



**SBA COMMUNICATIONS CORPORATION**  
8051 Congress Avenue  
Boca Raton, FL 33487-1307

12 January 2021

El Paso County  
Attention: Ryan Howser  
30 S Nevada Ave #105,  
Colorado Springs, CO 80903

RE: T-Mobile 20359 Industry Avenue T-Mobile Equipment Install (DN06266A)

Ryan,

T-Mobile intends to upgrade their equipment on SBA's existing site located at the address above. The scope of work is called out on the title page of the submitted plans. Here is a snippet of the SOW from the plans:

GROUND SCOPE OF WORK	TOWER SCOPE OF WORK
<ol style="list-style-type: none"><li>1. INSTALL NEW BATTERY CABINET</li><li>2. INSTALL NEW 600A SSC CABINET</li><li>3. INSTALL (1) FSMF</li><li>4. INSTALL (2) ASIK</li><li>5. INSTALL (2) ASIB</li><li>6. INSTALL (3) ABIA</li><li>7. INSTALL (6) ABIL</li><li>8. INSTALL (3) ABIC</li><li>9. INSTALL (2) AMIA</li><li>10. INSTALL (1) CSR IXRc V2</li><li>11. INSTALL (2) JUNCTION BOXES</li></ol>	<ol style="list-style-type: none"><li>1. REMOVE EXISTING PLATFORM MOUNT</li><li>2. REMOVE (3) ANTENNAS</li><li>3. REMOVE (12) RRHS</li><li>4. REMOVE (1) HYBRID CABLE</li><li>5. REMOVE (4) UNLICENSED CABLES</li><li>6. INSTALL NEW COMMScope PLATFORM MOUNT</li><li>7. INSTALL NEW COMMScope HANDRAIL KIT</li><li>8. INSTALL (6) ANTENNAS</li><li>9. INSTALL (6) RRHS</li><li>10. INSTALL (2) BREAKOUT PENDANTS</li><li>11. INSTALL (2) HYBRID CABLES</li></ol>

The T-Mobile equipment is located with a shelter so all the new ground work (cabinets) will be done inside the shelter so it will not be visible from the outside. See page 5 of the plans.

The tower work mainly consists of replacing the mount (the new mount is similar in size with the main difference being the platform at each "triangle"), remove the 3 antennas and adding 6 (similar sized) and removing 12 remote radio heads (RRH's—these are small "radios" that typically sit behind the antennas) and replacing them with 6 different models of RRH's. See page 6 of the plans.

The requested modifications does not constitute a substantial change. Below is a portion of El Paso County LDC, more specifically, Section 5.2.10.B.6.e., that defines substantial changes:

- It increases the height of the tower by more than 10% or by the height of one additional antenna array with separation from the nearest existing antenna not to exceed twenty feet, whichever is greater; for other eligible support structures, it increases the height of the structure by more than 10% or more than ten feet, whichever is greater. Changes in height should be measured from the original support structure in cases where deployments are or will be separated horizontally, such as on buildings' rooftops; in other



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circumstances, changes in height should be measured from the dimensions of the tower or base station, inclusive of originally approved appurtenances and any modifications that were approved prior to the passage of the Spectrum Act;

- This change is not increasing the height of the tower at all, nor by the height of one additional antenna array, because no additional array is being added. The change that is occurring, as described above, is at the current level of the existing antennas. They are being swapped for similar size antennas.
- It involves adding an appurtenance to the body of the tower that would protrude from the edge of the tower more than twenty feet, or more than the width of the tower structure at the level of the appurtenance, whichever is greater; for other eligible support structures, it involves adding an appurtenance to the body of the structure that would protrude from the edge of the structure by more than six feet;
  - The swap of similar antennas and platform will not protrude from the edge of the tower more 20 feet or the width of the tower structure at the level of the appurtenance. After the new platform and antennas are installed, they will not protrude any further out then what is already there.
- For any eligible support structure, it involves installation of more than the standard number of new equipment cabinets for the technology involved, but not to exceed four cabinets; or, for base stations, it involves installation of any new equipment cabinets on the ground if there are no pre-existing ground cabinets associated with the structure, or else involves installation of ground cabinets that are more than 10% larger in height or overall volume than any other ground cabinets associated with the structure;
  - All cabinets will not be visible to the public eye because they will be inside the existing shelter.
- It entails any excavation or deployment outside the current site
  - No excavation will occur
- It would defeat the concealment elements of the eligible support structure
  - This is not a concealed site
- It does not comply with conditions associated with the siting approval of the construction or modification of the eligible support structure or base station equipment, provided however that this limitation does not apply to any modification that is non-compliant only in a manner that would not exceed the thresholds identified in the Middle Class Tax Relief Act of 2012.
  - This is N/A for this facility

Should more information be required, please reach out to me via email, [ngarcia@sbsite.com](mailto:ngarcia@sbsite.com) or 702-429-0410.

Thank you,

*Nefi Garcia*  
**Nefi Garcia**



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*Your Signal Starts Here.*