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December 3, 2010

John T. Komeiji, Esq.
Senior Vice President & General Counsel
Francis Mukai, Esq.
Vice President & Associate General Counsel
Hawaiian Telcom
P.O. Box 2200
Honolulu, Hawaii 96841

Re: In re Application of Hawaiian Telcom Services Company, Inc.
For a Cable Franchise

Dear Messrs. Komeiji and Mukai:

On November 5, 2010, Hawaiian Telcom Services Company, Inc. ("**Applicant**") submitted an application for a cable franchise ("**Application**") for the island of Oahu to the Department of Commerce and Consumer Affairs ("**DCCA**"). In its accompanying letter also dated November 5, 2010, Applicant stated that the Application was a new filing and withdrew its prior application.

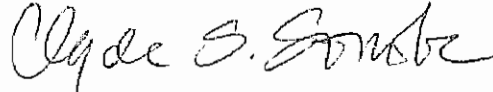
The Department of Commerce and Consumer Affairs ("**Department**") requires certain additional information in order to proceed with the processing of the Application under Chapter 440G, Hawaii Revised Statutes. Accordingly, pursuant to HAR §16-133-10, please provide the required information set forth in the attached Department of Commerce and Consumer Affairs First Request for Clarification/Supplemental Information and Confidential Requests within 15 days from the date of this letter.

As you are aware, the Department may request additional information throughout the application process. Although the Department has not yet accepted the Application for filing, the Department will make a decision whether or not to accept the Application once the requested information is received and considered.

Mr. John Komeiji
December 3, 2010
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Thank you for your cooperation and attention to this matter. If you have any questions, please feel free to call me.

Sincerely,

A handwritten signature in black ink that reads "Clyde S. Sonobe". The signature is written in a cursive style with a large initial 'C'.

Clyde S. Sonobe
Cable Television Administrator

cc: Director's Office

APPLICATION OF
HAWAIIAN TELCOM SERVICES COMPANY, INC.
FOR A CABLE FRANCHISE

DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS
FIRST REQUEST FOR CLARIFICATION/SUPPLEMENTAL INFORMATION

December 3, 2010

Each question should be answered separately, and copies of source documents should reference the question being answered. The certification provided by the Hawaiian Telcom Services Company, Inc. ("Applicant" or "HTSC") in the Application concerning the accuracy of the information is also applicable to the Applicant's responses to these questions.

The Applicant shall answer each question fully and completely, and to the extent the question or any subpart thereof is not applicable, the Applicant should explain why it is not applicable. This is an ongoing request for information. If any of the requested documents are executed or finalized, or updated and amended after the date Applicant submits its response and during the franchise application process, then Applicant shall provide these documents immediately to the Department.

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- A. III.A. (page 2 of Application). State the location of Applicant's business office.
- B. III.C. (page 2 of Application). Regarding information on the persons authorized to act on behalf of Applicant, state the mailing addresses, office telephone numbers and fax numbers of Mr. Komeiji and Mr. Mukai
- C. III. G (page 8 of Application). The Answer provided is incomplete. Please provide the specific information requested.
1. State Applicant's proposed plans and schedule of expenditures for or in support of the use of public, educational, and governmental (PEG) access channels and facilities including the following:
 - a. The amount Applicant proposes for the annual access operating fee payments to the Director or the Director's designee for PEG access purposes. If this proposed payment is based on a percentage of

revenue, explain how the percentage will be calculated.

- a. The amount Applicant proposes for the annual capital fund payments to the Director or the Director's designee for PEG access purposes. Explain how Applicant proposes to calculate this amount.
- D. III.H (page 9 of Application). State Applicant's proposed plans and schedule of expenditures for and in support of Hawaii Public Broadcasting.
 - E. V.D.1. (page 21 of Application). Applicant states that there are no audited financial statements for Applicant only. Provide the latest unaudited financial statements of the Applicant, Hawaiian Telcom, Inc., and Hawaiian Telcom Communications, Inc.).
 - F. VI.C.2 Subscriber and Service Projections (page 27 of Application). Applicant's response appears inconsistent with statement at III.D. History and experience (page 3 of Application) in which Applicant states that it currently provides non-regulated services including high-speed Internet, long distance, advanced communication and network services, directories, and wireless businesses. Respond to Question VI.C.2 for these and any other services provided by Applicant. Describe in detail the development and projected growth of any service other than basic and pay video service. Be specific on the sources and growth of each component of revenues from all Other Services.
 - G. VI.J. Form B-9 (page 34 of Application). The Answer does not provide the information requested. Please provide the specific information requested in Form B-9. To the extent that portions of Applicant's response cannot be accommodated in the form provided, please address in a separate document.
 - H. VIII. C. Construction and Safety Standards (page 40 of Application). Specify what acronyms NESC, NEC and BICSI stand for.
 - I. VIII.D. Tower Construction and VII.E. Detailed Construction Drawings (page 41 of Application). Applicant states that it will be using Hawaiian Telcom, Inc.'s existing network to provide its video service. Is Hawaiian Telcom going to construct or upgrade its system in a manner that will accommodate the build-out of

Applicant's video system, i.e., additional second-generation DSL expansion?

1. If yes, with regard to any construction, upgrades, line extensions and other major improvements that will be installed during the next five years by Hawaiian Telcom, Inc. in a manner that will accommodate Applicant's video service, provide:
 - a. Detailed construction drawing(s)/specification(s) of typical poles.
 - b. A map illustrating sections of the multi-channel video service distribution system which would be installed overhead and which would be installed underground, and indication of the lengths of these sections to the approximate nearest tenth of a mile.
 - c. Identification of areas in which existing utility poles would be used, and areas in which new poles would have to be installed, estimated number of new poles which would be required, and the approximate distances between poles.
 - d. For any underground cable sections which would be installed outside public street rights-of-way, indicate the locations and lengths to the approximate nearest tenth of a mile.
 - e. Typical trenching profile, showing conduit type, trench width and depth, bedding, embedment, and separation from adjacent utilities.
 - f. Identification of any freeways, railroads or Waterways (including creeks) to be crossed by the cable distribution system, and locations of crossing.

- J. VIII.G. Aid-To-Construction Policy (page 43 of Application). Applicant describes Hawaiian Telcom, Inc.'s service connection policy filed with the Hawaii Public Utilities Commission. Under this policy, a service connection is allowed for Hawaiian Telcom's subscribers of up to 320 feet for aerial and 500 feet for underground no charge.
 1. If customer would like to subscribe to Applicant's video service but is outside of the no charge service connection area (but within the 5,000 foot local loop distance of a central office), will the customer be required to pay for the additional

construction costs for the connection or will Applicant pay for the additional charges?

- K. VIII.I. Cable Drop to Schools (page 44 of Application). Applicant claims that this requirement may be redundant since the incumbent cable provider already is providing basic cable service to schools or institutions of higher education. Provide in detail a description of an alternative option to a basic cable drop to schools.
- L. IX.A.3. (page 48 of Application). Provide the name and addresses of all public buildings (including education and library buildings) with qualified second-generation DSL service that will be able to receive Applicant's service.
- M. State the public interest to be served by the issuance of a cable franchise to the Applicant.