

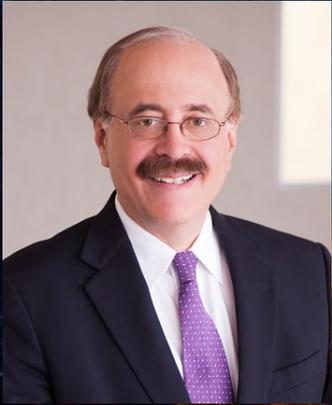
Morgan Lewis

NAVIGATING THE NEXT.

2021 TMT REGULATORY OVERVIEW: TELECOM, MEDIA, & TECH IMPACTS

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Presenter



Andrew D. Lipman

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Overview

- Federal Communications Commission
- Department of Justice
- Congress
- The Courts
- Administration Priorities

SECTION 01

FEDERAL COMMUNICATIONS COMMISSION

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Federal Communications Commission

- Composed of five Commissioners (maximum of three can be from one political party, including Chair)
- Commissioners nominated by President and confirmed by Senate (no filibuster)
- Commissioners have staggered, five-year terms (except when filling an unexpired term)
- FCC Chair appoints staff and controls agenda; first among equals
 - Customarily, Chair resigns from FCC at the end of Presidential term if there is a change in Administrations (and especially political parties); but it is not mandatory
 - Post-inauguration, President Biden named Commissioner Jessica Rosenworcel as Acting Chair
 - New Chair/Commissioner has not yet been nominated but expected soon, likely to be confirmed in Summer/Fall (based on prior changes of Administrations)

FCC Membership 2021

- Jessica Rosenworcel (D), term expired 6/30/2020 (can hold over until end of 2021)
 - Second appointment as Commissioner
 - Acting Chair, expected to accept re-nomination if she remains Chair
- Geoffrey Starks (D), term expires 06/30/2022
 - Confirmed by Senate in January 2019
 - Former prosecutor with experience in FCC Enforcement Bureau
- Brendan Carr (R), term expires 6/30/2023
 - Former advisor to Pai, briefly served as General Counsel of FCC
 - Confirmed by Senate Commerce committee in January 2019
- Nathan Simington (R), term expires 6/30/2024
 - Former senior advisor at NTIA
 - Confirmed by the Senate on 12/8/2020

Post-Election Changes at FCC

- Biden could designate Commissioner Rosenworcel or Commissioner Starks as the permanent FCC Chair (instead of just appointing as Acting Chair)
 - Commissioner Rosenworcel is considered a candidate for permanent Chair
- Former Commissioner Mignon Clyburn is an unlikely candidate for FCC Chair in light of her recent activities, including her support of telecom mergers and appointment to a corporate board
- If Commissioner Rosenworcel is not chosen as Chair, Biden would likely bring in an outsider: a Dark Horse with policy or industry experience
 - Potential candidates include Biden transition team members
 - John Williams, Senior Counselor for House Judiciary
 - Edward “Smitty” Smith, DLA Piper
 - Paul de Sa, former FCC official and analyst
- Regardless, the new Chair will push forward more consumer-focused policy initiatives

FCC Initiatives Prior to Fifth Commissioner Confirmation

- Until the fifth FCC Commissioner (a Democrat) is confirmed, regardless of the Chair decision, FCC initiatives will need to be bipartisan in nature given the 2-2 party split.
 - The more progressive agenda will be postponed until the Democrats have a majority.
- Likely noncontroversial items: spectrum policy, closing the Digital Divide, USF, national security strategy, enforcement initiatives
- Likely controversial items: Net Neutrality, Section 230, and some aspects of competition policy related to broadcast ownership

COVID-19 Telehealth Program

- Program uses appropriated by Congress and administered by USAC
- CARES Act appropriated \$200 million to help healthcare providers provide connected care services to patients at home or mobile locations
 - Application window closed on June 25, 2020
 - FCC issued awards for 539 applications in the initial round
- Consolidated Appropriations Act, 2021 appropriated \$249.95 million for second round of COVID-19 Telehealth funding
 - FCC adopted rules for Round 2 on March 30, 2021 that include improvements to the application process and refinement of evaluation metrics
 - At least \$150 million to be awarded during “initial commitment phase”, followed by “final commitment window” (amount of final awards to-be-determined)
 - Application window is April 29, 2021 to May 6, 2021

