

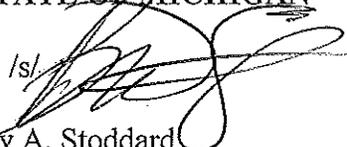
establish that its system is “materially different from the systems from which the metrics were derived”² as it would be for a smaller system.

Nonetheless, Michigan shares the concerns expressed in the Request about whether the TA cost metrics provide a valid benchmark against which all rebanding proposals rightfully should be compared. The Request raises serious issues about how the metrics are derived and how they properly should be used. It identifies some of the many meaningful distinctions among public safety systems that affect the cost of rebanding, but that are not captured in the TA cost metrics. It questions how incumbents can be charged with an obligation to distinguish themselves from other entities in their class without being given access to the information needed to make those distinctions.

For these reasons, the State respectfully requests the Commission to re-examine the use of the TA cost metrics in evaluating 800 MHz rebanding proposals and to ensure that their use does not compromise the FCC’s commitment to improving public safety communications in the 800 MHz band, the goal of the 800 MHz rebanding effort.

Respectfully submitted,

THE STATE OF MICHIGAN

/s/ 

Bradley A. Stoddard

Director

Michigan Public Safety Communications System

4000 Collins Rd.

P.O. Box 30631

Lansing, MI 48909-8131

Tel: 517-336-6108

February 4, 2010

² *Id.* at ¶ 45.