

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

In the Matter of

HAWAIIAN ISLANDS FIBER LINK, LLC,

Application for a License to Land and
Operate a Private Fiber-Optic Submarine
Cable System Connecting the Hawaiian
Islands of Kaua'i, O'ahu, Moloka'i, Lāna'i,
Maui, and Hawai'i,

THE HAWAIIAN ISLANDS FIBER LINK SYSTEM

ICFS File No. SCL-LIC-2025-_____

APPLICATION FOR CABLE LANDING LICENSE

Pursuant to 47 U.S.C. § 34, Executive Order No. 10,530, and 47 C.F.R. § 1.767, Hawaiian Islands Fiber Link, LLC (“HIFL”) hereby applies for a license to land and operate within the United States a private fiber-optic submarine cable network connecting the Hawaiian Islands of Kaua'i, O'ahu, Moloka'i, Lāna'i, Maui, and Hawai'i. The submarine cable system will be known as the Hawaiian Islands Fiber Link system (“HIFL System”). HIFL will operate the HIFL System on a non-common carrier basis by providing bulk capacity to wholesale and enterprise customers on particularized terms and conditions pursuant to individualized negotiations. The existence of robust competition on Hawai'i interisland routes obviates any need for common carrier regulation on public-interest grounds.

HIFL intends to commence commercial operation of the HIFL System by the second calendar quarter of 2027. HIFL therefore seeks timely grant of a cable landing license by the Commission no later than the fourth quarter of 2026 to permit construction activities to proceed on schedule. An expeditious grant of this application will significantly advance the public

interest. The HIFL System will provide significant new capacity on routes where capacity demand continues to increase substantially each year and further enhance the resilience of Hawai'i interisland connectivity.

This application raises no public-interest concerns and qualifies for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1) and (4), as HIFL is not—and is not affiliated with—any foreign carrier, much less one in a foreign country in which the HIFL System will land (as there are no such foreign countries). The application also streamlined processing pursuant to 47 C.F.R. § 1.767(k)(5), as it includes no reportable foreign ownership. Below, HIFL provides information required by 47 C.F.R. § 1.767.

I. INFORMATION REQUIRED BY 47 C.F.R. § 1.767

A. Licensee's Name, Address, Telephone Number, and Place of Organization¹

HIFL's full name, address, and telephone number are as follows:

Hawaiian Islands Fiber Link, LLC
3325 Paddocks Pkwy
Suite 410
Suwanee, Georgia 30024
+1 678 313 6653

HIFL is a Delaware limited liability company.

B. Contact Information²

The Commission should address correspondence regarding this application to:

Scott Schwertfager
President & CEO
3325 Paddocks Pkwy
Suite 410
Suwanee, Georgia 30024
+1 678 313 6653
Scott.Schwertfager@OceanNetworks.com

¹ 47 C.F.R. § 1.767(a)(1), (2).

² *Id.* § 1.767(a)(3).

and

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Counsel for Hawaiian Islands Fiber Link, LLC

C. System Description³

The HIFL System will consist of five main segments:

- ***Kaua'i-O'ahu Segment.*** This segment will connect Lihue Nukoli'i, Kaua'i with Barbers Point, O'ahu. It will have a total length of 190.4 kilometers and consist of 24 fiber pairs.
- ***O'ahu-Maui Segment.*** This segment will connect Barbers Point, O'ahu, with Kahului, Maui. It will have a total length of 195.5 kilometers and consist of 24 fiber pairs.
- ***Moloka'i Branch.*** This segment will connect a branching unit on the O'ahu-Maui Segment with Kaunakakai, Moloka'i. It will have a total length of 13.1 kilometers and consist of 12 fiber pairs.
- ***Lāna'i Branch.*** This segment will connect a branching unit on the O'ahu-Maui Segment with Mānele Harbor, Lāna'i. It will have a total length of 41.3 kilometers and consist of 12 fiber pairs.
- ***Maui-Hawai'i Segment.*** This segment will connect Kahului, Maui with Hilo, Hawai'i. It will have a total length of 230.3 kilometers and consist of 24 fiber pairs.

Each fiber pair will have a total design capacity of 18 Tbps per fiber pair (for a total of 432 Tbps for the HIFL System as a whole) using current technology. HIFL has not yet made decisions

³ *Id.* § 1.767(a)(4).

about the initial lit capacity of the system. HIFL expects the HIFL System to enter commercial service in the second calendar quarter of 2027. In Appendix A, HIFL provides a route map for the system.

