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November 25, 2009

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

**RE: Notice of Ex Parte Presentation  
Sandwich Isles Communications, Inc. Petition for Declaratory Ruling, WC Docket 09-133**

Dear Ms. Dortch:

On November 25, 2009, Jim Frame and Regina McNeil of NECA; and the undersigned met with Marcus Maher, Pamela Arluk, Lynne Engledow, Albert Lewis, Jennifer Prime, and Doug Slotten of the Wireline Competition Bureau to discuss the Petition for Declaratory Ruling submitted by Sandwich Isles Communications Inc (Sandwich Isles).

NECA addressed its continued belief that Sandwich Isles' exclusive lease of the entire Paniolo Cable Network does not meet the "Used and Useful" standards established by the Commission.<sup>1</sup> NECA explained that absent a Commission ruling on Sandwich Isles' petition, a surrogate amount is needed to establish the portion of Sandwich Isles' new lease costs that may be "Used and Useful for NECA settlement purposes. NECA further explained its rationale for using Sandwich Isles' prior lease cost with Hawaiian Telcom as the surrogate for the amount of the Paniolo lease that may be "Used and Useful".

Finally, NECA discussed its continued willingness to attempt to come to a mutual resolution of this matter with Sandwich Isles upon the submission by Sandwich Isles of detailed historical and projected demand data, along with related projection justifications.<sup>2</sup> Such data will help NECA evaluate what portion of the Paniolo lease cost may be appropriate.

Questions regarding this meeting may be directed to me.

Sincerely,

A handwritten signature in black ink that reads "Joe A. Douglas". The signature is written in a cursive, flowing style.

cc: Marcus Maher  
Pamela Arluk  
Lynne Engledow  
Albert Lewis  
Jennifer Prime  
Doug Slotten

<sup>1</sup> See, Comments of National Exchange Carrier Association, Inc., WC Docket No. 09-133 (Aug. 31, 2009) ("NECA Comments"); Reply Comments of National Exchange Carrier Association, Inc., WC Docket No. 09-133 (September 10, 2009) ("NECA Reply Comments")

<sup>2</sup> See also, NECA Comments at 4; NECA Reply Comments at 8; as of November 25, 2009, Sandwich Isles has not provided NECA with all of the requested data.