



# **Unmanned Aircraft Systems**

Signal Group and Wiley Rein

# Unmanned Aircraft Systems [UAS]

SIGNAL's Aviation Group and Wiley Rein's Unmanned Aircraft Systems (UAS) Group are more than a traditional Washington lobbying, communications, and legal practice. Our professional experience and unique approach to the federal marketplace reflect the complexity and multidimensional nature of the aviation industry, especially in the UAS sector.

The aviation community is defined by a wide cross section of interests and issues, with multiple stakeholders from the public sector and private industry holding diverse viewpoints. SIGNAL and Wiley Rein professionals are specifically focused on achieving our clients' goals in this highly complex environment. Our traditional experience in federal aviation policy, and UAS regulatory issues, is combined with a deep understanding of the fundamental policy issues driving industry performance and growth. As innovative technologies force convergence of new concepts and ideas, SIGNAL/Wiley Rein is able to provide the services demanded to drive market and regulatory solutions.

The potent combination of SIGNAL and Wiley Rein differentiates us from our competitors and provides our clients with a powerful advantage in achieving their objectives in Washington, DC.

First, SIGNAL offers clients premium traditional lobbying services. All members of our diverse, bipartisan team have worked in Washington at the highest levels of government to effect change in the aviation community. We work across party lines to establish and maintain strong credibility with key decision-makers in Congress and the White House. We know where to focus, when to act, and how to navigate the political and legislative process to generate positive outcomes for our clients. We work directly with the agencies that are needed to provide the optimum "flight plan" for UAS.

In addition, Wiley Rein LLP has been engaged in UAS matters since the outset of the Federal Aviation Administration (FAA) opening the door to commercial uses. Drawing on its wealth of experience representing clients before regulatory agencies, obtaining necessary authorizations and licenses, and advising clients on regulatory obligations, Wiley Rein has been significantly involved in the evolving legal landscape of UAS, representing clients across the telecom, insurance, aviation, agriculture, higher education, and manufacturing sectors.

Collectively, our professionals have a strong track record of success in implementing significant change across a broad spectrum of the aviation community. Our team has been heavily engaged in all of the FAA reauthorization bills for more than 20 years, negotiating, advocating, and driving critical solutions. Our team led the effort, post-9/11, in creating a new security regime for our country, enabling the U.S. airline industry and economy to get

back on their feet. In addition, our team has extensive experience developing consensus and building coalitions across the diverse aviation community to provide broad and sustainable success to the entire industry.

Our combined SIGNAL and Wiley Rein UAS Working Group includes lobbyists, lawyers, digital communicators, and engineers experienced in aviation issues at the FAA; privacy considerations at the Federal Trade Commission (FTC), the National Telecommunications and Information Administration (NTIA), and Congress; and spectrum needs being examined by the Federal Communications Commission (FCC), NTIA, U.S. Department of State, International Telecommunication Union (ITU), International Civil Aviation Organization (ICAO), and industry working groups.

Together, we have:

- Helped commercial UAS users in industries including insurance, media, and technology to obtain Section 333 Exemption grants from the FAA for the commercial use of UAS.
- Advised clients and regulatory decision-makers on the domestic and international spectrum issues for UAS command and control and payloads for both within visual line-of-sight and beyond visual line-of-sight uses;
- Counseled clients on compliance with the FAA's new Part 107 governing operation of small UAS;
- Met with key congressional committees and the FAA on the importance of the use of UAS and how best to integrate them into the national airspace;
- Consulted with multiple industry sectors to evaluate their operational requirements and counsel them on UAS compliance;
- Met with FAA staff to discuss regulatory developments and advocate for clients' policy needs;
- Monitored privacy developments at the federal, state, and local levels and assisted clients in participating in NTIA's multistakeholder process on UAS privacy;
- Analyzed insurance and risk management considerations associated with commercial use of UAS;
- Provided public policy strategic advice regarding potential UAS legislation;
- Aided clients in obtaining Certificates of Waiver or Authorization (COAs) to fly UAS;
- Tracked FAA UAS policies and news;
- Advised UAS manufacturers on how to comply with FAA requirements and policies, including by reviewing their Operations Manuals for various UAS;
- Prepared and filed comments on the FAA's proposed Small UAS Rules;
- Assisted and advised universities on how they can operate UAS to support their programs;
- Advised clients on the FAA's airworthiness certification processes;