D. Landing Points⁴

HIFL provides specific landing point information (including geographic coordinates and street addresses, where available, for beach manholes and cable landing stations) in the following appendices:

- Appendix B: Lihue Nukoli'i, Kaua'i
- Appendix C: Barbers Point, O'ahu (for Kaua'i-O'ahu and O'ahu-Maui Segments)
- Appendix D: Kahului, Maui (for O'ahu-Maui and Maui-Hawai'i Segments)
- Appendix E: Kaunakakai, Moloka'i
- Appendix F: Mānele Harbor, Lāna'i
- Appendix G: Hilo, Hawai'i

E. Regulatory Classification⁵

HIFL will operate the HIFL System on a non-common carrier basis. Non-common carrier classification of the proposed system is consistent with established Commission policy and precedent and with judicial precedent, and it will advance the public interest.

First, the Commission should not subject the HIFL System to common carrier regulation because the HIFL System will not operate on a common carrier basis as defined in *NARUC I*.⁶

⁴ *Id.* § 1.767(a)(5).

⁵ *Id.* § 1.767(a)(6).

⁶ *See Nat'l Ass'n of Regulatory Utility Comm'rs v. FCC*, 525 F.2d 630, 642 (D.C. Cir. 1976) ("*NARUC I*") (stating that the court must inquire "whether there are reasons implicit in the nature of [the] operations to expect an indifferent holding out to the eligible user public"), *cert. denied*, 425 U.S. 992 (1976); *see also Virgin Islands Tel. Corp. v. FCC*, 198 F.3d 921

The courts have stated that “[t]he primary *sine qua non* of common carrier status is a quasi-public character, which arises out of the undertaking ‘to carry for all people indifferently.’”⁷ On the HIFL System, however, HIFL will not sell capacity indifferently to the user public. Instead, HIFL will sell capacity to particular carrier and enterprise customers pursuant to individually-negotiated indefeasible rights of use (“IRUs”) and capacity leases, the terms of which would vary depending on the characteristics and needs of the particular capacity purchaser. The Commission has consistently found that such offerings do not make an applicant a common carrier.⁸

Second, the Commission should not subject the HIFL System to common carrier regulation because there is no legal compulsion or other public-interest reason for HIFL to operate the HIFL System in such a manner. Under the *NARUC I* test, the Commission must determine whether the public interest requires common carrier operation of the submarine cable system.⁹ Traditionally, the Commission has focused on whether the applicant has sufficient

(D.C. Cir. 1999) (affirming FCC’s use of *NARUC I* test for distinguishing common-carrier and private-carrier services following enactment of the Telecommunications Act of 1996).

⁷ *Nat’l Ass’n of Regulatory Utility Comm’rs v. FCC*, 533 F.2d 601, 608 (D.C. Cir. 1976) (quoting *Semon v. Royal Indemnity Co.*, 279 F.2d 737, 739 (5th Cir. 1960)).

⁸ *See AT&T Corp. et al.*, Cable Landing License, 13 FCC Rcd. 16232, 16,238 (Int’l Bur. 1998) (finding that individualized decisions concerning the sale or lease of capacity on the China-U.S. Cable Network would not constitute the effective provision of a service to the public so as to make the applicant a common carrier); *AT&T Submarine Systems, Inc.*, Cable Landing License, 11 FCC Rcd. 14,885, 14,904 ¶ 64 (Int’l Bur. 1996) (“*St. Thomas-St. Croix Cable Order*”) (finding that an “offer of access, nondiscriminatory terms and conditions and market pricing of IRUs does not rise to the level of an ‘indiscriminate’ offering” so as to constitute common carriage), *aff’d* 13 FCC Rcd. 21,585 (1998), *aff’d sub nom. Virgin Islands Telephone Corp. v. FCC*, 198 F.3d 921 (D.C. Cir. 1999).

⁹ *NARUC I*, 525 F.2d at 642 (stating that the court must inquire “whether there will be any legal compulsion . . . to serve [the public] indifferently”).

market power to warrant common carrier regulation,¹⁰ although the Commission “is not limited to that reasoning” and has looked more broadly to determine whether common carrier licensing is in the public interest.¹¹ The HIFL System poses no such competitive or other public-interest concerns. The HIFL System will enhance competition by competing vigorously with other submarine cable systems on Hawai‘i interisland routes.

The Commission has previously found that facilities need not be identical in order to offer pro-competitive benefits.¹² The existence of ample competing submarine cable facilities providing Hawai‘i interisland connectivity ensures that the HIFL System would not function as a bottleneck facility on those routes. HIFL’s intended operation of the HIFL System therefore serves the Commission’s long-standing policy to encourage competition through private submarine cable transmissions, pursuant to which the Commission has granted numerous cable landing licenses.¹³

¹⁰ See *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,893 ¶ 30.

