



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

Brendan Carr
Chairman

February 19, 2026

The Honorable Charles E. Grassley
Chairman
Committee on the Judiciary
United States Senate
Washington, D.C. 20510

Dear Chairman Grassley:

Thank you for your January 30 letter regarding the Federal Communications Commission's (FCC or Commission) use of Special Government Employees (SGEs). I welcome the opportunity to share information on the Commission's procedures for appointing SGEs and how the Commission ensures their service is free of conflicts of interest and in compliance with the statutes and regulations that apply to SGEs.

I would like to quickly note that I became Chairman of the FCC on January 20, 2025, and many of the records requested pre-date my term as Chairman. However, thanks to the dedicated and talented FCC staff and their record keeping, I am able to be responsive to this request.

Question 1:

From March 1, 2023, to present, please provide a complete list of SGEs who have served/are serving your agency, including their names and titles; dates of service; a description of their duty and/or assignment; whether they received ethics training; and the specialty and expertise that led to their appointment or hire. For all SGEs with concurrent employment, please identify their outside employer(s) and any other information collected by the agency regarding their employment, including any contracts, business, or lobbying. If you cannot provide some or all of this information, please state so and explain why.

FCC Response to Question 1:

The requested information is in Table 1 and Table 2 on the next pages. Table 1 includes the SGEs who have served the Commission from March 1, 2023, to present, including those currently serving. Table 2 includes those SGEs along with their concurrent employment.

Table 1: List of SGEs serving the FCC March 1, 2023-Present

<u>Name</u>	<u>Title</u>	<u>Period of Service</u>	<u>Committee</u>	<u>Description of Duties</u>	<u>Specialty/Expertise</u>	<u>Received Ethics Training</u>
Ali, Christopher	Committee Member	11/4/21 - 6/29/23	Communications Equity and Diversity Council	Committee Member	Communications law and policy	Yes
Brenner, Dean	Committee Member	2/26/24 - present	Technology Advisory Committee	Committee Member	Global spectrum strategy and technology policy initiatives	Yes
Brown, Rockell	Committee Member	12/15/21 - 6/29/23	Communications Equity and Diversity Council	Committee Member	Media and Communication	Yes
Carey, Joseph	Committee Member	1/16/24 - 1/1/25	Precision Agricultural Task Force	Committee Member	Data and mapping issues	Yes
Dorsey, Cody	Committee Member	1/29/24 - 10/13/24	Consumer Advisory Committee	Committee Member	Digital Equity issues	Yes
Gant, Jon	Committee Member	12/27/21 - 6/29/23	Communications Equity and Diversity Council	Committee Member	Education and telecommunication policy	Yes
Lan, Tian	Committee Member	2/26/24 - 9/5/25	Technology Advisory Committee	Committee Member	Research expertise in cloud computing, cyber security, fairness theory, and wireless communications.	Yes
Makecha, Tarek	DOGE Representative	3/26/25 - 4/10/25	N/A	Facilitating FCC operations and improving information technology and other systems and improving FCC and governmental efficiency, transparency and responsibility.	Software engineer with OPM.	Yes
McCausland, Robert	Committee Member	3/30/22 - 9/13/23	North American Numbering Council	Committee Member	Private sector telecommunication	Yes

Schulzrinne, Henning	Committee Member	2/26/24 - Present	North American Numbering Council	Committee Member	Broadband issues, standardization, spectrum management and access, cybersecurity, 6G, Internet applications	Yes
Sirbu, Martin	Committee Member	3/15/24 - 11/2025	Technology Advisory Committee	Committee Member	Regulation of local access technology, economics of pricing and markets for telecommunications services	Yes
Terry, Christopher	Committee Member	3/20/24-6/22/25	Communications Equity and Diversity Council	Committee Member	Cowles Fellow of Media Law, Policy and Ethics in the Hubbard School of Journalism and Mass Communication.	Yes
Wick, Jordan	DOGE Representative	3/18/25 - 6/27/25	N/A	Facilitating FCC operations and improving information technology and other systems and improving FCC and governmental efficiency, transparency and responsibility.	Software engineer with Department of Government Efficiency in the Executive Office of the President.	Yes

