

HENRY MCMASTER, CHAIR
GOVERNOR
CURTIS M. LOFTIS, JR.
STATE TREASURER
BRIAN J. GAINES
COMPTROLLER GENERAL



THE DIVISION OF PROCUREMENT SERVICES
DELBERT H. SINGLETON, JR.
DIVISION DIRECTOR
(803) 734-8018
JOHN ST. C. WHITE
MATERIALS MANAGEMENT OFFICER
(803) 737-0600
FAX: (803) 737-0639

HARVEY S. PEELER, JR.
CHAIRMAN, SENATE FINANCE COMMITTEE
BRUCE W. BANNISTER
CHAIRMAN, HOUSE WAYS AND MEANS COMMITTEE
GRANT GILLESPIE
EXECUTIVE DIRECTOR

Protest Decision

Matter of: Grace Outdoor Advertising LLC
File No.: 2025-136
Posting Date: June 24, 2025
Contracting Entity: Trident Technical College
Solicitation No.: N/A - Sole Source with Adams Outdoor Advertising
Description: Billboard advertisements - digital and static

DIGEST

The Chief Procurement Officer (CPO) grants the protests of Grace Outdoor Advertising (Grace) challenging Trident Technical College's (TTC) intent to award a contract as a sole source for billboard advertisement services where neither TTC's written sole source determination nor its response to this protest support the conclusion that these services are a sole source. The protest of Grace is attached as Exhibit A. TTC's response is attached as Exhibit B.

AUTHORITY

The Chief Procurement Officer (CPO) conducted an administrative review per S.C. Code Ann. §11-35-4210. This decision is based on materials in the procurement file and applicable law and precedents.

BACKGROUND

On May 7, 2025, TTC made a written determination that there was only one source for marketing to targeted demographics via billboards. [Exhibit C] On May 8, 2025, TTC advertised

its intent to award a sole-source contract to Adams Outdoor Advertising¹ (Adams), for static and digital billboard advertising services. [Exhibit D] On May 9, 2025, Grace protested that it had “billboards that can service the needs of Trident Tech.”

DISCUSSION

When a State agency has a need for a supply or service which is available from only one source, it may acquire that supply or service utilizing sole-source acquisition procedures. S.C. Code Ann. § 11-35-1560 and Reg. 19-446.2105. Section 11-35-1560 states:

(A) A contract may be awarded for a supply, service, information technology, or construction item without competition if, under regulations promulgated by the board, ... the head of a purchasing agency, or a designee ..., above the level of the procurement officer, **determines in writing that there is only one source** for the required supply, service, information technology, or construction item. ...

(B) Written documentation must include the determination and basis for the proposed sole source procurement. ... Any decision by a governmental body that a procurement be restricted to one potential vendor must be accompanied by **a thorough, detailed explanation as to why no other will be suitable or acceptable to meet the need.**

[emphasis supplied]

Regulation 19-445.2105(C) states:

Written Determination.

(1) The written determination to conduct a procurement as a sole source shall be made by ... the head of a purchasing agency, or designee ... above the level of the procurement officer. ...

(2) The written determination must include a purchase description that states the using agency's actual needs, which **shall not be unduly restrictive**. In cases of reasonable doubt, competition should be solicited. The determination must contain **sufficient factual grounds and reasoning to provide an informed, objective explanation for the decision and** must be accompanied by **market**

¹ TTC's notice of intent to award a sole source contract identifies the vendor as Adams Outdoor Advertising of Charleston. The CPO was unable to find such an entity registered with the South Carolina Secretary of State. There were a number of other registered with the name “Adams Outdoor Advertising” as either a corporation, limited partnership. All appear to be related.

research that supports the decision. The determination must be authorized prior to contract execution.

[emphasis supplied]

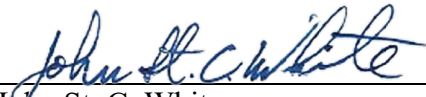
TTC's written determination defines its need at "marketing to targeted demographics through billboard advertisements." TTC lays out the importance of this need noting that in a spring 2025 survey of high schoolers, "respondents ranked billboards third in terms of marketing reach with enrollment messages." TTC further lays out the work it does to determine best "billboard locations for marketing campaigns" stating:

TTC Marketing Services staff conducts a market ride annually. The purpose of the market ride is to select billboard locations for upcoming marketing campaigns. During this ride, the marketing staff confirms the locations that provide optimal reach for TTC's message(s) and that billboard structures are indeed the only ones at specific locations. To determine optimal reach, the TTC staff looks at placement of each billboard and how drivers see them according to traffic flow. Ideal billboard placement may be ideal on the leftside of the road (left read) but a road curve may make a right-side billboard (right read) more effective. These decisions impact the effectiveness of the billboard campaigns.