¹¹ See *AT&T Corp. et al.*, Cable Landing License, 14 FCC Rcd. 13,066, 13,080 ¶ 39 (2000) (stating that “[a]lthough this public interest analysis has generally focused on the availability of alternative facilities, we are not limited to that reasoning”); *Australia-Japan Cable (Guam) Ltd.*, Cable Landing License, 15 FCC Rcd. 24,057, 24,062 ¶ 13 (Int’l Bur. 2000) (stating that “[t]his public interest analysis generally has focused on whether an applicant will be able to exercise market power because of the lack of alternative facilities, although the Commission has not limited itself to that reasoning”); *Telefonica SAM USA, Inc. et al.*, Cable Landing License, 15 FCC Rcd. 14,915, 14,920 ¶ 11 (Int’l Bur. 2000) (stating that “[t]his public interest analysis has focused on the availability of alternative facilities, although the Commission has stated it is not limited to that reasoning”).

¹² *St. Thomas-St. Croix Cable Order*, 11 FCC Rcd. at 14,898 ¶ 44 (stating that “requiring current identical substitute common carrier facilities before non-common carrier facilities will be authorized would serve as a disincentive for entities to take risks and expend capital to expand and upgrade facilities”).

¹³ See *Tel-Optik Ltd.*, Memorandum Opinion and Order, 100 FCC.2d 1033, 1041 (1985).

F. Cable Ownership Information¹⁴

HIFL will own and control all segments of the HIFL System.

The HIFL System's cable landing stations will be owned and controlled as shown in

Table 1 below:

Table 1: Control and Ownership of Cable Landing Stations

Landing	New or Existing Facility?	Control	Ownership
Lihue Nukoli'i, Kaua'i	Existing	HIFL	Kaua'i Community College, University of Hawai'i System
Barbers Point, Oahu	Existing	HIFL	University of Hawai'i West O'ahu, University of Hawai'i System
Honolulu, Oahu	Existing	HIFL	DRFortress, LLC
Kahului, Maui	Existing	HIFL	University of Hawai'i Maui College, University of Hawai'i System
Kaunakakai, Moloka'i	Existing	HIFL	Moloka'i Educational Center, University of Hawai'i Maui College, University of Hawai'i System
Mānele Harbor, Lāna'i	New	HIFL	Lana'i Education Center, University of Hawai'i System ¹⁵
Hilo, Hawai'i	Existing	HIFL	University of Hawai'i Hilo, University of Hawai'i System

As stated in part II below, HIFL seeks a waiver of 47 C.F.R. § 1.767(h)(1), as the University of Hawai'i System will have no ability to affect significantly the operation of the HIFL System.

¹⁴ 47 C.F.R. § 1.767(a)(7).

¹⁵ One fiber pair will terminate at the Lana'i Education Center (Lana'i City). The remainder of the fiber pairs will terminate at the beach manhole, with cross-connects to local carriers at the beach manhole.

G. Certification Regarding Ownership, Citizenship, Principal Business, and Interlocking Directorates¹⁶

HIFL certifies that it has the following 10-percent-or-greater direct or indirect interest holders:

Ocean Networks, Inc. (“Ocean Networks”)

Address: 3325 Paddocks Pkwy., Suite 410, Suwanee, Georgia 30024

Place of Organization: State of Georgia

Principal Business: telecommunications

Relationship: Ocean Networks holds a 100-percent voting and equity interest in HIFL.

Mr. Scott Schwertfager

Address: 3325 Paddocks Pkwy., Suite 410, Suwanee, Georgia 30024

Place of Citizenship: USA

Principal Business: telecommunications

Relationship: Mr. Schwertfager holds a 60-percent voting and equity interest in Ocean Networks, giving him an indirect 60-percent voting and equity interest in HIFL.

No other entity or individual holds a 10-percent-greater voting or equity interest in HIFL.

HIFL’s ownership information is shown graphically in Appendix I. HIFL further certifies that no corporate officer or director of HIFL is also an officer or director of any foreign carrier.

¹⁶ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(h).

H. Response to Standard Questions of Executive Branch Agencies¹⁷

HIFL has no reportable foreign ownership within the meaning of 47 C.F.R. §§ 1.767 and 1.40001(d) and is therefore not required to submit a response to the 2021 standard questions to the Committee for the Assessment of Foreign Participation in the United States Telecommunications Services Sector (“Team Telecom”).¹⁸ Given recent Team Telecom practice, however, HIFL expects that Team Telecom will request that the Commission refer the application to it. In parallel with the filing of this application with the Commission, HIFL has therefore submitted to Team Telecom a response to the 2021 standard questions, and provided it with a complete and unredacted copy of this Application.

