



THE UNDER SECRETARY OF WAR
3010 DEFENSE PENTAGON
WASHINGTON, DC 20301-3010

ACQUISITION
AND SUSTAINMENT

September 2, 2026

MEMORANDUM FOR SENIOR PENTAGON LEADERSHIP
SECRETARIES OF THE MILITARY DEPARTMENTS
DEFENSE AGENCY AND DOW FIELD ACTIVITY DIRECTORS

SUBJECT: Directive-type Memorandum 26-004 – “Mobile Broadband Infrastructure Outgrants and Reporting Guidance”

References: See Attachment 1.

Purpose. In accordance with the authority in DoD Directive 5135.02, and pursuant to Section 1455 of Title 47, United States Code (also known as the “Middle Class Tax Relief and Job Creation Act of 2012”), as amended by Title VI of Division P of Public Law 115-141 (also known as the “MOBILE NOW Act”) and General Services Administration (GSA) reporting requirements pursuant to Executive Order 13821, this directive-type memorandum (DTM):

- Establishes policy, assigns responsibilities, and provides guidance for standardized real estate outgrant processes for mobile broadband infrastructure applications across the DoW in accordance with the MOBILE NOW Act 270-day requirement.
- Implements GSA reporting requirements.
- Is effective September 2, 2026; it must be incorporated into DoD Instruction (DoDI) 4165.70 or a new DoW Instruction. This DTM will expire effective September 2, 2028.

Applicability. This DTM:

- Applies to:
 - OSW, the Military Departments, the Office of the Chairman of the Joint Chiefs of Staff and the Joint Staff, the Combatant Commands, the Office of Inspector General of the Department of War, the Defense Agencies, the DoW Field Activities, and all other organizational entities within the DoW.
 - Military installations located within the United States, and its territories and possessions, and all waters and airspace subject to its territorial jurisdiction.

- Real estate outgrant processes that are associated with mobile broadband infrastructure; however, Military Departments and Washington Headquarters Services (WHS) may leverage this process for other types of broadband infrastructure.
- Does not apply to overseas military installations outside of United States territories.

Definitions. See Glossary.

Policy. The DoW will:

- Have a standardized and timely real estate outgrant process associated with applications for mobile broadband infrastructure on military installations using Standard Form (SF) 299, “Application for Transportation, Utility Systems, Telecommunications and Facilities on Federal Lands and Property” (available at <https://www.gsa.gov/reference/forms/application-for-transportation-utility-systems-telecommunications-and-facilities-on-federal-lands-and-property>). A standard real estate process provides consistent procedures for mobile network operators, tower operators, vendors, and other applicants (referred to collectively in this DTM as “applicants”).
- Comply with mobile broadband infrastructure reporting requirements in accordance with Executive Order 13821. Each reporting organization (i.e., a Military Department or WHS) must appoint one or more point(s) of contact (POC(s)).
- Handle personally identifiable information submitted in the SF 299 in accordance with DoDI 5400.11.

Responsibilities.

- Under Secretary of War for Acquisition and Sustainment. The Under Secretary of War for Acquisition and Sustainment oversees the development and implementation of mobile broadband policy and procedures.
- Assistant Secretary of War for Energy, Installations, and Environment. Under the authority, direction, and control of the Under Secretary of War for Acquisition and Sustainment, the Assistant Secretary of War for Energy, Installations, and Environment oversees implementation of mobile broadband policy and procedures.

- Secretaries of the Military Departments and Director, WHS. The Secretaries of the Military Departments and, under the authority, direction, and control of the Director of Administration and Management, the Director, WHS:
 - Facilitate the deployment of mobile broadband infrastructure on Federal property in accordance with the MOBILE NOW Act and applicable DoW requirements pursuant to DoDI 4165.70.
 - Execute reporting requirements pursuant to Executive Order 13821.
 - Ensure records and information documenting the application and placement of mobile broadband infrastructure in accordance with Attachment 2 are retained in accordance with DoW Instruction 5015.02 and DoW Component records management disposition schedules.

Procedures. See Attachment 2.

Releasability. Cleared for public release. Available on the Directives Division Website at <https://www.esd.whs.mil/DD/>.



