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# Brevard County, Florida - Internal Audit of 800 MHz Cell Towers

February 3, 2021

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# TRANSMITTAL LETTER



February 3, 2021

The Audit Committee of  
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Pursuant to the internal audit plan for fiscal year (“FY”) 2020-2021 for Brevard County (“County”), approved by the Board of County Commissioners (“BoCC”), we hereby present the internal audit of Brevard County’s 800 MHz Cell Towers. We will be presenting this report to the Audit Committee at the next scheduled meeting on February 17, 2021.

Our report is organized into the following sections:

<b>Executive Summary</b>	This provides a high-level overview and summary of the observations noted in our internal audit of the County’s Towers.
<b>Background</b>	This provides an overview of the County’s Towers, as well as relevant background information.
<b>Objectives and Approach</b>	The internal audit objectives are expanded upon in this section as well as a review of our approach.
<b>Observations Matrix</b>	This section includes a description of the observations noted during our internal audit and recommended actions, as well as Management’s response including responsible party, and estimated completion date.

We would like to thank the staff and all those involved in assisting our firm with this internal audit.

Respectfully Submitted,

*RSM US LLP*

**Internal Auditors**

## EXECUTIVE SUMMARY

### Background

Brevard County's Public Safety Radio program primarily serves to provide an effective county-wide radio communications system in support of the needs of public safety agencies and first responders. The FY20 expenditures budget for the program was \$1,522,646, with the majority of funding coming from the agencies using the radio system and 6% of funding allocated from the General Fund. The County engages with carriers in the Wireless industry through tower license agreements, which allow the carrier to use existing County-owned towers or County-owned property in the provisioning of telecommunications service. Revenues from these license agreements serve to reduce the costs associated with on-going tower maintenance, as approved by the Board of County Commissioners on a case-by-case basis. In FY20, license agreement revenues contributed approximately 16% of the total expenditure budget.

The County currently operates eleven (11) towers and has engaged in seven (7) license agreements with cellular carrier and tower companies. Two (2) of the seven (7) carrier license agreements are currently under an abatement period, and will begin generating revenue in the coming years. One of the seven license agreements is a ground lease for a communication tower on County property.

The roles and responsibilities related to tower management are currently allocated between the Emergency Management/Public Safety Radio Program, Planning & Development, and Asset Management departments. Planning & Development is responsible for administering and enforcing compliance with County zoning, site planning and building permit regulations. Asset Management is charged with tower guardianship and proper records retention. Emergency Management - having the most significant role in the process - is responsible for initial negotiations with carrier companies, on-going vendor management, and the general maintenance and operations of towers on County-owned properties.

### Objectives and Scope

The objectives of the internal audit of the County's Towers included the following:

- Evaluate governance process for compliance with applicable Florida Statutes and County Ordinances.
- Assess the adequacy of County Administrative Orders and other related policy and procedures documentation.
- Assess the design and implementation of operational, financial, and compliance related controls within the tower management process.
- For active carrier agreements during FY19 and FY20, determine that payments were received in accordance with contractual terms.

Our scope period was October 1, 2018 through September 30, 2020. Fieldwork was performed from December 2020 through January 2021. Our approach included interviewing key members of the Emergency Management department and review of the County's Wireless Telecommunication Master Plan, as well as applicable Administrative Orders and internal policies. Carrier license agreements and evidence of related payments were also assessed.

At the conclusion of this audit, we summarized our findings into this report. We have reviewed the results with the appropriate persons in Management, and have incorporated Management's response into report.

### Overall Summary / Highlights

The observations identified during our assessment are detailed within the pages that follow. We have assigned relative risk or value factors to each observation identified. Risk ratings are the evaluation of the severity of the concern and the potential impact on the operations of each item. There are many areas of risk to consider in determining the relative risk rating of an observation, including financial, operational, and / or compliance, as well as public perception or 'brand' risk.

Summary of Observation Ratings			
	High	Moderate	Low
800 MHz Cell Towers	-	1	-

## EXECUTIVE SUMMARY – CONTINUED

### Observations Summary

There was one observation identified during this internal audit, as listed below. Detailed observations are included in the observations matrix section of the report.

Summary of Observations	
Observations	Rating
1. Governance and Update to the Strategic Plan for the Cell Tower Management Process	Moderate

## BACKGROUND

### County Towers

As part of the County's Wireless Telecommunications Master Plan, the County has identified certain plots, parcels, or tracts of County land which house, or have the potential to house, telecommunication towers - including the Public Safety 800 MHz Radio Towers associated with the revenue generating license agreements between the County and cellular carrier companies. However, the primary function of County-owned Towers is to serve as the County's public safety communications systems. Currently, there are eleven (11) County towers that operate on County-owned property, as shown below. Additionally, there is one tower owned by American Tower, LP located on leased County-owned property.