Broadband Data Collection

- There have been longstanding bi-partisan concerns on Capitol Hill and at the FCC that broadband data available through the FCC Form 477 are insufficient/inaccurate
 - “One served, all served” assumption from census block-level reporting
 - Lacks verification process to ensure accuracy in reporting
 - Key concern for Acting Chair Rosenworcel as Commissioner (e.g., data inaccuracy-based objections to RDOF process)
- Under Chairman Pai, FCC created the Broadband Opportunity Data Collection to require more granular and precise data on broadband availability that would be subject to challenge
- In 2020, Congress passed and the FCC implemented the Broadband DATA Act’s additional specific requirements for collection of broadband data
 - Requires use of geographically specific polygons and address/location lists (fixed); propagation maps/models (wireless)
 - Established Broadband Serviceable Location Fabric and other verification processes
- In January 2021, FCC adopted further refinements for the new collection and a challenge process
- In February 2021, Acting Chair Rosenworcel established Broadband Data Task Force to oversee implementation of data and mapping improvements
- First filing deadline expected late in 2021 (to be announced at least 6 months before filing is due)

Spectrum Policy

- Biden and Democratic FCC unlikely to make dramatic changes to 5G spectrum policy
- Focus to remain on making new spectrum available for 5G services
 - Additional attention expected on serving unserved and underserved areas – closing the Digital Divide
 - FCC likely to continue preemption of local government restrictions that hinder 5G and local fiber infrastructure deployment
- FCC expected to continue push for clearing of additional government spectrum; NTIA may resist on behalf of DoD and other government agencies and seek sharing of government spectrum instead
- Auctions will be unaffected (i.e., no delays), including 3.45 and 2.5 GHz
- Decision related to L-Band may be modified if presented with strong factual, real-world evidence of harmful interference that cannot be mitigated

Additional FCC Policy Initiatives

- Closing the Digital Divide
 - Biden FCC expected to make broadband expansion a priority
 - Biden supports increased federal support of municipal broadband and preventing states from blocking municipalities and rural co-ops from building publicly owned broadband networks
 - Expect increase focus on broadband and connectivity initiatives to serve unserved and underserved communities
 - Democratic FCC likely to push for more granular broadband deployment data
- Universal Service Fund
 - Rural Healthcare Program funding and RDOF expected to increase – limited by available Universal Service Fund
 - FCC likely to explore ways to broaden the contribution base to support more USF initiatives
 - Broadband baseline definition of 25/3 Mbps likely to increase

Additional Policy Initiatives

- National Security
 - FCC expected to continue with efforts to ensure integrity of telecommunications and internet network infrastructure and to address national security threats
 - Anti-Chinese measures focused on carriers, apps, equipment manufactures, and submarine cables expected to continue into Biden Administration
- Enforcement
 - Enforcement initiatives associated with finding and remedying “waste, fraud, and abuse” of USF funds expected to continue
 - Investigations of E-Rate and Rural Healthcare service providers will also proceed unabated
 - Biden FCC also expected to be aggressive on ensuring accuracy of carrier reports

Net Neutrality

- In 2015, the Democratic-led FCC classified broadband as a Title II telecommunications service, giving the FCC more regulatory authority over broadband service providers
 - The FCC also laid out three bright-line Net Neutrality rules that prohibited broadband service providers from blocking or throttling legal internet traffic or prioritizing certain traffic for payment
- In 2018, under Republican leadership, the FCC repealed the 2015 order, classifying broadband as a Title I information service and eliminating the FCC's authority to impose Net Neutrality rules
 - Internet service providers were required to publicly disclose if traffic is blocked, throttled or prioritized — though operators are not prohibited from those activities
- A Biden-appointed FCC Chair would be expected to look to reinstate provisions of 2015 order, reclassify broadband service as telecommunications service, and reestablish greater authority over broadband service providers

Net Neutrality

- Road to new Net Neutrality order likely to take a year or more, and FCC expected to need time to assemble factual record and develop legal analyses to reinstate, in essence, the 2015 order
- A new Net Neutrality order likely to bring back 2015 “bright line” rules and move to classify internet service providers as Title II carriers (subject to common carrier regulations, including enforcement)
 - No blocking – no blocking of lawful content, applications, services, or non-harmful devices
 - No throttling – cannot impair or degrade lawful internet traffic on the basis of content, application, or service, or use of a non-harmful device
 - No paid prioritization – prohibited from managing a broadband network to, directly or indirectly, favor some traffic over other traffic (a) in exchange for consideration (monetary or otherwise) from a third party, or (b) to benefit an affiliated entity
 - “No blocking” and “no throttling” rules subject to reasonable network management exception – practices primarily used for and tailored to achieving a legitimate network management purpose, but not for other business purposes.

