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DEPUTY TO THE CHAIRMAN

STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

P. O. BOX 1879
HONOLULU, HAWAII 96805

March 16, 2017

Via Electronic Mail

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Wireline Competition Bureau Seeks Comment On Initiating Proceedings To Revoke Sandwich Isles Communications, Inc.'s Commission Authorizations; Public Notice (DA 17-168, *rel.* February 14, 2017

WC Docket No. 16-405

Dear Chairman Pai:

The Department of Hawaiian Home Lands, State of Hawaii, ("DHHL") appreciates this opportunity to provide its views on whether the Commission should "initiate proceedings to revoke the Commission authorizations granted to Sandwich Isles Communications, Inc. ("Sandwich Isles")." We also appreciate that in reviewing this issue, the FCC "remains committed to maintaining service to all customers on the Hawaiian Home Lands and that it will coordinate with the Hawaii Public Utilities Commission ("HPUC") to ensure continued service."

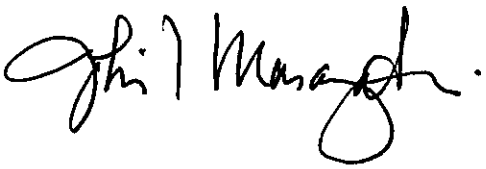
As the agency responsible for managing the Hawaiian home lands for the benefit of native Hawaiians, we ask that DHHL be consulted in any coordinated efforts between the FCC and the HPUC regarding telecommunications services in the home lands. As DHHL previously advised the Commission, our overriding concern in the on-going Sandwich Isles enforcement matter is that native Hawaiian residents of the home lands continue to have access to advanced telecommunications services. Home land residents must receive broadband services and other telecommunications services reasonably comparable to those in urban areas in terms of price, quality and data rates.

DHHL urges the Commission not to lose sight of this overriding goal in reviewing its enforcement options, including proceedings that look to revoke Sandwich Isles' Section 214 authorizations and to address fraud, waste and abuse. Should the Commission be inclined to consider such adverse action, DHHL further urges the Commission to first incorporate or facilitate a transition plan that accommodates and provides service continuity while maintaining

Universal Service Fund support of broadband and other telecommunications services throughout the home lands.

DHHL remains committed to working with the FCC in achieving a resolution that will best serve native Hawaiians and other residents of the home lands consistent with the Commission's policies and objectives underlying its commitment to Universal Service and its efforts to eliminate fraud, waste and abuse. Thank you for your consideration.

Sincerely,



Jobie M.K. Masagatani, Chairman
Hawaiian Homes Commission