#	Location	Established
1	4950 Highway 1 Scottsmoor, FL 32754	2015
2	1141 Day Street Titusville, FL 32780	2016
3	866 Camp Road Cocoa, FL 32927	2019
4	1746 Cedar Street Rockledge, FL 32955	2019
5	140 Malabar Rd. SE Palm Bay, FL 32909	2019
6	1167 Tequesta Dr. Barefoot Bay, FL 32976	2016
7	55 N Osceola Dr. Indian Harbor Beach, FL 32937	2017
8	4660 Tom Warriner Blvd. Cocoa Beach, FL 32931	2019
9	2800 Highway A1A Melbourne Beach, FL	2019
10	2575 North Courtenay Parkway Merritt Island, FL 32953	2019
11	1515 Sarno Rd. Melbourne, FL 32935	2019
12*	I-95 and Turtle Mound Rd. Melbourne, FL 32940*	-

\*Note: Tower #12 operates on County-owned land, but is owned by American Tower, LP.

## BACKGROUND (CONTINUED)

### Wireless Telecommunications Master Plan

In recognition of the increasing need to provide wireless telecommunication capabilities across the County, Brevard County (the County) intends to manage wireless network expansions through a centralized process which promotes expeditious review of related contracts and efficient infrastructure installations without compromising site development standards - especially in residential and scenic coastal areas. To assist the County in documenting these objectives and the plan to achieve such outcomes, a third party firm was contracted in 2014 for the development the Wireless Telecommunications Master Plan (Master Plan). The Master Plan addresses concerns about the proliferation of telecommunications infrastructure from the standpoint of aesthetics, public safety and fair deployment practices, and the legal implications of upholding both the public and private interest involved. The Master Plan serves as a general planning tool for the development of planning policies for future wireless communications infrastructure and the identification of County-owned properties that can be part of network deployment solutions for service providers.

In consideration of Brevard County's growing population, the Master Plan lays the ground work to protect community aesthetics by planning for well-sited and well-designed infrastructure, as well as the avoidance of an excess number of telecommunication facilities. The Master Plan addresses the safety of telecommunication facilities and avoidance of potential damage to people and property. Additionally, the Master Plan outlays an organized and efficient means for partnering with the cellular service industry in providing public infrastructure to support the citizenry and subscriber base Countywide.

### Administrative Order-60

Administrative Order-60 (AO-60) outlines the policies in place regarding requests for the use of County-owned telecommunication facilities, as well as the roles and responsibilities of the parties involved. AO-60 applies when the County is presented with an unsolicited written offer (or "request") for antenna space (co-location) on existing County-owned towers or an unsolicited written offer to utilize available pre-approved County-owned property (as identified per the Master Plan) for a new commercial communications tower. Additionally, AO-60 applies when the County opts to advertise surplus County-owned tower antenna space with the intention of entering into a contract with a carrier licensee.

#### Roles and Responsibilities

AO-60 provides guidance on the roles and responsibilities of the various County departments and parties involved in the process. Roles and responsibilities for the parties specified in AO-60 include:

- Planning & Development Department
  - Responsible for review of unsolicited written request and/or new telecommunication tower construction from wireless communication companies on County-owned properties, in conjunction with Emergency Management
  - Responsible for administering and ensuring/enforcing compliance with Brevard County zoning, site planning and building permit regulations
- Emergency Management Department
  - Responsible for review of unsolicited written request and/or new telecommunication tower construction from wireless communication companies on County-owned properties, in conjunction with Planning and Development
  - Responsible for coordination of vendor services for construction, installation, maintenance, and repair of County-owned towers
  - Responsible for coordination with County departments responsible for license(s) legal review, risk management, and insurance
  - Responsible for coordination of the licensee's requirements with respect to access, and any potential future needs, with the County departments responsible for the requested property where the existing/future tower is or will be located

## BACKGROUND (CONTINUED)

### Administrative Order AO-60 (Continued)

#### Roles and Responsibilities (Continued)

- Purchasing Department
  - Responsible for administering purchasing policies and administrative orders, as specified within the Brevard County Board of County Commissioners Purchasing Procedures Manual
  - Facilitate selection of vendor services for construction, installation, maintenance and repair of County-owned towers in alignment with the standard Purchasing policy requirements
  - Responsible for the award of licenses for antenna space
- Board of County Commissioners
  - Responsible for the allocation of revenue generated via County-owned wireless communication facilities
    - Revenue generated via County-owned towers that are part of the public safety radio system (i.e. all eleven towers) is specifically dedicated to the maintenance and operations of that radio system
- Prospective Licensee
  - Responsible for obtaining building permits, site plan approval, conditional use permits and FCC licenses, as needed
  - Responsible for providing structural analysis, if needed, stamped by a State of Florida Registered Professional Engineer (PE)
  - Responsible for providing radio frequency analysis, if needed, stamped by a State of Florida Registered Professional Engineer (PE)

