



STATE OF MICHIGAN
MICHIGAN'S PUBLIC SAFETY BROADBAND PROGRAM
LANSING



August 12, 2016

Ms. Carolyn Dunn
National Telecommunications and
Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 4078
Washington, DC 20230

RE: Docket # 160706588-6588-01 State Alternative Plan Program

Dear Ms. Dunn,

The Michigan Public Safety Broadband Workgroup (MiPSB), a workgroup established under the State Interoperable Governing Board (SIGB), Michigan's Public Safety Communications Interoperability Board (MPSCIB), has reviewed the National Telecommunications and Information Administration (NTIA) published guidance on the State Alternative Plan Program (SAPP) and the First Responder Network Authority (FirstNet) Nationwide Public Safety Broadband Network (NPSBN), and welcomes the opportunity to provide comment to the Notice.

The cost for a state to assume the responsibility to construct, operate, maintain, and improve the Radio Access Network (RAN), and the requirement to demonstrate the cost-effectiveness of the state alternate plan is referenced throughout the Notice as a key factor in the approval of a state-operated RAN. The cost and terms of the spectrum capacity lease are fundamental in determining those costs, however the state cannot apply to the NTIA for authority to enter into negotiations with FirstNet until *after* the state alternative plan has been submitted and approved. Michigan is very familiar with the cost to construct and operate a large statewide land-mobile radio network. It is not possible to develop a comprehensive plan for a state-operated RAN without knowing the cost and terms of the spectrum lease up-front.

The Notice provides 180 days after the 90-day opt in/out window for the state to develop and complete requests for proposals for the construction, maintenance, and operation of the state-operated RAN. It also directs the state to demonstrate compliance with the minimum technical interoperability requirements and to maintain ongoing interoperability with the NPSBN. Those requirements have not yet been developed. Again, this makes it virtually impossible for a state to get accurate cost estimates from vendors to meet the network policies. The Federal Communications Commission (FCC) must ensure these requirements have been established and published well before the start of the 90-day opt in/out window for inclusion in a state design.

The Notice also directs the state to demonstrate it can provide comparable security, coverage, and quality of service to that of the NPSBN. Through extensive data collection efforts, Michigan has identified the priority coverage areas and phased deployment plan for public safety stakeholders across the state. Those geographic areas may not align with the coverage areas and deployment plan identified by FirstNet. It is Michigan's request that the NTIA use the coverage areas and phased deployment plan identified by Michigan's public safety stakeholders when weighing comparable coverage requirements.

And finally, Michigan is concerned about the timeline for all of the approval processes in order to fully execute an opt-out decision. There is no apparent schedule or deadlines for:

- FCC to make a determination and approve the technical and interoperability criteria
- NTIA to review and approve the five technical and financial demonstrations
- The states to negotiate and enter into a spectrum capacity lease agreement with NTIA
- The states to apply for a RAN Construction Grant with NTIA

Ms. Carolyn Dunn
August 12, 2016
Page 2

This further validates our concern that the states are not going to get the critical information required to develop a reasonably accurate design, cost estimate, and deployment schedule in order to make an informed decision.

Thank you for the opportunity to provide feedback on this critical process. Please feel free to contact me with any questions or for additional information.

Sincerely,

Pamela Matelski

Pamela Matelski
Director, MiPSB Program