

Steven A. Augustino

Partner

101 Constitution Avenue, NW T 202.689.2947
Suite 900 M 240.305.2456
Washington, D.C., 20001

steven.augustino@nelsonmullins.com



Steve's practice ranges from regulatory, legislative, and administrative law counsel to transactional advice, advocacy, and litigation. His practice focuses on USF contributions, E-rate and Universal Service audits and investigations. He also is a leading practitioner in anti-robocall technologies and Telephone Consumer Protection Act (TCPA) matters. For over 25 years, he has guided clients through the shifting policies, exponential growth, and extraordinary innovation in the telecommunications industry. His clients include companies and organizations from around the world, including major wireless service providers, manufacturers, trade associations, and emerging telecom businesses.

Experience

The following is a selected sampling of matters and is provided for informational purposes only. Past success does not indicate the likelihood of success in any future matter.

Experience

- Experienced in enforcement, investigations, and audits of communications companies, representing telecommunications service providers in Federal Communications Commission (FCC) enforcement actions and state attorneys general investigations. His enforcement experience includes investigations involving USF contribution obligations, Lifeline, E-rate, and other USF benefit payments, customer proprietary network information (CPNI) obligations, third-party billing ("cramming"), 911 call-handling obligations, network outage reporting, prepaid card marketing, fax marketing, and other carrier practices.
- Has advised on USF issues in transactions and representing filers in audits and enforcement investigations relating to reporting or failure to pay: For recipients of the USF, counsels on issues pertaining to the Lifeline program, E-rate, and rural healthcare-related matters.
- Has counseled on Telephone Consumer Protection Act compliance, including the use of auto-dialers, calls and texts to mobile telephone numbers, and receipt of customer consent:

Education

Georgetown University Law Center, JD, magna cum laude (1991)

University of Virginia, BA, with highest distinction (1988)

Admissions

District of Columbia

Maryland

Supreme Court of the United States

U.S. Court of Appeals for the District of Columbia Circuit

U.S. District Court for the District of Columbia

U.S. District Court for the District of Maryland

Certifications

University of Virginia McIntire School of Commerce, Certificate in Cybersecurity for Business Leaders (2020)

Practice Areas

[Congressional Oversight Investigations](#)

[Appellate Practice & Legal Strategies](#)

[Outsourcing & Managed Services](#)

[Government Relations Strategies](#)

advocates for clients in FCC petitions, waiver proceedings, and declaratory ruling proceedings involving TCPA issues.

- Has been involved with a variety of new and pioneering technologies, including connected car, anti-robocall technology, web-based conferencing and collaboration, mobile games and apps, hosted VoIP, texting, and wi-fi management.

USAC Audits and Appeals

- Represented several major international telecom providers in USAC audits of their reporting for federal USF contribution obligations.
- Represented a rural local telecommunications carrier in an audit of its High Cost Fund disbursements relating to affiliate transactions.
- Represented one of the largest facilities-based CLECs in a USF administrator's audit of \$1.5 billion in revenues and a subsequent FCC appeal: The case led to a leading clarification of wholesale/resale USF contribution obligations and private line jurisdictional reporting, and the client received a significant refund on remand of the appeal.
- Represented a telecom and broadband provider in central Texas in a multiyear audit and the subsequent FCC appeal: The FCC granted all three issues on appeal, leading to refunds for DSL (broadband) revenues, Subscriber Line Charge assessments, and reseller classification issues.
- Represented the U.S. affiliate of a foreign telecom company in an administrator's audit of its revenues: Argued that most of the revenues were foreign (non-U.S.) revenue not subject to USF assessments. The appeal on a portion of international revenue is pending at the FCC.
- Represented the largest provider of audio conferencing services in a USAC dispute and FCC appeal regarding the classification of audio conferencing services.
- Represented a public holding company in an appeal of the administrator's denial of corrective USF filings: received the first-ever waiver of the late-filing prohibition for corrections to a Form 499-Q, allowing the client to correct an error and receive several million dollars in refunds.
- Represented a global leader in web conferencing and collaboration technology in a similar appeal, which established the ability to receive waivers for late filing of the annual true-up revenue report (Form 499-A). The client received a substantial refund.
- Represented several MPLS providers in audits addressing the classification of advanced virtual private network services.

