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May 13, 2020

VIA IBFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554
Attention: International Bureau

Re: ***Pro Forma* Assignment of two cable landing stations for the Hawaii Island Fiber Network ("HIFN Cable") from Hawaiian Telcom Services Company, Inc. ("HTSC") to Hawaiian Telcom, Inc. ("HTI")**

Dear Secretary Dortch:

Pursuant to 47 C.F.R. § 1.767, Hawaiian Telcom Services Company, Inc. ("HTSC"), a Delaware corporation, notifies the Commission of a *pro forma* assignment of the Kawaihae and Makaha cable landing stations associated with the Hawaii Island Fiber Network ("HIFN Cable") to Hawaiian Telcom, Inc. ("HTI"), a Hawai'i corporation. HTSC holds authorization for the two cable landing stations pursuant to SCL-ASG-20150512-00012. Both HTI and HTSC are direct subsidiaries of Hawaiian Telecom Communications Inc., which, in turn, is an indirect subsidiary of Cincinnati Bell Inc, a publicly traded Delaware corporation (NYSE: CBB).¹

In 2015, HTSC obtained authorization for a *pro forma* assignment of the Kawaihae and Makaha cable landing stations associated with the HIFN cable from its affiliate, Wavecom Solutions Corporation ("Wavecom"), a direct wholly owned subsidiary of HTI.² Separately, in 2016, HTI obtained authorization for a *pro forma* assignment of the HIFN Cable and all of the HIFN cable landing stations, except for the Kawaihae and Makaha cable landing stations, from Wavecom.³ HTSC and HTI submit that the prior 2016 *pro forma* assignment should have sought authorization to assign the Kawaihae and Makaha cable landing stations to HTI. HTI currently owns and operates the building and equipment associated with the Makaha cable landing station and the equipment associated with the

¹ The Commission approved the transfer of control of both HTSC and HTI to Cincinnati Bell in 2018. See *Joint Application of Cincinnati Bell Inc. and Hawaiian Telcom Holdco, Inc. and Hawaiian Telcom, Inc., Hawaiian Telcom Services Company, Inc. and Wavecom Solutions Corporation for authority Pursuant to Section 214 of the Communications Act of 1934, as Amended, to Transfer Indirect Control of Domestic and International Section 214 Authorization Holders to Cincinnati Bell Inc.*, Public Notice, 33 FCC Rcd. 6085 (2018).

² See IBFS File No. SCL-ASG-20150512-00012.

³ See IBFS File No. SCL-ASG-20161222-00027.

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Kawaihae cable landing station, which is located in a building owned by HTSC. A table listing the current locations for the Kawaihae and Makaha cable landing stations is provided below.

Station	Ocean Access Cable Landing Point and Datum WGS 1984 coordinates	Equipment Location and Datum WGS 1984 coordinates
Kawaihae, Hawaii	62-3461 Kawaihae RD, Waimea, HI 96743 Tax Map Key: (6) 2-002-008:0000 Spencer Beach 20.024500, -155.822333	Lot R-1-B-1, Ouli, Waimea, District of South Kohala, South Kohala Resort, Island of Hawaii Tax Map Key: (3) 6-2-013-011 HTSC Kawaihae Data Center 62-3589 Queen Kaahumanu Highway Kawaihae, HI 96743 20.004941, -155.813089
Makaha, Hawaii	84-369 Farrington Hwy., Waianae, HI 96792 Tax Map Key: (8) 4-001:012 Makaha Beach 21.477500, -158.220667	HTI Waianae Central Office 85-677 Farrington Hwy. Waianae, HI 96792 21.44951, -158.190946

HTSC and HTI certify that the assignment is *pro forma* and that, together with all previous *pro forma* transactions, did not result in a change in the ultimate owners of any of the parties or any access by unrelated third parties to the assets of any of the parties. Both HTSC and HTI are direct, wholly owned subsidiaries of HT Communications and an indirect, wholly owned subsidiary of Cincinnati Bell, a widely held, publicly traded Ohio corporation (NYSE: CBB). Attached is the certification required by Section 1.767(g)(7).