Michael P. Duffey

Under Secretary of War for Acquisition and Sustainment

Attachments:

As stated

ATTACHMENT 1

REFERENCES

DoD Directive 5135.02, “Under Secretary of Defense for Acquisition and Sustainment (USD(A&S)),” July 15, 2020

DoD Instruction 4165.70, “Real Property Management,” April 6, 2005, as amended

DoD Instruction 5400.11, “DoD Privacy and Civil Liberties Programs,” January 29, 2019, as amended

DoW Instruction 5015.02, “DoW Records Management Program,” June 26, 2026

Executive Order 13821, “Streamlining and Expediting Requests to Locate Broadband Facilities in Rural America,” January 8, 2018

General Services Administration Broadband Application Survey, current edition¹

Public Law 115-141, Division P, Title VI, “Making Opportunities for Broadband Investment and Limiting Excessive and Needless Obstacles to Wireless,” March 23, 2018 (also known as the “MOBILE NOW Act”)

Public Law 115-232, Section 889, “John S. McCain National Defense Authorization Act for Fiscal Year 2019,” August 13, 2018

United States Code, Title 42, Sections 4321 through 4347 (also known as the “National Environmental Policy Act”)

United States Code, Title 47, Section 1455 (also known as the “Middle Class Tax Relief and Job Creation Act of 2012”)

United States Code, Title 54, Section 106 (also known as the “National Historic Preservation Act of 1966”)

¹ Available at <https://www.gsa.gov/policy-regulations/policy/real-property-policy-division-overview/data-collection-and-reports/federal-broadband-quarterly-report-library>

ATTACHMENT 2

PROCEDURES

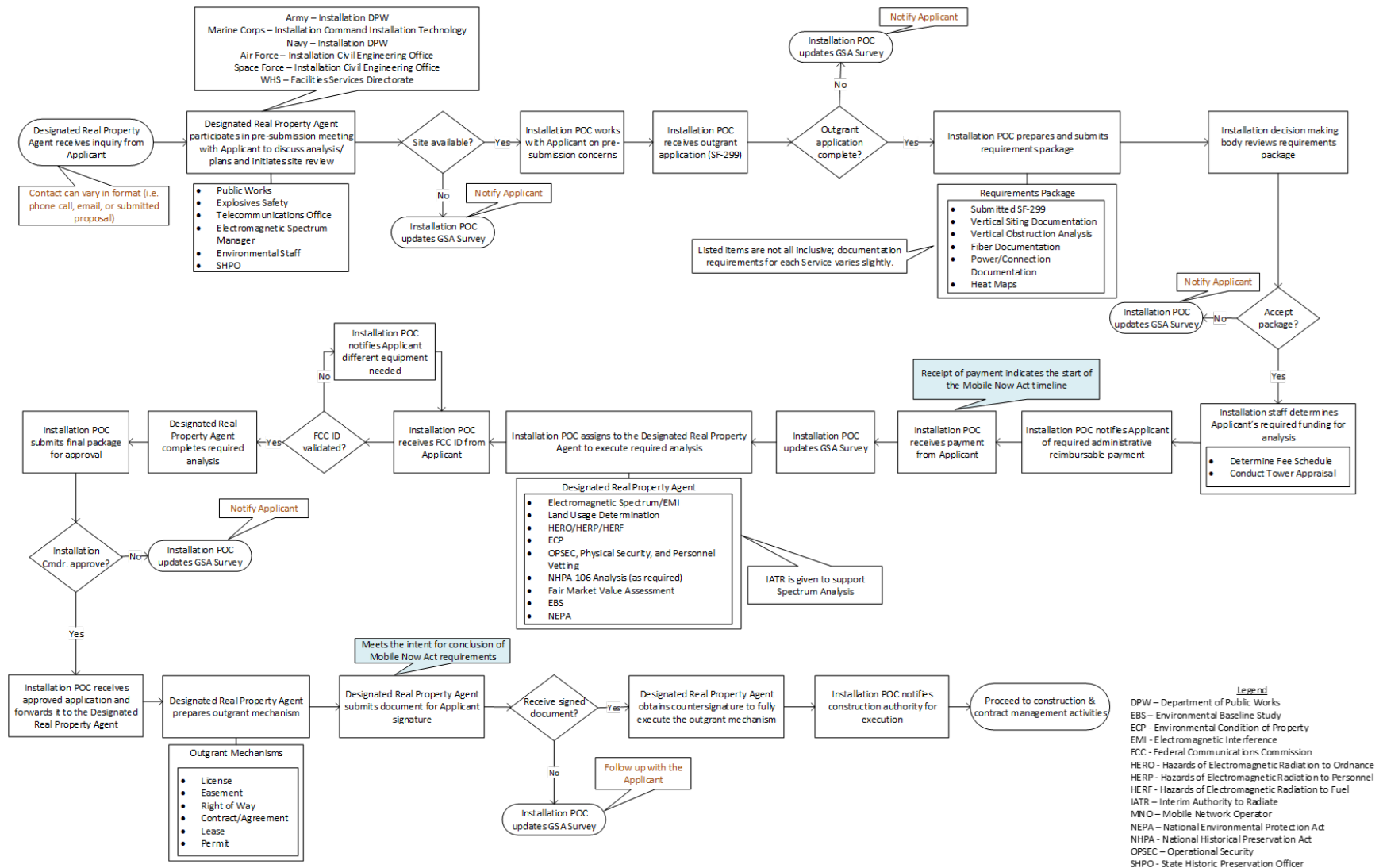
1. INTRODUCTION.

