

assist persons with disabilities, and benefit the environment.² In addition, broadband access ties people in rural areas closer to the rest of country improving our “unity as a nation.”³

These benefits are even more keenly needed in areas that are both rural and insular, such as most of the State of Hawaii. Seventy-two percent of Hawaii’s population lives on the island of Oahu, which makes up only 9.4 percent of Hawaii’s land mass.⁴ The remaining 335,000 people are scattered throughout the other islands.⁵ Hawaii’s islands are separated from the mainland and each other by deep ocean waters and are dominated by volcanic mountain ranges. Thus, people living in Hawaii’s rural areas are not only isolated from the more urbanized areas of Hawaii, they are also thousands of miles from the rest of the United States and five time zones away from the East Coast. This makes broadband even more critical for taking advantage of business opportunities, obtaining medical care, as well as fostering a sense of being connected to the rest of the State of Hawaii and the country.

In addition, deploying broadband in areas that are both rural and insular is more difficult than in rural areas of the continental United States. In the *Report*, the Commission notes many of the factors that complicate efforts to bring broadband to rural areas. These include: technological limitations inconsistent with certain rural area

² *Report*, ¶¶ 16-23.

³ *Report*, ¶ 15.

⁴ Hawaii Department of Business, Economic Development & Tourism, 2009 State of Hawaii Data Book, Table 1.05 (2009) *available at* <http://hawaii.gov/dbedt/info/economic/databook/db2009/>.

⁵ *Id.*, Table 1.11.

areas,⁶ weather and environmental conditions,⁷ topography,⁸ and insufficient return on investment to justify deployment of facilities.⁹ Areas that are both rural and insular are affected by these factors even more than rural areas on the mainland. For example, broadband providers in Hawaii must contend with volcanic activity, rain erosion and streams which isolate already remote communities, mountain topography that hampers wireless communications, and a lack of commercial power and paved roads in some mountainous and heavily forested areas. Further, unlike mainland rural areas, the islands themselves are separated by deep ocean channels which require that personnel and equipment must be transported by air or sea between islands and from the mainland and the use of undersea fiber and/or long microwave radio hops to provide service.¹⁰

Areas that are both rural and insular face more and different challenges in deploying broadband than rural mainland areas. In updating its report on bringing broadband to rural America, HTI requests that Commission include a section which addresses the conditions and needs of communities that are both rural and insular.

⁶ *Report*, ¶¶ 78-80.

⁷ *Report*, ¶ 83.

⁸ *Report*, ¶ 84.

⁹ *Report*, ¶ 117.

¹⁰ Because of the unique challenges it faces in providing service, HTI filed a waiver petition to permit HTI to receive high-cost universal service support. Hawaiian Telcom, Inc. Petition for Waiver of Sections 54.309 and 54.313(d)(vi) of the Commission's Rules, WC Docket No. 08-4 (filed Dec. 31, 2007).

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