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October 29, 2010

VIA HAND DELIVERY

Doc. No. 3260636

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

Attn: Chief, Wireline Competition Bureau

**Re: Sandwich Isles Communications, Inc. – Petition for Reconsideration and
Request for Confidential Treatment under 47 C.F.R. §§ 0.457 and 0.459**

Dear Ms. Gillette:

Sandwich Isles Communications, Inc. (“SIC”) hereby submits its Petition for Reconsideration (the “Petition”) of the Wireline Competition Bureau’s September 29, 2010 Declaratory Ruling in WC Docket No. 09-133 (the “Ruling”). Enclosed, please find one original and four copies of the confidential, non-redacted original version of the Petition.

SIC requests confidential treatment for the Petition pursuant to Sections 0.457 and 0.459 of the Commission’s rules, 47 C.F.R. §§ 0.457 and 0.459. As discussed in greater detail below, the entire Petition should be kept confidential because (1) it contains confidential information about SIC’s facilities and expenses, and (2) it is founded in all aspects on proprietary internal accounting guidelines of the National Exchange Carrier Association (“NECA”), which SIC understands to be confidential to NECA and not otherwise available to the public (the “Confidential NECA Information”).

The Confidential NECA Information is so integral to the Petition that SIC does not believe that it is practical to redact the Petition in a way that adequately protects NECA. SIC notes that although the Petition contains a small amount of information that is proprietary to SIC, the need to keep the entire Petition confidential arises from the fact that SIC has no authority to release the Confidential NECA Information. As a result, SIC is not providing a redacted version of the Petition for public inspection.

For the foregoing reasons, SIC respectfully requests that the Petition be treated as confidential under the Commission’s rules and precedent and that no portion of the Petition be made available for public inspection. In the event that any person or entity requests access to the Petition or seeks to make any part of the confidential information therein part of

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the public record, SIC also respectfully requests to be notified immediately so that it can consider such request or take other action as necessary to safeguard its interests.

Respectfully yours,



Dana Frix

Counsel to Sandwich Isles
Communications, Inc.

Enclosure

PUBLIC VERSION

This document contains privileged and confidential information and has therefore been withheld from the public copy of this document pursuant to Federal Communications Commission Protective Order entered in WC Docket No. 09-133.

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2010 I caused a copy of the foregoing *Petition for Reconsideration* was served to the following parties of record as indicated:

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