



H O K U
HOKU INDUSTRIES, INC
A Native Hawaiian Corporation

September 1, 2005

Ms Deborah Tronic
Defense Acquisition Regulations Council
OUSD (AT&L) DPAP (DAR), IMD#C132
3062 Defense Pentagon
Washington, D.C. 20303062

Re: DFAR Case 2004-D031, Comment on Sole Source 8(a) Awards to Small Business Concerns Owned by Native Hawaiian Organizations

Aloha Ms Tronic,

Hoku is a Hawaiian word meaning star and Hoku Industries, Inc. is a Native Hawaiian-owned and operated company located in Honolulu, HI. We appreciate the opportunity to comment on the Department of Defense (DoD) interim rule amending the Defense Federal Acquisition Regulation Supplement (DFAR) to implement DoD appropriations act provisions permitting the award of sole source contracts to small business concerns owned by Native Hawaiian Organizations – DFAR Case 2004-D031.

Hoku Industries, Inc. fully supports the interim rule and strongly recommends that DoD make this interim rule permanent, which will give Native Hawaiians the same status in the DFAR as the Alaskan Natives and Native Americans.

We also greatly appreciate DoD's commitment to provide business, and therefore employment, opportunities to indigenous economically and socially disadvantaged peoples like the Native Hawaiians. This is already making a difference in helping to improve their lives by providing them the means to help themselves.

Along with other indigenous groups, Native Hawaiians continue to suffer economically and socially, leading to dreadful statistics of their well-being. We are high where we should be low such as incarceration; welfare rolls; school dropouts and absenteeism; family and school violence, and alcohol/drug abuse problems. We are low where we should be high such as higher education (the key to leadership and reversing their situation); health care (low life-span, high rates of cancer, diabetes, and heart problems); employment in other than low paying jobs; wages, and housing.

Congress has empowered Native Hawaiians by creating nonprofit Native Hawaiian Organizations (NHO) that can participate indirectly in the 8(a) program through the ownership of for-profit 8(a) companies. The NHO may designate the net profit of its businesses to support the Hawaiian people in addressing their needs in Hawaii through community services. These community projects, programs and services are not more welfare programs but are designed to instill cultural pride; an attitude that education is important from birth through college; an attitude of high standards of achievement in jobs, social standing, and accomplishments because they are as good as anyone else from an intellectual, social, and cultural perspective; to provide an opportunity for participants to give back to their communities; and to develop leadership in all fields necessary to be fully contributing members of their local communities, counties, the state of Hawaii, and our nation.

While our Hawaiian ancestors were entrepreneurs in navigation, astronomy, ecology, fishing, agriculture, aquaculture, and construction, they were not entrepreneurs in western commerce and business. Thus it's not surprising that today there are no large Native Hawaiian-owned businesses in Hawaii compared to the many Asian and Caucasian businesses that dominate the Hawaii economy. While perpetuation of our culture will always remain a priority, we Hawaiians also realize that our survival requires assimilation of Western commerce and business values. Thus, the NHO provides the opportunity for Native Hawaiians to help themselves by standing up businesses that can grow and then compete successfully with anyone, serve their communities, and provide more employment for qualified Native Hawaiians.

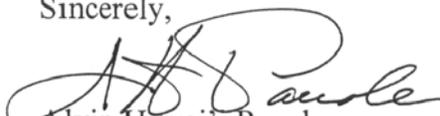
The reflection of Native Hawaiians in successful businesses and top positions of authority, respect, and accomplishment compared to just being the laborers, provides a powerful incentive for our youngsters and Hawaiian families to raise their standards of achievements and pursue education as a very high priority. This then is the true value of the NHO along with all their community service contributions.

Therefore, the sole source authority of DFAR Case 2004-D031 and partnership with the DoD is a wonderful gift, and it is truly a benefit for the Native Hawaiian peoples and not just about individuals. We, who are the companies of the NHOs, are there to serve our people and will continue to serve them for all our lives.

We strongly recommend the interim ruling be made permanent.

Mahalo nui loa (thank you very much) for the opportunity to file comments on DFAR Case 2004-D031.

Sincerely,


Alvin Hawai'i Pauole
President and CEO