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August 31, 2010

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

Re: WC Docket No. 09-133

Dear Ms. Dortch:

Hawaiian Telcom, Inc. (“HTI”) hereby responds to Sandwich Isles Communications, Inc.’s (“Sandwich Isles”) letter dated August 17, 2010, in the above-captioned proceeding. Despite Sandwich Isles claims to the contrary,¹ HTI takes no position on the relief requested by Sandwich Isles, including Sandwich Isles’s efforts to obtain funding.

On August 11, 2010, HTI filed a letter with the Federal Communications Commission (“FCC”) correcting certain claims in a prior Sandwich Isles filing.² Sandwich Isles disputes certain HTI statements in its August 17 letter.³ HTI stands by the accuracy of its August 11 letter, despite Sandwich Isles’ assertions.

First, in its letter, HTI stated that four submarine cables, rather than the three cited by Sandwich Isles, serve Hawaii. Sandwich Isles acknowledges that “HTI is correct,” but then argues that HTI statement “is irrelevant, if not misleading.”⁴

¹ 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) (August 17 *Ex Parte*).

² Letter from Suzanne Yelen, Counsel to HTI, to Marlene H. Dortch, FCC Secretary, WC Docket No. 09-133 (filed Aug. 11, 2010) (HTI August 11 Letter).

³ August 17 *Ex Parte*.

⁴ August 17 *Ex Parte* at 2.

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HTI's sole point was to correct the record regarding the number of cables connecting the Hawaiian Islands.

Second, in response to Sandwich Isles's claim 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,"⁵ HTI stated that:

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.⁶

Sandwich Isles now argues that "Oceanic required 70 Gigabits of capacity, which is equivalent to at least six OC-192s. This was and remains substantially above the capacity available on the HTI cable."⁷

HTI reaffirms that it had more than sufficient capacity available on its interisland cable to support all of the traffic normally carried on the Wavecom cable and continues to have this capacity available today. During the recent outage, HTI fulfilled all of the orders it received except for a request for two OC-48s. Although HTI would have been and continues to be able to provide these two OC-48 facilities, as well as additional ones, the request was withdrawn before HTI was able to provide service. Further, HTI's actions during the recent Wavecom cable outage confirm that when it has a reciprocal restoration agreement, HTI can swiftly and effectively assist other entities in restoring service.

HTI appreciates this opportunity to clarify the record.

⁵ July 30 *Ex Parte* at 2.

⁶ HTI August 11 Letter at 2.

⁷ August 17 *Ex Parte* at 2.

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Sincerely,

/s/ Suzanne Yelen

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