USF Recipients and Beneficiaries

- Represented a Lifeline telephone service provider in an investigation into its compliance with the Lifeline rules: The investigation, which was conducted by the U.S. Attorney's

Industries

Advertising, Marketing, Sponsorship & Promotions

Technology and Commercial Transactions

office serving the company's headquarters, the state AG office, and the FCC OIG, was dropped after extensive investigation and presentation.

- Represented a major Lifeline carrier in FCC, FCC OIG, and Department of Justice investigations and proposed enforcement actions alleging fraudulent behavior by third-party sales agents
- Represented a consortium of rural schools under the e-rate program in an investigation into alleged gifts received from a service provider. The investigation was resolved with no finding of improper gifts, and full funding was retained by the consortium.
- Represented an E-rate applicant in a USAC audit of its disbursements for broadband service support.
- Assisted E-rate service providers in investigations and reimbursement difficulties.
- Represented an E-rate service provider in an audit involving "lowest corresponding price" obligations and competitive bidding rules in the E-rate program.
- Represented multiple Lifeline service providers in USAC audits and "PQAs" of Lifeline reimbursement requests.

Enforcement (Consumer Protection)

- Represented more than a dozen carriers in consumer protection enforcement actions dating back to the 1990s.
- Represented a company that provides 911 and emergency communications infrastructure, systems, and services to telecommunications service providers and government public safety agencies in the U.S. and worldwide in an investigation of a multistate 911 outage.
- Represented an American telecommunications holding company that provides wireless services and is a major global Internet carrier in a multiagency investigation of the carrier's third-party billing practices for premium SMS messaging services.
- Represented a dial-around long distance carrier in an FCC enforcement action proposing several million dollars in fines for allegedly deceptive marketing: The FCC let the statute of limitations expire without imposing a fine.
- Represented several prepaid calling card providers in FCC investigations of their marketing disclosures to consumers: Two of the investigations were closed without the FCC taking action and two proceeded to forfeitures (fines), which were settled or abandoned in ensuing collection actions.

Enforcement (Other Matters)

- Represented a conferencing provider in an enforcement action for failing to file CPNI certifications: Challenged the FCC's authority to issue a fine, given its classification of audio

bridging services.

- Represented several carriers in investigations of their failure to pay USF assessments or of late payment of USF assessments.
- Represented a nationwide provider of telecommunications relay services for the deaf in investigations of billing errors and reimbursement revisions relating to their provision of TRS services.

Litigation

- Represented a business funding company in an FCC TCPA class action petition involving unwanted facsimile advertisements.
- Defended a business texting company in FCC TCPA class action complaints involving text messages.
- Represented service providers in False Claims Act complaints and FCC Inspector General investigations involving USF-related payments.
- Counseled intervenors in an appeal of an FCC 2015 Declaratory Ruling involving autodialers, reassigned wireless numbers, and revocation of consent under the TCPA.
- Represented a national wireless carrier in state AG investigation involving its third-party billing practices.
- Represented a national telecommunications provider in connection with a multi-state 911 outage investigation.
- Represented the largest conferencing provider in a USF appeal concerning classification of its services.
- Defended a prepaid calling card provider in an investigation of prepaid card marketing disclosure: The FCC closed the investigation without taking action.
- Led a coalition of carriers pursuing high-capacity and broadband network elements during the FCC's Triennial Review of unbundled network element obligations: The coalition obtained rules that preserve access to these elements where competitive alternatives are not present.
- Led an industry trade association in enforcing a statutory prohibition on a major telephone company's ownership of alarm-monitoring companies: These efforts resulted in the FCC declaring more than \$1 billion in acquisitions to be unlawful.

Recognitions

The bar rules of some states require that the standards for an attorney's inclusion in certain public accolades or recognitions be provided. When such accolades or recognitions are listed, a hyperlink is provided that leads to a description of the respective selection methodology.