Table 2: List of SGEs serving the FCC March 1, 2023 – Present with Concurrent Employment

<u>Name</u>	<u>Employment</u>
Ali, Christopher	1) International Communications Association (Chair, Communication Law & Policy Division); 2) Communication Law & Policy (online) (Associate Editor); 3) University of Virginia (Associate Professor); and 4) Tow Center for Digital Journalism, Columbia University (Fellow).
Brenner, Dean	1) Alzheimer’s Association (National Treasurer, Member of Board of Directors); 2) Alzheimer’s Association, National Capitol Area Chapter (Chairman of Board of Directors,); 3) RetMap, Inc. (Member of Advisory Board); and 4) Duke University (Adjunct Professor).
Brown, Rockell	1) Texas Southern University (Interim Dean for School of Communication); and 2) San Jacinto Community College (Adjunct Instructor)
Carey, Joseph	1) Trimble, Inc, (Director of Wireless Strategy); 2) GLG Insights (Subject Matter Expert); and 3) Third Bridge (Subject Matter Expert).
Dorsey, Cody	Baltimore Digital Equity Coalition (Executive Director)
Gant, Jon	1) North Carolina Central University (Dean and Professor); and 2) Telecommunication Policy Research Conference (Chair, Board of Directors)
Lan, Tian	1) George Washington University (Professor); and 2) National Quantum Lab, UMD-College Park (Fellow/Visiting Scholar)
Makecha, Tarek	Office of Personnel Management (Software Engineer)
McCausland, Robert	1) Intrado (Vice-President, Regulatory and Government Affairs); 2) Cow Boss, LLC (CEO and Co-Owner); and 3) Lately Inc. (Chairman, Board of Directors).
Schulzrinne, Henning	1) Columbia University (Professor); and 2) EDAS Conference Services (Managing Partner).
Sirbu, Martin	Carnegie Mellon University (Professor)
Terry, Christopher	University of Minnesota (Associate Professor)
Wick, Jordan	Executive Office of the President, Department of Government Efficiency (Software Engineer)

Question 2:

From March 1, 2023, to present, list each SGE that was compensated or not compensated for service in your agency.

FCC Response to Question 2:

According to Commission records, no SGE listed was compensated for their service to the Commission.

Question 3:

From March 1, 2023, to the present, list each SGE for whom a conflict of interest or ethics problem was identified, along with a description of that conflict and how it was resolved. In responding to this request, and irrespective of whether a problem was identified, include all financial disclosures, public or confidential, filed by the employee. If you cannot provide some or all of this information, please state so and explain why.

FCC Response to Question 3:

As noted in Table 1, Commission records reflect that all SGEs receive ethics training and file financial disclosure reports as part of their onboarding process. Further, and perhaps most importantly, prior to Commission appointment the Commission's Office of General Counsel (OGC) Ethics Officials collect financial interest and professional affiliation information from all prospective employees, including SGEs, and provide advice and counsel on potential ethics conflicts, which includes issuing guidance on necessary or recommended financial divestitures, and other preventative actions.¹

For SGEs who wish to serve on Commission FACs, the standard public notice announcing the membership application procedure advises would-be applicants of the ethics and conflict of interest requirements before the application process even begins. Specifically, the Commission's standard public notice for such FACs alerts potential SGEs that they will be “. . . subject to a variety of restrictions under the conflict of interest statutes, 18 U.S.C. § 203 et seq., and the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. Part 2635 [and] . . . must file confidential employee financial disclosure reports prior to beginning their service and annually thereafter [, and further] . . . will also be subject to ethics restrictions in section 4(b) of the Communications Act, 47 U.S.C. § 154(b), and in the Commission's rules, 47 CFR Part 19 and 5 CFR Parts 3901 and 3902.”