I. Anti-Drug Abuse Act Certification¹⁹

HIFL certifies that it is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.²⁰

J. Law Enforcement Certifications²¹

HIFL certifies that it will:

- Ensure compliance with all *applicable* Communications Assistance for Law Enforcement Act requirements and related rules and regulations (of which there should be none given that HIFL System will operate on a non-common carrier basis);²²

¹⁷ 47 C.F.R. §§ 1.40003(a), 63.18(p); *Requirements for Applications and Petitions Subject to Executive Branch Review*, available at <https://www.fcc.gov/international-affairs/requirements-applications-and-petitions-subject-executive-branch-review>.

¹⁸ See 47 C.F.R. §§ 1.40003, 63.18(p)(2).

¹⁹ *Id.* § 1.767(a)(8)(i), 63.18(o).

²⁰ *Id.* § 63.18(o) does not reflect the renumbering and recodification of this statutory provision as Section 421 of the Controlled Substances Act, 21 U.S.C. § 862(a).

²¹ 47 C.F.R. §§ 1.767(a)(8)(i), 63.18(q).

²² *Id.* § 63.18(q)(1)(i).

- Ensure availability of communications to, from, or within the United States, as well as records thereof, in a form and location that permits them to be subject to a valid and lawful request or legal process in accordance with U.S. law, including but not limited to the authorities set forth in 47 C.F.R. § 63.18(q)(1)(ii);²³
- Designate the following points of contact who are located in the United States and are U.S. citizens or lawful U.S. permanent residents, for the execution of lawful requests and as an agent for legal service of process:

Scott Schwertfager
 President & CEO
 3325 Paddocks Pkwy
 Suite 410
 Suwanee, Georgia 30024
 +1 678 313 6653
 Scott.Schwertfager@OceanNetworks.com

- Ensure the continuing accuracy and completeness of all information submitted, whether at the time of submission of the application or subsequently in response to either the Commission or Team Telecom request, as required by 47 C.F.R. § 1.65(a), and inform the Commission and Team Telecom of any substantial and significant changes while an application is pending;²⁴
- After the application is no longer pending for purposes of 47 C.F.R. § 1.65, notify the Commission and Team Telecom of any changes in the authorization holder or licensee information and/or contact information promptly, and in any event within thirty (30) days;²⁵ and

²³ *Id.* § 63.18(q)(1)(ii).

²⁴ *Id.* § 63.18(q)(1)(iv)(A).

²⁵ *Id.* § 63.18(q)(1)(iv)(B).

- Acknowledge that if they fail to fulfill any of the conditions and obligations set forth in the certifications set out in 47 C.F.R. § 63.18(q) or in the grant of an application or authorization and/or that if the information provided to the U.S. Government is materially false, fictitious, or fraudulent, that it may be subject to all remedies available to the U.S. Government, including but not limited to revocation and/or termination of the Commission's authorization or license, and criminal and civil penalties, including penalties under 18 U.S.C. § 1001.²⁶

K. Certification Regarding Foreign Carrier Status and Foreign Affiliations²⁷

HIFL certifies that it:

- (A) is not a foreign carrier in any foreign country;
- (B) does not own or control a cable landing station in any foreign country; and
- (C) is not affiliated with any foreign carriers.

²⁶ *Id.* § 63.18(q)(v).

²⁷ *Id.* § 1.767(a)(8)(ii).

L. Certification Regarding Foreign Destination Countries²⁸

HIFL certifies that: (A) it is not a foreign carrier in any foreign destination country for the HIFL System, of which there are none; (B) it does not control any foreign carrier in any foreign country; (C) no entity owning more than 25 percent of, and controlling, HIFL controls any foreign carrier in any foreign country; and (D) no grouping of two or more foreign carriers in Taiwan (or parties that control foreign carriers in those destination countries) own, in aggregate, more than 25 percent of it and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of arrangements for the terms of acquisition, sale, lease, transfer, and use of capacity on the HIFL System in the United States.

M. Certifications Regarding WTO Status and Affiliations with Foreign Carriers Having Market Power in Foreign Destination Countries²⁹

No response is required, as HIFL did not identify any non-WTO member countries in response to 47 C.F.R. § 1.767(a)(8)(iii) above.

N. Certification Regarding Routine Conditions³⁰

HIFL certifies that it accepts and will abide by the routine conditions specified in 47 C.F.R. § 1.767(g).

O. Certification Regarding Service to Executive Branch Agencies³¹

As indicated in the attached certificate of service, HIFL has sent a complete copy of this application to the U.S. Departments of State, Commerce, and Defense.

²⁸ *Id.* § 1.767(a)(8)(iii).

²⁹ *Id.* § 1.767(a)(8)(iv).

³⁰ *Id.* § 1.767(a)(9).

³¹ *Id.* § 1.767(j).