a. Military Departments and WHS must require the submission of SF-299s for the placement of mobile broadband infrastructure on military installations. Military Departments and WHS will process the applications for an authorization to use government real property with the intent to meet the MOBILE NOW Act's 270-day requirement. These procedures provide a standardized mobile broadband infrastructure outgrant process as depicted in Figure 1, including when the 270-day requirement period begins and ends. There are also procedures to comply with reporting requirements pursuant to Executive Order 13821.

b. Inconsistent processing of mobile broadband infrastructure siting requests by each Military Department and WHS creates challenges for applicants to understand how to obtain necessary military installation access, including the need for specific POCs for applicants at each installation. As such, each Military Department and WHS will identify the official at each installation who will serve as an applicant's primary POC.

c. The real estate processes in this DTM are applicable to mobile broadband infrastructure; however, they may also be applied at Military Department and WHS discretion to all types of broadband infrastructure.

Figure 1. Mobile Broadband Infrastructure Outgrants Process Flow



2. NEW AUTHORIZATION. The procedures in this paragraph outline steps to process SF-299 applications and are supplemented by the process flow referenced in Figure 1. The installation POC archives documents after a determination to provide a record of the application status. This guidance is limited to authorization of mobile broadband infrastructure on DoW real property and may be used for authorization of other broadband infrastructure on real property.

a. Step 1. The installation POC receives inquiry from a potential applicant for any potential broadband purpose. When received, the POC will schedule a pre-submission meeting with various subject matter stakeholders (e.g., public works, explosives safety, telecommunications, electromagnetic spectrum, and environmental) to discuss application matters. Contact from a potential applicant may be made via a phone call, email, or submitted proposal. The installation office for the POC is different for each Military Department and their respective Military Services and WHS and is designated as follows:

- (1) Army – Installation Department of Public Works.
- (2) Marine Corps – Installation Command Installation Technology.
- (3) Navy – Installation Public Works Department.
- (4) Air Force – Installation Civil Engineering Office.
- (5) Space Force – Installation Civil Engineering Office.
- (6) WHS – Facilities Services Directorate.

b. Step 2. The installation POC participates in the pre-submission meeting with applicable subject matter stakeholders and the applicant to discuss the applicant's analysis and plans and to initiate a site review to determine where equipment and infrastructure will be installed or constructed and proceeds to Step 3.

(1) If the site is available, the installation POC should work with the applicant to address pre-submission concerns and additional project scope information (e.g., proposed site, equipment description, right of way access, and construction needs) to supplement the requirements package as part of the SF-299 submission in Step 3. This effort is not included in the 270-day requirement's calculation, which only begins once the installation POC receives a fully complete SF-299 and accepts payment. While the pre-submission effort is optional, application delays that may cause non-compliance with the MOBILE NOW Act time requirement should be minimized.