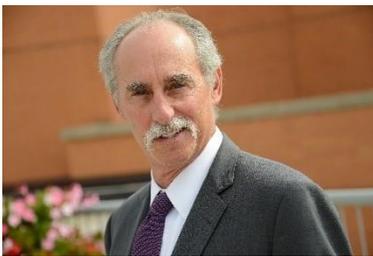
- Monitored state and local legislation and regulation and assessed the role federal preemption will play in the deployment of UAS;
- Evaluated newsgathering and First Amendment considerations associated with UAS for media clients;
- Advised insurance clients on using UAS to analyze post-catastrophe situations; and
- Briefed utility companies on how to avoid risks to human inspectors and obtain authority to use UAS to conduct utility inspections.

We consistently apply the energy, substantive expertise, ingenuity, insight, and political sophistication required to meet our clients' needs, and we take an aggressive posture in ensuring that we deliver meaningful and measurable results for our clients in Washington. We do not wait for the phone to ring before we act; we do not confuse having a meeting with having success; we are passionate about our work; and we are committed to generating real results on real projects in real time.

We judge our achievements from our clients' perspective – our success depends entirely on improving each client's competitive position.

## **SIGNAL Professionals**

# Primary team.



**Sam Whitehorn**

MANAGING DIRECTOR, SIGNAL

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Sam Whitehorn favors the big issues. The ones that make headlines and affect change. From technology, aviation, and security, to transportation, telecommunications, and Native American Affairs, you'll find him at the center of the conversation and the heart of the solution. As a Managing Director at SIGNAL, Sam's driven our firm to help redefine advocacy in Washington. With a practice based in original thinking and collaboration, he's helped elevate our offering and achieve results for our clients.

Sam brings more than 16 years of Senate experience to SIGNAL. Before joining our team, he held several key positions on the U.S. Senate Committee on Commerce, Science, and Transportation. During the 109th Congress, he served as the Deputy Staff Director and General Counsel to the full committee, where he addressed issues ranging from automobile and highway safety to data privacy, aviation, transportation, security, and pipeline policy. As the Senior Counsel and Staff Director to the Committee's Aviation subcommittee for 14 years, Sam led the effort to craft the Aviation and Transportation Security Act (ATSA), which revamped our nation's aviation and transportation security system after 9/11.

While Sam's always working to stay ahead of the curve on the big issues, he takes pleasure in conversation and comedy, and considers the tennis court a great arena for mastering the art of competition.



## Rob Chamberlin

MANAGING DIRECTOR, SIGNAL

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Rob Chamberlin is all about results. His hard-charging style has earned him the loyalty of some of SIGNAL's biggest clients. As Managing Director of the company and co-lead of the Transportation and the Technology and Telecommunications groups at SIGNAL, he's built a reputation on his ability to steer client outcomes and achieve results.

Clients turn to Rob for strategic guidance, policy expertise, and dynamic execution. His mastery of bicameral outreach to both U.S. Senate and House Republicans on tech, transportation and telecom issues as well as issues ranging from financial services and energy to cybersecurity and defense, equips him with the influence and experience to effectively position initiatives that guide groundbreaking policy. As a member of the SIGNAL Executive Committee, Rob provides advocacy insight and business leadership across all of our practices through the development of new growth areas and mentorship of new team members.

Prior to joining SIGNAL, Rob was Chief Counsel on the U.S. Senate Commerce, Science, and Transportation Committee under Chairman John McCain (R-AZ). There, he honed his expertise in aviation, transportation, automobile safety, and telecommunications by working closely with the U.S. Department of Transportation, the Federal Aviation Administration, the U.S. Department of Homeland Security, the U.S. Department of Commerce, and the White House. He spent time on similar issues at the House Transportation and Infrastructure Committee working for then-Chairman Bud Shuster.

TheHill.com named Rob one of The Top Lobbyists of 2015. While he eats, breathes, and sleeps strategy, his personal transportation plan involves an occasional escape to the North Carolina shoreline with his wife and family.