Thus, TTC presents a rational argument for the selection of specific billboards at specific locations. Obviously, the owner of each specific billboard is a sole source. Indeed, based on this information one is anticipating that TTC will next layout the locations selected and who the owner of the billboards in those locations is. But that is not what TTC does. TTC does not assert that Adams is the sole owner of the very billboards it needs but instead asserts that Adams owns the largest inventory of billboards in tri-county area TTC serves (Berkeley, Charleston, and Dorchester Counties). TTC goes on to outline the advantages it believes Adams has as a billboard provider over other providers in the region. Importantly, nothing in TTC's determination asserts that Adams is the *sole* billboard provider that owns billboards in the targeted locations. Instead, TTC presents an argument for why Adams is the best *source* for billboard advertising in the tri-county area. In other words, TTC has inappropriately used market research and sole-source acquisition procedures in the place of competitive-sealed proposals to select what it believes to be the best source of billboards in the region, not the only source of billboards at its selected locations.

DECISION

Based on the forgoing, the CPO grants the protests of Grace and remands the matter back to TTC to proceed in accordance with the Procurement Code.



John St. C. White
Chief Procurement Officer

Columbia, South Carolina

STATEMENT OF RIGHT TO FURTHER ADMINISTRATIVE REVIEW

Protest Appeal Notice (Revised July 2024)

The South Carolina Procurement Code, in Section 11-35-4210, subsection 6, states:

(6) Finality of Decision. A decision pursuant to subsection (4) is final and conclusive, unless fraudulent or unless a person adversely affected by the decision requests a further administrative review by the Procurement Review Panel pursuant to Section 11-35-4410(1) within ten days of posting of the decision in accordance with subsection (5). The request for review must be directed to the appropriate chief procurement officer, who shall forward the request to the panel or to the Procurement Review Panel, and must be in writing, setting forth the reasons for disagreement with the decision of the appropriate chief procurement officer. The person also may request a hearing before the Procurement Review Panel. The appropriate chief procurement officer and an affected governmental body shall have the opportunity to participate fully in a later review or appeal, administrative or judicial.

Copies of the Panel's decisions and other additional information regarding the protest process is available on the internet at the following web site: <http://procurement.sc.gov>

FILING FEE: Pursuant to Proviso 111.1 of the 2024 General Appropriations Act, "[r]equests for administrative review before the South Carolina Procurement Review Panel shall be accompanied by a filing fee of two hundred and fifty dollars (\$250.00), payable to the SC Procurement Review Panel. The panel is authorized to charge the party requesting an administrative review under the South Carolina Code Sections 11-35-4210(6), 11-35-4220(5), 11-35-4230(6) and/or 11-35-4410...Withdrawal of an appeal will result in the filing fee being forfeited to the panel. If a party desiring to file an appeal is unable to pay the filing fee because of financial hardship, the party shall submit a completed Request for Filing Fee Waiver form at the same time the request for review is filed. *[The Request for Filing Fee Waiver form is attached to this Decision.]* If the filing fee is not waived, the party must pay the filing fee within fifteen days of the date of receipt of the order denying waiver of the filing fee. Requests for administrative review will not be accepted unless accompanied by the filing fee or a completed Request for Filing Fee Waiver form at the time of filing." PLEASE MAKE YOUR CHECK PAYABLE TO THE "SC PROCUREMENT REVIEW PANEL."

LEGAL REPRESENTATION: In order to prosecute an appeal before the Panel, business entities organized and registered as corporations, limited liability companies, and limited partnerships must be represented by a lawyer. Failure to obtain counsel will result in dismissal of your appeal. *Protest of Lighting Services*, Case No. 2002-10 (Proc. Rev. Panel Nov. 6, 2002) and *Protest of The Kardon Corporation*, Case No. 2002-13 (Proc. Rev. Panel Jan. 31, 2003); and *Protest of PC&C DCGs, LLC*, Case No. 2012-1 (Proc. Rev. Panel April 2, 2012). However, individuals and those operating as an individual doing business under a trade name may proceed without counsel, if desired.