Net Neutrality

- Under Title II, the FCC would technically have the authority to impose rate regulation and force unbundling
- However, the FCC is unlikely to institute new Net Neutrality requirements that extend beyond the scope of the 2015 order (which employed a “light-touch” approach for the use of Title II)
 - No rate regulation,
 - No unbundling of last-mile facilities,
 - No tariffing,
 - No cost accounting rules, and
 - No new federal taxes or fees
- Appeal guaranteed
 - FCC will need to justify reversing its 2018 order and explain to the D.C. Circuit why the Court’s rationale that upheld the 2018 order’s classification of broadband internet services as an “information service” under Title I allows the FCC to reclassify the broadband services as a “telecommunications service”
 - D.C. Circuit may suffer from Net Neutrality fatigue – third order on appeal since 2015
 - Court may question giving FCC *Chevron* deference given fluctuating decisions
 - No guarantee that D.C. Circuit will agree with the FCC second attempt at applying Title II, and legislation may be needed to institute Net Neutrality safeguards

Section 230

- Section 230 of the 1996 Communications Decency Act shields online publishers from liability for content generated by users
- Calls for reform of Section 230 have increased; Biden appears to have supported repeal of Section 230 (wholesale elimination is not, however, expected)
- While criticism of Section 230 has come from both sides of the political aisle, Democrats and Republicans are not unified in their concerns
 - Democrats say too much hate, election meddling, and misinformation gets posted online
 - Republicans claim their ideas and candidates are censored
- Uncertain whether the FCC has the authority to interpret Section 230
- FCC will most likely defer to Congress

Competition Policy

- FCC likely to scrutinize consolidation in the wireline, wireless, cable, broadband, and broadcast industries more closely during its public interest analysis
 - Likely to construe the markets impacted by a proposed merger more narrowly and find greater level of concentration
 - Also likely to be more skeptical of competitive entry arguments
- FCC expected to strictly enforce merger conditions, especially ones related to network deployment and buildout obligations
- Relaxation of limitations on media ownership not expected
 - FCC may eliminate the UHF Discount (again) but would likely need to address impact on national ownership cap at the same time
 - Attributable interests associated with JSAs, SSAs, and LMAs expected to be reexamined
 - *Prometheus IV* decided by SCOTUS leaves the FCC discretion to change media ownership rules
- No pending telecom mergers are expected to trigger competition policy concerns; as things stand currently, they are not controversial.

SECTION 02

DEPARTMENT OF JUSTICE

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Department of Justice – Antitrust Division

- President nominates and the Senate confirms the Assistant Attorney General for the Antitrust Division
- Nomination and confirmation process expected to take several months
- Importance of DOJ for most telecom mergers; FTC for cable, but not always and not recently
- FTC still relevant in certain media and tech combinations and privacy areas

Post-Election Changes at Antitrust Division

- Few clues to new head of Antitrust Division
 - Historically, Democrats have appointed a private practitioner rather than an academic or career DOJ lawyer; Biden expected, however, to select a more policy-driven individual to lead the Antitrust Division
 - If Senator Warren (D-MA) influences decision, antitrust enforcement head would likely be more aggressive overall
 - Jonathan Sallet (former high-ranking DOJ Antitrust and FCC official) and Phil Weiser (AG for Colorado) rumored candidates for the position – both with longtime telecom antitrust experience.
- Decisions on merger approval, litigation, and enforcement actions are made by Antitrust AAG and other mid-level political appointees based on recommendations of professional staff
 - Individual case decisions were historically made largely on a non-political basis
 - Political factors may have come into play in limited instances during the most recent administration in who was targeted by the antitrust laws
 - Republicans tend to favor more flexibility for mergers/acquisitions, while Democrats are suspicious of size
 - Previous AAG Delrahim was more aggressive in some areas than expected