As noted in the public notice, FAC members – including SGEs – “have an initial and continuing obligation to disclose any interests in, or connections to, persons or entities that are, or will be, regulated by or have interests before the Commission.”

¹ Of note, Commission SGEs are subject to the Communications Act restriction barring them from holding financial interests in certain entities regulated by the Commission. 47 USC § 154(b). Accordingly, prior to onboarding at the Commission, SGEs who hold such interests are advised to divest them as a condition of their employment.

As a result of the Commission's extensive efforts to identify and address potential conflicts prior to their appointment, the Commission has found no violations of ethics and conflicts of interests rules and regulations involving the Commission's SGEs over the past five years.

Question 4:

For each SGE granted a waiver under 18 U.S.C. §§ 203 (e), 205 (f), 208 (b)(1), (b)(2), or (b)(3), or any other applicable law or regulation, please provide a detailed description of the conflict and the reason for the waiver, as well as the legal authority for granting it. In responding to this request, please note the number of waivers that were granted or not granted and reference the applicable statute.

FCC Response to Question 4:

Commission records show that no FCC SGE has been granted a waiver under any conflict of interest law or regulation within the past three years. This includes 18 U.S.C. §§ 203 (e), 205 (f), 208 (b)(1), (b)(2), or (b)(3), as well as, 47 USC § 154(b)(2)(B), which is a waiver procedure under the Communications Act for Commission employees who are otherwise prohibited from holding financial interests in certain entities regulated by the Commission.

Question 5:

If you have difficulty determining which employees qualify as SGEs, please describe why you have difficulty making this determination.

FCC Response to Question 5:

At the Commission, there are typically three categories of SGEs: 1) SGEs who serve as independent subject matter experts on our Federal Advisory Committees (FACs); 2) post graduate fellows who offer their voluntary services to the Commission pursuant to our statutory gift acceptance authority, 47 USC 154(g)(3), and its implementing regulations, 47 CFR 1.3000, et seq.; and 3) SGEs who serve as temporary experts/consultants pursuant to contract.²

As shown in the information provided in Table 1, only a fraction of the Commission's staff members since March 1, 2023, have been SGEs. For those few employees whom the Commission hired as SGEs, there has been no difficulty making the necessary determinations regarding their qualifications as SGEs.

Question 6:

Please provide the most recent copy of all agency policies, procedures, or regulations related to SGEs, including those related to determining when your agency should hire SGEs. Include in your response agency policies and procedures for identifying and resolving conflicts of interest among SGEs.

² The Commission has not hired any SGEs in this third category since March 1, 2023.

FCC Response to Question 6:

Our agency relies on guidance from the Office of Personnel Management (OPM) with regard to personnel and hiring determinations regarding SGEs. Our OGC Ethics Attorneys advise on actual and potential conflicts of interest for all Commission employees, including SGEs. A copy of OGC's internal procedures regarding ethics training, financial disclosure obligations and advice and counsel for SGEs is included as Attachment A.

Question 7:

From March 1, 2023, to the present, please provide a detailed list of all SGEs whose work exceeded the statutory limit of 130 days within the relevant 365-day period. Describe why the employee(s) exceeded the statutory limit and if this was due to "unique and unlikely to recur" circumstances. Describe such circumstances. Also note whether the SGE received the designation in subsequent years.

FCC Response to Question 7:

Since March 1, 2023, Commission records show there has not been an SGE who exceeded 130 days of employment within the relevant 365-day period.

Question 8:

From March 1, 2023, to the present, identify all SGEs whose non-government employers or businesses were awarded any sole source contract and whether the contract was awarded during the SGE's term of service.

FCC Response to Question 8:

Commission records show there have not been sole source contracts awarded by the FCC to the non-government employers or businesses of the FCC's SGEs during the relevant time period.

Question 9:

Describe whether any SGE or SGE-staffed agency boards provide advice on procurement or otherwise play a decision-making role in procurement, licensing, or contracting.

FCC Response to Question 9:

According to Commission records, no SGEs or SGE-staffed agency boards provide advice on procurement or otherwise play a decision-making role in procurement, licensing, or contracting.

