SQUIRE PATTON BOGGS

Paul C. Besozzi

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About Paul

Paul Besozzi concentrates his practice in the wireless, broadband and emerging technology areas.

His extensive experience of more than 40 years in the telecommunications field includes regulatory, transactional, legislative and litigation matters for clients ranging from wireless service and infrastructure providers to resellers of long-distance service, including cellular, personal communications services, specialized mobile radio, point-to-point microwave, advanced wireless services and other emerging wireless technologies.

Paul represents or advises clients before the federal and state regulatory and policy-making agencies and organizations, including the Federal Communications Commission, National Telecommunications and Information Administration, Congress and state public service commissions, in matters relating to rulemaking, ratemaking, licensing, spectrum auctions, adjudication, enforcement, compliance and grant opportunities. These include national security-related matters involving the Federal Communications Commission (FCC) and Department of Commerce. Paul was actively involved in the FCC spectrum transition of the lower C Band over the 2020-2025 period for the Relocation Payment Clearinghouse (RPC), serving on the RPC Executive Committee for a portion of that time.

He specializes in advising clients on regulatory compliance, enforcement, rulemaking and legislative issues relating to the Telephone Consumer Protection Act and the Junk Fax Act overseen by the FCC, and works with litigation colleagues on these issues. He further works with applicants and appellants dealing with the Universal Administrative Company, including E-Rate and contributor issues. and data privacy and security requirements as applied to telecommunications carriers and broadband internet service providers.

His extensive transactional experience includes asset and stock transactions and a broad variety of commercial and business agreements for the entities he advises, including spectrum leases, interconnection arrangements and wireless-infrastructure-related agreements. Paul was a partner in his own telecommunications law firm for a decade, after serving as general counsel and minority counsel to the US Senate Committee on Armed Services. Paul served as a member and editor of the *Georgetown Law Journal* during law school and was elected Phi Beta Kappa while attending Georgetown University's School of Foreign Service.

Experience

- Represented wireless licensees in various asset and other transactions totaling more than US$500 million.
- Represented trade association in various state and federal proceedings setting network access rates.
- Represented various appellants challenging USF funding decisions.
- Represented telecom provider in connection with multijurisdictional regulatory approvals in five major ownership transactions involving in excess of US$2billion

Credentials

Education

- George Washington University, M.B.A., 1977
- Georgetown University Law Center, J.D., 1972
- Georgetown University School of Foreign Service, B.S.F.S., *cum laude*, 1969

Admissions

- District of Columbia, 1973
- Virginia, 1972

Courts

- U.S. Court of Appeals for the 3rd Circuit
- U.S. Court of Appeals for the 4th Circuit
- U.S. Court of Appeals for the Armed Forces
- U.S. Court of Appeals for the District of Columbia
- U.S. Supreme Court

Memberships & Affiliations

- Member, Executive Board, HoyaGateway, 2015-2020
- Member, Board of Governors, Hoyas Unlimited, 2012-2018
- Member , Board of Choya Hoop Club, 2023-present
- Member, Federal Communications Bar Association, 1984-present
- Member, Board of Governors, Georgetown University Alumni Association, 1993-2016
- Member, Board of Visitors, Edmund A. Walsh School of Foreign Service, Georgetown University, 2001-2012
- President, Georgetown University Alumni Association, 2008-2010
- Member, Board of Directors, Georgetown University, 2008-2010
- Member, Da Vinci Council, National Italian American Foundation

Recognitions

- Martindale-Hubbell AV Preeminent Peer Review Rated
- Recognized as Arcritas Star Lawyer, 2017, 2018
- Recognized as a "Washington Super Lawyer," Telecommunications, *Super Lawyer* magazine, 2012-2014, 2017-2018, 2018-2019, 2019-2026
- Recognized for Communications Law in *The Best Lawyers in America, 2024-2026*
- "Top Rated Lawyers," *The Wall Street Journal*, December 2015
- Recommended for Telecoms and Broadcast: Regulatory, *Legal 500*, 2015
- Profiled in "Legal Leaders: Washington DC and Baltimore's Top Rated Lawyers," *ALM*, 2013
- *Who's Who In American Law*
- *Who's Who Among Practicing Attorneys*
- John Carroll Award for service to Georgetown University, April 2005
- William Gaston Award for service to Georgetown University, January 1996