**South Carolina Procurement Review Panel
Request for Filing Fee Waiver
1205 Pendleton Street, Suite 367, Columbia, SC 29201**

Name of Requestor

Address

City

State

Zip

Business Phone

-
1. What is your/your company's monthly income? _____
 2. What are your/your company's monthly expenses? _____
 3. List any other circumstances which you think affect your/your company's ability to pay the filing fee:

To the best of my knowledge, the information above is true and accurate. I have made no attempt to misrepresent my/my company's financial condition. I hereby request that the filing fee for requesting administrative review be waived.

Sworn to before me this
_____ day of _____, 20_____

Notary Public of South Carolina

Requestor/Appellant

My Commission expires: _____

For official use only: _____ Fee Waived _____ Waiver Denied

Chairman or Vice Chairman, SC Procurement Review Panel

This _____ day of _____, 20_____
Columbia, South Carolina

NOTE: If your filing fee request is denied, you will be expected to pay the filing fee within fifteen (15) days of the date of receipt of the order denying the waiver.

Exhibit A

From: [Diana Stevenson](#)
To: [Protest-MMO](#)
Cc: [Barry Sanders](#)
Subject: [External] protest of Trident Technical College and Adams Outdoor Advertising
Date: Friday, May 9, 2025 8:48:31 AM

To Whom it May Concern,

Grace Outdoor Advertising would like to protest this intent to Sole Source with Adams Outdoor.

Grace Outdoor Advertising is a locally-owned, and woman-owned business with headquarters in Columbia, SC. Grace Outdoor is also a registered vendor with SCEIS.

With assets in and around Charleston as well as Columbia, we have billboards that can service the needs of Trident Tech.

Adams Outdoor is nationally headquartered in Lansing, MI.

We would like to ask that Grace Outdoor be considered in this sourcing.

Thank you,

Diana Stevenson
Chief Executive Officer
[Grace Outdoor Advertising](#)
Cell: (803) 319-4381
Check out our full [inventory](#)

Exhibit B

Trident Technical College

Procurement and Contracts Office

Date: June 6, 2025

To: South Carolina Materials Management Office (MMO)

From: Jeff O'Dell, Buyer

Subject: Response to Protest of Sole Source Justification – Adams Outdoor Advertising

Trident Technical College hereby responds to the Protest as to the Sole Source Determination for its annual billboard advertising campaign as follows:

Background

On May 8, 2025, TTC published a sole source procurement notice for its annual billboard advertising campaign, identifying Adams Outdoor Advertising (“Adams”) of Charleston as the only vendor capable of meeting its campaign needs.

On May 9, 2025, Grace Outdoor Advertising (“Grace”) filed a notice of intent to protest the sole source determination. TTC made a good faith effort to evaluate Grace's capabilities by requesting detailed billboard inventory information on May 20, 2025. After follow-up communication, Grace provided the requested details on May 27, 2025, by the stated deadline.

Applicable Law

This procurement was conducted in accordance with the South Carolina Consolidated Procurement Code, specifically:

S.C. Code Ann. § 11-35-1560 (2022) — *Sole Source Procurement*:

“A contract may be awarded for a supply, service, or construction item without competition when, under regulations promulgated by the board, the chief procurement officer, the head of a purchasing agency, or a designee above the level of the procurement officer determines in writing that there is only one source for the required supply, service, or construction item.”

TTC determined, in writing, that Adams Outdoor Advertising is the only known source capable of meeting the scope, geographic coverage, operational demands, and technical requirements of TTC's billboard campaign. This decision complies fully with the South Carolina Procurement Code and associated regulations.

Evaluation of Protest and Sole Source Justification

1. Billboard Inventory and Coverage

TTC serves a tri-county area with over 20,000 students and requires extensive billboard inventory to ensure adequate reach. The inventory and reach of Adams and Grace are as follows:

- Adams Outdoor Advertising:

- ~450 static post billboards
 - ~250 static bulletin billboards
 - 41 digital billboards
- Grace Outdoor Advertising:
 - 7 static billboards
 - 2 digital billboards

Grace cannot meet the inventory or geographic scope required by TTC.