#### Procedures

AO-60 also defines the specific procedures that shall be utilized when the County is presented with an unsolicited written offer for County-owned tower antenna co-location or an unsolicited written offer to utilize available pre-approved County-owned property, listed in the Master Plan, for the construction of a new tower. Requests may be submitted online through either Planning & Development or Emergency Management's respective page on the County's official website. Any requests received by Planning & Development are immediately forwarded to Emergency Management for a detailed review of the request's validity. All tower service requests received are required to undergo a staff analysis performed by Emergency Management within thirty (30) business days of request submission. Per AO-60, the following considerations are assessed:

- Co-Location
  - Availability of antenna tower capacity and ground space
  - Requirements of the potential licensee(s) with respect to access, tower loading, ground space and utilities, and any potential future needs for the requested space by County, State or Federal Agencies
- New Tower
  - Availability of ground space and compatibility with pre-established requirements included in the Master Plan for the requested location
  - Any potential future needs for the requested space by County, State, and Federal Agencies

## BACKGROUND (CONTINUED)

### Administrative Order AO-60 (Continued)

#### Procedures (Continued)

After analysis, a decision shall be reached regarding whether the potential licensee's request is acceptable or deficient/not compatible with the pre-established requirements included in the Master Plan. If a request is determined to be deficient, a notice of non-compliance shall be sent to the applicant detailing the issues identified during review, as well as a description of the following options for remediation:

- Co-Location
  - Request may be amended by the potential licensee within thirty (30) business days after receiving the notification
  - If an amendment is not received within thirty (30) business days on a deficient request, the application will be withdrawn by the County
- New Tower
  - Prospective licensee may request County approval (via Planning & Development) to file a joint conditional use permit application pursuant to Sections 62-1901 and 62-1953, Brevard County Code
    - If no request is received within thirty (30) business days, the application will be withdrawn by the County

If a request for a co-location is found to be acceptable, Emergency Management will present the request to the Board of County Commissioners (BOCC) for review and approval. Once approved by the BOCC, Emergency Management will create an Invitation to Bid (ITB), detailing the requirements of the requested service(s), which is then provided to the Purchasing department. Purchasing will then advertise the ITB in an effort to solicit bids for the available space from all interested parties, following the guidelines laid out in the approved Brevard County Purchasing Policies and Procedures Manual. Following completion of the procurement process, Purchasing will approve the qualified carrier(s) ("licensee") to award a license. After potential licensee(s) have been selected, Emergency Management will work with the Legal department to negotiate the terms of the license agreement with the selected carrier. After negotiations are completed, the license agreement is drafted and submitted for review and approval by the County Manager or designee. After the appropriate approvals have been obtained, the licensee may begin the permitting process through Planning & Development. Additional technical reviews and permitting processes will proceed, as required.

If a request for the construction of a new tower is deemed acceptable by the County, a new location for the tower will be selected and presented at a Public Hearing for approval. If approval is granted, Emergency Management will create an ITB for the construction of a new tower. Purchasing will then advertise the ITB to solicit bids for the available location from all interested parties. The County follows the standards defined in the approved Brevard County Purchasing Policies and Procedures Manual during the solicitation process. Once the procurement process is completed and potential licensee(s) have been selected, Emergency Management will work with the Legal department to complete the negotiation process. Once negotiations commence, a license agreement is drafted for review and approval by the County Manager or designee. After approval, the licensee may begin the permitting process through Planning & Development. Additional technical reviews and permitting process will proceed, as required.

In certain situations the County may desire to electively make surplus County-owned tower antenna space available. Under these circumstances, the Director of Emergency Management (or designee) is required to produce technical requirements related to the election, as needed. Purchasing will then follow the procurement process defined in the approved Brevard County Purchasing Policies and Procedures Manual to solicit bids for the available space from all interest parties.

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## BACKGROUND (CONTINUED)

### Administrative Order AO-60 (Continued)

#### Accountability (Continued)

The Office of Emergency Management is charged with the consistent adherence to AO-60, as well as the management of the County's 800 MHz Tower Program. Emergency Management is responsible for the general maintenance, operations, contract monitoring, and vendor management of towers on County-owned properties. Additionally, Emergency Management is tasked with ensuring that best practices are adhered to by maintenance vendors and wireless communication companies on County-owned properties.

#### Tower Licensing Agreements

Use of County-owned Towers is made available to service providers/carriers through a Licensing Agreement (i.e. Contract), wherein the County agrees to grant a service provider/carrier (Licensee) the right to use County property upon which a tower and related structures are located, in exchange for rental payments. License Agreements serve an important public purpose as a Licensee's antennas and equipment are instrumental in providing telecommunication services to a significant portion of the population in the surrounding area. Additionally, the rental payments made to the County contribute to funds needed for the continuous maintenance of each tower and the related equipment.

As previously noted, the primary function of the radio towers is to serve as the County's public safety communications systems. Thus, Licensing Agreements specify that a licensee has the right to the continued use of the property so long as the Licensee's use of the property does not interfere with the operation of the County's emergency communications system, which holds precedence over the Licensee's use of the property. Towers are administered/controlled by the Emergency Management department on behalf of the County for the purpose of supporting the County-wide public safety radio communications network.