Expertise

Services

- Corporate
- Data Privacy, Cybersecurity & Digital Assets
- Communications

Publications and Speaking Engagements

During his career, Paul periodically has authored various articles and reports in trade publications covering the wireless and other components of the telecommunications industry, as well as appearing on panels and at conferences. A sample of such efforts includes:

- Author, Key Changes to Virginia Telephone Privacy Protection Act Take Effect, *National Law Review*, January 15, 2026.
- Author, District Courts Empowered to Independently Analyze FCC TCPA Interpretations, *National Law Review*, July 01, 2025.
- Author, New Class Action Threat: TCPA Quiet Hours and Marketing Messages, *National Law Review*, March 14, 2025.
- Author, Circuit Court Employs Loper Bright to Knock Out the FCC's TCPA One-to-One Consent Rule, *National Law Review*, January 28, 2025.
- Author, US Cyber Trust Mark Program at Hand After White House Launch Announcement, *National Law Review*, January 10, 2025.
- Author, FCC Moves Forward with Proposed Rules for Use of Artificial Intelligence with Robocalls and Political Advertisements, *National Law Review*, August 19, 2024.
- Author, FCC to Consider Formal Rules for Use of Artificial Intelligence and Robocalls, *National Law Review*, July 23, 2024.

- Author, FCC Rules Voice-Cloned Robocalls Are Covered by the TCPA as Artificial/Pre-Recorded, *National Law Review*, February 17, 2024.
- Author, FCC Initiatives on Data Privacy, Internet Network Security and Data Caps, *National Law Review*, June 21, 2023.
- Author, Federal Communications Commission Authorizes Use of Automated and Prerecorded Voice Technology Outreach for Certain Health Policy Renewals, *National Law Review*, February 6, 2023.
- Author, FCC Acts to Protect Consumer Privacy from Unwanted Ringless Voicemails, *National Law Review*, November 22, 2022.
- Author, Second Circuit Holds Fax Surveys Offering $ for Participating Are Not Unsolicited Advertisements Under the TCPA, *National Law Review*, January 10, 2022.
- Author, FCC Proposes Action Against Foreign-Initiated Robocalls, *National Law Review*, October 5, 2021.
- Author, No Waiver of Arbitration Right and Arbitrability Determination for Arbitrator, *National Law Review*, August 2, 2021.
- Author, New York Adds Texting to Telemarketing Law, *National Law Review*, Friday, July 23, 2021.
- Author, "House Robocall Legislation Taking Shape," *TCPAWorld*, June 12, 2019.
- Author, "A TCPA call is 'made': Successful Attempt Or Actual Receipt?," *TCPAWorld*, June 7, 2019.
- Author, "DEEPER DIVE: FCC Affords Legal Foundation For Aggressive Blocking Of Unwanted Robocalls," *TCPAWorld*, June 6, 2019.
- Author, "Profit Motive Does Not Magically Transform Data Request Fax Into Unsolicited Advertisement," *TCPAWorld*, May 29, 2019.
- Author, "It Just Got Real: TRACED Act Barrels Across The Senate Goal Line," *TCPAWorld*, May 23, 2019.
- Author, "Pai To State AGs: Unwanted Robocalls Require Comprehensive Response," *TCPAWorld*, May 22, 2019.
- Author, "Washington Update: TCPA Week In the Capital," *TCPAWorld*, May 16, 2019.
- Author, "TRACED Act Train Rolls On," *TCPAWorld*, May 8, 2019.
- Author, "Heavy Duty Ruling: Sheer Call Numbers Do Not Equate To An ATDS," *TCPAWorld*, May 7, 2019.
- Author, "Building a Record: House Subcommittee Plumbs Depths Of Legislative Solutions To Illegal Robocalls," *TCPAWorld*, May 1, 2019.
- Author, "Huge TCPA Impact?: Congressional Focus On Robocall Legislation Shifts To House of Representatives With Hearing and New Bills," *TCPAWorld*, April 29, 2019.
- Author, "Primary Jurisdiction Patience Prevails In Reassigned Number Case," *TCPAWorld*, April 18, 2019.
- Author, "Legislative Initiatives To Address Illegal Robocalls Continue," *TCPAWorld*, April 15, 2019.
- Author, "TCPA Senate Testimony: Senate Focus On Combating Illegal 'Robocalls' Continues," *TCPAWorld*, April 11, 2019.

