

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Qwest Petition for Forbearance Under 47 U.S.C. § 160(c) from Title II and <i>Computer Inquiry</i> Rules with Respect to Broadband Services)	WC Docket No. 06-125
)	
Petition of AT&T Inc. for Forbearance Under 47 U.S.C. § 160(c) from Title II and <i>Computer Inquiry</i> Rules with Respect to its Broadband Services)	
)	
Petition of BellSouth Corporation for Forbearance Under 47 U.S.C. § 160(c) from Title II and <i>Computer Inquiry</i> Rules with Respect to Its Broadband Services)	
)	
Petition of Embarq Local Operating Companies for Forbearance Under 47 U.S.C. § 160(c) From Application of <i>Computer Inquiry</i> and Certain Title II Common-Carriage Requirements)	WC Docket No. 06-147
)	

REPLY COMMENTS OF HAWAIIAN TELCOM, INC.

Hawaiian Telcom, Inc. (“Hawaiian Telcom”) supports the above-captioned forbearance petitions submitted by AT&T Inc. (“AT&T”), BellSouth Corporation (“BellSouth”), Qwest Corporation and Qwest Communications Corporation (“Qwest”), and the Embarq Local Operating Companies (“Embarq”) (together, the “Petitioners”).

The Petitioners seek forbearance from the *Computer Inquiry* requirements and Title II rules for broadband services provided by each of their incumbent local exchange carrier (“ILEC”) operating companies and all similarly situated carriers, consistent with the regulatory relief that the Commission granted to the Verizon Telephone Companies earlier this year. In their petitions, the Petitioners amply demonstrate that forbearance is warranted under the requirements of Section 10 of the Communications Act of 1934, as amended (the “Act”).

Moreover, the competition faced by all ILECs throughout the United States is similar to that faced by one or more of the operating companies of Verizon, AT&T, BellSouth, Embarq or Qwest. Therefore, all ILECs should be afforded the same forbearance relief granted to Verizon and sought by the Petitioners. The Commission should grant forbearance relief to all ILECs to facilitate competition, remove the burdens of unnecessary regulation, and ensure a level playing field among *all* providers of broadband services. Based on the substantial record in this proceeding, and consistent with Commission and court precedent, Section 10 of the Act mandates that the Commission grant forbearance as to the Petitioners and all ILECs nationwide.¹

For the foregoing reasons, and the reasons set forth in each of the above-captioned petitions, the Commission should forbear from applying the *Computer Inquiry* requirements and Title II rules to broadband services provided by all ILECs.

Respectfully submitted,

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¹ See *EarthLink, Inc. v. Federal Communications Commission*, No. 05-1087, slip op. at 12 (DC Cir. Aug. 15, 2006) (upholding the Commission's decision to grant forbearance from the unbundling obligations set forth in Section 271 of the Act on a nationwide basis, and without an analysis of more localized geographic markets).