All Licensing Agreements are subject to negotiations with the licensee, facilitated by Emergency Management and the County's Legal department. The negotiation process is intended to determine the License Agreement's term, pricing, and escalation percentage before the agreement may be finalized. In general, License Agreements set a minimum term of 20 years and may include an option to renew at specified time intervals. Before tower services are advertised for bid, a minimum price threshold is set to prevent Carriers from submitting unreasonably low bids for tower services. The minimum price is determined by Emergency Management through review of similar private sector contracts and communication with County contacts within the industry. Every License Agreement is unique with respect to tower pricing and compensation to the County. Pricing depends on the value of Tower use to the carrier. Considerations such as how the license fits into the carrier's larger network plan and design, tower value and specifications (tower height, capacity, etc.) and other available comparable options all effect license pricing. Further, the County negotiates an escalation percentage for each License Agreement to determine the percentage annual increase for the agreement. Negotiated escalation percentages generally range from 3-5%. Once the negotiation process is complete, the results are communicated to the County Manager (or designee) for review and approval before the License Agreement can be finalized. The rental payment for the initial term of a License Agreement is paid annually in advance and in full for the upcoming year.

## BACKGROUND (CONTINUED)

### Expenditures and Revenue for Towers

The total budget for Brevard County's public safety radio program was \$2,563,257 in FY19 and \$1,522,646 in FY20, with the primary driver for the decrease being the completion of two major capital projects for public safety code requirements during FY19. These total budget figures include expenditures related to on-going operation, maintenance, repair, and upgrade of County-owned Towers; as well as all other related line items such as salaries and benefits.

Revenues received from the licensing of County tower services provide a portion of the funding for maintenance expenditures and other necessary enhancements to the radio tower system. County revenues received from the licensing of County tower services equate to approximately 25% of the tower maintenance costs of \$958,114 and \$955,265 for FY19 and FY20, respectively. An approximate 25% revenue to maintenance expense ratio was also identified during a comparison to a similar County in Florida. (Benchmarking exercises such as this assist in gauging how well performance objectives are being executed, as well as identifying areas that require improvement or special attention.) As of FY21 Brevard County currently has five (5) active Licensing Agreements for the use of 800 MHz Radio System, accounting for revenues of \$230,947 in FY19 and \$240,025 in FY20. Additionally, there are two (2) executed agreements currently in an abatement period – revenues from these agreements have been appropriated by the Board for expenditures associated with the new Emergency Operations Center. Contract details are shown in the table below.

Contract #	Licensee	Address of the Property	License Agreement Commencement Date	FY20 Payment Received	FY19 Payment Received
2949	New Cingular Wireless PCS, LLC	1167 Tequesta Dr. Barefoot Bay, FL 32976	6/1/2015	\$71,471.77	\$68,068.35
3085	SprintCom, Inc.	1141 Day Street Titusville, FL 32780	12/1/2015	\$40,945.08	\$39,370.26
3218	Verizon Wireless	1141 Day Street Titusville, FL 32780	3/1/2016	Abatement Period*	Abatement Period*
3322	Verizon Wireless	2575 North Courtenay Parkway Merritt Island, FL 32953	3/1/2016	\$41,009.81	\$39,432.51
3487	American Tower, LP	I-95 and Turtle Mound Road Melbourne, FL 32940	12/22/2016	\$46,987.26	\$45,618.70
3283	Verizon Wireless	2800 Highway A1A Melbourne Beach, FL	4/1/2017	\$39,611.35	\$38,457.63
4527	New Cingular Wireless PCS, LLC	1515 Sarno Rd. Melbourne, FL 32935	11/1/2019	Abatement Period**	Abatement Period**
<b>Totals</b>				<b><u>\$240,025.27</u></b>	<b><u>\$230,947.45</u></b>

