the following as part of one pdf manual or document -- If not, contact Lorman, John Pestle or Jonathan Kramer for copies
 - John Pestle's slides
 - Jonathan Kramer's slides
 - FCC Order
- FCC one-page Emergency Broadband Benefit Program Fact Sheet ("Fact Sheet") with summary, links to resources

Origins of Program, FCC Order (cont'd)

- This webinar is intended for schools, municipalities, libraries, churches, social service providers and others with an interest in
 - Making sure eligible households are aware of the discounts
 - Helping them apply for discounts,
 - Especially schools which under the Order are likely required to confirm students' eligibility

Part 2 -- One Page Summary of Order

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One Page Summary

- Discounts of \$50/month (\$75 on Tribal lands) on Internet service, \$100 on equipment per “low-income” household
- “Low-income” includes getting free/reduced price school meals, Pell grant in 2020-2021, SNAP benefits, Medicaid, Lifeline phone/Internet service; lost job/substantial loss of income; “household” is broadly defined
- Discounts apply to any type of Internet service (cable, phone, cell phone, wireless) except dial-up - - Providers will provide the discounts on customer’s bills, then be reimbursed by Federal Government
- How to get discount - - Households enroll directly with a provider, or via a national website. Providers are audited, have to confirm household eligibility, e.g. - - with schools
- Discounts will start soon (before end of April) and end 6 months after pandemic ends or \$3.2 billion runs out, whichever comes first
- Order and related FCC Fact sheet included with webinar

Part 3 - - Discounts Described

Discounts Described

- Monthly discount is \$50 (\$75 on Tribal lands) from provider's rate schedule on December 1, 2020. Order ¶ 13, 72
 - December date prevents gaming program by raising rates to offset discount
 - Rates are before applicable taxes, etc. Id. ¶ 70
 - Discount also applies to "bulk billing", Id. ¶ 45 where Internet service is included in monthly rent, such as for households in
 - Mobile home parks
 - Apartment buildings
 - Low-income housing
 - Senior centers
 - Assisted living and nursing homes
 - For eligible households their monthly rent is reduced by the discount

Discounts Described (cont'd)

- Discount applies to “bundled services” that include text messaging, and voice mail, Order ¶¶ 76-77, as well as to bundles that include modems, routers, hotspots, etc. Id. ¶ 78
 - Not to bundles that include “video”, Id. ¶¶ 76-77, so not to bundles with conventional cable TV service.
 - Discounts thus apparently apply to most cell phone service packages.
- One time discount of up to \$100 for equipment applies only to laptop computers, desktops or tablets, not to cell phones. Id. ¶¶ 79-80
 - Discount is once per household”,
 - And household must contribute between \$10 and \$50 towards cost of device. Id. ¶ 81.

Part 4 -- What Households are Eligible for Discount

What Households are Eligible for Discounts

- Discussed at length in the Order at ¶¶ 43-68, see same for details.
- A household is eligible if one member of the household qualifies, Id. ¶ 44
- Five major ways a member can qualify:
 1. Experienced a substantial loss of income since February 29, 2020,
 - Shown for example by
 - Layoff or furlough notice, or
 - Applying for/receiving unemployment benefits
 - And the household had a total income in 2020 below \$99,000 for single filers and \$198,000 for joint filers. Id. ¶ 58

What Households are Eligible (cont'd)

- Five ways to qualify (cont'd):
 2. Family member received a Federal Pell Grant in the current award year. Id. ¶¶ 51, 59;
 3. Family member who in the current school year receives benefits under the free and reduced-price school meals program, including through the USDA Community Eligibility Provision, or did so in the 2019 - 2020 school year. Id. ¶¶ 51, 55-57, 68 and passim.
- Lengthy discussion in Order of eligibility, and how to comply with student privacy, parental consent, and minimizing burden on schools, Id. ¶ 68
 - If entire school qualifies for USDA free or reduced lunch, e.g. – in areas with high poverty rates – then all students qualify. Id. ¶¶ 56-57

What Households are Eligible (cont'd)

- Five ways to qualify (cont'd):
 4. One family member meets the eligibility criteria for a participating provider's existing low-income or COVID-19 program. Id. ¶ 60.
 5. One family member qualifies for FCC Lifeline program for low-income consumers by participating (list is not exhaustive) in programs such as
 - Medicaid,
 - Supplemental Nutrition Assistance Program (SNAP),
 - Supplemental Security Income (SSI),
 - Federal Public Housing Assistance (FPHA),
 - Veterans and Survivors Pension Benefit),
 - Having an income at or below 135% of the Federal Poverty Guidelines or
 - On Tribal lands qualifying Tribal-specific federal assistance program
- See Act, div. N, tit. IX, § 904(a)(6)(A); Order ¶ 7, 43

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What Households are Eligible (cont'd)

- “Household” is broadly defined as “[A]ny individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An “economic unit” consists of all adult individuals contributing to and sharing in the income and expenses of a household . . . If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians.” Order ¶ 44 (emphasis supplied).

