

REDACTED – FOR PUBLIC INSPECTION

Received & Inspected

OCT 22 2012

FCC Mail Room

October 19, 2012

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

Re: In the Matter of Wavecom Solutions Corporation, Transferor and Hawaiian  
Telcom, Inc., Transferee; Application for Consent to Transfer Control of  
Domestic Authorizations Under Section 214 of the Communications Act, as  
Amended, WC Docket No. 12-206

Dear Ms. Dortch:

In response to a further request from FCC staff and pursuant to the Protective Order in this proceeding,<sup>1</sup> Wavecom Solutions Corporation (“Wavecom”) and Hawaiian Telcom, Inc. (“HTI”) (jointly, “the Applicants”) hereby supplement the information provided in the Applicants’ supplemental filing dated August 1, 2012 in the above-captioned proceeding (“Supplement”).

First, HTI confirms that the overwhelming majority of customers in the locations identified in Chart 1 of the Supplement have long term relationships with HTI. However, it would be misleading and highly burdensome to identify each customer and state the remaining term of individual arrangements. Such an effort is unnecessary because these customers purchase either special access services or unbundled network services pursuant to tariffs and interconnection contracts, respectively. It is typical for each type of arrangement for terms, which normally range between three and five years, to either be renewed or extended beyond their original termination dates. Therefore, the overwhelming majority of customers are long term.

Second, with respect to Chart 2 in the Supplement, the attachment to this letter provides additional detailed information concerning facilities and revenues at specific building locations in the State of Hawaii. Because this information contains competitively sensitive data, it is Confidential Information and is being filed subject to the procedures in the Protective Order entered in this proceeding.

Pursuant to the Protective Order, one copy of this filing containing Confidential Information (the “Confidential Filing”) and two copies of the filing in redacted form (the

---

<sup>1</sup> *Wavecom Solutions Corporation, Transferor and Hawaiian Telcom, Inc., Transferee; Application for Consent to Transfer Control of Domestic Authorizations Under Section 214 of the Communications Act, as Amended, Protective Order, WC Docket No. 12-206, DA 12-1533 (Wir. Comp. Bur., rel. Sept. 25, 2012) (“Protective Order”).*

No. of Copies rec'd  
List ABCDE

0+1

REDACTED – FOR PUBLIC INSPECTION

Ms. Marlene H. Dortch  
August 3, 2012  
Page 2

“Redacted Confidential Filing”) are being provided to the Secretary’s Office.<sup>2</sup> Two copies of the Confidential Filing are also being delivered to Jodie May, Competition Policy Division, Wireline Competition Bureau.

Please contact the undersigned with any questions.

Sincerely,

/s/ Nancy J. Victory

Nancy J. Victory  
Wiley Rein LLP  
1776 K Street, N.W.  
Washington, D.C. 20036  
(202) 719-7344  
[nvictory@wileyrein.com](mailto:nvictory@wileyrein.com)

Counsel for Wavecom Solutions  
Corporation

/s/ Gregory J. Vogt

Gregory J. Vogt  
Law Offices of Gregory J. Vogt, PLLC  
2121 Eisenhower Ave.  
Suite 200  
Alexandria, Virginia 22314  
(703) 838-0115  
[gvogt@vogtlawfirm.com](mailto:gvogt@vogtlawfirm.com)

Counsel for Hawaiian Telcom, Inc.

cc: Jodie May

---

<sup>2</sup> *Id.* at ¶ 4.

**REDACTED – FOR PUBLIC INSPECTION**

**Attachment**

**(CONTAINS CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE  
ORDER IN WC DOCKET NO. 12-206 BEFORE THE FEDERAL  
COMMUNICATIONS COMMISSION)**