Antitrust Outlook

- Biden expected to support antitrust enforcement to stop industry concentration that unfairly limits competition
- Supports investigations into Big Tech, but has stated it was “premature” to make final judgement
- His hand now forced with initiation of Big Tech lawsuit
 - Litigation against Big Tech expected to continue; resolution is years away barring capitulation
 - Republican and Democratic State AGs expected to continue to push the litigation forward
- Expect somewhat more aggressive review of horizontal mergers, especially where combined market share < 60%
 - 4 to 3 mergers less likely than in previous years
- Trend toward structural remedies (i.e., divestitures) expected to continue, but Biden AAG may be more open to considering behavioral remedies if deemed effective
- State AGs will continue as factors in antitrust enforcement
 - Democratic AGs may turn their attention to more traditional consumer protection issues assuming that the Antitrust Division is in line with their objectives

Antitrust Outlook

- Resolution of pending transactions currently subject to antitrust review may be delayed by change of Administration if significant competition policy issues are involved
- None of the currently pending horizontal teleco or infrastructure deals are inherently problematic, but vertical deals may have conditions tacked on in order to close
- Less likely to see acceptable combinations of large incumbents/providers in cable, telco, satellite, and wireless space
- DOJ expected to continue to view broadcast market narrowly, which may limit future industry consolidation
- Congressional action to modify scope of antitrust review possible but currently no clear path forward or consensus view

SECTION 03

CONGRESS

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117th Congress

- House: all 435 seats were up for election; Democrats retained majority but with a smaller margin
 - 218 to 211, with 6 vacancies currently due to deaths and resignations
- Senate: 33 of 100 seats were up for election
 - Democrats held 35 seats not up for election, only 12 were up
 - Republicans held 30 seats not up for election, 21 were up
 - Democrats picked up both remaining seats in Georgia run-off elections to create a 50/50 split
 - 2 Independents (not up for election) caucus with Democrats
 - VP Harris has the tie-breaking vote
 - Neither party has the 60 seats needed to break a filibuster

117th Congress – Committee Leadership

- “Power sharing” agreement gave Democrats leadership of committees
- House
 - Democrats retained majority by a slightly smaller margin, House Energy and Commerce Committee Chair Frank Pallone (D-NJ) voted in December to retain position
 - Mike Doyle (D-PA), Telecom subcommittee Chair
 - GOP selected Cathy McMorris Rodgers (R-WA) is Energy and Commerce Committee ranking member
 - Bob Latta (R-OH), Telecom subcommittee ranking member
- Senate
 - Maria Cantwell (D-WA) is Chair of the Commerce Committee
 - Roger Wicker (R-MS) is Ranking Member of the Commerce Committee (formerly Committee Chair)

117th Congress – Policy Outlook

- 116th Congress passed several FCC-related bills, including process reforms and auctioning additional spectrum for 5G, but efforts at a major rewrite of the 1996 Telecom Act made no progress
- Bipartisan legislative initiatives remain possible, although likely focused on narrower tech/telecom issues
 - Broadband infrastructure spending
 - Consumer privacy and data protection
 - Increasing interest in both parties, but approaches are likely to diverge
 - Spectrum sharing
 - Cybersecurity/China
 - Antitrust reform
- Changes to Communications Decency Act Section 230 expected to be debated

SECTION 04

THE COURTS

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Telecommunications Policy and the Courts

- All FCC final decisions are subject to review by U.S. Courts of Appeals
 - 75-80% of appeals result in affirmance
 - Stays are highly unlikely, but still occur (e.g., inmate calling)
 - But remands can alter the FCC agenda by forcing the agency to reopen proceedings
 - New FCC leadership can also voluntarily withdraw orders that are on appeal
- Most cases go to D.C. Circuit, which has tended to give more deference to FCC policy decisions in recent decisions
 - Current make up; future make up of Court
 - Current make up (4 Republicans – 6 Democrats – 1 vacancy; Tatel (D) expected to move to senior status)
 - Most notably, affirming Open Internet Order
 - Spectrum issues must be brought to D.C. Circuit

Telecommunications Policy and the Courts

- Third Circuit review of broadcast ownership rules has been particularly critical, resulting in multiple remands (*Prometheus* decisions)
 - FCC’s 2017 orders vacated on appeal in 2019, and agency has issued new ownership rules
 - Supreme Court granted cert in October 2020 to *Prometheus IV* and oral argument held in 2021; Decided April 1, 2021
 - SCOTUS reversed, holding that the FCC considered the record evidence and reasonably concluded that three ownership rules were no longer necessary to promote competition/localism/viewpoint diversity
 - The FCC need not commission its own studies and can disagree with interpretations advanced in the record in making predictive judgments as to impacts of regulatory changes
 - SCOTUS found FCC’s 2017 order “reasonable and reasonably explained”
 - Other circuits are usually more deferential than D.C. Circuit to FCC (e.g., 10th Circuit on USF/ICC; 8th Circuit on Business Data Service deregulation)
- Most (not all) circuit courts have majority of Democratic appointees, but this trend reversing over past few years (but expected to reverse again under Biden)
 - Nominees to courts (even Supreme Court) not subject to filibuster in Senate