P. Streamlining³²

This application qualifies for streamlined processing pursuant to 47 C.F.R. § 1.767(k)(1). HIFL has certified above that it is not affiliated with any foreign carrier. This application raises no other foreign ownership, competition, or public interest concerns that would merit consideration outside the Commission’s streamlined review process.

HIFL also qualifies for streamlined processing under 47 C.F.R. § 1.767(k)(4) and certifies that it is not required to submit a consistency certification to any state or territory pursuant to Section 1456(c)(3)(A) of the Coastal Zone Management Act, codified at 16 U.S.C. § 1456(c)(3)(A). Hawai‘i—the only state in which the HIFL System will land—does not list a cable landing license as a federal activity requiring a consistency certification.³³

Finally, HIFL requests streamlined processing pursuant to 47 C.F.R. § 1.767(k)(5), as the application includes no reportable foreign ownership.

II. REQUEST FOR WAIVER OF 47 C.F.R. § 1.767(h)(1)

HIFL requests a waiver of 47 C.F.R. § 1.767(h)(1) rules so that neither the University of Hawai‘i System nor DR Fortress, LLC (“DRFortress”) need be a joint applicant for the HIFL System cable landing license. “The purpose of [Section 1.767(h)(1)] is to ensure that entities having a significant ability to affect the operation of the cable system become licensees so that they are subject to the conditions and responsibilities associated with the license.”³⁴ Neither the

³² *Id.* § 1.767(k).

³³ *See Hawaii’s Federal Listed Actions*, NOAA Office for Coastal Management, <https://coast.noaa.gov/data/czm/consistency/media/hi.pdf>.

³⁴ *See Actions Taken Under the Cable Landing License Act*, Public Notice, 23 FCC Rcd. 227, 229 (Int’l Bur. 2008) (“*TPE Cable Landing License*”) (citing *Review of Commission Consideration of Applications under the Cable Landing License Act*, Report and Order, 16 FCC Rcd. 22,167, 22,194-95 ¶¶ 53-54 (2001)).

University of Hawai‘i System or DRFortress, however, will have any ability to affect significantly the HIFL System’s operation. Moreover, inclusion of the University of Hawai‘i System and DRFortress as joint applicants is also not necessary to ensure compliance by HIFL with the Cable Landing License Act, the Commission’s cable landing license rules, or the terms of any cable landing license. Grant of the waiver is therefore consistent with longstanding Commission precedent.³⁵

The University of Hawai‘i System and DRFortress will provide certain limited services that would not provide it with any ability to affect significantly the HIFL System’s operation. Under the contemplated agreements, the University of Hawai‘i System and DRFortress will grant to HIFL long-term leases or IRU agreements for collocation spaces in the cable landing stations and access to conduits, with HIFL retaining exclusive control. HIFL will seek to ensure that such

³⁵ See, e.g., *Actions Taken Under the Cable Landing License Act*, Public Notice, 32 FCC Rcd. 1436, 1437 (Int’l Bur. 2017) (accepting the applicant’s representations that Tata “will not have the ability to affect significantly Atisa’s operation” and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under the Cable Landing License Act*, Public Notice, 24 FCC Rcd. 7828, 7829-30 (Int’l Bur. 2009) (accepting the applicants representations that “Tata will not be able to affect significant the operation of HANTRU-1” and declining to require Tata be a joint applicant for the cable landing license); *Actions Taken Under the Cable Landing License Act*, Public Notice, 24 FCC Rcd. 226, 227-28 (Int’l Bur. 2009) (noting that “Applicants will retain operational authority over their ASHC System facilities and provide direction to AT&T in all matters relating to the ASHC System”); *Actions Taken Under the Cable Landing License Act*, Public Notice, 23 FCC Rcd. 13,419, 13,420 (Int’l Bur. 2008) (declining to require that Tata Communications (US) Inc.—which owns the existing cable station at Piti, Guam, where the PPC 1 System will land—be a joint applicant or licensee for the PPC 1 System, noting that “Applicants will retain operational authority over PPC 1 System facilities and provide direction to [Tata] in all matters relating to the PPC 1 System.”); *TPE Cable Landing License*, 23 FCC Rcd. at 229 (declining to require that WCI Cable, Inc. (“WCIC”)—which owns an existing cable station at Nedonna Beach, Oregon—be a joint applicant or licensee for the Trans-Pacific Express Network (“TPE”), which will land at WCIC’s Nedonna Beach cable station, finding that “WCIC will not have the ability to affect the operation of the TPE Network. Verizon will retain effective operational authority and provide direction to WCIC in all matters relating to the TPE Network”).

IRU agreements and leases will have initial minimum of one-year terms, with the option of extensions that may be exercised at HIFL's sole discretion, for a maximum of 25 years each.

HIFL will retain operational authority over the HIFL System's landing facilities at all landing sites and provide direction to the University of Hawai'i System and DRFortress in all matters relating to the HIFL System.