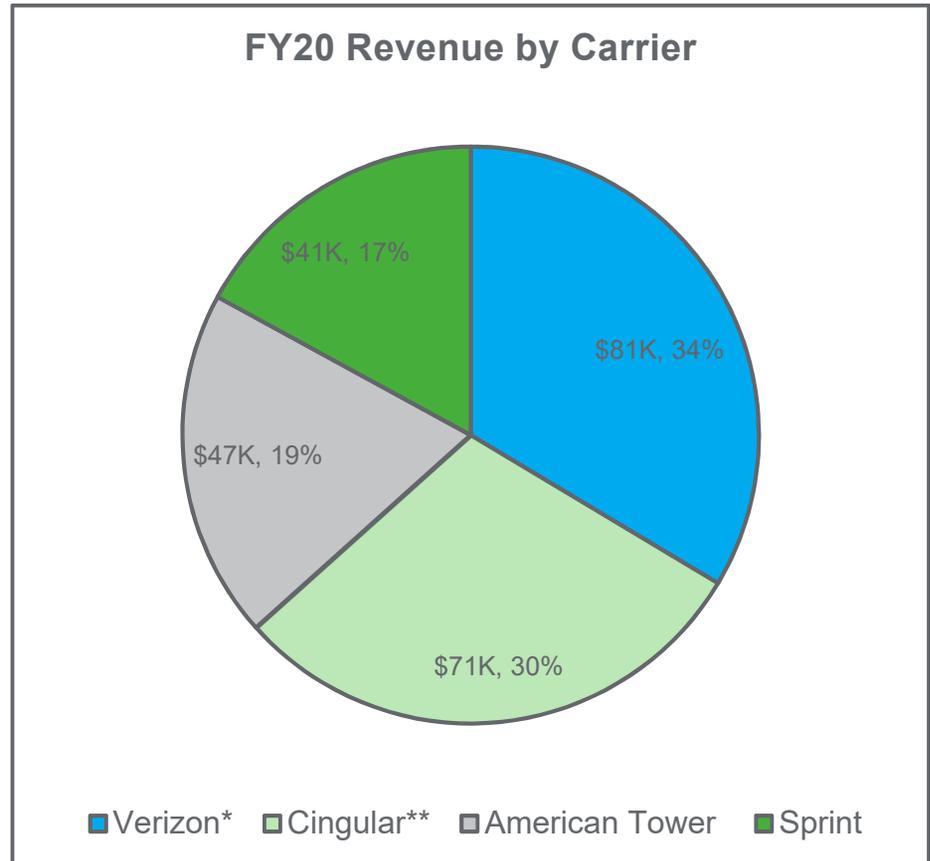
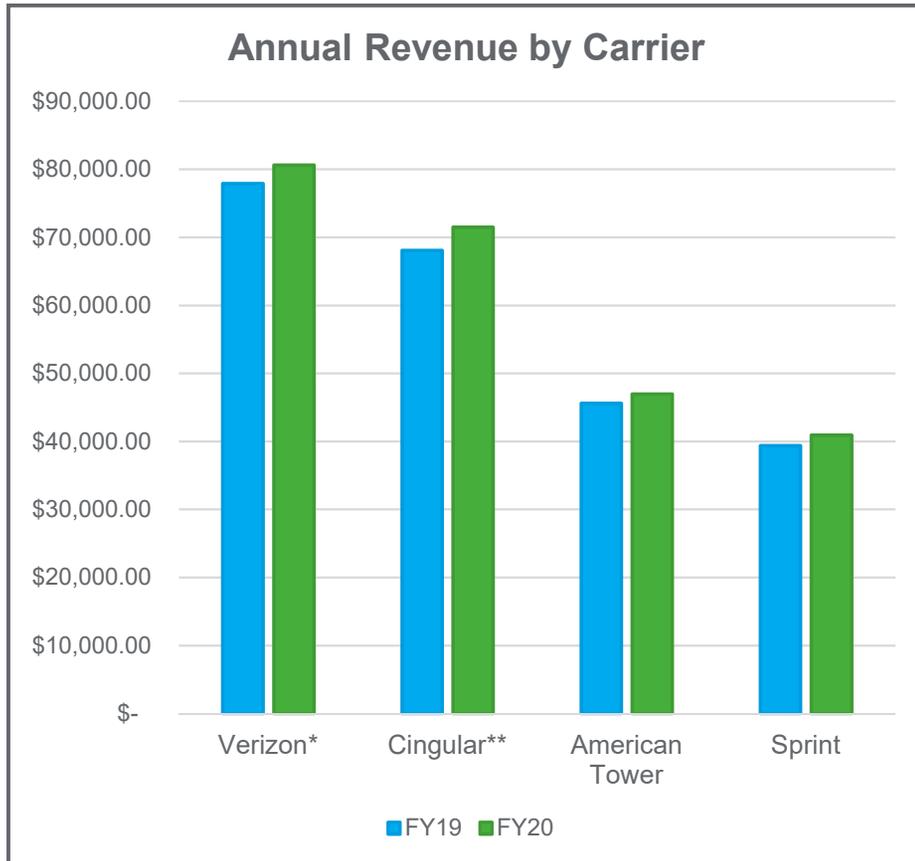
\*Note: License Agreement is currently under an abatement period through 3/1/2023. Annual payments will begin on 3/1/2023 in the amount of \$32,322.67, subject to an annual increase (escalation) of 3%.

\*\*Note: License Agreement is currently under an abatement period through 12/1/2021. Annual payments will begin on 12/1/2021 in the amount of \$35,295.28, subject to an annual increase (escalation) of 3%. Revenues from this contract have been allocated by the BoCC for use in the construction of a new Emergency Operations Center.

