DIVISION OF CORPORATION FINANCE

UNITED STATES SECURITIES AND EXCHANGE COMMISSION WASHINGTON, D.C. 20549

Mail Stop 3233

June 1, 2018

Via E-mail
Thomas P. Hunt, Esq.
Executive Vice President
8051 Congress Avenue
Boca Raton, Florida 33487

Re: SBA Communications Corporation Registration Statement on Form S-4

> Filed May 23, 2018 File No. 333-225137

Dear Mr. Hunt:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Rahul K. Patel, Staff Attorney, at (202) 551-3799 with any questions.

Sincerely,

/s/ Robert F. Telewicz, Jr.

Robert F. Telewicz, Jr. Accounting Branch Chief Office of Real Estate and Commodities

cc: Kara MacCullough