

Answer to Question 13

Applicant has, through execution of a new Amended and Restated Limited Liability Limited Partnership Agreement, changed only its organizing entity structure, from a Limited Partnership to a Limited Liability Limited Partnership.

The ownership structure, and nature of control, of assignee Hawaii Pacific Teleport, L.L.L.P. will be identical to that of the current structure and control of assignor/authorization holder Hawaii Teleport L.P. In both cases:

-Hawaii Capital Holdings, LLC is the sole General Partner, with 1% equity/capital interest in the licensee and full and exclusive right to control, manage, and operate the licensee business, provided that the certain major corporate decisions and actions (such as transfer of partnership interests, sale of substantially all assets, dissolution of the business) require the consent or approval of the Limited Partner, as is typical in limited partnership agreements. CS Wilton Group LLC remains the sole member of Hawaii Capital Holdings, and Leana Smith-Ryland remains the sole member of CS Wilton Group, LLC.

-1050 Piiholo LLC is the sole Limited Partner, with 99% equity/capital interest in the licensee, but no right to control, manage, or operate the licensee business, other than the right to give consent to certain major corporate decisions and actions, as described above. Neil Struminger remains the sole member of 1050 Piiholo LLC.

Accordingly, this will be a pro forma assignment, and this assignment application is thus subject to the notification procedure under Section 63.24(f) of the Commission's rules. The certification required under Section 63.24(f) of the Commission's rules is attached hereto.

SECTION 63.24(f)(2)(ii) CERTIFICATION

I, Leeana Smith-Ryland, hereby certify that the assignment notified in this application is pro forma and that, together with all previous pro forma transactions, it has not resulted in a change in the actual controlling party.

Leeana Smith-Ryland

Leeana Smith-Ryland

CEO, Hawaii Pacific Teleport, L.P.

January 15, 2021