

March 6, 2015

Via Electronic Filing

Ms. Marlene Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street S.W.
Washington, DC 20554

Re: Special Access Data Collection, WC Docket No. 05-25; RM-10593
Hawaiian Telcom, Inc.
FRN 0001520980

Dear Ms. Dortch:

With this letter, Hawaiian Telcom, Inc. ("HTI") files a public version of the following essay responses in the above-referenced Special Access Data Collection proceeding, in accordance with the *Order and Data Collection Protective Order, DA-14-1424*, adopted October 1, 2014: II.D.1 and II.D.2, and HTI's Explanatory Attachment.

HTI's responses for the entire Data Collection have also been submitted via the Special Access Web Portal.

Please direct any questions regarding this matter to me at 808-546-3877 or at steven.golden@hawaiiantel.com.

Sincerely,



Steven P. Golden
Vice President, External Affairs

Attachment

Hawaiian Telcom, Inc. (HTI)

II.D.1.: Describe your company's short term and long-range promotional and advertising strategies and objectives for winning new – or retaining current – customers for Dedicated Services. In your description, please describe the size (e.g., companies with 500 employees or less, etc.), geographic scope (e.g., national, southeast, Chicago, etc.), and type of customers your company targets or plans to target through these strategies.

Response:

For retail customers, HTI has a portfolio of next-generation *Dedicated Services* including MPLS-based Layer 2 switched Ethernet and Layer 3 VPN. **[BEGIN HIGHLY CONFIDENTIAL INFORMATION** [REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION]

[BEGIN HIGHLY CONFIDENTIAL INFORMATION] [REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION]

HTI's Wholesale Markets promotional and advertising strategies are based upon **[BEGIN HIGHLY CONFIDENTIAL INFORMATION** [REDACTED]

[END HIGHLY CONFIDENTIAL INFORMATION] Collateral and technical specification sheets on

products and services are also provided to potential customers. The targeted customers' geographic scope ranges from international, national to local and includes Competitive Local Exchange Carriers, Interexchange Carriers, wireless service providers, and internet service providers.

Hawaiian Telcom, Inc. (HTI)

II.D.2.: Identify where your company's policies are recorded on the following *Dedicated Service*-related processes: (a) initiation of service; (b) service Upgrades; and (c) service Disconnections. For instance, identify where your company records recurring and non-recurring charges associated with the processes listed above. If recorded in a Tariff, provide the specific Tariff section(s). If these policies are recorded in documents other than Tariffs, list those documents and state whether they are publicly available. If they are publicly available, explain how to find them. For documents that are not publicly available, state whether they are conveyed to customers orally or in writing.

Response:

For intrastate tariff services (regulated by the Hawaii Public Utilities Commission (HPUC)), general policies, terms and conditions, and pricing for recurring and non-recurring charges, as well as other rate elements, are located as follows:

- HPUC Tariff 21 Private Line
 - Section 1.1 (General Regulations - Application)
 - Section 1.2 (General Regulations – Definitions)
 - Section 1.3 (General Regulations – Regulations)

- Product-specific policies are located in their respective sections of HPUC Tariff 21
 - Section 3.1 (Digital Private Line Services – Application)
 - Section 3.2 (Digital Private Line Services – Regulation)
 - Section 3.3 (Digital Private Line Services – Rates and Charges)
 - Section 3.4 (Digital Private Line Services – Special Construction)
 - Section 4.4 (Digital Network Services – Point to Point Fiber OpticSM Service)

For interstate services (regulated by the FCC). general policies, terms and conditions, and pricing for recurring and non-recurring charges, as well as other rate elements, are located as follows:

- FCC Tariff 1 Facilities for Interstate Access (FIA)
 - Section 1 (Application of Tariff)
 - Section 2 (General Regulations)

- Product-specific policies are located in their respective sections of FCC Tariff 1
 - Section 5.1 (Special Access – General)
 - Section 5.2 (Special Access – Description of Special Access)
 - Section 5.3 (Special Access – Description of Terminating Options)
 - Section 5.6 (Special Access – Rate Regulations)
 - Section 11 (Special Access – Special Federal Government FIA)
 - Section 17 (Special Access – Interconnection Between Collocated Spaces)

REDACTED FOR PUBLIC INSPECTION

- Section 19 (Special Access – Rate Zone Wire Centers applicable to services in Section 5)
- Section 20 (Special Access – Optical Networking)
- Section 21 (Special Access – Contract Tariffs)

Retail Markets non-tariff services are provided by HTI under an individually contracted Service Quote and Service Agreement with the end-user customer. The documents are not publicly available. The documents are provided in either soft or hard copy to the end-user customer.

