May 18, 2016

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554


Dear Secretary Dortch,

We are writing pursuant to Section 1.1206(b)(1) of the FCC’s rules to notify you of a meeting Mr. James A. Hynes of International Towers Incorporated (ITI) attended on April 26, 2016, with members of the FCC staff. The following FCC personnel were in attendance:

- Dorann Bunkin – Media Bureau/Incentive Auction Task Force
- Erin Griffith – Wireless Telecommunications Bureau/Incentive Auction Task Force
- Howard Symons - Incentive Auction Task Force
- Sandra Danner – Wireless Telecommunications Bureau
- Gary Epstein - Incentive Auction Task Force
- Hillary DeNigro – Media Bureau
- Pamela Gallant – Media Bureau

The purpose of the meeting was to provide the FCC representatives identified above a copy of ITI’s corporate capabilities briefing (copy attached) and brief them on the actions ITI is implementing in order to provide tower and antenna modification services to the Broadcast industry as a result of the Incentive Auction re-pack.

We explained that ITI is a small business/licensed general contractor with over 30 years of experience supporting the national broadcasting industry. We have locations in Tucson AZ, Houston TX, and New Orleans, LA. Our key personnel, including crew leaders, are all rooted in the broadcast industry. Since the early 1980’s we have experience designing, manufacturing, and erecting new broadcast structures and modifying existing broadcast structures. In fact, the tasks we routinely performed include antenna and line repair and replacement, as well as transmitter and combiner, diplexer and in-house component installation and tuning.

When the analog to digital conversion was completed, we focused on performing tower erection and antenna/sensor installations for the U.S. Government and Commercial Cellular customers. Since that time, we have been fortunate to be currently supporting several U.S. Department of Homeland Security/Customs and Border Protection (CBP) Security/Surveillance initiatives.
including the CBP Block-1 Operations, Maintenance and Sustainment Program (ITI is prime), Integrated Fixed Tower (IFT) (Partnered with Elbit Systems of America - Prime), Remote Video Surveillance System (RVSS) (Partnered with General Dynamics - Prime), and the Arizona Land Mobile Radio Modernization (AZ LMR) program (Partnered with AT&T Federal Government Solutions - Prime). Additionally, we also support the design and installation of wireless communications infrastructure for large carriers like AT&T, T-Mobile, Sprint and Verizon. And, we recently supported local police, fire and EMS first responders on the FirstNet Los Angeles Regional Interoperable Communications (LA-RICS) program in Los Angeles County.

In anticipation of the frequency reallocation that will occur after the incentive auction is completed, we explained that we are preparing to provide turn-key broadcast tower inspection, condition assessment, analysis, design solutions, equipment replacement, and manufacturing and installation services. We have 5 tall tower crews immediately available to support the transition/re-pack efforts. Because the deployment of the government contracts mentioned above is accelerating, these jobs are likely to finish earlier than expected. As a result, we plan to rotate the 15 crews that support these efforts into repack activities as they occur over the course of Calendar Year 2017. To accomplish this, we will implement our in-house training program to covert these crews into tall-tower crews well in advance of re-pack implementation.

Additionally, we also explained that we are in the process of re-tooling in preparation for the re-pack. We are fabricating gin-poles, obtaining rigging equipment, hoists, and other equipment needed to support re-pack efforts. To support the national broadcast re-pack market, we will centrally stage equipment and material. Crews will be dispatched from one of the regional offices that we are establishing to support the Broadcast Industry during this transition.

We appreciate the opportunity to meet with members of your organization about this important issue. Additional information is available via our corporate web-site www.itowersinc.com. If you require additional information please contact Mr. Hynes at (504) 655-3403 or via e-mail at james.hynes@itowersinc.com.