CONCLUSION

For the foregoing reasons, the Commission should expeditiously grant this cable landing license application for the HIFL System pursuant to streamlined processing.

Respectfully submitted,

HAWAIIAN ISLANDS FIBER LINK, LLC

/x/ Scott Schwertfager

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November 25, 2025

Attachments

LIST OF APPENDICES

Appendix A: HIFL System Route Map

Appendix B: Lihue Nukoli'i, Kaua'i, Landing Point Information

Appendix C: Barbers Point, O'ahu, Landing Point Information (for Kaua'i-O'ahu and O'ahu-Maui Segments)

Appendix D: Kahului, Maui, Landing Point Information (for O'ahu-Maui AND Maui-Hawai'i Segments)

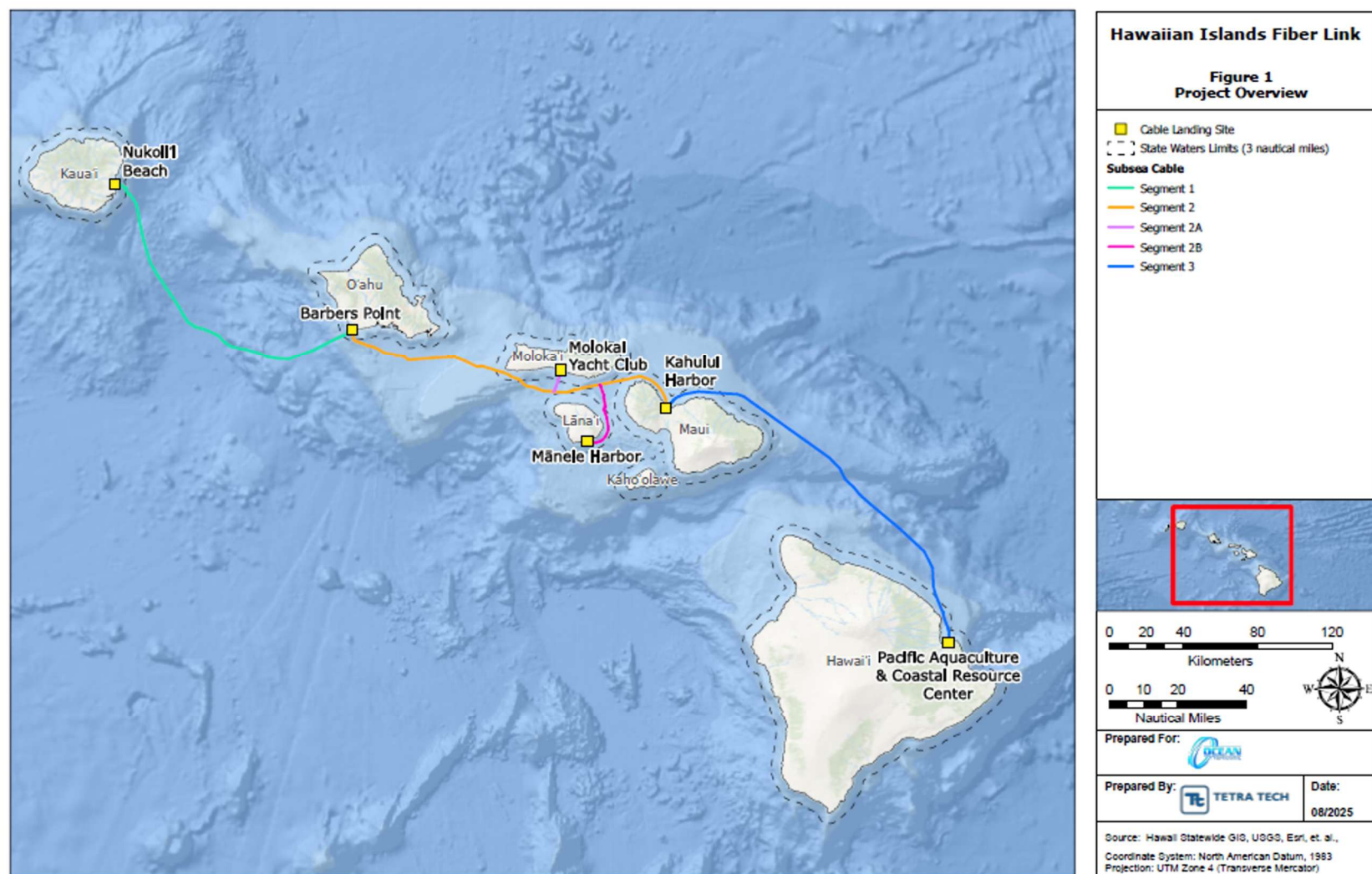
Appendix E: Kaunakakai, Moloka'i, Landing Point Information

