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June 1, 2018

Michael Dougherty
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Re: File Nos. SCL-T/C-20170811-00019, SCL-T/C-20170811-00020

Ladies and Gentlemen:

As set forth in the above-referenced matters, Cincinnati Bell Inc. (“Cincinnati Bell” or “Transferee”) and Hawaiian Telcom Holdco, Inc. (“Holdco” or “Transferor”) have sought consent from the Federal Communications Commission (“FCC”) to transfer of control of Hawaiian Telcom, Inc. (“HTI”), and Hawaiian Telcom Services Company, Inc. (“HTSC”) (collectively, the “Licensees,” and together with Transferor and Transferee, the “Applicants”) from Holdco to Cincinnati Bell. By virtue of the proposed transaction described in these applications, Cincinnati Bell will indirectly acquire 100% ownership of the Licensees, to include their interests the following submarine cable systems: (1) Hawaii Island Fiber Network (“HIFN”);¹ (2) Hawaii Inter-Island Cable System (“HICS”);² and (3) the Southeast Asia-US submarine cable system (“SEA-US”).³

On December 7, 2012, HTI provided a Letter of Assurances (“LOA”) to the Department of Homeland Security (“DHS”) and Department of Justice (“DOJ”) undertaking certain obligations in connection with the HIFN and HICS cable systems. On January 11, 2017, HTSC (along with GTI Corporation, RAM Telecom International, Inc., and TeleGuam Holdings, LLC, d/b/a GTA TeleGuam) entered into a National Security Agreement (“NSA”) with DHS undertaking certain

¹ See SCL-LIC-19950627-00024. The Hawaii Island Fiber Network, which is operated on a common carrier basis, connects the six major islands of Oahu, Kauai, Molokai, Lanai, Maui, and the island of Hawai‘i. The HIFN cable is jointly-owned with tw telecom of Hawaii.

² See SCL-LIC-19921015-00008. The Hawaii Inter-Island Cable System connects four of the Hawaiian Islands, Oahu, Kauai, Maui, and Hawai‘i.

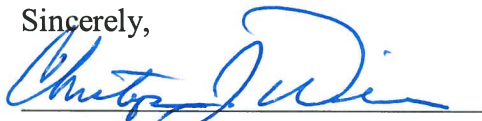
³ File No. SCL-LIC-20150626-00016. The SEA-US is a non-common carrier fiber-optic submarine cable network connecting the continental United States, Indonesia, the Philippines, Guam, and Hawai‘i. This cable is jointly authorized to HTSC, GTI Corporation, Globe Telecom, Inc., RAM Telecom International, Inc., TeleGuam Holdings, LLC, d/b/a GTA TeleGuam, PT Telekomunikasi Indonesia International, and Telekomunikasi Indonesia International (USA) Inc.

obligations regarding SEA-US. Both the 2012 LOA and the 2017 NSA are attached by the FCC as conditions on the relevant submarine cable landing licenses for these cable systems.

Cincinnati Bell understands and acknowledges the commitments set forth in the above-referenced 2012 LOA and 2017 NSA, and further acknowledges that Cincinnati Bell will cooperate with HTI and HTSC to take all necessary steps to comply with the terms, conditions, and requirements of the 2012 LOA and 2017 NSA, and to ensure that adequate resources are made available for purposes of such compliance.

In addition, Cincinnati Bell understands that DHS and DOJ will periodically evaluate the 2012 LOA and that DHS will periodically evaluate the 2017 NSA to determine whether the terms of such documents are sufficient to address national security, law enforcement and public safety concerns. Cincinnati Bell confirms its commitment to negotiate in good faith and in a reasonably expedited fashion to update or modify the 2012 LOA and/or the 2017 NSA to address any such concerns that may arise.

Sincerely,



Christopher J. Wilson
Vice President & General Counsel
Cincinnati Bell Inc.