Sincerely,

Douglas J. Gratzer
President

Enclosure(s)
Capabilities Briefing
Our team has played a leading role in the communications revolution for more than 30 years, designing, manufacturing, and erecting towers and antennas worldwide for broadcasters, cellular providers, and governments. (Shown below our 2,000 platform tower in Sioux City Iowa from the ground and from an aircraft)
ITI started as a broadcast antenna/tower maintenance and repair company in 1981 (SG Communications).
SG expanded into tower construction company in the 1980s and became the largest broadcast tower erector for a seven year period erecting hundreds of tall towers.
Then in 1996 we acquired Tri–Ex towers and expanded into a full service tower company to work the digital conversion of TV. Our design/build projects include broadcast sites with 2,000 foot towers. Many of these were collocated with existing towers that were removed.
ITI sold our tall tower manufacturing facility with the broadcast division in 2000 to Spectrasite. Today all 1640 stations have been long converted to digital. However, with the repack a need for additional capacity in the tall tower rigging arena is perceived. This requires knowledgeable crews and specialized equipment including hoists and gin poles. ITI fabricated the gin poles we used for many years and are still being used by others. We are currently retooling by fabricating new equipment for this endeavor.
We have changed antennas that are 200’ long. Low and mid band batwing antennas were normally changed by jumping the gin pole on the lower half of the mast. We analyzed this in the late 1980s and determined it would be much safer and efficient to keep the bottom of the pole on the tower. Shown below is an FM antenna change where the bottom section of the pole is on the tower and a standoff bracket attaches the pole to the antenna mast.
All of our gin poles have capacity charts similar to a crane that are used to keep the usage within the safety limits. ITI has an internal classroom training program that has a proven track record of safely rigging towers.

**Load Chart**

- **Load Parameters**
  - Load Angle (°)
  - Tag Angle (°)
  - Load Wt (lbs)

**Calculations**

- Load LP: 20 + 10 + 10 = 40 lbs
- Load GP: 1.5 * 3 = 4.5 lbs
- Load TT: 64.5 lbs
- Load HB: 2,000 lbs
- Load LW: 1,000 lbs

**Notes**

- Max Working Pole Wind Speed Limit: 30 mph
- Refer to Separate Chart for Conversion of Degrees to Distances
- The Gross Load Shall Be Reduced By 50% When Lifting Personnel
ITI has also installed strings of communications towers. One project for Diablo communications went from Bakersfield to Sacramento. This design/build contract included the design, manufacturing, and installation of (42) 180 foot structures in a 120 day period. We ran a foundation crew ahead of our assembly and then erection crews.
Deployment Equipment

Caterpillar Construction equipment sized for excavation and placement of foundations and shelter pads

CAT 308 Excavator with rock breaker
Tower Hoist and Gin Pole on single trailer

Peterbilt dump truck and equipment trailer

CAT 420E backhoe with attachments

CAT 246C Skid steer with trencher, auger and bucket
New Deployment Equipment this year

Altec 38 ton crane

Cat 314 Excavator

Cat 259 Skid steer
Foundation Dimensions / Types

Precast, Caissons (With pre-manufacture rebar cages), Spread Footers - with or without Rock Anchors

Rock Anchor Installation – Tucson Mountain

Caisson Installation – Tucson, AZ

Rock Anchor Installation – Grandmother Mt. NC
International Towers Inc.

R 56/FAA 19E Complainant Grounding Designs
Commercial Microwave Installations for Cellular

ITI is currently deployed to multiple markets performing commercial microwave installations for cellular carriers. Below is a screenshot of the GUI during programming.

Screen shot of radio programming in Telnet following the supplied MOP.

Photographic documentation of proper installation of microwave links – closeout packages.
ITI is currently deployed in different markets supporting the LTE build. Last year our ranking with AT&T was #1 for quality in the Southwestern region. ITI is currently finishing similar LTE installations for FirstNet in LA county.
Our government projects include:
Fort Irwin, Nevada Test Site (NTS), Navy ELF, Voice of America (VOA), Coast Guard Loran mid-continent gap fill, 29 Palms Marine Base Backbone Infrastructure Upgrade, and Malaysia RTM projects, FirstNet, PCWIN, Natchez Trace, RVSS, IFT, CBP LMR, and Block One
Shown are pictures of the 100’ tower replacement on the 350’ Bank of America Building in downtown Tucson. ITI won a design/build contract for this Pima County Wireless Integrated Network project.
RDS (Rapid Deployment Structure)

For Infrastructure Builds or Upgrades

Patented Technology
ITI has recently completed a five mountain top build for the Twenty Nine Palms Marine Base. Four of the five towers were installed with helicopters since there were no roads to the sites. The entire project was completed within a 120 day performance period.
RDS 4XP Design Features

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NOTES:
1. SEE STRUCTURAL ENGINEERING SHEET 5-1 FOR LOCKER
2. SEE STRUCTURAL ENGINEERING SHEET 5-10 FOR INSTALLATION INSTRUCTIONS
Construction equipment for excavation and placement consisted of (1) D3, (1) 308 excavator (with breaker attachment) and one drill rig.
RDS – 4XP Foundation Dimensions