## BACKGROUND (CONTINUED)

### Expenditures and Revenue for Towers (Continued)

Currently, the County has seven (7) active License Agreements with four (4) separate Carriers (Verizon, Cingular, Sprint, and American Tower). The four (4) Carriers account for all of the annual revenue derived from the licensing of County towers and property. Each License Agreement is subject to an annual escalation percentage, generally 3-5%, determined during the contract negotiation process and specified in the License Agreement. The escalation percentage is utilized to calculate the annual increase applied to payments received from the Carriers. Application of a License Agreement's stated escalation percentage explains the increase in total revenue from FY19 to FY20. Annual revenue obtained from each carrier is detailed in the graphics below:



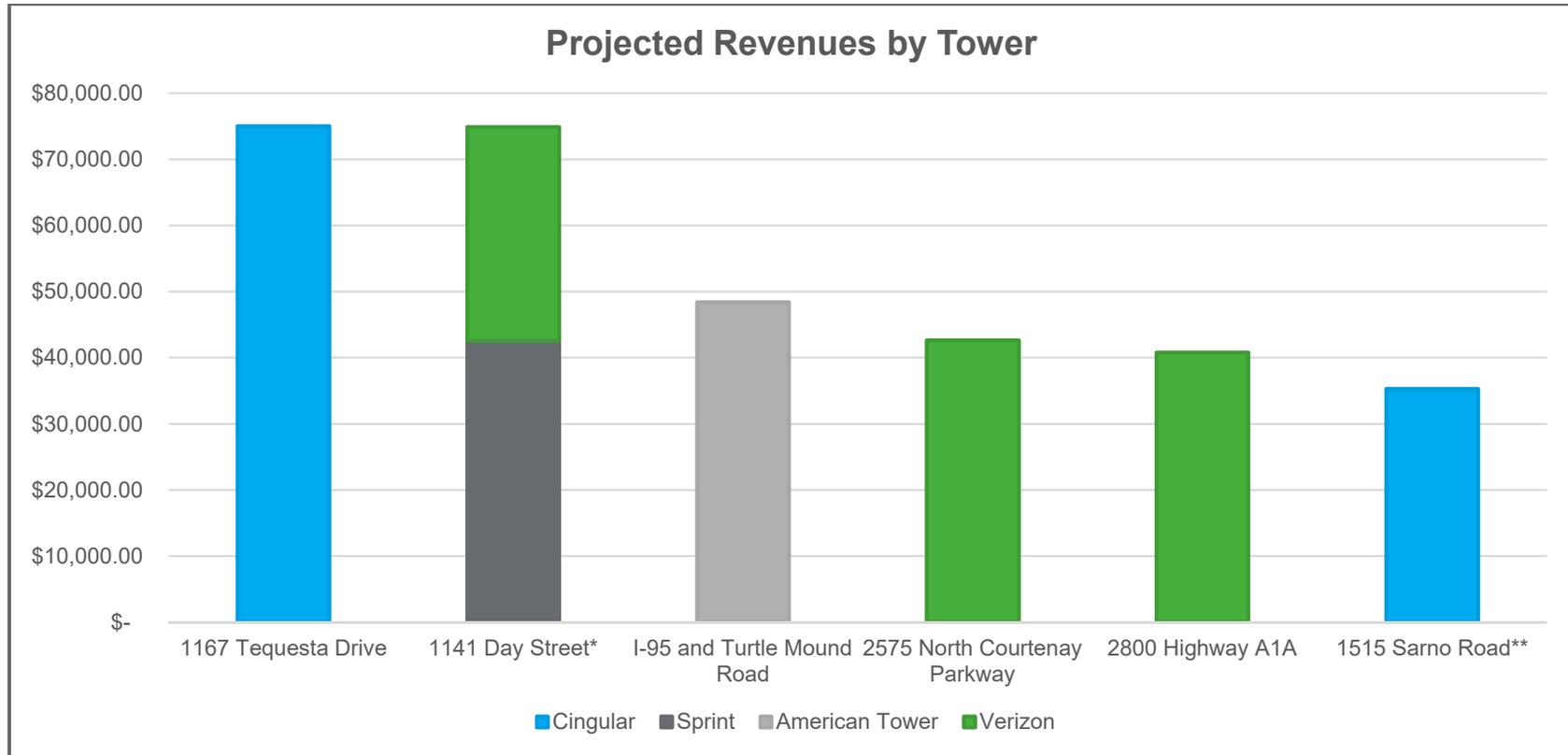
\*Note: Verizon has two (2) active License Agreement which provide revenue to the County, accounting for the disproportionate revenue amount.

\*\*Note: Cingular has two (2) active License Agreement which provide revenue to the County, accounting for the disproportionate revenue amount.

## BACKGROUND (CONTINUED)

### Expenditures and Revenue for Towers (Continued)

Of the eleven (11) County towers currently in operation, five (5) towers have active License Agreements in place, in addition to a Ground License with American Tower for the use of the property. The projected annual revenues associated with the seven (7) existing active License Agreements is detailed below:



**\*Note:** The County currently has two License Agreements, one with Sprint and one with Verizon, in place for the use of this tower. The License Agreement with Verizon is currently under an abatement period, payments are set to begin on 3/1/2023.