As required by Sections 1.767(g)(7) and 63.24(f)(2) of the Commission’s Rules (47 C.F.R. §§ 1.767(g)(7) and 63.24(f)(2)), HTSC and HTI provide the following information required by 63.18(a) through (d) and (h) of the Commission’s Rules (47 C.F.R. § 63.18):

Section 63.18(a): Name, address and telephone number

Hawaiian Telcom Services Company, Inc. (Assignor)
 Hawaiian Telcom, Inc. (Assignee)
 1177 Bishop Street
 Honolulu, HI 96813
 808-546-4511

Sections 63.18(b): Organization of the Licensee:

HTSC is a Delaware corporation
 HTI is a Hawai'i corporation

Section 63.18(c): Correspondence concerning this filing should be sent to the Licensee’s counsel:

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Section 63.18(d): Other FCC Authorizations

HTSC is authorized to operate two of the seven cable landing stations on the HIFN, at Kawaihae and Makaha.⁴ HTSC also holds an interest in segments four through six of the SEA-US East subsystem, a part of a non-common carrier fiber-optic submarine cable network connecting the continental United States, Indonesia, the Philippines, Guam, and Hawai'i, the Southeast Asia-US submarine cable system ("SEA-US Cable").⁵ In addition, HTSC holds international Section 214 authority to provide global or limited global international facilities-based and resale services.⁶

HTI is authorized to operate the HIFN Cable, which consists of approximately 400 miles of undersea fiber that connects the six major islands of Oahu, Kauai, Molokai, Lanai, Maui, and the island of Hawai'i.⁷ Also, HTI owns and operates the Hawaii Inter-Island Cable System ("HICS Cable") that connects four of the Hawaiian Islands, Oahu, Kauai, Maui, and Hawai'i.⁸ In addition, HTI holds international Section 214 authority to provide international facilities-based services.⁹

Section 63.18(h) Ownership Information: A current corporate structure chart is attached as Exhibit A. The following entities currently hold, directly or indirectly, a 10% or greater interest in HTSC and HTI as calculated pursuant to the Commission ownership attribution rules for international telecommunications carriers:

⁴ See IBFS File No. SCL-ASG-20150512-00012 (transferring interests in Kawaihae and Makaha cable landing stations, from Wavecom, a wholly owned, direct subsidiary of HTI, to HTSC).

⁵ See IBFS File No. SCL-LIC-20150626-00016 (joint authorization of HTSC, GTI Corporation, Globe Telecom, Inc., RAM Telecom International, Inc., TeleGuam Holdings, LLC, d/b/a GTA TeleGuam, PT Telekomunikasi Indonesia International, and Telekomunikasi Indonesia International (USA) Inc.).

⁶ See IBFS File Nos. ITC-214-20010503-00269 and ITC-214-20040630-00513.

⁷ See IBFS File Nos. SCL-LIC-19950627-00024; SCL-MOD-20001015-00036; SCL-MOD-20131114-00012; SCL-ASG-20161222-00027 (transferring interest in HIFN Cable, except for Kawaihae and Makaha cable landing stations, from Wavecom to HTI).

⁸ See IBFS File Nos. SCL-LIC-19921015-00008; SCL-ASG-20110112-00002 (assigning authorization from GTE Hawaiian Telephone Company Inc. to HTI).

⁹ See IBFS File No. ITC-214-20040630-00512.

Marlene H. Dortch, Secretary
May 13, 2020
Page 4

Name: Hawaiian Telcom Communications, Inc.
Address: 1177 Bishop Street, Honolulu, HI 96813
Citizenship: Delaware
Interest Held: 100% (directly)

Name: Hawaiian Telcom Holdco, Inc.
Address: 1177 Bishop Street, Honolulu, HI 96813
Citizenship: Delaware
Interest Held: 100% (indirectly as 100% direct owner of HT Communications)

Name: Cincinnati Bell Inc.
Address: 221 East Fourth Street Cincinnati, OH 45202
Citizenship: Ohio
Interest Held: 100% (indirectly, as 100% direct owner of Hawaiian Telcom Holdco, Inc.)