What Households are Eligible (cont'd)

- Again, a household is eligible if one member of the household qualifies, Id. ¶ 44
- For multiple qualifying households at same address, each household qualifies to get discounts. Id. ¶ 46.
 - For example, for multiple families in a homeless shelter, each can qualify. Id. and fn. 112
 - And households are eligible for discounts despite being behind on their payments to a provider, now or in the past, not paying/having paid termination fees for a current or prior service, or not complying with a “gap” or waiting period between changing services. Id. ¶¶ 37, 43.

Part 5 -- Who Provides the Discounts

Who Provides the Discounts

- Discussed at length in the Order at ¶ 10-42
- But in English, both
 - Traditional communications providers
 - Cable companies
 - Telephone companies
 - Cell phone companies
 - And less traditional providers
 - Municipalities, such as those providing broadband service
 - Cooperatives, such as rural electric/telephone cooperatives which often by microwave provide broadband to rural areas
 - Wireless internet service providers, also often providing service by microwave dishes
- Community broadband networks. Order ¶ 12

Who Provides the Discounts (cont'd)

- To be eligible to provide the discounts, and then be reimbursed for them by the Federal Government, providers must
 1. Either
 - Already be approved to assist low-income households as an “Eligible telecommunications carrier” for the FCC’s Lifeline program (many large companies are) or
 - Be approved by an expedited approval process which the Order creates for this program, and
 2. Comply with requirements set up in the Order on how to sign-up households, keep records, get reimbursed, etc.
 - These approvals and requirements are set forth generally in the Order at ¶¶ 10-42, and 86-132 and are beyond the scope of this presentation

Who Provides the Discounts (cont'd)

- What broadband service qualifies? Basically conventional Internet service
 - Must have been part of provider's Internet offerings as of December 1, 2020, Id. ¶¶ 13, 29
 - Must be faster than dial-up, Id. ¶ 12, otherwise no specific minimum speed requirement, Id. ¶¶ 73-74
 - Not "metered" service based primarily on a data allowance (e.g., one gigabyte for §§5), Id. ¶ 70
 - Technology neutral - - Any technology meeting preceding qualifies. Id. ¶ 12
 - Participating providers
 - Must provide the discounts on at least one of their broadband offerings, and do so throughout their entire service area, and
 - Are encouraged to provide the discounts on all their broadband offerings. Id. ¶ 37

Part 6 -- How to Obtain the Discounts

How to Obtain the Discounts

- The FCC Fact Sheet indicates that enrollment will either be
 - Through the provider offering the discount, or
 - By registering with USAC (which administers the FCC's program of discounts on phone and Internet service)
- Too soon for either of the preceding to have been set up, so stay tuned!
- FCC says to check its web site, www.fcc.gov/broadbandbenefit, regularly for updates and latest information.
- Assumption/Best Guess
 - Providers may reach out to schools, customers, on program, how to apply
 - Especially for people with no Internet, or unlikely to be aware of program -- schools, social service entities and the like will reach out to people to inform them.
 - Last several pages of Order are all about promoting public awareness. Id. ¶ 133 ff
 - Hence this program!

How to Obtain the Discounts (cont'd)

- Please note: Providers will have to verify that households are eligible for the discounts, in order to be reimbursed.
- Three ways to confirm eligibility. Order ¶ 49 and fn 130
 1. School-based eligibility verification: Schools confirming to a provider that a student receives free or reduced-price meals. Id. ¶ 68.
 - This will be a major method of verification, building on the verification process some schools already use to confirm student's eligibility for discounted phone and broadband service (e.g., FCC Lifeline program)
 - Order is sensitive to need for parental consent to disclose student information, privacy concerns; may issue consent form, protective order form
 - Again, still under development

How to Obtain the Discounts (cont'd)

- Three ways to confirm eligibility (continued)
 2. A student or parent register with and has eligibility verified by United Service Administrative Company (“USAC”), <https://www.usac.org/>
 - This is in an expansion of USAC’s role administering the FCC “Lifeline” program
 - Order directs USAC to set up a web page, program to verify eligibility for these new discounts. Id. ¶¶ 49ff - - Too soon, web page has not been set up yet.
 - In general, would appear to be most useful for households receiving Medicaid, SNAP or other Federal benefits (see slide 17 above) as USAC computers apparently can automatically cross-check on these items
 - Household can do this in advance, so approval should be quick once provider checks with USAC