**\*\*Note:** The License Agreement with Cingular is currently under an abatement period, payments are set to begin on 12/1/2021.

In addition to these known revenues, solicitations and active carrier negotiations are currently underway as related to four new contracts for use of the existing Indian Harbor Beach, Melbourne Beach, and Palm Bay radio towers; as well as for two new tower builds.

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## OBJECTIVES AND APPROACH

### Objectives

The objectives of the internal audit of the County's tower management process included the following:

- Evaluate governance process for compliance with applicable Florida Statutes and County Ordinances.
- Assess the adequacy of County Administrative Orders and other related policy and procedures documentation.
- Assess the design and implementation of operational, financial, and compliance related controls within the tower management process.
- For active carrier agreements during FY19 and FY20, determine that payments were received in accordance with contractual terms.

### Approach

Our audit approach consisted of the following three phases:

#### Gaining an Understanding

The first phase of this audit consisted primarily of inquiry, in an effort to obtain an understanding of the key personnel, risks, processes, and controls relevant to the objectives outlined above. The following procedures were completed as a part of this phase:

- Interviews and transactional walkthroughs facilitated by members of Emergency Management.
- Review of applicable Florida Statutes, County Ordinances, Administrative Orders and policies and procedures.
- Inspection of budgets, licensee agreements, correspondence with carriers and additional supporting documentation as necessary.

#### Detailed Testing

The purpose of this phase was to conduct analysis and perform appropriate testing, in order to validate that processes are operating as intended and data used in reporting was accurate. For each of the seven active carrier agreements, used the payment terms defined in each agreement to calculate the expected amounts due for each licensee for the fiscal years 19 and 20. Obtained the Receipts Ledger and validated that all payments were made in full in accordance with the timelines established per the contractual agreement.

#### Reporting

At the conclusion of this audit, we summarized our observations into this report. We have reviewed the results with the appropriate persons in Management, and have incorporated Management's response the report.

## OBJECTIVES AND APPROACH – CONTINUED

Provided below is the observation risk rating definitions for the detailed observations starting on the following page.

Observation Risk Rating Definitions	
Rating	Explanation
<b>Low</b>	Observation presents a low risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of low importance to business success/achievement of goals.
<b>Moderate</b>	Observation presents a moderate risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of moderate importance to business success/achievement of goals. Action should be in the near term.
<b>High</b>	Observation presents a high risk (i.e., impact on financial statements, internal control environment, brand, or business operations) to the organization for the topic reviewed and/or is of high importance to business success/achievement of goals. Action should be taken immediately.

## OBSERVATIONS MATRIX

Observation	1. Governance and Update to the Strategic Plan for the Cell Tower Management Process
<p><b>Moderate</b></p>	<p>Although Administrative Order - 60 has been implemented to provide guidance over cell tower management, there is opportunity to strengthen the related governance structures in support of an optimized and consistently enforced process. Specifically, Internal Audit noted the following items:</p> <ul style="list-style-type: none"> <li>• Although Emergency Management does have strategic plans to proactively increase available 800MHz capacity and to advertise these opportunities through County-driven solicitation of bids, it has been seven (7) years since an in-depth analysis and formally documented strategic plan has been completed (i.e. a “Master Plan.”) Without regular Master Plan review under counsel of expert resources having current knowledge of telecommunications industry trends and technical specifications, the County may face inefficient expenditure of resources (personnel time, funds) or may miss opportunities to maximize revenue from towers.</li> <li>• Policies do not explicitly state that all tower guardianship or intent to construct a new tower, or add antenna or other cellular equipment to an existing tower be reported to Asset Management. An incomplete or inaccurate asset inventory may hinder the County’s ability to fully capitalize on existing assets. Further, the absence of this requirement makes it more difficult to enforce policy requirements and ensure that Emergency Management is appropriately engaged in all tower management functions - other County agencies seeking to employ this revenue stream may circumvent the intended processes outlined per AO-60.</li> </ul>
<p><b>Recommendation</b></p>	<p>In support of a strategic approach to maximize revenue streams through focused solicitation of bids for new tower builds or colocations in prime locations, the County may consider the creation of an up-to-date, forward looking Telecommunications Master Plan. The Master Plan, as owned by Planning and Development (i.e. Zoning), shall consider inputs from internal County experts such as Emergency Management and/or contracted industry resources. We recommend coordination with Planning and Development. The wide-scale approval of a holistic strategic plan could expedite the competitive speed to market during the Board of County Commissioners approval process.</p> <p>In consideration of succession planning needs, the County should continue to invest in training the Radio Frequency Engineer on the procedural tasks currently owned by the 800MHz Manager. Appointment of a full-time, dedicated resource may become more necessary as the number of active license agreements continues to rise, however this expense is likely to be offset with the increased revenue generation over time.</p> <p>Finally, AO – 60 should be enhanced to include a description of the role of Asset Management and the related reporting requirement for all agencies with intent to construct a new tower or add an antenna or other cellular equipment to an existing tower.</p> <p>(Continued on next page.)</p>