Again, I appreciate the opportunity to share the Commission's procedures and procedures for appointing SGEs and how the Commission ensures their service is free of conflicts of interest

and in compliance with the statutes and regulations that apply to SGEs. Please let me know if you have any additional questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read 'B. Carr', with a long horizontal flourish extending to the right.

Brendan Carr
Chairman

Attachment A



FEDERAL COMMUNICATIONS COMMISSION

Inquiries: email: Ethics.Approvals@fcc.gov

Visit our Intranet site at
<http://intranet.fcc.gov/ogc/ethics/>

ETHICSgram

Ethics Rules Applicable To Special Government Employees

As a “Special Government Employee,” or “SGE,” you are subject to most federal ethics laws.

What is a Special Government Employee? A Special Government Employee (SGE) is a person who is retained on a temporary basis to serve the agency for a period not to exceed 130 days during any period of 365 consecutive days.¹ SGEs may serve with or without compensation.

What do SGEs do at the FCC? SGEs at the FCC serve the agency in a variety of roles. They include consultants who provide advice on specific projects, recent college or law school graduates granted a fellowship from their alma mater and subject-matter experts participating on Federal Advisory Committees.

What ethics rules apply to me as an SGE? An SGE, even if serving only a few days per year, is subject to the federal criminal conflict-of-interest rules, the Standards of Conduct for Employees of the Executive Branch, the Communications Act, the Hatch Act and other ethics provisions applicable to federal employees. There are essentially five broad categories of ethics rules to remember – (1) Financial Interests, (2) Use of Official Position and Resources, (3) Gifts and Invitations and (4) Political Activity.

Financial Interests

- You must not participate as an SGE in a matter that has a direct and predictable effect on your financial interests. *This is a federal criminal statute.*²
- For purposes of this restriction, the financial interests of the following people and entities are considered to be your interests:
 - Your spouse or minor child;
 - Your business partner;
 - An organization in which you are an officer, director, trustee, general partner or employee;
 - A person or entity with whom you are negotiating with or have any arrangement concerning prospective employment.

¹ 18 U.S.C. § 202(a).

² 18 U.S.C. § 208.

- It is a violation of the Communications Act for an FCC employee, including an SGE, to have a financial interest in an entity that is significantly regulated by the Commission.³
 - This includes, for example, telephone providers and cable and broadcast companies.
 - This restriction does not extend to financial interests of an employee’s family members.
- Depending upon the duties that will be performed, SGEs may be required to file a Financial Disclosure Report.

Use of Official Position and Government Resources

- Except as authorized, you may not use or disclose non-public information, that is, information that you learned via your FCC position.
- You may not use your official FCC position to benefit yourself or a third party. Examples of this prohibited activity include (but are not limited to) the following:
 - Including FCC seal or reference to FCC position on a non-FCC business card or website.
 - Mentioning your FCC affiliation in a dispute with your cable provider.
 - Endorsing a product or service in your official FCC capacity.
 - Utilizing your FCC credentials to gain admission to an event that you are attending in your personal, non-official capacity.
- You may not use official time or government resources (e.g., computers, phones, copiers) for non-government purposes.
- You may not represent another entity, including your non-government employer or a client, before the FCC in any party-specific matter, even if that matter is wholly unrelated to your service as an SGE. If a business partner of yours appears before the FCC, please reach out to OGC Ethics to obtain guidance before participating in the matter.

Gifts and Invitations

- It is a violation of the Standards of Ethical Conduct for you to solicit or accept gifts that are either –
 - From a “prohibited source,” i.e., a person or entity that does business with the FCC, or
 - Given because of your official FCC position.⁴
- An invitation to an industry event is a gift.
- There are exceptions to the gift rule, so please contact OGC Ethics (Ethics.Approvals@fcc.gov) if you are offered a gift such as an invitation to an event. Each employee must individually seek Ethics clearance to accept an invitation that is from a prohibited source or that was motivated by your FCC position.

³ 47 CFR. § 154(b).