US Supreme Court

- Perhaps most significant longstanding impact of President Trump
- Senate Republicans lowered threshold of affirmative votes for confirmation of Supreme Court nominees in 2017 to 51 – no filibuster rule in effect
- Potential for “court packing” legislation (e.g., increasing number of Supreme Court justices or imposing term limits) but Biden looking for other judicial reforms as alternatives
- Few telecom cases make it to the Supreme Court and, historically, few of those have been 5–4 decisions
 - Since 1996, Supreme Court has tended to uphold FCC on implementation of the Telecom Act
 - *Chevron* deference challenges likely to have most impact on FCC
- Four justices required to grant cert to hear cases

SECTION 05

ADMINISTRATION PRIORITIES & POLICIES

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Introduction

- Party platforms are drafted by activists at the party convention and do not always reflect the candidate's preferences or active engagement
- Candidates' policy statements do not always result in tangible results post-election; many require Congressional action to enact
- Biden administration is likely to move toward
 - greater regulation of the technology sector
 - more competition, less confrontation with China – do not expect a major change in substance but a change in tone
 - closing the Digital Divide, especially for vulnerable populations (e.g., urban and rural) where obstacles in network deployment, affordability, and adoption still exist
- Unclear how these general preferences translate into specific FCC/DOJ policy outcomes in many areas

Positions (Overview)

- Telecom Act rewrite is a possibility but is slim this session, given the avalanche of other Biden priorities, the complexity and controversial nature of the issues, the lack of a bipartisan consensus, and the lack of Democratic Progressive interest outside of Net Neutrality
- Cable regulation regarding Net Neutrality is possible but unlikely to include price regulation
 - More intrusive regulations likely unwarranted because of 5G wireless rollout and price incentive created by current wireline broadband market structure
- Expect stronger efforts, with differing levels of success, toward competition policy, antitrust enforcement, privacy policy, cybersecurity, and Section 230 reforms
- Will include telecom and broadband spending in Biden infrastructure package
 - \$100 billion in funding for “future proof” broadband infrastructure (including on tribal lands)
 - Prioritizing networks affiliated with local government/non-profit/co-operatives
 - Potential for emphasis on rate regulation v. subsidies to make broadband affordable (i.e., seeking “solution to reduce internet prices for All Americans”)

Competition Policy and Antitrust

- Biden likely to appoint aggressive regulators to key antitrust posts to pursue, or at least attempt, strong competition policy through regulation and enforcement actions
- Biden DOJ also expected to continue with Big Tech lawsuits; additional counts may be added later to address issues left out of AG Barr's complaint
- Antitrust enforcement is always tempered by the courts (e.g., US v. AT&T/TWX); therefore, for parties willing to push back, a judge may still approve the deal (e.g., State AGs v. T-Mobile/Sprint).
- Congressional changes of antitrust law possible but clearly no consensus on what to do

Internet and Net Neutrality

- Biden support for open internet not only from a Net Neutrality perspective but also as a matter of social justice; push likely to come from Congress and FCC
- Section 230 reforms and the effort to regulate social media will continue but resolution uncertain
- Tech companies likely more willing to negotiate with Democrats on privacy issues but less willing on competition concerns
- Congressional action will be needed as Executive Branch has limited authority to modify and FCC will likely defer to Congress
- Section 230 exempts “interactive computer service” providers from being treated as a “publisher or speaker” for user-posted content and provides immunity from civil liability for good faith efforts to police obscene or otherwise objectionable content on their service

Spectrum Policy

- No stated positions on these issues
- Biden and Democratic FCC unlikely to make dramatic changes to spectrum policy for 5G
- Focus to remain on making new spectrum available for 5G deployments
- Could see further push for sharing of government spectrum