How to Obtain the Discounts (cont'd)

- Three ways to confirm eligibility (continued)
 3. Comply with a provider's FCC-approved verification process. Id. ¶¶ 62-67
 - Order allows providers to set up their own programs to verify eligibility
 - Unclear to what extent this will occur.
 - Practical suggestions:
 - Local providers are crucial
 - Reach out to them, their local managers, government affairs people, for guidance, to work together
 - Elected officials, state and local, often know/can easily find out whom to contact, especially for entities (e.g. cell companies) with little local presence
 - Similarly state professional organizations, associations and their gov't affairs people usually know the state government affairs people for major providers

Part 7 -- When Are Discounts Available

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When Are Discounts Available

- FCC Fact Sheet says it expects discounts to be available in April 2020
- Discounts end on earlier of
 - Six months after Secretary of HHS determines pandemic emergency is over, or
 - Exhaustion of \$3.2 billion appropriated by Congress. Id. ¶ 110.
- Providers must give customers at least 30 days notice of discounts terminating, and
 - Customers must affirmatively “opt in” to being charged for service at the full, non-discounted rate once the program ends. Id. ¶ 132.



New Federal Emergency Internet Discount Program for Low-Income Households

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Jonathan L. Kramer, Esq., J.D., LL.M., LP.D

- **Telecom Law Firm, P.C.**
 - Admitted to practice law in California and New Mexico
 - Licensed by FCC since early 70s (**holds six licenses/certs**)
 - Licensed as a Communications Contractor in California (inactive)
 - Licensed as a Real Estate Broker in California
 - 35+ years in telecom engineering/safety reviews (RF, broadband, fiber, outside plant safety, code compliance, RF safety)
 - 33+ years consulting on telecom matters > 1,000 governments/firms;
 - 25+ years of wireless siting and planning >2,000 cases/matters
 - Expert witness/trial advisor in 40+ wireless, wired telecom cases
 - Co-author, Co-editor of FCC's 'A Local Government Official's Guide to Transmitting Antenna RF Emission Safety: Rules, Procedures, and Practical Guidance'

- **Member:**

- IMLA (Attorney Member)
- NATOA (Twice Member of the Year)
- FCBA (Attorney Member)
- Society of Broadcast Engineers (Senior Member)
- SCTE (UK) (Fellow Member); SCTE (US) (Emeritus Senior Member)

- **Education:**

- Doctor of Law and Policy, Northeastern Univ., Boston (LP.D)
Master of Law *with honors*, Strathclyde University School of Law, Glasgow (I.T. & Telecom Law) (LL.M)
Juris Doctor *cum laude*, Abraham Lincoln School of Law, Los Angeles (JD)
- **Teaching:**
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Emergency Broadband Benefit Program Providers:

Eligible Telecommunication Carriers (ETCs)

(no review required; automatic eligibility)

and

Non-ETCs (expedited review for eligibility):

Traditional Internet Service Providers (ISPs)

- ...including cable TV/Fiber optic providers

Wireless Internet Service Providers (WISPs)

Non-traditional broadband providers:

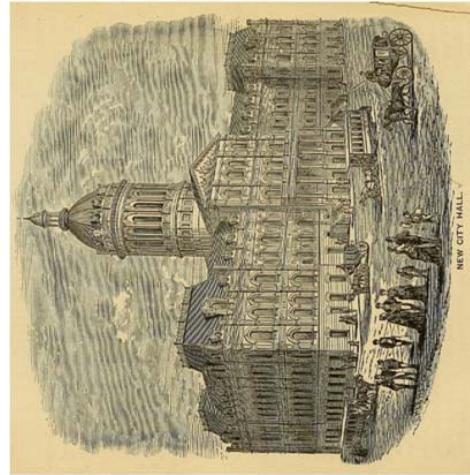
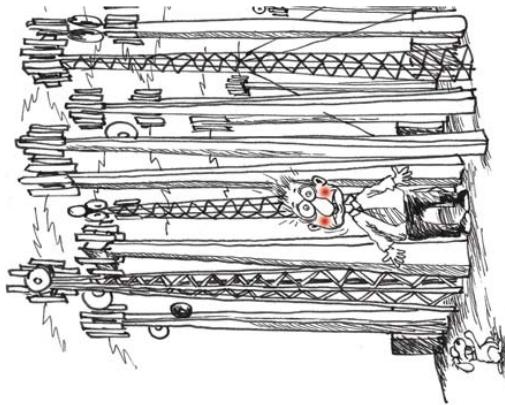
- ...community-owned networks