2. Billboard Type and Message Flexibility

TTC's strategy requires both static and digital billboards for diverse messaging needs. Grace's digital capacity is inadequate for a year-round campaign requiring real-time updates.

3. Billboard Locations

TTC's campaign specifically targets schools and traffic corridors across Charleston, Dorchester, and Berkeley counties. Grace's inventory does not provide sufficient location coverage to meet TTC's needs.

4. Centralized Dashboard Control

Adams offers a web-based digital management dashboard that TTC's marketing team uses to schedule and control billboard messaging directly. This is critical to TTC's internal workflow. Grace has not demonstrated an equivalent capability.

5. Brand Consistency and Creative Control

Using a single vendor ensures uniformity in design, formatting, and quality across all billboards, preserving TTC's brand integrity.

6. Operational Efficiency and Speed to Market

A sole vendor model minimizes administrative overhead and expedites deployment of urgent or seasonal campaigns.

7. Data Integration and Performance Tracking

Centralized performance reporting is essential for campaign optimization. Adams' systems enable data consolidation, while multiple vendors introduce data silos and inconsistencies.

Conclusion and Recommendation

Based on all findings and in accordance with S.C. Code § 11-35-1560, TTC has properly justified a sole source procurement. Grace Outdoor Advertising:

- Lacks the inventory, reach, and infrastructure
- Cannot provide centralized digital management
- Cannot support TTC's creative and strategic requirements

We request that the protest submitted by Grace Outdoor Advertising be denied, and the sole source award to Adams Outdoor Advertising be upheld as fully compliant with South Carolina Procurement Law.

Respectfully submitted,
Jeff O'Dell
Buyer, Trident Technical College
Procurement and Contracts Office
June 6, 2025

Sole Source Written Determination

Agency Identification: Trident Technical College

Description of the agency need that this procurement fulfills:

Marketing to the Trident Technical College (TTC) targeted demographics through billboard advertisements.

Describe the Market Based on Research Performed:

Data reveals the importance of billboard advertising to TTC. While the TTC Marketing Department has not conducted a broad survey since 2017, they have conducted a recent survey of high schoolers, which is one of the college's largest target markets. Results of this survey, conducted in the spring 2025, shows respondents ranked billboards third in terms of marketing reach with enrollment messages.

This survey showed that billboard advertising was one of the most effective means to market the College. Billboard advertising was one of the top four outlets where high schoolers in the Tri-county area that the college serves saw TTC's ads. In previous years' surveys, respondents consistently ranked billboard advertising as the number one initiative in terms of message reach and recall.

TTC Marketing Services staff conducts a market ride annually. The purpose of the market ride is to select billboard locations for upcoming marketing campaigns. During this ride, the marketing staff confirms the locations that provide optimal reach for TTC's message(s) and that billboard structures are indeed the only ones at specific locations. To determine optimal reach, the TTC staff looks at placement of each billboard and how drivers see them according to traffic flow. Ideal billboard placement may be ideal on the left side of the road (left read) but a road curve may make a right-side billboard (right read) more effective. These decisions impact the effectiveness of the billboard campaigns.

Sole Source Vendor Name: Adams Outdoor Advertising of Charleston

Based upon the following determination, Agency proposes to acquire the supplies, construction, information technology, and/or services described herein from the vendor named above per SC Code Ann § 11-35-1560 and SC Regulation 19-445.2105, Sole Source Procurement.

Description of supplies, construction, information technology, and/or services vendor will provide under the contract:

Billboard advertisements – digital and static

Explain why the described solution is the only solution that meets the agency's need and how no other identified solutions were sufficient.

Adams Outdoor is the only tri-county vendor with a comprehensive inventory, (over 900+ units) covering Dorchester, Berkeley, and Charleston counties, that allows TTC Marketing Services staff to achieve significant reach with outdoor campaigns. Not only does Adams's inventory provide coverage in terms of volume, but their inventory provides the opportunity to select locations based on the campaign's message. As an example, TTC continues targeting males and females, ages 18-24. In particular, the college is targeting high school males.

Adams Outdoor is the only known vendor with the ability to target all major area high schools including Ashley Ridge, Summerville, Fort Dorchester, Stratford, Berkeley, West Ashley, Stall, North Charleston, Goose Creek, John's Island, etc. They are the only billboard firm that offers this amount of selection and the ability to quickly and efficiently market in the needed areas.

