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November 8, 2013

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

**Re: Connect America Fund, High Cost Universal Service Support, WC
 Docket Nos. 10-90, 05-337; Additional Costs Associated with Price Cap
 Company Service to Non-contiguous Geographic Areas**

Dear Ms. Dortch:

Hawaiin Telcom, Inc. ("HTI") in the attached letter hereby files certain additional information that is proprietary and highly confidential to HTI under the terms of the Second Protective Order in the above-captioned dockets. Accordingly, the attached letter indicates the confidential treatment to be afforded the submitted information as required by those Orders.

In accordance with those Orders, I have attached one copy of HTI's Stamped Highly Confidential documents, plus two copies addressed to Katie King in the Wireline Competition bureau, and two copies redacted for public inspection (the redacted copy is also being filed electronically in ECFS, which ommits confidential or highly confidential information. Please let me know if you have any questions.

Sincerely,

/s/ Gregory J. Vogt

Gregory J. Vogt
 Counsel for Hawaiian Telcom Inc.

Enclosure

cc: Katie King
 Margaret Avril Lawson

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 445 Twelfth Street, S.W.
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Re: Connect America Fund, High-Cost Universal Service Support, WC Docket Nos. 10-90, 05-337; Additional Costs Associated with Price Cap Company Service to Non-contiguous Geographic Areas

Dear Ms. Dortch:

In response to staff questions, Hawaiian Telcom, Inc. (“HTI”) hereby submits the following additional information concerning Connect America Fund (“CAF”) Phase II support necessary for the Connect America Cost Model (“CACM”) to implement the Commission directive to provide adequate support in the State of Hawaii.

On September 11, 2013, HTI submitted information demonstrating its additional costs of providing voice and broadband services in the State of Hawaii.¹ In particular, one of the cost categories identified in that submission indicated that HTI’s unique plant mix, as well as specific service costs for placing aerial facilities, should be reflected in the CACM in order to provide adequate universal service support to HTI.

HTI provides the following information showing its current plant mix based on its current engineering system records:

Plant Mix: All

Density	Aerial	Buried	Underground
Rural	79.4%	1.0%	19.7%
Suburban	44.7%	2.4%	52.8%
Urban	32.9%	2.1%	65.1%

¹ Letter from Steven P. Golden, Hawaiian Telcom, Inc., to Marlene H. Dortch, FCC, WC Docket No. 10-90 (Sept. 11, 2013) (“HTI September 11 Ex Parte”).

Plant Mix: Copper

Density	Aerial	Buried	Underground
Rural	79.5%	1.1%	19.4%
Suburban	45.2%	3.1%	51.8%
Urban	34.6%	2.5%	62.9%

Plant Mix: Fiber

Density	Aerial	Buried	Underground
Rural	78.5%	0.0%	21.4%
Suburban	43.2%	0.0%	56.8%
Urban	24.0%	0.0%	76.0%

As indicated in HTI September 11 Ex Parte, HTI records do not categorize individual segments as “distribution,” “feeder,” or “interoffice” plant; making this assessment would require individual review and manual classification of each record, a process that would take many weeks. However, HTI is able to estimate the forward-looking percentages based on the fact that distribution and feeder plant are largely copper facilities, whereas inter-office are fiber. Based on the records for copper and fiber feeder plant, HTI believes that it accurately estimated the forward-looking costs of each type of plant for Hawaii in HTI September 11 Ex Parte.²

However, simply using the accurate forward-looking plant mix is insufficient to modify the CACM to accurately reflect HTI costs in Hawaii. The cost model should also reflect the significantly higher forward looking costs of placing aerial pole facilities in Hawaii.³ In support of these higher costs, HTI submits as Appendix A additional cost support material demonstrating the proposed costs increases, which represents the joint ownership costs of maintaining and operating aerial pole facilities in Hawaii.

Please let me know if you have any additional questions.

Sincerely,

/s/ Steven P. Golden
 Steven P. Golden
 Vice President External Affairs
 Hawaiian Telcom Inc.

² *Id.* at 10 & Masutomi Declaration at 2.

³ *Id.* at 9.

APPENDIX A

(REDACTED -- FOR PUBLIC INSPECTION)