(2) If the site is unavailable, the installation POC updates the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization's guidance and notifies the applicant in writing within 7 business days with a statement of the reason(s) for denial. The application process ends, or the applicant resubmits the application with additional information to address the lack of site availability.

c. Step 3. The installation POC receives the SF-299 from the applicant and reviews it to determine if it is a fully complete application. Information required includes completion of sections 1, 3, 4, 5, 7, 8, 12, 13, 19, and 20 with a signature, date, and fee submission. Sections 2, 6, 11, and “Supplemental” must also be completed, if applicable.

(1) A fully complete application will proceed to Step 4.

(2) If the application is not fully complete, it is denied. The installation POC updates the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization’s guidance and notifies the applicant in writing within 7 business days with a statement of the reason(s) for denial.

d. Step 4. The installation POC prepares and submits a requirements package to the installation decision-making body. The requirements package will include these items, plus any applicable special documents the installation requires:

(1) Fully complete and submitted SF-299.

(2) Vertical siting documentation.

(3) Vertical obstruction analysis.

(4) Fiber documentation.

(5) Power or connection documentation.

(6) Heat maps.

e. Step 5. The installation decision-making body reviews the requirements package.

(1) The installation decision-making body provides second-level approval by signature. The installation decision-making body provides the signed package to the installation staff to proceed to Step 6.

(2) If the installation decision-making body does not approve the requirements package, it is returned to the installation POC to update the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization’s guidance and the installation POC notifies the applicant in writing within 7 business days with a statement of the reason(s) for denial.

f. Step 6. Within 14 business days after the decision-making body approves the application, the installation POC or staff will determine the amount required from the applicant to fund necessary analysis. Items to consider include fee schedule and tower appraisal and the extent of environmental compliance required.

g. Step 7. The installation POC notifies the applicant of the required administrative reimbursement payment to reimburse the government for its analysis. The applicant should submit payment within 30 business days.

h. Step 8. Once the installation POC receives payment from the applicant to evidence acceptance of the SF-299, the MOBILE NOW Act timeline begins. If it is a new accepted application, or a modified existing application, the installation POC updates the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization's guidance and proceeds to Step 9.

i. Step 9. The installation POC assigns the designated respective action officer to perform the required analysis. The analysis includes, but is not limited to:

- (1) Electromagnetic spectrum and electromagnetic interference.
- (2) Land usage determination.
- (3) Radiation hazards, including hazards of electromagnetic radiation to ordinance, personnel, and fuel.
- (4) Environmental condition of property.
- (5) Operations security, physical security, and personnel vetting.
- (6) Section 106 of Title 54, United States Code (also known as the "National Historic Preservation Act of 1966") analysis, as required.
- (7) Fair market value assessment.
- (8) Environmental baseline survey.
- (9) Sections 4321 through 4347 of Title 42, United States Code (also known as the "National Environmental Policy Act") analysis.
 - (a) The environmental aspect is a thorough process, and the required analysis may extend the process and exceed the MOBILE NOW Act's 270-day requirement.
 - (b) If delays occur, the installation POC provides notes as part of reporting to breakout the timelines for real estate and environmental reviews.

j. Step 10. The installation POC receives a Federal Communications Commission (FCC) identification number from the applicant and will validate that the grant of equipment authorization is current in accordance with Section 889 of Public Law 115-232 to prohibit acquisition of covered telecommunications equipment or service.

(1) If the installation POC validates the FCC identification number, the process proceeds to Step 11.

(2) If the installation POC cannot validate the FCC identification number, they notify the applicant that different equipment is needed, and the applicant resubmits another FCC identification number.

k. Step 11. The designated respective action officer completes and provides the required analysis to the installation POC.

l. Step 12. The installation POC receives required analysis, prepares the final package, and submits the final package to the installation commander for final site approval.

(1) If the installation commander approves the application, they return it to the installation POC, who forwards it to the designated respective real estate action officer (e.g., U.S. Army Corps of Engineers, Naval Facilities Engineering Systems Command) to proceed to Step 13.

(2) If the installation commander denies the package, it is returned to the installation POC to document in the GSA Broadband Application Survey in accordance with the applicable organization's guidance. The installation POC informs the applicant within 7 business days, including a statement of the reason(s) for denial.

m. Step 13. The designated respective action officer prepares real estate outgrant instrument (e.g., applicant is granted a license, easement, right of way, lease, or permit).

n. Step 14. Once the designated respective real estate action officer prepares the real estate outgrant instrument, within 7 business days they submit the outgrant to the applicant for signature. The MOBILE NOW Act 270-day requirement concludes at this step pursuant to Section 606 (b)(3)(A) of the MOBILE NOW Act. The installation POC will update the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization's guidance.