For Wholesale Markets, Circuit Based Dedicated Services above a DS3 bandwidth and all Packet Based Dedicated Services are provided via Private Carriage Contracts that are not publicly available and are conveyed to customers both orally and in written contracts.

In addition, Wholesale Markets' processes related to initiation of *Dedicated Service*, upgrades and disconnects can be found on HTI's website at <http://www.hawaiiantel.com/wholesale/Wholesale/tabid/106/Default.aspx>. These processes reflect use of industry-standard tools such as Access Service Requests (ASRs) and the Access Service Ordering Guide (ASOG)¹.

¹ The Access Service Ordering Guide Industry Support Interface document is copyrighted by the Alliance of Telecommunication Industry Solutions (ATIS) on behalf of the ATIS-sponsored Ordering and Billing Forum (OBF).

**Hawaiian Telcom, Inc.
Special Access Data Collection
Explanatory Attachment**

Hawaiian Telcom, Inc. ("HTI" or "Company") includes this Explanatory Attachment to provide key assumptions made during the data collection process, as well as any issues encountered regarding data sourcing or data quality.

Table II.B.3

- **[BEGIN CONFIDENTIAL INFORMATION]** [REDACTED] **[END CONFIDENTIAL INFORMATION]** We made an effort to update these during the data collection process, but some Locations may have been duplicated due to differing addresses, and some location addresses may still be vague.
- For Ethernet virtual connections (circuits with service code 'VL', we summed the bandwidth for both the Ethernet virtual circuits and the physical GigE circuits at the End User Location.
- Where a circuit had two End-User locations (e.g. between customer sites), one of the locations was selected to be identified as a "Location" in Table II.B.3.

Table II.B.4 Part 1

- In 2005 the sale of Verizon Hawaii (n/k/a Hawaiian Telcom, Inc. to the Carlyle Group was finalized. As part of the agreement, Carlyle agreed to transition all data systems from Verizon's proprietary systems to its own systems within one year. **[BEGIN CONFIDENTIAL INFORMATION]** [REDACTED]

[END CONFIDENTIAL INFORMATION]

- In the "Offer" field, a Y was used when the billing code for that rate element indicated that the rate was derived from a price flex or contract based tariff.
- Where a term length was available, but a term end date was not, a date of "12/2092" was used.
- Where no information on Volume Commitment was available, it was assumed that there was no commitment.

Table II.B.4 Part 2

- Customers were classified as Providers based on HTI's understanding of the nature of the customer's business, but we did not confirm whether they have FRNs and are otherwise under FCC oversight. In addition, **[BEGIN**

CONFIDENTIAL INFORMATION] [REDACTED]

[END

CONFIDENTIAL INFORMATION]

- We did our best to assign a unique customer code to each customer. However, where large entities such as the State of Hawaii or US Government do business with HTI as separate "customers" (e.g. University of Hawaii, Hawaii State Department of Transportation, US Army, DITCO) or had different IDs in two different billing systems, these may have different customer ID numbers. Also, due to inconsistencies and idiosyncrasies in the customer names, it is not always possible to determine which accounts belong to a large entity.

Table II.B.5

- There were a few billing adjustments that occurred after the customers had disconnected service and the accounts had been closed. These accounts were reactivated several months later in 2013 in order to issue the adjustments. To capture these adjustments, line items were added to Table II.B.4 Part 1 for these circuits, and assigned unique billing codes of "2" and "5". The Adjustment IDs for these transactions were then placed in the Adjustment ID fields.
- Where adjustments were issued in 2013 for November and December of 2012, those Adjustment IDs were placed in the months of January and February, respectively.

Table II.B.12

- "Customer count new" – Data is not kept in the normal course of business so it was not possible to determine if a customer was new or existing at the time they subscribed to a plan. We indicated "0" for all plans, based on the practical experience that most are existing customers.