Appendix F: Mānele Harbor, Lāna'i, Landing Point Information

Appendix G: Hilo, Hawai'i, Landing Point Information

Appendix H: HIFL Ownership Chart

APPENDIX A: HIFL SYSTEM ROUTE MAP



APPENDIX B:

LIHUE NUKOLI'I, KAUAI, LANDING POINT INFORMATION



Beach manhole geographic coordinates: 22.006351, -159.337111

Cable landing station geographic coordinates: 21.968983, -159.395966

Cable landing station street address: Kauai Community College, 3-1901 Kaumuali'i Hwy., Lihue, Hawai'i 96766

APPENDIX C:

BARBERS POINT, O'AHU, LANDING POINT INFORMATION (FOR KAUA'I-O'AHU AND FOR O'AHU-MAUI SEGMENTS)



Kaua'i-O'ahu Segment

Beach manhole geographic coordinates: 21.296823, -158.103646

Cable landing station geographic coordinates Fiber Pair 1: 21.35405, -158.055633

Cable landing station address for Fiber Pair 1: University of Hawai'i West O'ahu, Building F, 91-1001 Farrington Hwy., Kapolei, Hawai'i 96707

Cable landing station geographic coordinates for Fiber Pairs 2 through 24: 21.334833, -157.918333

Cable landing station address for Fiber Pairs 2 through 24: DRFortress Data Center, 3375 Koapaka Street, D198, Honolulu, Hawai'i 96819

O'ahu-Maui Segment

Beach manhole geographic coordinates: 21.296802, -158.103573

Cable landing station geographic coordinates for Fiber Pair 1: 21.35405, -158.055633

Cable landing station address for Fiber Pair 1: University of Hawai'i West O'ahu, Building F, 91-1001 Farrington Hwy., Kapolei, Hawai'i 96707

Cable landing station geographic coordinates for Fiber Pairs 2 through 24: 21.334833, -157.918333

Cable landing station address for Fiber Pairs 2 through 24: DRFortress Data Center, 3375 Koapaka Street, D198, Honolulu, Hawai'i 96819

APPENDIX D:

**KAHULUI, MAUI, LANDING POINT INFORMATION
(FOR O'AHU-MAUI AND MAUI-HAWAII SEGMENTS)**



Beach manhole geographic coordinates: 20.89804, -156.478325

Cable landing station geographic coordinates: 20.891533, -156.481716

Cable landing station street address: Maui Community College. University of Hawai'i Maui College, 310 W. Kaahumanu Avenue, Kahului, Hawai'i 96732

APPENDIX E:
KAUNAKAKAI, MOLOKA'I, LANDING POINT INFORMATION



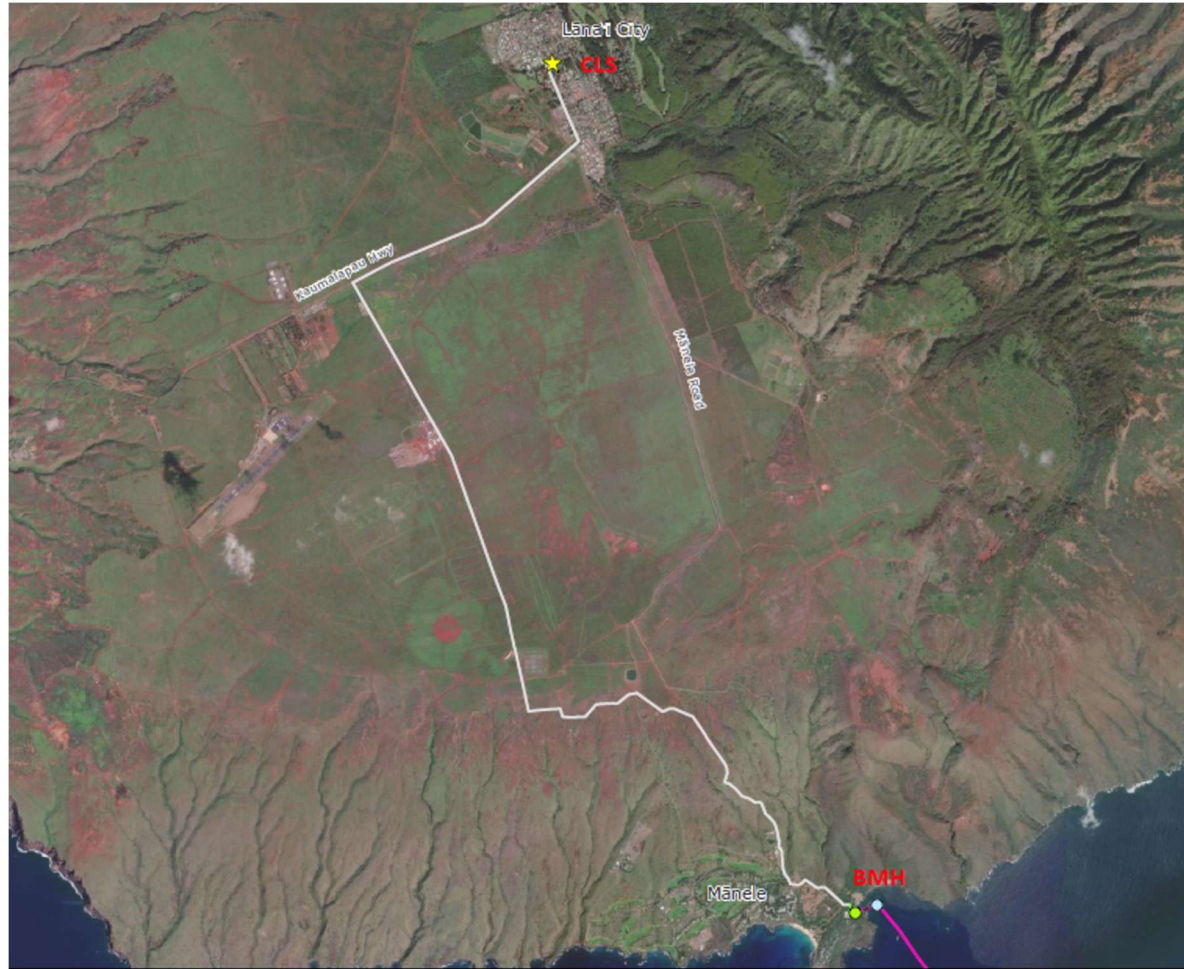
Beach manhole geographic coordinates: 21.088013, -157.024745