## Julie Bertoson

EXECUTIVE VICE PRESIDENT, SIGNAL

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Julie has an instinct for strategy. As an Executive Vice President at SIGNAL, she supports our transportation, technology, and telecommunications practices with a relentless focus on delivering results. Her commitment positions our clients to engage where it matters – with congressional, Executive branch, and regulatory decision-makers. Julie’s advocacy experience encompasses trade associations, coalitions, Fortune 100 companies, and local and regional governments. Prior to joining SIGNAL, Julie provided key support to U.S. Secretary of Transportation Ray LaHood, serving as liaison to the Senate and House of Representatives. She oversaw day-to-day contact with key congressional offices to manage changes to departmental programs, regulations, and initiatives.

As a Democratic staffer on the Senate Commerce, Science, and Transportation Committee, Julie worked under Chairmen Daniel Inouye (D-HI) and John Rockefeller (D-WV) to research, draft, and negotiate bills from introduction through enactment. A graduate in political science from the University of Minnesota-Twin Cities, Julie followed her home state senator from Minnesota to Capitol Hill and found her new home in Washington, DC.



## George Riccardo

MANAGER, SIGNAL

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Simply put, George is a doer – his main goal is to achieve success for clients. George is always looking for a new challenge, and the chance to drive new opportunities is what excites him. He is constantly seeking to exceed expectations, and will go outside of his comfort zone to do so.

As a manager for SIGNAL, George focuses on helping clients deal successfully with telecommunications, transportation, and infrastructure issues. He’s had a prosperous career on Capitol Hill, putting in his time on the House Committee on Transportation and Infrastructure, and for three U.S. Representatives – Jack Kingston, John Sullivan, and Keith Rothfus. He’s worked on numerous pieces of legislation, including the FAST Act, the PIPES Act, the Howard Coble Coast Guard and Maritime Transportation Act, and the STB Reauthorization Act. George graduated from Penn State University with a major in Business Management, and a minor in International Business.

## Wiley Rein Professionals

# Primary team.



### Anna M. Gomez

PARTNER, WILEY REIN  
CO-CHAIR, UAS PRACTICE

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Anna, former Deputy Assistant Secretary for Communications and Information for the National Telecommunications and Information Administration (NTIA) of the U.S.

Department of Commerce (DOC), specializes in regulatory, policy, and transactional matters related to domestic and international telecommunications and unmanned aircraft systems. Anna is co-chair of Wiley Rein's Unmanned Aircraft Systems Practice Group.

### Representative Experience

- As Deputy Assistant Secretary for Communications and Information at NTIA, developed and advocated communications and information policy on behalf of the Administration before the U.S. Congress, private industry, other federal agencies, state and local governments, foreign governments, international organizations, and private organizations. Also advised the White House on information and telecommunications policy issues. Oversaw the establishment of FirstNet.
- As Acting Administrator of NTIA, oversaw agency's enhanced TV Converter Box Coupon Program during the nation's successful transition to digital broadcasting.
- Advocated on behalf of former employer before state and federal government agencies regarding non-spectrum issues that affect the company's wireless and wireline assets.
- Served for 12 years in various positions at the Federal Communications Commission (FCC), including Deputy Chief of the International Bureau – where she developed and implemented Commission policy on international telecommunications and satellite spectrum – and Chief of the Network Services Division in the Common Carrier (now Wireline) Bureau.

- Advises clients on telephony and wireless matters, including spectrum, licensing, compliance, policy, and foreign ownership matters.
- Counsels on and analyzes U.S. and international regulation governing unmanned aircraft systems (UAS), including on matters before the Federal Aviation Administration (FAA), and unmanned aircraft spectrum licensing and allocation matters before the FCC, the NTIA, and the International Telecommunication Union (ITU).
- Successfully served as communications regulatory counsel on multi-billion dollar transactions.

### **Professional Experience**

- National Telecommunications and Information Administration, U.S. Department of Commerce
  - Deputy Assistant Secretary for Communications and Information (2009-2013)
  - Acting Administrator (2009)
- Vice President, State and Federal Regulatory, Government Affairs, Sprint Nextel (2006-2009)
- Federal Communications Commission
  - Deputy Chief, International Bureau (1999-2006)
  - Senior Legal Advisor, Office of Chairman William E. Kennard (2000-2001)
  - Chief and Deputy Chief, Common Carrier Bureau, Network Services Division (1997-1999)
  - Counsel to the Chief, Common Carrier Bureau (1994-1996)
  - Attorney, Cable Services Bureau, Consumer Protection Division (1994)
- Deputy Chief of Staff, National Economic Council, White House (1997)
- Democratic Counsel, U.S. Senate Committee on Commerce, Science, and Transportation, Subcommittee on Communication (1996-1997)



## Joshua S. Turner

PARTNER, WILEY REIN  
CO-CHAIR, UAS PRACTICE

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Josh represents clients in proceedings before the Federal Communications Commission (FCC), Federal Aviation Administration (FAA), and other federal agencies, as well as in federal and state court actions. In addition to regularly advocating in front of federal agencies, Josh argues in federal appellate court as well as in federal district court and state court.

