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August 11, 2010

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

Re: WC Docket N. 09-133

Dear Ms. Dortch:

Hawaiian Telcom, Inc. (“HTI”) hereby submits this letter in response to recent *ex parte* filings by Sandwich Isles Communications, Inc. (“Sandwich Isles”) in the above-captioned proceeding. As in its Comments and Reply, HTI takes no position on the relief requested by Sandwich Isles or on any issues other than those addressed in HTI’s submissions.¹

However, HTI is concerned that certain statements in Sandwich Isles’ letters dated July 30, 2010² and August 2, 2010³ may not accurately represent aspects of the communications networks serving the State of Hawaii. Specifically, Sandwich Isles states that “[t]hree undersea cables serve Hawaii,” and lists the Paniolo Cable, the Wavecom cable, and the HTI cable.⁴ However, a fourth undersea cable, owned by Southern Cross, also services Hawaii. According to Southern Cross’s website, its network provides substantial service between Oahu, the Big Island, Australia, and the United States:

¹ Comments of Hawaiian Telcom, Inc., WC Docket No. 09-133 (filed Aug. 31, 2009) (“HTI Comments”); Reply of Hawaiian Telcom, Inc., WC Docket No. 09-133 (filed Sept. 10, 2009).

² Letter from Dana Frix, *et al.*, Counsel to Sandwich Isles, to Marlene H. Dortch, FCC Secretary, WC Docket No. 09-133 (filed July 30, 2010) (July 30 *Ex Parte*).

³ Letter from Dana Frix, *et al.*, Counsel to Sandwich Isles, to Marlene H. Dortch, FCC Secretary, WC Docket No. 09-133 (filed August 2, 2010) (August 2 *Ex Parte*).

⁴ July 30 *Ex Parte* at 1.

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There are nine cable stations (two each in Australia, New Zealand, Hawaii and the US mainland, and one in Fiji) and an access point in San Jose, California.

Both cables in the network contain six optical fibres (3 fibre pairs) between Sydney and Hawaii, and eight fibres (4 fibre pairs) between Hawaii and the US West Coast.⁵

In addition, Sandwich Isles states that in response to a recent outage on the Wavecom cable, Sandwich Isles “agreed on an emergency basis to immediately provide inter-island capacity on the Paniolo Cable to assist in the restoration of Oceanic Time Warner’s cable and internet service”⁶ and that “the Wavecom and Hawaiian Telcom undersea cables, [] lack sufficient quality and capacity to meet the needs of Hawaii now, much less into the future.”⁷ Sandwich Isles further states that it “could not reasonably rely upon leasing capacity on the two existing cables due to limitations of those aging cables.”⁸ HTI seeks to clarify any confusion regarding its network these statements may cause. Based on its estimates of the traffic carried by the Wavecom cable, HTI has the capacity to support all of the traffic normally carried on the Wavecom cable on HTI’s undersea cable in the event of an outage. For the recent outage, HTI is providing service on its undersea cable to both Wavecom and tw telcom. In addition, for those parties with whom HTI has a reciprocal restoration agreement, HTI is able to assist in rerouting service to HTI’s cable quickly and efficiently, minimizing disruptions experienced by end-user customers.

HTI appreciates this opportunity to clarify the record.

⁵ Southern Cross Cable Network, Network Description *available at* <http://www.southerncrosscables.com/public/Network/default.cfm>.

⁶ July 30 *Ex Parte* at 2.

⁷ *Id.* at 2.

⁸ August 2 *Ex Parte* at 12.

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Sincerely,

/s/ Suzanne Yelen

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