The foundation design for the center piers consists of concrete precast units to be placed directly into the excavated area with helicopters. The guy anchors have steel I Beam units that are secured with soil/rock anchors.
RDS – 4XP
Remote/helicopter Deployment

The RDS – 4 XP structures can be erected quickly, emphasizing the modular design for both the foundations and tower sections. All materials and equipment can be air lifted to remote sites.
RDS – 4XP Deployment

The structures were erected using proven techniques from the power industry centered around the modular design of the tower sections. ITI then won a patent on the design.
Remote/helicopter Deployment

The RDS – 4 XP structures can be erected quickly, emphasizing the modular design for both the foundations and tower sections. Our unique guide systems allow for setting the steel without Iron workers on the tower.
ITI has been installing solar systems for many years with both on grid and off grid applications. We recently installed a 22kW on grid system and 5 off grid systems on the Twenty Nine Palms Marine Base.

ITI is a Kohler generator dealer
WAREHOUSING AND STAGING

DOI – NPS - Natchez Trace - ITI has System responsibility for the microwave backbone transition from 2GHz to 8GHz while maintaining LMR coverage. We set up a remote staging facility where all procured materials were assembled then transported to the sites for installation.

ITI supplied equipment includes; RF systems - 50 microwave antennas, 3.5 miles of elliptical waveguide, towers, shelters, and generators.

Harris supplied equipment includes; microwave radios, dehydrators, and IT infrastructure. Below are pictures of our Tupelo warehouse equipped with office and test facilities.
ITI PLANNING AND PROJECT MANAGEMENT

ITI Has Been Using Microsoft Project To Successfully Plan And Manage Complex Tower Infrastructure Projects Since The Mid 1990's
ITI is deploying sensor systems on the southern border for General Dynamics through a teaming agreement that gives us system responsibility. We are supplying the engineering, fabrication and installation of all structural sensor mounts. We are configuring all IP addresses in the cameras, microwave radios, power supplies, inclinometers and encoders. We are then shipping the configured equipment to the site.
SHELTER INTEGRATION

PCWIN (Pima County Wireless Integrated Network) Childs Mountain Ajo, AZ

48 Volt DC Power Plant, Microwave Radio and Land Mobile Radio Installation
Specialized Equipment for proper installation
At the site we are installing the system then performing the final bore sighting and checkout. Shown below is our crane picking the sensor suite for installation.
IFT

Sensor Tower Site Design/Build – ELBIT demonstration site

NATE for safety requirements - ITI is a member of the National Association of Tower Erectors (NATE) organization. ITI’s management personnel are founding members of this organization and devoted to ensuring tower erection safety.
Assembly and test
ITI receives all CFE material including sensors into our Tucson facility. Our technicians assemble, test, and then ship the materials to the remote sites where they are reassembled and installed.
International Towers Inc. (ITI)

IFT

Deployment / Sensor Installation
ITI’s Specialized Rigging for Sensor Installation
ITI is installing 7 helicopter access only sites on the western part of Arizona for the Border Patrol. We are on 4 TACOM teams for Projects.
ITI is upgrading 3 of the existing CBP Land Mobile Radio sites with new technology. We are also installing 4 new sites as part of this project. This is a time and material contract since these are helicopter access only sites.
ITI has a multi year contract with the FAA to maintain and upgrade the sites delivered under the SBInet program.
The ITI Team has vendor trained and certified technicians with the training and real world experience to accomplish acceptance testing. We have in-house test equipment for microwave path alignment, waveguide sweeps, and system grounding measurements. We routinely run tests on solar installations, DC power plants, microwave radios, and land mobile radios. Our technicians recently finished a 145 site upgrade for the FAA that included testing requirements.
The ITI Team has a 30 year history of 24/7 support of operating and maintaining communications sites CONUS and OCONUS. We have troubleshooted and repaired high power broadcast antennas, microwave networks, Land Mobile Radio systems, generators, solar power systems, and strobe light systems. ITI anticipates adapting its core infrastructure to adapt to the support of the lifecycle sustainment and ILS plans. We have a fleet of service body one ton 4 x 4s that regularly access difficult and remote sites for O&M. We are currently maintaining sites in Southern AZ on a multi year commitment for CBP (Block One, RVSS, and IFT).