### Representative Experience

- Represents clients in matters involving FCC and state regulation of wireless and wireline telecommunications services, including commercial mobile radio service (both voice and data), TCPA, broadband services such as cable and fiber, competitive provision of video services, and satellite services.
- Provides counseling on compliance with evolving regulation of unmanned aircraft systems (UAS, or more commonly, drones); tracks and analyzes (a) Federal Aviation Administration (FAA) rulemakings and enforcement actions, and (b) state and local regulation of UAS, with a particular focus on potential conflicts between different regulatory authorities.
- Specializes in federal appellate review of FCC decisions and both prosecution and defense of federal district court actions.
- Represents companies with communications law disputes in state and federal courts across the country.
- Particular experience in actions involving federal preemption.
- Provides large telecommunications carriers with national strategic legal advice on a variety of issues.
- Representative matters include:
  - *Montgomery County, MD v. US*, No 15-1240 (4th Cir.): Represented Intervenor CTIA in defending the FCC's Infrastructure Order, which interprets and implements limitations on local authority to deny wireless facility siting requests.
  - *State of Tennessee v. FCC*, No. 15-3291 (6th Cir.): Represented the State of Tennessee in a challenge to the FCC's rules prohibiting states from regulating broadband provision by their municipalities.
  - *Sprint Spectrum et al. v. Zoning Board of Adjustment of Paramus*, No. 14-2954 (3d Cir.): Represented T-Mobile in an appeal of a denial of a wireless siting application; the Third Circuit affirmed the finding below that a Distributed Antenna System would not be a viable alternative to the proposed site.

- *CTIA v. City and County of San Francisco*, No. 11-17707 (9th Cir.): Represented the wireless industry in a major First Amendment and preemption challenge to the City of San Francisco's requirement that retailers display health warnings at the point of sale for wireless phones. The team succeeded in securing an injunction against enforcement of San Francisco's law from the Ninth Circuit.
- *New York SMSA L.P. d/b/a Verizon Wireless et al. v. Town of Clarkstown*: In a major victory for wireless carriers, the Second Circuit affirmed a lower court decision finding that a local ordinance that legislated a preference for alternate technologies, including Distributed Antenna Systems, and regulated radio frequency (RF) interference was preempted by federal law under a field preemption theory.



### **Kathleen A. Kirby**

PARTNER, CO-CHAIR OF TMT PRACTICE, WILEY REIN

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Kathy represents media clients, including major radio and television group owners and programming networks, on a host of business and transactional issues as well as regulatory matters before the Federal Communications Commission (FCC). She has additional expertise in newsgathering, content regulation, and First Amendment issues. In addition, Kathy regularly counsels media organizations regarding statutory and regulatory interpretation of the Federal Aviation Administration (FAA) rules governing operation of unmanned aircraft systems (UAS), including application to newsgathering and use of video obtained therefrom. Regularly rated by Chambers USA as one of Washington, DC's "Leading Lawyers" in her field, Kathy is commended for "her work on First Amendment and FCC matters" and her "responsiveness and proactive approach" (2013). She is praised for being "highly intelligent, knowledgeable, and articulate," (2014) and is acknowledged for her "superior subject expertise, commitment to her clients, and great connections within the industry" (2010). Kathy co-chairs the Telecom, Media & Technology Practice, and serves on the firm's two governance committees, the Executive Committee and the Management Committee.