Name: BlackRock, Inc.
Address: 55 East 52nd Street New York, NY 10055
Citizenship: Delaware
Interest Held: 10% (indirectly, as 10% direct owner of Cincinnati Bell Inc.)

Please do not hesitate to contact us with any questions concerning this filing.

Respectfully submitted,

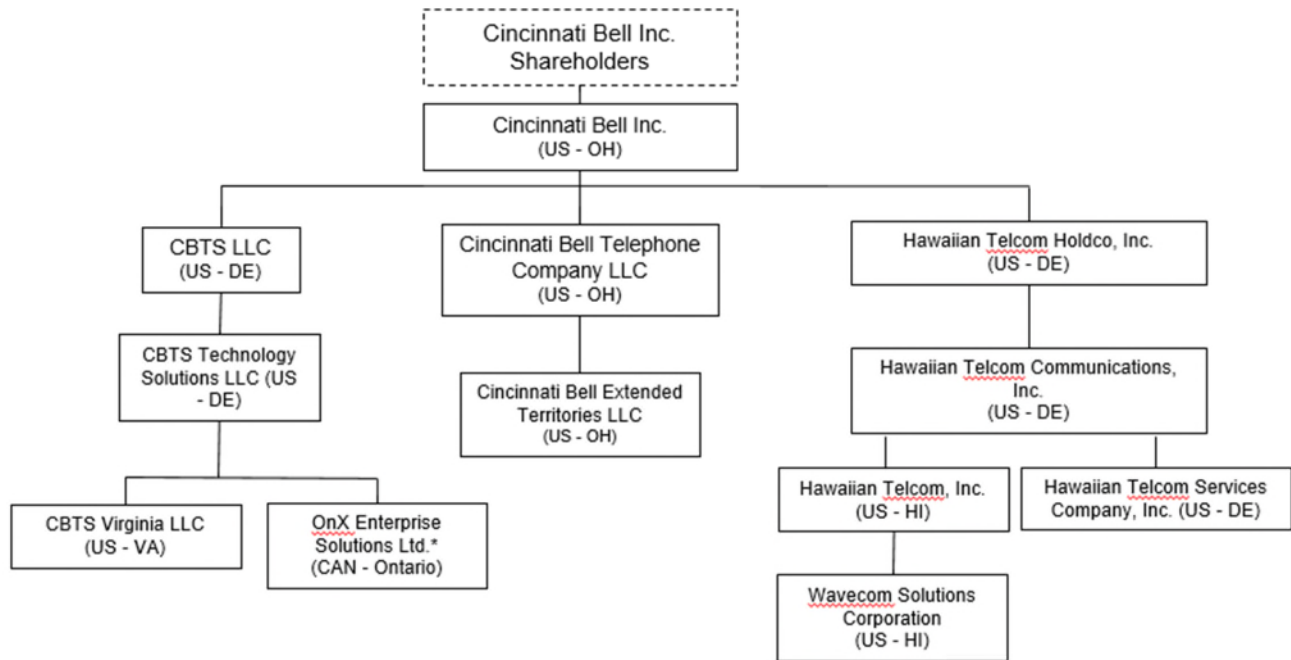
/s/

Joshua M. Bobeck
Danielle Burt

Counsel to Hawaiian Telcom Services Company, Inc. and Hawaiian Telcom, Inc.

EXHIBIT A

Current Corporate Structure

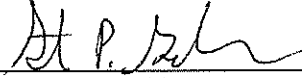


The entities listed herein only include those affiliates of Cincinnati Bell that (1) hold authorization to provide intrastate, interstate or international telecommunications services, or (2) are in the chain of ownership of those entities described in (1).

*Licensed by the Canadian Radio-television and Telecommunications Commission (CRTC) to provide Basic International Telecommunications Services, as Resellers of Telecommunications Services, and as Resellers of High Speed Retail Internet Service.

Certification

I hereby certify that the assignment described in the foregoing was *pro forma* and that, together with all previous *pro forma* transactions, did not result in a change in the licensee's ultimate control.



Steven P. Golden
Vice President of External Affairs
Hawaiian Telcom, Inc.
Hawaiian Telcom Services Company, Inc.

Dated: May 13, 2020