

VIA ECFS

April 1, 2015

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

Re: Rural Call Completion, WC Docket No. 13-39

Dear Ms. Dortch:

Pursuant to paragraph 67 of the Commission's Report and Order ("Order")<sup>1</sup> in the above-mentioned proceeding, Hawaiian Telcom Communications, Inc., ("HTCI") (FRN 0011062460) respectfully informs the Commission that through its various subsidiaries, in the aggregate, it provides long distance services for more than 100,000 domestic retail subscriber lines. HTCI is exempt from the rural call completion reporting requirements either because it carries all intraLATA calls on its own network or does not make the initial call path choice for interLATA calling. Calls for each affiliate are handled as follows:

1. Hawaiian Telcom Services Company, Inc. ("HTSC") (FRN 0013077250):
  - a. InterLATA long distance service is provided by HTSC as a primary interexchange carrier and a VoIP provider by reselling the services of MCI Worldcom (dba Verizon Global Wholesale) ("Verizon") and Sprint Emerging and Wholesale Solutions ("Sprint"). These calls are delivered to either Verizon or Sprint, and HTSC does not make the initial call path choice for these calls.
  - b. IntraLATA services are provided by HTSC's LEC affiliate, Hawaiian Telcom, Inc. ("HTI"). Calls that remain within the HT affiliate network are delivered to HTI's Access tandem switch serving HTI's terminating local exchange end offices. Calls intended for end users of the Rural Local Exchange Carrier (RLEC) in Hawaii are delivered to HTI's access tandem switch, where the RLEC picks up the calls and completes them to its end users. HTSC therefore hands off these calls directly to the terminating local exchange carrier or to the tandem switch serving the terminating local exchange carrier's end office. Pursuant to 47 CFR §64.2105(e), these calls are excluded from the reporting requirements.

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<sup>1</sup> *Report and Order And Further Notice of Proposed Rulemaking*, FCC 13-135, WC Docket No. 13-39, released November 8, 2013.

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- c. InterLata and intraLATA services are also provided via HTSC Wireless service. HTSC resells Sprint Wireless service, and HTSC does not make the initial call path choice for these calls.
2. Wavecom Solutions Corporation ("WC") (FRN 0005940671):
  - a. InterLATA long distance service is provided as a primary interexchange carrier and a VoIP provider. These calls are routed to HTSC, aggregated with HTSC's calls, and then delivered to either Verizon or Sprint. WC does not make the initial call path choice for these calls.
  - b. IntraLATA services are routed directly to HTI's access tandem for delivery to the called party, or, where Feature Group-D trunks are available, to the called parties' end offices. Calls intended for end users of the RLEC in Hawaii are delivered to HTI's access tandem, where the RLEC picks up the calls and completes them to its end users. WC therefore hands off these calls directly to the terminating local exchange carrier or to the tandem switch serving the terminating local exchange carrier's end office. Pursuant to 47 CFR §64.2105(e), these calls are excluded from the reporting requirements.
3. SystemMetrics Corporation ("SM") (FRN 0013385729):
  - a. InterLATA calling is provided through SM's VoIP service by reselling the services of Bandwidth.com. Such calls are handed off directly to Bandwidth.com for routing, and SM does not make the initial call path choice.
  - b. IntraLATA calls originating from SM's VoIP users are handed off to HTI for routing to HTI's end users. Calls to the RLEC's end users are delivered to HTI's access tandem, where the RLEC picks up the calls and completes them to its end users. SM therefore hands off these calls directly to the terminating local exchange carrier or to the tandem switch serving the terminating local exchange carrier's end office. Pursuant to 47 CFR §64.2105(e), these calls are excluded from the reporting requirements.
4. Hawaiian Telecom, Inc. ("HTI") (FRN 0001520980):
  - a. IntraLATA long distance service within the Hawaiian Islands is provided for customers presubscribed to HTI's intraLATA services. These calls remain on-net. Pursuant to 47 CFR §64.2105(e), these calls are excluded from the reporting requirements.

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If there are any questions regarding this matter, please contact Steven Golden at 808-546-3877 or at [steven.golden@hawaiiantel.com](mailto:steven.golden@hawaiiantel.com).

Sincerely,



Scott Barber  
Chief Operating Officer

cc: MCI Worldcom Network Services, Inc.  
Sprint Emerging and Wholesale Solutions  
Sprint Wholesale Business Solutions  
Bandwidth.com