- [The Best Lawyers in America®](#), Communications Law (2018–2026)
- [Chambers USA: America's Leading Lawyers for Business](#),

Telecom, Broadcast & Satellite – District of Columbia (2021–2025)

- [Super Lawyers](#), Communications, Washington D.C. (2014–2025)
- [Legal 500 United States](#), Telecoms and Broadcast: Regulatory (2011, 2013–2021, 2023)

Professional Activities

- American Bar Association (1991–2015)
- Federal Communications Bar Association (1991–present)
- Federal Communications Bar Association, Internet of Things Committee, co-chair (2018)
- Federal Communications Bar Association, Enforcement Committee, co-chair (2013–2018)
- Federal Communications Bar Association, Wireline Committee, co-chair (2011–2012)

Community

- Montgomery County, MD Government, Upcounty Citizens Advisory Board, Member (2019–present)
- Gaithersburg High School Education Foundation (501(c)(3)), Co-Founder and Board Member, (2011–present)
- Montgomery County (MD) Board of Education, Facilities Advisory Committee (2017–2018)
- Montgomery County (MD) Council of PTAs, School Construction Committee Chair, (2005–2013)

Articles & Speeches

Events/Speaking Engagements

[The Importance of Opt-Ins and Opt-Outs: TCPA Past, Present and Future](#)- Co-Speaker (December 9, 2025)

[Fighting on All Fronts: Ongoing FCC Initiatives to Combat Illegal Robocalls](#)- Co-Speaker (November 18, 2025)

[Creating a Data Privacy & Security Playbook for 2024, An Overview of Compliance and Regulations, AI, and Data Breach Concerns](#)- Speaker (February 7, 2024)

[The Scoop on Generative AI](#)(November 8, 2023)

[Tech & Law \(R\)evolution: Cutting Edge Practices for Business Transformation and Advancement](#)- Speaker (October 20, 2023)

[Learning the Generative AI Landscape, The INCOMPAS Show 2023](#)- Speaker (October 8, 2023)

[Session Initiation Protocol Network Operators Conference 2023](#)- Speaker (Thursday, Sept. 14)

[Reply STOP: Limitations for Service Providers in Communicating with Your Customers](#)- Speaker (June 15, 2023)

[Competition in Multi-Tenant Environments \(MTEs\), The 2022 INCOMPAS Show](#)- Session Leader (October 23, 2022)

[Perspectives From Outside Counsel – A Panel Discussion of 2022 Robocall Regulatory and Enforcement Developments, Stir/Shaken Enterprise Summit](#)- Panelist (October 19, 2022)

[Assessing the 2022 Robocall Landscape – A Discussion With Outside Counsel](#)(March 22, 2022)

Technology Roundtable: Private 5G Networks, TC3 Carrier Connections - Host (November 16, 2021)

The Future of Telecom Policy & Regulation: How COVID Changes Everything, Communications Taxation - Presenter (October 12, 2021)

STIR/SHAKEN Vetting, KYC, TN Authorization, STIR/SHAKEN VIRTUAL SUMMIT - Speaker (July 23, 2021)

Effectively Mitigating Illegal Robocalls: What Service Providers Need to Do, TeleStrategies Webinars - Speaker (March 3, 2021)

Meeting the Mark Part 2: Robocall Compliance - Industry Panel, INCOMPAS Policy Summit - Speaker (Feb. 9, 2021)

Meeting the Mark Part 1: Robocall Compliance - FCC Panel, INCOMPAS Policy Summit - Speaker (February 9, 2021)

Internet of Things Program, Federal Communications Bar Association - Speaker (January 21, 2021)

IoT Cybersecurity Act of 2020, Telecom Council's IoT Forum on Cybersecurity - Speaker (January 21, 2021)

Compliance with the TRACED Act - What You Need to Know, Transaction Network Services - Speaker (November 17, 2020)

Rural Health Care Workshop 2: Successful Strategies for Obtaining RHC Support, Schools, Health & Libraries Broadband Coalition - Speaker (November 6, 2020)

Compliance With TRACED Act: What You Need to Know, Competitive Carriers Association - Speaker (October 28, 2020)

Universal Service Fund - What's Next?, Communications Taxation - Online Training - Speaker (October 13, 2020)

Policy Workshop: Sizing Up the FCC in 2021, The INCOMPAS Show - Speaker (September 14, 2020)

Furthering UAS Deployment in U.S. Airspace, Federal Communications Bar Association - Moderator (June 15, 2020)

Unfinished Business with the TCPA, Federal Communications Bar Association Webinar - Speaker (April 21, 2020)

STIR/SHAKEN with a Dash of Analytics - Mitigating Robocalls in 2020, The INCOMPAS Policy Summit - Speaker (March 3, 2020)

Policy Workshop – TCPA and Robocalling, INCOMPAS Show - Speaker (November 4, 2019)