#### **Representative Experience**

- Advises clients on media transactions, including compliance with FCC ownership and attribution rules.
- Assists clients with drafting and negotiating network affiliation, retransmission consent and distribution agreements, multichannel use, syndicated programming, and other program licensing agreements.
- Assists clients with business and legal issues associated with digital and online distribution platforms, including content licensing, copyright, and defamation.
- Advises broadcast clients on FCC regulatory compliance, including rules governing indecency, political advertising, children's programming, closed captioning, Equal Employment Opportunity (EEO), license renewal, and reporting requirements.
- Counsels clients on rulemaking and legislative initiatives impacting the media.
- Counsels clients on newsgathering issues, including privacy, libel, audio-visual coverage of courtroom proceedings, access, fair use, and reporters' privilege.
- Drafts FCC comments and congressional testimony.
- Counsels media organizations regarding statutory and regulatory interpretation of the Federal Aviation Administration (FAA) rules governing operation of unmanned aircraft systems (UAS), including application to newsgathering and use of video obtained therefrom.

## **Professional Experience**

- General Counsel, Radio Television Digital News Association (1994-Present)
- Radio-broadcaster with extensive experience in news, operations, sales, and marketing (1978-1988)



## Hap Rigby

SENIOR POLICY ADVISOR, WILEY REIN

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Hap served for more than a decade as a professional staff member and policy advisor to members of the United States Senate, gaining valuable experience in public policy and the legislative process. He regularly advised members of the Senate Committee on Commerce, Science, and Transportation on media, wireline, wireless, internet, technology, privacy, and data security policy.

### **Representative Experience**

- Led efforts to draft and negotiate multiple pieces of legislation, including bills related to STELA reauthorization, broadband deployment (Mobile Now Act), Federal Communications Commission (FCC) reauthorization, retransmission consent reform, net neutrality, and data security and breach notification.
- Developed and managed non-legislative actions related to FCC proposals and orders, including broadcast exclusivity, pay-TV set-top boxes, broadband privacy, and universal service programs.
- Prepared statements and questions for more than a dozen hearings on issues including FCC oversight, broadband privacy regulation, the Telephone Consumer Protection Act, the universal service Connect America Fund, wireless broadband development, net neutrality, and video market competition.
- Advised on legislative efforts related to Communications Act reforms, the 2008 economic crisis, and the 2009 Stimulus.

### **Professional Experience**

- Professional Staff Member, U.S. Senate Committee on Commerce, Science, and Transportation (2011-2017)
- Legislative Assistant, Office of Senator Jim DeMint (2005-2010)
- Director of Correspondence and Policy Assistant, Office of Governor Haley Barbour (2003-2004)
- Campaign Volunteer, Barbour for Governor (2003)



**David E. Hilliard**  
SENIOR COUNSEL, WILEY REIN

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David serves as senior counsel to Wiley Rein LLP. He represents clients on a wide variety of matters before the Federal Communications Commission (FCC), including wireless technology, mobile radio operations, and mass media issues. David also represents clients before the Consumer Product Safety Commission in matters involving electrical products, including battery-powered devices.

### **Representative Experience**

- Represents clients on radio frequency exposure and safety matters, FCC Enforcement Bureau Proceedings, and spectrum allocation issues involving numerous radio services.
- Represents developers of equipment that operates under Part 15 and Part 95 of the FCC rules including, short range devices, ultra-wideband devices, digital products, and wireless medical devices.
- Counsels clients concerning equipment authorization and regulations including radio frequency emissions testing, 911 technical issues, hearing aid compatibility, and radio frequency identification (RFID) technologies.
- Advises clients on the regulation of devices under Part 18 of the FCC rules governing industrial, scientific, and medical equipment including wireless charging of batteries.
- Provides advice concerning FCC regulations on the marketing of equipment, as well as the development of new electronic products and experimental radio.
- Counsels clients on the privacy of radio communications and mobile radio regulation including cellular, PCS, paging, private, aviation, satellite, and marine.
- Advises clients on electromagnetic compatibility regulation and radio and television broadcasting technical issues.
- Advises clients on radio spectrum and communications regulation for emerging technologies involving unmanned aircraft systems (UAS), railroads, ships, and land vehicles in proceedings before the FCC, the Federal Aviation Administration (FAA), the National Telecommunications and Information Administration (NTIA), and the International Telecommunication Union (ITU).

### **Professional Experience**

- General Attorney, Federal Communications Commission, Cable Television Bureau (1975-1976)



**Katy M. Ross**  
ASSOCIATE, WILEY REIN

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Katy offers counsel to clients on a variety of telecommunications regulatory, transactional, and compliance matters.