Cable landing station geographic coordinates: 21.08585, -157.013583

Cable landing station street address: Molokai Education Center, 375 Kamehameha V Hwy., Kaunakakai, Hawai'i 96748

APPENDIX F:

MĀNELE HARBOR, LĀNA'I, LANDING POINT INFORMATION



Beach manhole geographic coordinates: 20.741132, -156.888752

Cable landing station geographic coordinates: 20.825733, -156.920933 (Fiber Pair 1 will terminate here; Fiber Pairs 2 through 24 will terminate at the beach manhole as identified above)

Cable landing station street address: none

APPENDIX G:
HILO, HAWAII, LANDING POINT INFORMATION

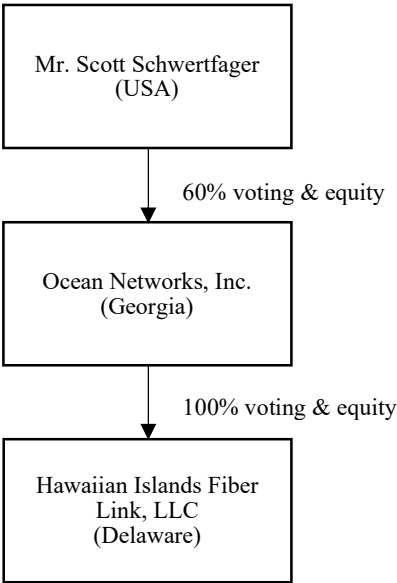


Beach manhole geographic coordinates: 19.731205, -155.048417

Cable landing station geographic coordinates: 19.7025, -155.080167

Cable landing station street address: University of Hawai'i, Building 346, 200 West Kawili Street, Hilo, Hawai'i 96720

APPENDIX H: HIFL OWNERSHIP



CERTIFICATE OF SERVICE

I, Kent Bressie, hereby certify that consistent with 47 C.F.R. § 1.767(j), I have served copies of the foregoing application for a cable landing license for the Hawaiian Islands Fiber Link submarine cable system, by hand delivery or electronic mail this 25th day of November, 2025 to the following:

Alka Patel
Director, Technology and Security Policy
International Communications and Information Policy
Bureau of Cyberspace and Digital Policy
U.S. DEPARTMENT OF STATE
EB/CIP : Room 4634
2201 C Street, N.W.
Washington, D.C. 20520-4634

Andrew J. Coley
Attorney Advisor
U.S. DEPARTMENT OF COMMERCE/NTIA
14th Street and Constitution Avenue, N.W.
Room 4713
Washington, D.C. 20230

Lia Wentworth
Acting General Counsel
DEFENSE INFORMATION SYSTEMS AGENCY
6910 Cooper Avenue
Fort Meade, Maryland 20755

A handwritten signature in black ink, appearing to read "Kent Bressie", is written over a horizontal line.

Kent Bressie