Voluntary Approaches to the Protection of IoT Devices, FBCA's Securing IoT Devices: Evaluating Varying Ways to Enhance Cybersecurity Protections - Speaker (October 29, 2019)

The Universal Service Fund: Future Possibilities and Pitfalls, 9th Annual SHLB Conference - Speaker (October 17, 2019)

Roundtable on Robocalls, TC3 Carrier Connections Conference - Speaker (September 6, 2019)

Understanding USF Pre-Conference Workshop, Communications Taxation Conference 2019 - Speaker (May 13, 2019)

E-Rate Service Provider Toolkit, 8th Annual SHLB Conference - Presenter (October 11, 2018)

Data Privacy and What Every Contact Center Needs to Know, PACE Washington Summit - Speaker (September 24, 2018)

Consumer Protection Issues (TCPA) and How to Regulate Consumer Protection, Telecom Regulation: Today's Challenges and Opportunities - Presenter (August 7, 2018)

USF Contribution Rules - Dealing with a Hardening of the Arteries, Communications Taxation Conference - Presenter (May 15, 2018)

Net Neutrality, ComTech Forum: Predictions for 2018 - Speaker (February 8, 2018)

A Lawyer's Briefing on Net Neutrality: Beyond the Soundbites, Casual Connect - Speaker (January 16, 2018)

Key Regulatory Issues Impacting Your Company, The INCOMPAS Show - Partner (October 15, 2017)

FCC and FTC Enforcement Priorities under the New Administration, FCBA's CLE Seminar - Moderator (September 14, 2017)

E-rate and Lowest Corresponding Price Enforcement, SHLB Seventh Annual Conference - Speaker (June 1, 2017)

From Pirates and Jammers to Wi-Fi and Signal Blocking: Issues in Modern Interference Enforcement, FCBA Enforcement Committee - Speaker (May 23, 2017)

Business Opportunities in the Federal Universal Service Programs, The INCOMPAS Show - Speaker (April 4, 2017)

The New FCC, Telecom Council's Predictions 2017 - Speaker (January 11, 2017)

Alerts

[FCC Download -- Shutdown Edition](#), FCC Download (October 1, 2025)

[Texts Are Telemarketing in Texas: SB 140 Set to Place New Requirements on Marketing Communications](#), FCC Download (August 27, 2025)

[Hobbling the Hobbs Act: Supreme Court Rules that Federal Courts are Not Bound by Agency Interpretations of Statutes](#), FCC Download (June 27, 2025)

[SCOTUS: USF Funding Mechanism Is Constitutional](#), FCC Download (June 27, 2025)

[Good for the Grid \(and for Customers\): Demand Response Communications are "Closely Related" to Utility Service Under the TCPA](#), FCC Download (June 23, 2025)

[The 1 to 1 Consent Rule Is No More](#), FCC Download (January 29, 2025)

[The FCC's "Prior Express Written Consent" Rule is Changing This Month: What Marketers Need to Know](#), FCC Download (January 9, 2025)

[Applying Loper Bright, Sixth Circuit Sets Aside FCC's Net Neutrality Rules, Ending the Agency's "Vacillations" on Broadband Internet Regulation](#), FCC Download (January 6, 2025)

[FCC CPNI Certification and Privacy Rules Update](#), Additional Nelson Mullins Alerts (February 21, 2024)

[Beware of Scams that Hijack Cellphone Accounts: The Importance of Authentication for Businesses and Consumers](#), Privacy & Data Security Alert (January 29, 2024)

[FCC Announces ACP Wind-Down Requirements for Providers and a February 8 Enrollment Freeze](#), Additional Nelson Mullins Alerts (January 12, 2024)

[FCC Turns to its TCPA Consent Rules: Time for a Checkup?](#), Additional Nelson Mullins Alerts (July 20, 2023)

[FCC Creates Privacy and Data Protection Task Force, Broad Agenda Announced](#), Additional Nelson Mullins Alerts (June 26, 2023)

[Supreme Court to Hear Challenge to Chevron Doctrine Seeking to Limit Courts' Deference to FCC and Other Agencies](#), Additional Nelson Mullins Alerts (May 12, 2023)

[Federal Trade Commission Initiates Privacy Rulemaking to Curb Commercial Surveillance](#), Additional Nelson Mullins Alerts (August 12, 2022)

[NM Monthly FCC Download: May 2022](#), Additional Nelson Mullins Alerts (June 3, 2022)