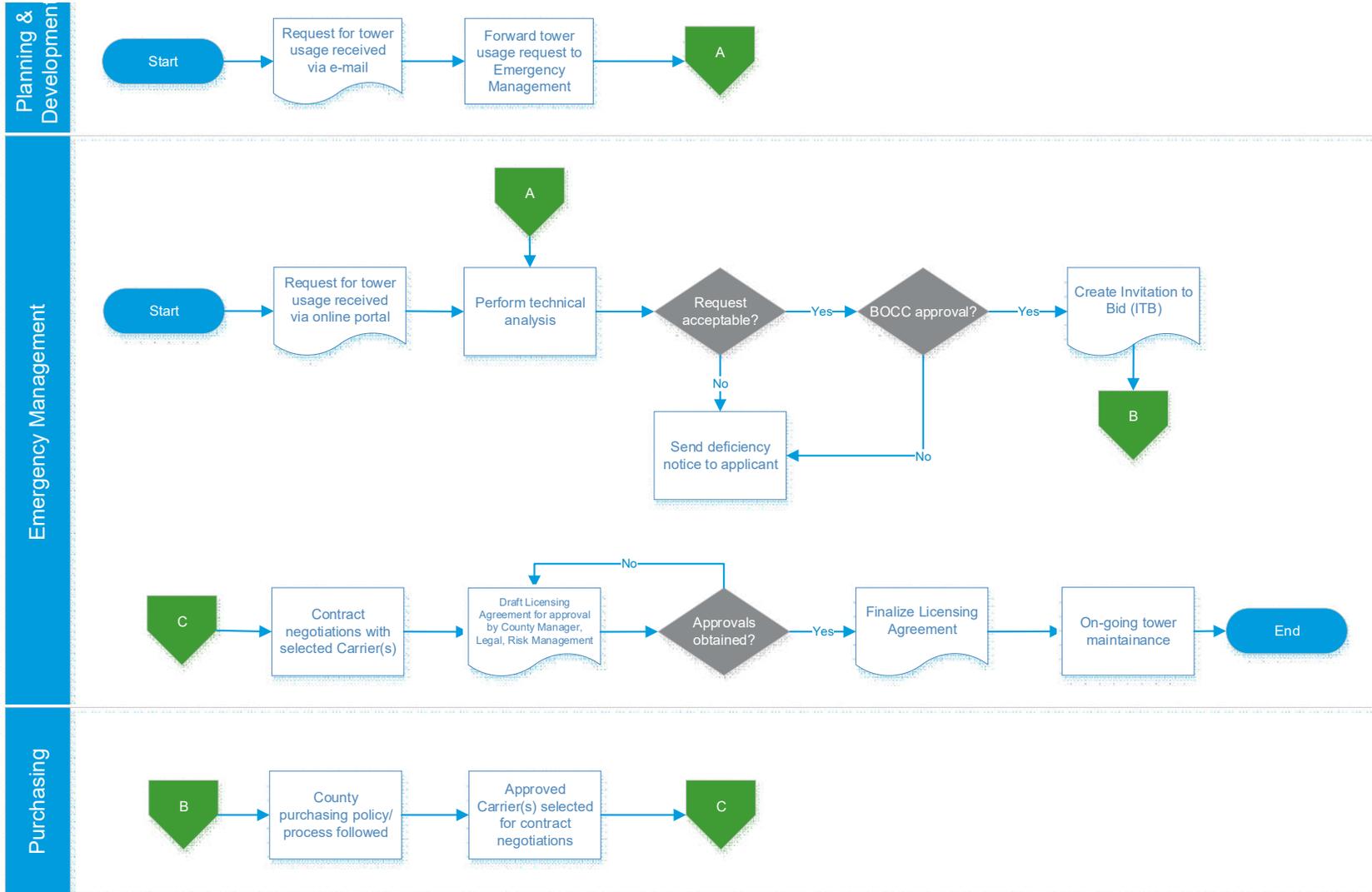
## OBSERVATIONS MATRIX – CONTINUED

Observation	1. Governance and Update to the Strategic Plan for the Cell Tower Management Process (Continued)
<b>Management's Action Plan</b>	<p><b>Response:</b> On an annual basis, Planning &amp; Development will assess the need to update the Brevard County Wireless Telecommunications Master Plan; based on the wireless industry trends, marketplace, and the number of land acquisitions by the County.</p> <p>Emergency Management will update the AO-60 to include Asset Management's role regarding new towers and wireless collocations.</p> <p><b>Responsible Party:</b> Emergency Management and Planning &amp; Development</p> <p><b>Estimated Completion Date:</b> 04/01/2021</p>

# APPENDIX A

## 800MHz Tower Licensing and Management Process

Brevard County





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