



June 15, 2018

HAWAIIAN TELCOM, INC.
Request for Confidential Treatment of Demand Data
In Support of Transmittal No. 136 being filed on a streamlined basis on 16 days' notice under
Section 204(a) of the Communications Act.

Hawaiian Telcom, Inc.
1177 Bishop Street
Honolulu, Hawaii 96813

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Hawaiian Telcom, Inc. Request for Confidential Treatment of Cost Information Filed
Under Seal in Support of 2018 Annual Price Cap Filing

Attention: Wireline Competition Bureau

Dear Ms. Dortch:

Hawaiian Telcom is submitting its 2018 Annual Tariff Review Plan with supporting documents under Transmittal No. 136.

Because of the competitively sensitive nature, Hawaiian Telcom has redacted certain demand data associated with their 2018 Annual Price Cap Filing. Accordingly, Hawaiian Telcom is hereby requesting, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R., Section 0.457 and 0.459, pursuant to Exemption 4 of the Freedom of Information Act ("FOIA"), 5 U.S.C. Section 552(b)(4), and pursuant to the Tariff Streamlining Order and rules adopted thereunder, that such demand data be treated as confidential and be made subject to the standard Protective Order and Declaration adopted by the Commission in the Tariff Streamlining Order issued by the Commission in Public Notice DA 18-578 issued June 4, 2018 in WC Docket No. 18-100.

Under Exemption 4 of the FOIA, commercial or financial information is held to be confidential, and thus entitled to protection, if disclosure of such information would, inter alia, be likely to cause substantial harm to the competitive position of the person from whom the information was obtained. See *National Parks and Conservation Ass'n v. Morton*, 498 F.2d 765, 770 (D.C. Cir. 1974); *Critical Mass Energy Project v. NRC*, 830 F.2d 278 (D.C. Cir. 1987).

Ms. Marlene H. Dortch
June 15, 2018
Page 2

The information for which Hawaiian Telcom seeks confidential treatment is competitively sensitive demand data which, if made available to competitors and alternate providers, would provide such entities with valuable information regarding Hawaiian Telcom's customer base in particular zones within the state. This information, which is otherwise not publicly available, would assist competitors in targeting their marketing efforts to the areas with the largest concentrations of customers. For the reason cited above, Hawaiian Telcom respectfully requests that the Commission grant confidential treatment to certain detailed demand information submitted in their 2018 Annual Price Cap Filing and that such information be subject to the standard protective order provided for in the Tariff Streamlining Order. Pursuant to the non-disclosure agreement that provides for review of information granted confidential treatment by interested parties, for the specific purpose of review and comment on the instant transmittal only, Hawaiian Telcom will provide access and review of such information to signatories of such an agreement at the location listed below.

Petitions pertaining to this filing may be served by facsimile to:

Steven P. Golden
Vice President - External Affairs
Telephone: (808) 546-3877
Facsimile: (808) 546-8992

All correspondence and inquiries concerning this transmittal should be addressed to Connie Wightman at 407-740-3002 or cwightman@inteserra.com, 151 Southhall Lane, Suite 450 Maitland, FL 32751.

Sincerely,

/s/Connie Wightman

Connie Wightman
Consultant to Hawaiian Telcom, Inc

cc: Candace Donohoe, Hawaiian Telcom, Inc.
cc: Lisa Suan, Hawaiian Telcom, Inc.
file: HTI - FCC
tms: FCC 2018 TRP Request for Protective Order