- Author, "Senate TRACED Act Bandwagon Rolls On," *TCPAWorld*, April 10, 2019.
- Author, "Commerce Entreats FCC To Retain Government Contractor TCPA Immunity," *TCPAWorld*, April 9, 2019.
- Author, "Actions Speak Louder Than Words: Monitronics Fails To Escape TCPA Morass," *TCPAWorld*, April 8, 2019.
- Author, "Yet More Senate Commerce Committee Robocall Focus," *TCPAWorld*, April 5, 2019.
- Author, "Seven More Senators Join the TRACED Act Bandwagon," *TCPAWorld*, April 4, 2019.
- Author, "Senate Commerce Committee Favorably Reports TRACED Act," *TCPAWorld*, April 3, 2019.
- Author, "TRACED Act Scheduled for Senate Commerce Committee Action," *TCPAWorld*, April 2, 2019.
- Author, "When Is A TCPA Violation 'Willful?'," *TCPAWorld*, April 1, 2019.
- Author, "Update: Senate Version of TRACED Act Gains Yet More Bipartisan Support," *TCPAWorld*, March 27, 2019.
- Author, "Indiana Legislature Dials Up 'Do Not Call' Statute Revisions," *TCPAWorld*, March 25, 2019.
- Author, "Senate Version of TRACED Act Gains More Bipartisan Support," *TCPAWorld*, March 15, 2019.
- Author, "The TCPA Legislative Beat Goes On: TRACED Act Emerges in the House," *TCPAWorld*, March 14, 2019.
- Author, "Combatting Illegal Robocalls: FCC's 'Top Consumer Protection Priority'," *TCPAWorld*, March 13, 2019.
- Author, "TCPA to be Amended?: A Fourth 'Robocall' Bill Dropped Into the Legislative Hopper," *TCPAWorld*, March 8, 2019.
- Author, "Light at the End of the TCPA Tunnel for Subway?," *TCPAWorld*, March 4, 2019.
- Co-author, "Federal Communications Commission Tackles the 'Reassigned Number Problem'," *The National Law Review*, July 24, 2017.
- Moderator, "Small Cells – Surmounting the Obstacles to Deployment," Above Ground Level (AGL) Regional Conference, April 6, 2017.
- Speaker, "Digital Media – Net Neutrality: A 2015 Update and Beyond," ABA Forum on the Entertainment and Sports Industries Annual Meeting, October 10, 2015.
- Co-author, "FCC Becomes Latest Agency to Increase Consumer Privacy and Data Security Enforcement," *Privacy & Cybersecurity Law Report,* August/September 2015.
- Speaker, "Spectrum, Technology and Tower Trends," Above Ground Level (AGL) Regional Conference, June 15, 2015.
- Guest, "Municipal Broadband Developments," Capital Thinking Radio Show, March 19, 2015.
- Guest, "Developments on E-Rate Reforms and the Federal Communications Commission's Report and Order," Capital Thinking Radio Show, July 24, 2014.
- Guest, "Net Neutrality," Capital Thinking Radio Show, May 29, 2014.

- Co-author, "For the FCC, a Tricky Balancing Act in Clarifying TCPA Requirements," *Bloomberg BNA,* April 25, 2014.
- Speaker, "The FCC's Tough New Telemarketing Rules: What Every Business Needs to Know," Bloomberg BNA Webinar, November 13, 2013.
- Moderator, "Site Acquisition: Where Will All the Wireless Go?" Above Ground Level (AGL) Regional Conference, November 5, 2013.
- Co-author, "Companies May Be Held Liable for the Actions of Their Telemarketer," *Bloomberg BNA Antitrust and Trade Regulation Report,* July 5, 2013.
- Guest, "CFIUS," Capital Thinking Radio Show, November 29, 2012.
- Speaker, "Changing Face of Tower Regulation," Above Ground Level (ABL) Midwest Regional Conference, Chicago, IL, September 15, 2011.
- Speaker, Tower Technology Summit 2011, Orlando, FL, March 21-24, 2011.
- Contributor, "Smart Grid Focus," Patton Boggs TechComm Update, November 25, 2009.
- Presenter, The 2008 Wireless Infrastructure Show, Orlando, FL, October 2008.

About our firm

One of the world's strongest integrated law firms, providing insight at the point where law, business and government meet. We deliver commercially focused business solutions by combining our legal, lobbying and political capabilities and invaluable connections on the ground to a diverse mix of clients, from long-established leading corporations to emerging businesses, startup visionaries and sovereign nations. More than 1,500 lawyers in over 40 offices across four continents provide unrivaled access to expertise.