Additionally, Adams Outdoor is the only known vendor with sufficient inventory of digital billboards in the tri-county market, that can provide the ability for TTC to target messages to specific locations and to


**Sole Source
Written Determination**

achieve required reach and frequency with messages.

Further, Adams Outdoor maintains its digital billboards at the highest technical level, providing high quality images required for TTC's messaging. TTC prefers digital billboard campaigns as there is the ability to change the design and for flexible messaging. Adams Outdoor offers TTC a proprietary scheduling suite to upload and schedule creative to digital locations directly. This system allows TTC to schedule different messages / designs to different digital units geographically, on specific days of the week, and even specific hours of the day. This enables TTC to promote different programs, classes, events, open houses, new campus buildings, and campaigns constantly and to respond to needs instantly if needed. Via this direct network connection the Marketing Department can bring the TTC message to the market faster than any other method. By managing only one scheduling system, TTC can efficiently schedule all creative and all locations in one platform. Adams Outdoor is the only vendor that can provide all the above.

Finally, Adams Outdoor is a member of Geopath, a not-for-profit organization that audits (OOH) billboard traffic and impressions. Geopath uses state-of-the-art audience location measurement, deep consumer insight, and media research.

DocuSigned by:

Required Signatures: 

Prepared by: DC62D91B7C1A4A1... **Date:** 05/07/2025

Printed Name: Jeff O'Dell **Title:** Procurement Manager I

Approved by: Vicky Wood, Ph.D. Digitally signed by Vicky Wood, Ph.D.
Date: 2025.05.07 13:53:23 -04'00' **Approval Date:** 05/07/2025

Printed Name: Vicky Wood, Ph.D. **Title:** President

Contract Period: 07/01/25 – 06/30-26

Contract Amount: \$442,645.00

Commodity Code 915

Blanket Sole Source ☐ Yes ☒ No

Contract \$50,000 or greater. Drug Free Workplace Act Form	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Signed Drug Free Workplace Certification form attached:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Open Trade Certification Attached	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

South Carolina Business Opportunities

Published by Division of Procurement Services - Delbert H. Singleton, Jr., Division Director

Ad Category: Sole Source and Emergency

Notice Start Date: May 8, 2025

Notice End Date: May 22, 2025

Vendor Name: Adams Outdoor Advertising of Charleston

Contract Amount: 442,645.00

Agency Procurement Manager: Jeff O'Dell

Agency Procurement Manager Email: jeff.odell@tridenttech.edu

Agency Procurement Manager Telephone#: 843-574-6205

The Agency hereby provides notice that it intends to enter into a sole source contract per S.C. Code Ann. §11-35-1560 with Vendor for the following supplies, services, information technology, or construction:

Annual Billboard Advertising

Agency's justification for a sole source procurement may be viewed or immediately obtained at: Web Address Where Item Is Posted
URL To View Justification: https://www.tridenttech.edu/about/departments/proc/ttc_solic.htm

PROTESTS:

Any actual or prospective bidder, offeror, contractor, or subcontractor aggrieved in connection with the intended award or award of this sole source contract, shall notify the appropriate chief Procurement officer in writing of its intent to protest within five (5) business days of the date this notice is posted. Any actual or prospective bidder, offeror, contractor, or subcontractor who is aggrieved in connection with the intended award or award of this sole source contract and has timely notified the appropriate chief procurement officer of its intent to protest, may protest to the appropriate chief procurement officer in the manner set forth below within fifteen days of the date this notice is posted; except that a matter that could have been raised as a protest of the solicitation may not be raised as a protest of the award or intended award of a contract.

A protest must be in writing, filed with the appropriate chief procurement officer, and set forth the grounds of the protest and the relief requested with enough particularity to give notice of the issues to be decided. The protest must be received by the appropriate chief procurement officer within the time provided above. Days are calculated as provided in S.C. Code Ann. § 11-35-310(13).

Any Notice Of Intent To Protest And Protest Must Be Addressed To: Materials Management Officer

South Carolina Business Opportunities • SCBO Team • 1201 Main Street, Suite 600 • Columbia, SC 29201
803-737-0600 • scbo@mmo.sc.gov • <https://scbo.sc.gov> • <https://procurement.sc.gov>