⁴ 5 CFR § 2635.202.

Political Activity

- As an SGE subject to the Hatch Act, you may not engage in partisan political activity while on government time, in a government building or using government resources.⁵
- Partisan political activity is anything directed toward the success or failure of a political party or candidate.
 - The law is broadly interpreted; simply forwarding a partisan email while on government time or in a government building would be a violation, even if you forward that email without comment.
 - You may not display political signs, buttons, t-shirts or similar items in the federal workplace.
- You may not solicit, accept or receive campaign funds for a partisan political candidate or group during the hours that you are performing government business.

For a more detailed explanation of these and other ethics rules, please visit <http://intranet.fcc.gov/ogc/ethics/>.

Please submit all ethics-related questions, including those involving speaking engagements, travel and invitations to events, by emailing “Ethics Approvals”.

Kathleen Fulp, Assistant General Counsel (Ethics)
Sharon Kelley, Ethics Counsel
Ellen Herr, Ethics Counsel
Will Jacobi, Ethics Counsel
Radames Peña-Jordan, Ethics Counsel
Lauren Northrop, Ethics Program Manager
Tjuana Price, Program Analyst
Richard Williams, Program Analyst

All FCC employees are subject to the standards of employee conduct and conflict of interest rules presented in Part I of Executive Order 12674, the Standards of Ethical Conduct for Employees of the Executive Branch (5 C.F.R. § 2635 et seq.), the Supplemental Standards of Ethics Conduct for Employees of the FCC (47 C.F.R. § 19.735-201 et seq.) and Chapter 11 of Title 18 of the United States Code (18 U.S.C. §§ 201-209). For copies of these regulations and other useful information, please see our FCC intranet page at <http://intranet.fcc.gov/ogc/ethics/>

⁵ 5 U.S.C. § 7321-7326, implemented by 5 C.F.R. Part 734.



Federal Communications Commission
Washington, DC 20554

Financial Interests Certification

- I have received copies of the following documents, have read and understand each one:
 - [Standards of Ethical Conduct for Employees of the Executive Branch](#), and particularly:
 - [5 CFR 2635, Subpart D](#) (Conflicting Financial Interests)
 - [5 CFR 2635, Subpart E](#) (Impartiality in Performing Official Duties)
 - Supplemental Standards of Ethical Conduct for Employees of the Federal Communications Commission ([5 CFR 3901](#))
 - Supplemental Financial Disclosure Requirements for Employees of the Federal Communications Commission ([5 CFR 3902](#))
 - Federal Communications Commission Employee Responsibilities and Conduct ([Title 47, Chapter 1, Part 19, 19.735-101 through 203 \(particularly §202\)](#))

- In order to assure my compliance with these regulations and to facilitate any necessary conflict of interest determination for financial interests held by myself, my spouse, or minor children, I certify that I and/or my family (check one):

DO currently hold financial interests in a corporation, company, firm, mutual fund, trust or other business enterprise.

DO NOT currently hold financial interests in a corporation, company, firm, mutual fund, trust or other business enterprise.

- I understand that this certification covers all interests, and is not limited to entities considered to be communications-related.

- I have also received a copy of the FCC Directive, FCC Instruction 1139.1, “*Management of Non-Public Information*” and understand my obligation to become familiar with and follow the procedures contained in this directive.

Applicant's Name (printed)	
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This block is for OGC use only.

Applicant's Signature	Date
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[FCC Office of General Counsel Approval](#)

OGC Ethics Official Name & Title	
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Signature	Date
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Ethics Procedures Applicable to Special Government Employees (SGEs)

General; Identification of SGEs

A Special Government Employee (SGE) is defined by 18 U.S.C. § 202(a) as “an officer or employee of the executive or legislative branch of the United States Government, of any independent agency of the United States or of the District of Columbia, who is retained, designated, appointed, or employed to perform, with or without compensation, for not to exceed one hundred and thirty days during any period of three hundred and sixty-five consecutive days, temporary duties either on a full-time or intermittent basis....”