- ...electric cooperatives

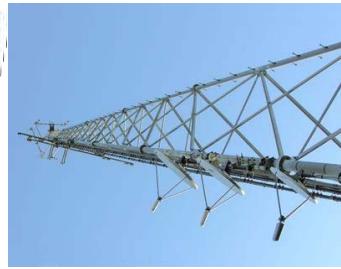
- ...municipal governments

Order #12

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Eligible Households for the Lifeline Program

Provides for discounts on voice or broadband Internet access service, as well as on bundled services

Test: Do only animals live in the household? Not eligible.

Test: Do some humans live there? Likely eligible if...

...they can be found via the National Verifier or the National Lifeline Accountability Database, *and*
...they are participating in a qualifying assistance program
i.e., Medicaid, Supplemental Nutrition Assistance Program (SNAP)
Supplemental Security Income (SSI)
Federal Public Housing Assistance (FPHA)
Veterans and Survivors Pension Benefit
In school areas covered by the USDA Community Eligibility Provision
or
the human earns no more than 135% of the Federal Poverty Guidelines (Contig. 48 in 2021: 1 person earning no more than \$17,388).

Tribal lands: Qualify for the Lifeline program by meeting any of the criteria above *or* by participating in a qualifying Tribal-specific federal assistance program.



How Provided?

Dial Up

('You've got real slow')

DSL (copper)

('You've got a wee-bit faster')

Coax (cable TV)

(You've got fast to really fast')

Wireless ISP

(Mainly you've got faster than DSL and up to fast')

Community Wi-Fi

('You've also got faster than DSL and up to fast')

Wireless Carrier Internet

('You've also got very faster to really, really fast')

Fiber to the Home

('I hate you, you speed demon!')



Why Does Fast Matter?

Dial Up

(Downloads, especially video/large images are painful)

DSL (copper)

(Ah, that was really quick unless during prime time)
(Take few minutes to relax)

Wireless ISP

Community Wi-Fi

(Not in a speed race with Cable TV)

(It depends on distance from the tower, users, backhaul)

(My fingers are burning up)

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Ways and Means

Dial Up

(No changes; program overlay on the technology)

DSL (copper)

(No changes; but likely not long for this world...)

Coax (cable TV)

(No changes; program overlay on the technology)

Wireless ISP

(No changes; program overlay on the technology plus new)

Community Wi-Fi

(No changes; program overlay on the technology plus new)

Wireless Carrier Internet

(No changes; program overlay on the technology)

Fiber to the Home

(No changes; program overlay on the technology)



Sites and Sight

Wireless ISP and Community Wi-Fi
(Local government Wi-Fi like Community Wi-Fi)

- Wireless ISP** (commonly commercial, hill tops, tall towers, tall rooftops)
- Community Wi-Fi** (commonly community centers, service buildings, in-buildings)
- Municipal Wi-Fi** (commonly traffic signals for parking meters; destinations such shopping districts, government buildings, PD logging, public works logging, etc.)



Siting and Planning and OTARD, oh my!

Wireless ISP *and* Community Wi-Fi

(Local government may not be subject to planning)

FCC Over the Air Receiving Devices (OTARD) rules likely to apply

See: <https://docs.fcc.gov/public/attachments/FCC-21-10A1.pdf> (FCC 21-10, adopted Jan 6, 2021, released Jan. 7, 2021)

“1. Today, we update the Commission’s rule for over-the-air reception devices (OTARD) to expand its coverage to include hub and relay antennas that are used for the distribution of broadband-only fixed wireless services to multiple customer locations, regardless of whether they are primarily used for this purpose, provided the antennas satisfy other conditions of the rule. 1 By making this modest adjustment to our rule while maintaining the other existing OTARD restrictions, we place fixed wireless broadband-only service providers on similar competitive footing with other service providers. This rule change should allow fixed wireless service providers to bring faster Internet speeds, lower latency, and advanced applications—like the Internet of Things, telehealth, and remote learning—to all areas of the country, and to rural and underserved communities in particular.”

Internal citations omitted

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Over the Air Receiving Devices (OTARD)

Examples:

TV reception antennas *and* masts to adequately receive over-the-air TV signals

(“Masts higher than 12 feet above the roofline may be subject to local permitting requirements for safety purposes.”)