### **Representative Experience**

- Assists clients with a variety of Federal Communication Commission (FCC) wireless and satellite licensing issues in a rapidly changing regulatory environment, frequently preparing comments, replies, and other legal pleadings.
- Counsels clients on the legal, policy, and procedural aspects associated with securing FCC approval for both complex mergers and acquisitions as well as smaller telecommunications transactions.
- Assists with drafting and negotiating commercial agreements regarding communications transactions.
- Advocates for communications clients' policy objectives.
- Counsels communications clients on compliance with the federal and state regulatory obligations.
- Has experience advising clients about broadband funding programs established by the National Telecommunications and Information Administration (NTIA) and the Rural Utilities Service (RUS). Assists clients with obtaining funding under these programs and counsels clients on compliance issues.
- Provides advice on U.S. unmanned aircraft systems (UAS) legal, regulatory, and public policy issues, including analysis of FCC, Federal Aviation Administration (FAA), and state law considerations.
- Maintains an active pro bono practice. Katy has represented indigent individuals in a landlord/tenant matter and in multiple Social Security benefits appeals.

### **Professional Experience**

- Intern, U.S. Attorney's Office, Southern District of Illinois, Organized Crime Drug Enforcement Task Force (2008)
- Legal Intern, Advocacy Forum-Nepal (2007)



**Sara M. Baxenberg**  
ASSOCIATE, WILEY REIN

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Sara offers counsel to telecommunications and mass media clients on a variety of regulatory, transactional, and compliance matters. She also counsels clients seeking to operate unmanned aircraft systems.

### **Representative Experience**

- Assists clients in developing strategy for and preparing comments, petitions, and other pleadings in complex proceedings before the Federal Communications Commission (FCC).
- Counsels telecommunications and mass media clients on compliance with federal regulatory obligations.
- Provides counseling on compliance with evolving regulation of unmanned aircraft systems (UAS).
- Assists clients in obtaining authorization from the Federal Aviation Administration (FAA) to operate UAS; tracks and analyzes state and local regulations of UAS, with a focus on potential conflicts between different regulatory authorities.
- Advises clients on compliance with federal obligations to make telecommunications services and devices accessible to persons with disabilities.
- Assists satellite clients seeking authorization from the FCC to launch and operate satellites or serve the U.S. market; advises satellite clients on compliance with federal regulations.
- Represents clients in FCC enforcement proceedings and assists clients with meeting requirements associated with enforcement decisions.
- Advises information and communications technology clients on Internet policy issues in the U.S. and abroad.
- Maintains an active pro bono practice.

### **Professional Experience**

- Legal Intern, Massachusetts Department of Elementary and Secondary Education (2013)
- Law Clerk, Center for Law and Education (2012)



**John Lin**  
ASSOCIATE, WILEY REIN

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John represents clients in a variety of telecommunications litigation and regulatory matters. He also counsels clients seeking to operate unmanned aircraft systems (UAS).

### **Representative Experience**

- Researches and drafts comments and other written submissions for clients in proceedings before the Federal Communications Commission (FCC) and other federal agencies.
- Counsels telecommunications clients on compliance with federal and state regulatory obligations.
- Advises clients on substantive issues affecting the telecommunications industry.
- Advises clients on legal, regulatory, and public policy issues affecting UAS, including analysis of FCC, Federal Aviation Administration (FAA), and state law considerations.
- Maintains an active pro bono practice with experience arguing a habeas corpus appeal before the U.S. Court of Appeals for the Sixth Circuit, litigating a Title VII Civil Rights case in federal district court, and writing an amicus brief in a First Amendment case before the U.S. Supreme Court.

### **Professional Experience**

- Law Clerk, U.S. House of Representatives, Committee on Oversight and Government Reform (2016)
- Student Attorney, University of Michigan Federal Appellate Litigation Clinic (2015)
- Law Clerk, U.S. Senate, Permanent Subcommittee on Investigations (2014)
- Judicial Intern, Chief Judge Gerald E. Rosen, U.S. District Court for the Eastern District of Michigan (2013)
- Assistant Director of Scheduling/Personal Aide, Office of Governor Rick Snyder (2011-2012)
- Administrative Assistant to the Campaign Manager, Rick Snyder for Michigan (2010)