Broadband Deployment/Adoption

- Pledges infrastructure spending to boost domestic economy, including telecom facilities, and address Digital Divide
- Biden pushing for an increase in infrastructure spending; a goal shared by congressional Democrats and some Republicans.
 - Biden and Congressional Democrats have each proposed their own infrastructure plans
 - Biden's is contained in his four-year, \$2 trillion "American Jobs Plan"; House Democrats passed a bill in 2020 that would spend \$1.5 trillion over 10 years
 - However, those amounts are high-water marks both in magnitude and timing; federal infrastructure spending is limited by the realities of congressional politics and the need for an incoming Biden administration to first address other crises facing the country
- Expected to support "social safety nets," Lifeline and other Universal Service programs, as well as Rural Healthcare Programs and RDOF

Consumer Privacy/Data Security

- Democratic platform aggressive in expanding scope of privacy protection
- Consumer privacy issues expected to be a concerned voiced by Congressional leaders and will likely push Biden administration more toward increasing privacy protection
- Biden still likely to want to balance privacy protections against law enforcement and national security concerns

Media Ownership/Spectrum Ownership

- No explicit position on FCC ownership limits
- Democrats customarily support keeping broadcast ownership limits at current levels (or possibly tightening) based on competition and diversity of voices grounds
- Broadcasters unlikely to have 39% national TV coverage limit (with UHF Discount) lifted or a relaxation of other ownership limits

China/National Security

- Biden is not likely to “go it alone” against China and is expected to work closely with European allies and build an international coalition against practices deemed unfair and unjust
- Chinese technology issues are expected still to be considered national security concerns, given the previous privacy and data security vulnerabilities
- Biden has also stressed the importance of bringing critical supply chains back to the U.S. as a matter of national security

Coronavirus COVID-19 Resources

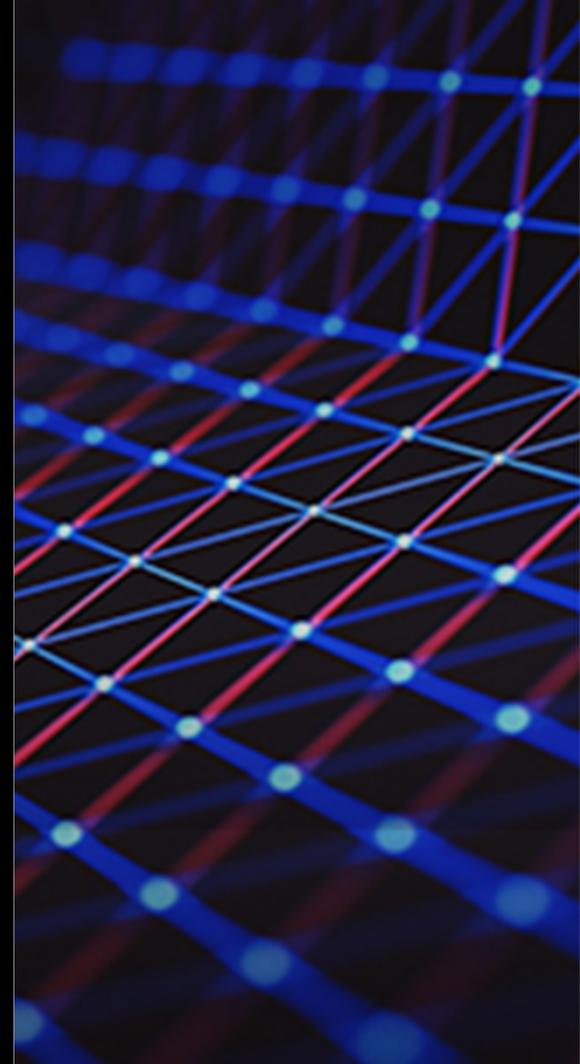
We have formed a multidisciplinary **Coronavirus/COVID-19 Task Force** to help guide clients through the broad scope of legal issues brought on by this public health challenge.

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To help keep you on top of developments as they unfold, we also have launched a resource page on our website at

[www.morganlewis.com/
topics/coronavirus-
covid-19](http://www.morganlewis.com/topics/coronavirus-covid-19)

If you would like to receive a daily digest of all new updates to the page, please visit the resource page to [subscribe](#) using the purple “Stay Up to Date” button.



Biography



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Andrew Lipman has spent more than 30 years developing Morgan, Lewis & Bockius' Telecommunications, Media and Technology Group into one of the largest practices of its kind in the nation. He practices in virtually every aspect of communications law and related fields, including regulatory, transactional, litigation, legislative and land use. The TMT Group is international in scope, representing clients in the U.S., Central and South America, Europe, Asia and other parts of the world.