- Satellite Dishes (1 meter or less)
- Wireless Internet end-user antennas (1 meter or less)
- Wireless carrier end-user antennas

Fees:

“Any requirement to pay a fee to the local authority for a permit to be allowed to install an antenna would be unreasonable because such permits are generally prohibited.”

But *not*...

- CB antennas
- Ham radio antennas
- Digital Audio Radio Services (e.g., SiriusXM®)

See: <https://www.fcc.gov/media/over-air-reception-devices-rule>



Siting and Planning and OTARD, oh my!

Wireless ISP *and* Community Wi-Fi
(Local government may not be subject to planning)

FCC Over the Air Receiving Devices (OTARD) rules likely to apply

See: <https://docs.fcc.gov/public/attachments/FCC-21-10A1.pdf> (FCC 21-10, adopted Jan 6, 2021, released Jan. 7, 2021)

“2. The Commission’s OTARD rule prohibits laws, regulations, or restrictions imposed by State or local governments or private entities that impair the ability of antenna users to install, maintain, or use over-the-air reception devices.” “The rule prohibits restrictions that unreasonably delay or prevent installation, maintenance, or use of an antenna; unreasonably increase the cost of installation, maintenance, or use of an antenna; or preclude reception of an acceptable quality signal. For the OTARD rule to apply, the antenna must be installed on property within the exclusive use or control of the antenna user where the user has a direct or indirect ownership or leasehold interest in the property upon which the antenna is located.”

Internal citations and quotes omitted



Recognizing Wireless Internet OTARD Providers

1. Not (yet) being filed by traditional wireless carriers
2. Relatively wide-area footprint sites, usually on hills, rooftops, and towers
3. Often uses very small aperture dish antennas with whip-type and panel antennas
4. May offer ‘dial-up’ telephone services (look for state PUC/PSC rights)
5. May have one or more ‘distribution sites’



Recognizing Community Wi-Fi OTARD Providers

1. Not (yet) being filed by traditional wireless carriers
2. Relatively small footprint coverage sites, usually on local hills, rooftops, and towers inside the served community
3. Often uses whip-type and sometimes panel antennas
4. Unlikely to offer ‘dial-up’ telephone services
5. May have one or more ‘distribution sites’ inside the community



Recognizing Municipal Wi-Fi OTARD Providers

1. Operated by the/a local government unit
2. Functions related to government operations and tourism/economic development
3. Often uses small whip-type panel antennas attached to traffic signals interconnected by a ‘mesh’ network connected back to City Hall/data center
4. Unlikely to offer any form of telephone services, but might have some limited traffic/security camera uses
5. Will likely have many ‘distribution sites’ inside the jurisdiction



Special considerations for Local Governments

If participating in the Emergency Broadband Benefit Program (and even if not!) it is vital that your government adopt and enforce an “acceptable use policy” (AUP) for all internal users and external public.

Some examples AUPs online (search ‘municipal government Wi-Fi acceptable use policy’):

<https://www.calfund.org/guest-wireless-access-acceptable-use-policy/>
<https://www.lakeforestca.gov/DocumentCenter/View/2122/Acceptance-Use-Policy-PDF>
<https://www.schools.nyc.gov/about-us/policies/internet-acceptable-use-policy>
<https://www.anacorteswa.gov/1114/Acceptable-Use-Policy>

Ask your IT specialists about how they are performing access control now, and how they (hopefully) developed and use an AUP. Ask whether they are using a ‘radius server’ or equivalent

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Wrap Ups and Take-Aways

The Emergency Broadband Benefit Program is, at a fundamental level, an important tool for bridging the digital divide.

The EBBP provides discounted connectivity, but user hardware (i.e., computers) remains a problem.

Expect multiple program participants in the EBBP, each may use the program to expand their footprints.

OTARD figures into EBBP and local government planning staff must understand the updated FCC OTARD rules as they exist today.

The EBBP is a limited-time program but may open the legislative door to longer-term means of reducing the digital divide. Beneficiaries should look out for sign-up fine print that automatically ‘opts-in’ a household to the full rate after the program ends.

Hang on; keep all body parts inside the ride.

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Resources

Contact Information:

Telecom Law Firm, P.C. web site:
<http://TLF.Law/>

FCC RF Safety Page:
<http://www.fcc.gov/encyclopedia/radio-frequency-safety>

Jonathan Kramer's Wireless Blog:
Wireless.Blog.Law

3,000+ Cell Site Example Photographs:
<http://www.CellTowerPhotos.com>

“A Practical Guide to Radio Frequency Emissions Safety”
<http://www.TelcomLawFirm.com>

John Pestle’s Blog:
<http://www.varnumlaw.com/blogs/cell-phone-tower/>

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