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December 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:

This letter is filed as a Supplement to the above-captioned applications. I have attached as Appendix A to this Supplement the Declaration of Brian Tanner of Hawaiian Telcom Holdco, Inc, which explains how the company's foreign ownership is in compliance with the authorization granted and conditions imposed in International Authorizations Granted, Public Notice, DA No. 10-1798, at 2 (Sept. 23, 2010).

Please let me know if you have any questions.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
Counsel for Hawaiian Telcom Inc.

cc: David Krech

Appendix A

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
WAVECOM SOLUTIONS)
CORPORATION, Transferor,)
)
and) WC Docket No. 12-206
)
HAWAIIAN TELCOM, INC.,)
Transferee)
)
Applications for Consent to Transfer)
Control.)

DECLARATION OF BRIAN TANNER

I, Brian Tanner, hereby declare the following:

1. I am the Director of Investor Relations for Hawaiian Telcom Holdco, Inc. (“Holdco”), the ultimate parent company of Hawaiian Telcom, Inc. (“HTI”), transferee in this instant proceeding. I am responsible for monitoring whether HTI and Holdco are in compliance with the conditions that the Federal Communications Commission adopted in International Authorizations Granted, Public Notice, DA No. 10-1798, at 2 (Sept. 23, 2010) (“Foreign Ownership PN”). In that conditional grant of authority, the Commission found that

the indirect foreign ownership of HTI in excess of the 25 percent benchmark in section 310(b)(4) is consistent with the public interest. Specifically, this ruling allows up to 100 percent indirect foreign ownership of HTI as a result of foreign equity and/or voting interests held directly or indirectly in its controlling U.S. parent, Hawaiian Telcom

Holdco, Inc. (Holdco), subject to the following conditions:
(1) HTI shall obtain prior Commission approval before any foreign individual or entity acquires a direct or indirect equity and/or voting interest in Holdco in excess of 25 percent; and (2) HTI shall obtain prior Commission approval before Holdco's direct or indirect equity and/or voting interests from non-WTO Member countries (including interests from unknown countries) exceeds 25 percent.¹

2. As indicated in the applications filed in the above-captioned proceeding, Holdco is in compliance with these conditions. Holdco common stock is publicly traded and is widely held. I have monitored compliance with these conditions. The shareholders that comprise approximately 81 percent of the total outstanding stock of Holdco are either U.S. entities or entities that are organized in and/or have their main headquarters in the World Trade Organization (“WTO”) countries of either the Netherlands or Switzerland. These entities are either mutual funds or investment management firms. I have gained this information in part from direct contacts with company representatives, in part from filings with the Securities & Exchange Commission, and in part from public website information.

3. Although I believe that the vast majority of the remaining 19 percent shareholders, which are much more widely held than the first 81 percent, are most likely either U.S. or WTO entities as well, it is unnecessary to further delve into their ownership because, even if they are all non-WTO entities, it would not violate the 25 percent threshold condition imposed in the Foreign Participation PN.

¹ Foreign Ownership PN at 2.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Brian Tanner
Brian Tanner

Dated: December 19, 2012