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April 3, 2026

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re Cable Landing License Application for the Hawaiian Islands Fiber Link System, ICFS File No. SCL-LIC-20251121-00076

Dear Ms. Dortch:

In this supplement to the above-referenced cable landing license application, Hawaiian Islands Fiber Link, LLC ("HIFL") addresses clarification questions posed by staff in the Commission's Office of International Affairs and explain other aspects of the associated amendment.

RESPONSES TO COMMISSION QUESTIONS

1. ***First, we need an explanation of the landing situation on Oahu. The system description discusses a landing at Barbers Point in Oahu (page 3) and the list of landing points lists Barbers Point and references Appendix C (page 4). Table 1 regarding Control and Ownership of the Cable Landing Stations (page 7), however lists two landing stations in Oahu, one at Barbers Point that is owned by the University of Hawaii and one at Honolulu that is owned by DR Fortress LLC. There is no explanation of this second Oahu landing. The application asks for a waiver of the requirement for DR Fortress to be a licensee along with the University, but still not information about why the two landings. Appendix C does state that one fiber pair will terminate at the University landing and fiber pairs 2 through 24 will terminate at the DR Fortress landing.***

   Response: There will be a single O'ahu landing point for the HIFL System, with one beach manhole, but the HIFL System will use two cable landing stations: (a) the one owned by DRFortress (for Fiber Pairs 2 through 24); and (b) a facility at the University of Hawaii West O'ahu campus (for Fiber Pair 1). Please see the amended response to Question 16 and the updated Appendix C, attached to this supplement, for updated geographic coordinates for the beach manhole.

2. ***We need more information about the dual landing in Oahu and the distinctions between the University landing and the DR Fortress landing. By the way, if the DR Fortress landing is the one being used for the Hawaiki cable, our records show that GI DI Fortress SpinCo LLC is the cable landing station operator.***

   Response: The University of Hawaii West O'ahu campus facility will host the landing of Fiber Pair 1, while DRFortress's facility will host the landing of Fiber Pairs 2 through 24. HIFL confirms that the address of the DRFortress facility, owned and operated by DRFortress, LLC, is 3375 Koapaka Street, D198, Honolulu, Hawai'i 96819.

3. ***Second, about the capacity market in Hawaii. In arguing that the HIFL System should be classified as non-common carrier, the application state that there is "ample competing submarine cable facilities". We need more information to back up this statement. As you know, applicants will provide the names of existing and planned subcables that will provide competition to the applicant's cable to support this type of claim.***

   Response: HIFL supplements the discussion on page 6 of the Narrative Application to state that the HIFL System will compete with existing inter-island submarine cable systems, including the Hawaii Inter-Island Cable System, the Hawaii Island Fiber Network, and the Paniolo Cable System.

EXPLANATION OF OTHER AMENDMENT ELEMENTS

The Applicants also amend the application to:

- Update Appendix F to provide the CLS physical address; and
- Supplement part I, paragraph C of the Narrative Application to adjust the HIFL System's segment lengths, which have changed slightly based on the final survey:
  - ***Kauaʻi-Oʻahu Segment***. This segment will connect Lihue Nukoliʻi, Kauaʻi with Barbers Point, Oʻahu. It will have a total length of 191.7 kilometers and consist of 24 fiber pairs.
  - ***Oʻahu-Maui Segment***. This segment will connect Barbers Point, Oʻahu, with Kahului, Maui. It will have a total length of 197.2 kilometers and consist of 24 fiber pairs.
  - ***Molokaʻi Branch***. This segment will connect a branching unit on the Oʻahu-Maui Segment with Kaunakakai, Molokaʻi. It will have a total length of 13.0 kilometers and consist of 12 fiber pairs.

- ***Lānaʻi Branch***. This segment will connect a branching unit on the Oʻahu-Maui Segment with Mānele Harbor, Lānaʻi. It will have a total length of 41.6 kilometers and consist of 12 fiber pairs.

- ***Maui-Hawaiʻi Segment***. This segment will connect Kahului, Maui with Hilo, Hawaiʻi. It will have a total length of 233.0 kilometers and consist of 24 fiber pairs.

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Please contact Kent Bressie with any questions regarding this supplement.

Yours sincerely,

Kent Bressie
Colleen Sechrest

Counsel for Hawaiian Islands Fiber Link, LLC

Attachments

cc: Denise Coca
David Krech