(1) The designated respective real estate action officer receives the signed outgrant from applicant and obtains a government countersignature to complete outgrant execution. The process proceeds to Step 15.

(2) If a signed document is not received, the installation POC updates the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization's guidance and follows up with the applicant in writing within 30 business days.

o. Step 15. The installation POC notifies the construction authority for execution, and the process proceeds to communications infrastructure construction and contract management activities.

3. QUARTERLY REPORTING. These procedures address reporting requirements pursuant to Executive Order 13821.

a. The installation POC tracks application status throughout the authorization process until application disposition is determined and updates the GSA Broadband Application Survey spreadsheet in accordance with the applicable organization's guidance.

b. The Military Department or WHS POC submits the Broadband Application Survey spreadsheet to GSA.

GLOSSARYPART I. ABBREVIATIONS AND ACRONYMS

ACRONYM	MEANING
DoDI	DoD instruction
DTM	directive-type memorandum
FCC	Federal Communications Commission
GSA	General Services Administration
POC	point of contact
SF	standard form
WHS	Washington Headquarters Services

PART II. DEFINITIONS

Unless otherwise noted, these terms and their definitions are for the purpose of this issuance.

TERM	DEFINITION
covered telecommunications equipment or services	Defined in Section 889(f)(3) of Public Law 115-232.
easement	An outgrant for a right of specified use of Federal Government real property providing the easement holder the right to do something on government land (e.g., constructing, operating, maintaining and repairing a communications facility).
electromagnetic spectrum	The entire distribution of electromagnetic radiation according to frequency or wavelength. Comprises the span of all electromagnetic radiation and consists of many subranges, commonly referred to as portions (e.g., visible light or ultraviolet radiation).

TERM	DEFINITION
heat map	A data visualization tool that uses radio frequency signals to determine where to place access points. A heat map considers: - Interference from nearby electrical equipment or radio frequency equipment. - Building materials, including the presence of glass, steel, concrete, and water. - Nearby wireless fidelity networks that may cause interference. - Population of the building, particularly in gathering spaces (conference rooms, etc.)
lease	A written agreement which conveys an interest in real property, usually exclusive, for a specified consideration. It may contain express provisions or conditions restricting the use of the property or reserving rights of access by the U.S. Government. The entity that transfers the interest is the lessor; the entity to whom the interest is transferred is the lessee.
license	A bare authority to an individual, an organization, a corporation, a State or local governmental entity, or another Federal agency, to use the licensor's property for a specified act or purpose without acquiring any estate therein. Use is not exclusive, is usually revocable and unassignable, and there is no alienation of title, ownership, or control of government property. The license instrument provides written evidence of the permission granted and of the obligations, responsibilities, restrictions, and liabilities imposed on the licensee.
military installation	A base, camp, post, station, yard, center, or other activity under the jurisdiction of the Secretary of a Military Department, or, in the case of an activity in a foreign country, under the operational control of the Secretary of a Military Department or the Secretary of War, without regard to the duration of operational control.
mobile broadband infrastructure	Any buried, underground, or aerial facility, and any cellular wireless (e.g., 4G, 5G) or applicable wireline connection (e.g., fiber), that enables users to send and receive voice, video, data, graphics, or any combination thereof.

TERM	DEFINITION
outgrant	A written document by which a DoW Federal property manager grants to a non-DoW Federal agency or a non-Federal party an interest or the right to use government real property. It includes leases, licenses, easements, and permits.
permit	A document conveying the temporary authority conferred on a government agency to use real property under the jurisdiction of another government agency.
radiation hazards	A high dose of radiation that causes damage. It includes hazards in three main categories: Hazards of electromagnetic radiation to ordnance (also known as HERO). Unexpected explosions triggered by radio frequency radiation entering devices. Hazards of electromagnetic radiation to personnel (also known as HERP). Burns or shock caused by using high frequency transmitters and high-gain antennas that result impact voltage levels. Hazards of electromagnetic radiation to fuel (also known as HERF). Accidental ignition of fuel vapors by radio frequency-induced arcs during fuel-handling operations.