Andy has been involved in nearly every new legal and regulatory policy at the Federal Communications Commission (FCC), at state public service commissions, in Congress and before courts to open the U.S. local telephone market to competition. He also helped shape crucial provisions of the Telecommunications Act of 1996 and has used similar approaches to promote the opening of foreign markets. He also obtained one of the first competitive local service and interconnection agreements in continental Europe and the first competitive fiber network application in Japan. Andy's expansive practice includes the strategic analysis of companies' telecom user agreements, including renegotiating existing agreements, and when necessary, negotiating new, more favorable telecom user agreements.

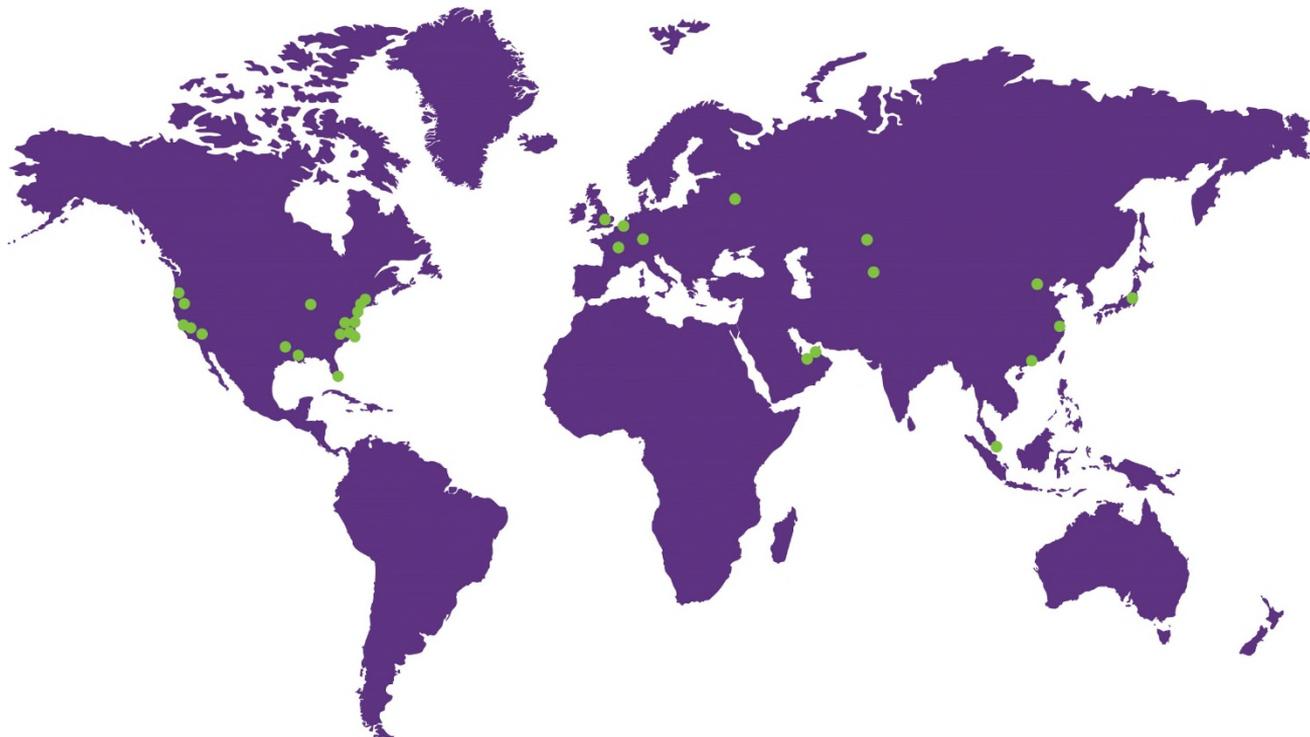
A frequent author and speaker on telecommunications related topics, Andy has published more than 170 articles and is the author of five books, including two Dow Jones books on telecommunications. He has appeared as a commentator on National Public Radio, C-SPAN, Bloomberg News Network and ABC News.

Our Global Reach

Africa
Asia Pacific
Europe
Latin America
Middle East
North America

Our Locations

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Boston
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Century City
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Dallas
Dubai
Frankfurt
Hartford
Hong Kong*
Houston
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Miami
Moscow
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