



417 Pine Street

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Green Bay, WI 54301

April 22, 2019

Dane County Planning & Development  
Attn: Majid Allan, Senior Planner  
210 Martin Luther King Jr. Blvd – Room 116  
Madison, WI 53703

Re: Dane County Conditional Use Permit Application #2456 Bug Tussel Wireless/Town of Montrose

Dear Mr. Allan,

This letter is in response to the Staff Report (“Staff”) and the CityScape Consultants, Inc. (“CityScape”) Report that was presented at the March 26, 2019 public hearing. Both the CityScape Report and the Staff Report improperly assumed that since the size and location of the search ring changed a couple of times over the last few years that something nefarious was happening. Quite the opposite, and we stand by the final affidavit our engineers sent on January 7, 2019. After several years of trying to attain this same tower location in Dane County the network has been developing in neighboring counties including locations of coverage and backhaul needed to make the system sustainable.

We will be very frank regarding the financial issues of collocating on the SBA tower as suggested by CityScape. As, indicated in the CityScape Report (Page 2), they identify that under Dane County Ordinance “§10.194(3) Term *Reasonable* is defined as 125% cost of new tower – Unknown.” In order to answer this question and satisfy the ordinance, we have provided the following totals as confirmation that we qualify under Dane County Chapter 10 and Wis.Stat. 66.0404(2)(b)6. as the SBA tower attachment would be “...economically burdensome to the mobile service provider.”

As indicated in the report, Staff contacted the SBA tower to identify that space was available and that collocation was an option, but the Staff report failed to confirm the cost of that collocation and chose to focus primarily on the technological feasibility aspect. SBA attended the meeting and, again, did not express the cost of collocation to their SBA towers. The staff did indicate our concerns about the difficulty of that collocation, and our ability to work through SBAs cumbersome process.

Identified below is the cost analysis of attaining collocation space on the SBA tower compared with the cost of building our own Bug Tussel/Cloud 1 Tower. This information satisfies the question of collocation vs. new tower for both the County’s requirement of “economically feasible,” and the State’s Requirement of “economically burdensome.” It also satisfies the county ordinance 10.194(2)(e) standard of “unreasonable relative to industry norms.” This would erase the need for any additional analysis and further arguments regarding the CityScape or County Staff Report. Please amend the County staff report to include this analysis and recommendation for approval based on your ordinance and state statute. We look forward to approval at the next regularly schedule Zoning and Land Regulation Meeting as we discuss how we meet all requirements of Wis.Stat. 66.0404 and Dane County §10.194.

- Cost of SBA Collocation:**
- a. Cost of Equipment, Install, and Structural Engineer: \$195,000
  - b. Additional \$20,000-100,000 for a structural analysis and structural modification to existing tower, given the loading requirements.
  - c. Current Leases we have with SBA 1) \$4,880/mo 2) \$4,232/mo 3) 4,017/mo  
Average cost \$4,376/Mo for 40 years = \$2,100,480.
  - d. Taking the average cost for collocation (\$195,000 + \$60,000) x 2 antennae array's = \$510,000 construction cost.

- Cost of Bug Tussel/Cloud 1 Tower:**
- a. Cost of Materials, Civil, Utilities, and Site Acquisition - \$170,000
  - b. Antenna/line, engineering, cost of equipment - \$185,000
  - c. Our average land owner lease \$250/mo with 3% term escalator with a 40-year Lease Term is \$133,385

**Cost of Building a New Tower vs. Collocation is 35.8% difference exceeding the 25% threshold.**

Bug Tussel/Cloud 1 new tower = \$355,000

SBA Collocation = \$510,000

**New Tower vs. Collocation on an industry standard 40-year lease term 1,474.8% difference.**

Bug Tussel/Cloud 1 New Tower lease paid to land owner = \$133,385

SBA Collocation tower average lease paid by = \$2,100,480

Total cost of construction and lease amounts to collocation on the SBA over an industry standard 40-year lease is \$2,610,480 compared to \$488,385 of Bug Tussel/Cloud 1 building our own tower. The difference of 435.5% exceeds the county standard of 25%. These fees and costs of collocating on the existing SBA tower is unreasonable relative to industry norms.

Thank you and I look forward to hearing from you soon. If you would like, we can meet to discuss this further.

Sincerely,



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