

Note added by Michigan Plate Readers. Email from the Clinton Township Police Department's Records Office, October 16, 2026, 11:46 am, copying the Township attorney, forwarding at our request the Captain's memo of October 13, 2026 to the Records Office on the fee appeal of October 9 ("RE: Explanation of Estimated Labor Costs"). Text as received; the Records Clerk's, the attorney's and the Captain's names left out; the copy of our appeal letter quoted below the memo is left out. End of note.

Per your request see below.

From: [the Captain]

Sent: Tuesday, October 13, 2026 8:20 AM

To: [the Records Clerk]

Cc: [none]

Subject: Re: daFW: FOIA fee appeal: Flock Safety / license plate reader records, requests received October 7, 2026

RE: Explanation of Estimated Labor Costs – Flock Safety FOIA Requests

The Clinton Township Police Department respectfully submits the following explanation regarding the estimated labor costs associated with the two Freedom of Information Act requests received on October 7, 2026, concerning the Department's Flock Safety automated license plate reader (ALPR) system.

The Department recognizes the requester's concerns regarding the estimated time necessary to fulfill these requests and wishes to clarify the operational and technical challenges associated with retrieving and preparing the requested records.

Nature of the Requested Records and Technical Limitations

Although the Flock Safety system provides functions for exporting certain records, the availability of an export function does not necessarily mean that the requested information can be retrieved, processed, and delivered immediately.

The Department's experience with exporting information from the Flock Safety platform has demonstrated that the process can be extremely time-consuming due to the system's performance and the limitations of the computer equipment used to retrieve the data.

The primary difficulty is not necessarily identifying where the requested information is located within the system. Rather, it is the process of generating, downloading, handling, and transferring the exported records.

When large amounts of information are requested, the computer can experience significant delays while processing the export. Depending on the size and complexity of the requested information, the system may take an extended period to generate and download the records.

The Department must then ensure that the requested information has been successfully retrieved and transferred into an appropriate format for release.

Explanation of the Estimated Labor Hours

The Department's original estimate of approximately sixteen hours for the documents request and six hours for the system exports request was based on its anticipated workload and prior experience with retrieving information from the Flock Safety system.

The estimated processing activities may include:

1. Accessing the appropriate system functions and identifying the requested records and applicable parameters.
1. Initiating the necessary exports and addressing system delays or unsuccessful download attempts.
1. Retrieving completed downloads and verifying that the files were successfully generated.
1. Organizing and transferring the exported files into an appropriate location for review and production.
1. Examining the responsive records for completeness and identifying any information requiring further review before disclosure.

Unlike a routine FOIA request involving a readily accessible police report or document, these requests involve specialized electronic records and a retrieval process that may require multiple separate operations.

The Department's estimate was intended to account for the anticipated employee work associated with these activities, rather than simply the time necessary to locate the information.

Unreasonably High Costs Compared With Routine FOIA Requests

These requests differ from ordinary FOIA requests received by the Department because of the volume and nature of the requested electronic information, the technical limitations encountered during the export process, and the additional employee involvement necessary to prepare the information for release.

The Department believes these circumstances warrant consideration under MCL 15.234(3), which addresses labor costs that would be unreasonably high due to the nature of a particular request.

However, the Department recognizes that the distinction between actual employee labor and periods of unattended computer processing must be considered when determining the final chargeable amount.

Accordingly, the Department is prepared to review its estimates to ensure that the labor charges reflect only activities authorized under Michigan FOIA and the Township's established procedures and guidelines.

Comparison With Other Municipalities

The requester references the fees charged by several other municipalities for similar Flock Safety records.

Although these comparisons are acknowledged, the time necessary to retrieve electronic records may vary depending on the quantity of information requested, the relevant date ranges, the capabilities of the computer equipment, and the procedures used to export and prepare the records.

Consequently, the amount charged by another municipality does not necessarily establish the time required for Clinton Township to fulfill these particular requests.

Conclusion

The Department's original estimates were made in good faith based on its experience with the Flock Safety platform and the anticipated work involved in fulfilling the requests.

The estimated time was not based solely on locating the records but on the technical and administrative work anticipated in retrieving, examining, organizing, and preparing the information for release.

The Department remains committed to complying with Michigan FOIA and providing responsive public records while ensuring that any labor costs assessed are properly supported, accurately categorized, and consistent with applicable law and Township procedures.

The Department recommends reviewing the itemized labor estimates to distinguish necessary employee activity from unattended processing time and to determine whether revised estimates are appropriate.

Captain [name left out]