SGEs at the FCC include:

- individuals offering voluntary gifts of service to the Commission pursuant to section 4(g)(3) of the Communications Act, and
- individual experts serving on FCC advisory committees and subgroups.
 - This does not include individuals expected to represent the interests of particular entities (i.e., representative members) on advisory committees.
 - SGE advisory committee members are selected based on their own professional expertise rather than as representatives of interested entities.
 - SGE advisory committee members may not be registered lobbyists.
 - See separate process for reviewing and appointing members of advisory committees.

Onboarding – Financial Disclosure

Forms. While 5 C.F.R. § 2634.202(c) requires certain paid SGEs to file a Public Financial Disclosure Report (OGE-278), FCC SGEs would rarely satisfy those criteria. Accordingly, all FCC SGEs shall file a new entrant Confidential Financial Disclosure Report (OGE-450) unless it has been determined that exclusion from the requirement is appropriate pursuant to 5 C.F.R. § 2634.904(b). That section reads as follows:

(b) Any individual or class of individuals described in paragraph (a) of this section, including special government employees unless otherwise noted, may be excluded from all or a portion of the confidential reporting requirements of this subpart, when the agency head or designee determines that the duties of a position make remote the possibility that the incumbent will be involved in a real or apparent conflict of interest.

The examples following the rule contemplate SGE positions that are not substantive in nature, such as an architectural draftsman or a clerical worker. Notably, the exception to the filing requirement for employees serving 60 days or less does not extend to SGEs. *See* 5 C.F.R. § 2634.903(b)(2)(iii).

FCC SGEs are also required to file the Confidential Supplemental Statement of Employment and Financial Interests (FCC A54A) per 5 C.F.R. § 3902.102.

Distribution of Blank Forms and Instructions. The Ethics Program Manager or designee will send each employee identified as an FCC SGE a blank OGE 450 form, a blank FCC A54A form, and instructions for completing them as soon as that SGE is identified.

Due Dates. Completed forms are due within 30 days of their distribution, with extensions to be permitted per 5 C.F.R. § 2634.903(d). For SGEs on advisory committees, in no event may the individual provide advice to the agency or attend an advisory committee meeting prior to submitting the forms to the Ethics Program Manager. *See* 5 C.F.R. § 2634.903(b)(3). All agency SGEs are to be treated as new entrants for this purpose and must file updated new entrant reports upon reappointment. SGEs serving on advisory committees shall annually file updated new entrant reports during the term of the committee.

Review. The financial disclosure reports of FCC SGEs shall be reviewed using the same process specified elsewhere for regular FCC employees.

Tracking. The Ethics Program Manager or his or her designee will maintain a computerized list of all agency SGEs that includes the individual's name, assignment, start date, date on which the filer was provided a blank OGE-450, the date on which the completed form was initially received at OGC, and the date it was certified by the FCC reviewer.

Onboarding – Initial Ethics Training

Per 5 C.F.R. § 2638.304(e)(1), FCC SGEs shall be provided with a briefing sheet explaining what an SGE is and covering the following topics:

- Financial conflicts of interest
- Impartiality
- Misuse of position
- Gifts

Per 5 C.F.R. § 2638.304(e)(2), FCC SGEs shall also be provided the following written materials, or hyperlinks to the materials:

- OGE's summary of the Standards or an equivalent summary prepared by the agency
- Any relevant supplemental agency regulations
- Any other materials the DAEO deems relevant
- Instructions for contacting the agency's ethics office

The briefing sheet and written materials described above, along with any individualized ethics advice provided to the SGE, are intended to satisfy initial ethics training requirements of FCC SGEs. This information should be given to SGEs at the time they are provided with blank financial disclosure forms.

The distribution of this material shall be tracked in concert with the computerized tracking of financial disclosures as described above. SGEs serving on advisory committees shall annually be provided with these materials.

Agency Review. The Assistant General Counsel for Ethics and such other OGC Ethics employees as he or she designates shall annually review these procedures and update as warranted.