



April 12, 2021

Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: Granite Telecommunications, LLC  
FEIN 04-3643290  
Annual Report Year End 2020

Dear Sir or Madam:

In compliance with the Missouri Public Service Commission requirements, Granite Telecommunications, LLC respectfully requests that revenue information reported in its Annual Report to be treated as non-public, confidential information under seal. Enclosed is an affidavit with Granite's justification for such treatment.

Granite respectfully requests that all revenue information in the Annual Report be treated as confidential.

If you have any questions or concerns, please contact me at 617-837-4604.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael B. Galvin". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping underline.

Michael B. Galvin  
Executive Vice President & General Counsel  
Granite Telecommunications, LLC  
100 Newport Avenue Extension  
Quincy, MA 02171

---

100 Newport Avenue Ext.  
Quincy, MA 02171  
(866) 847-1500  
[www.granitenet.com](http://www.granitenet.com)

**BEFORE THE  
MISSOURI PUBLIC SERVICE COMMISSION**

**AFFIDAVIT OF MICHAEL B. GALVIN  
IN SUPPORT OF CONFIDENTIAL TREATMENT  
OF PORTIONS OF THE TELECOMMUNICATIONS ANNUAL  
REPORT FOR 2020  
BY GRANITE TELECOMMUNICATIONS, LLC**

1. My name is Michael B. Galvin. I am the Executive Vice President & General Counsel of Granite Telecommunications, LLC ("Granite"), a limited liability company whose business address is 100 Newport Avenue Extension, Quincy, MA 02171.
2. Since its inception in 2002, Granite has grown from a start-up operation to an established, successful business without debt or outside investors. I have worked at Granite since July 2011. Prior to joining Granite, I was a partner at a nationally-recognized, Boston-based law firm that specialized in litigation and commercial disputes. I earned a J.D. from Suffolk University Law School and B.A. from Boston College.
3. The purpose of my affidavit is to further support Granite's request for protective treatment of portions of Granite's CLEC Annual Report for 2020.
4. The Annual Report that Granite seeks to keep confidential contains sensitive and detailed information about Granite's company-wide assets, liabilities, members' capital, revenues, costs of services, operating margins and expenses, income from operations and net income.
5. This information is not made publicly available. As a privately-owned company, Granite is not obligated to publicly disclose information about its financial performance to the U.S. Securities Exchange Commission or any other federal or state agency or commission. Granite does not voluntarily share this information.
6. Granite does not disclose this information to employees or others involved in Granite's business. Out of over 2,000 employees, fewer than one dozen of them have access to this type of financial information, and those who do so are limited to Granite's senior most employees or those whose specific job duties and responsibilities require knowledge about Granite's financial performance (i.e., senior employees of

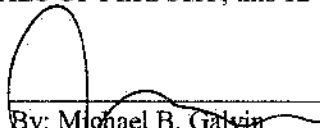
Granite's finance, tax and legal departments). Each of the employees who have access to this information have entered into written confidentiality and / or non-disclosure agreements that prevent them from disclosing the information. Many senior Granite personnel, including personnel in key sales and operational roles, do not have access to this information; nor do Granite's personnel who are employed in lower ranking positions. None of the information is available on Granite's network drives; it is generally not emailed or shared in electronic format, but rather kept on segregated drives or printed and maintained in locked filing cabinets or safes. The only outsiders who receive this information are Granite's outside financial auditors, who utilize it to help prepare Granite's financial and tax filings and Granite's banking institution which requires such financial information under a secured line of credit borrowing agreement.

7. Granite likewise does not make this information available within the telecom marketplace, Granite generally resists providing this information even to potential or actual customers, some of whom are interested in it to ensure that Granite is financially secure enough to furnish critical services, such as telephone, broadband and data services. Granite provides such services to two thirds of the Fortune 100 businesses in the United States. When it is forced to do so by a potential or actual customer, Granite insists that the recipient first enter into a non-disclosure agreement, which precludes the use of the information for any reason other than to evaluate Granite's financial capabilities. To further safeguard the information, requests for such information are generally handled by senior financial and legal personnel.
8. Granite attempts to similarly limit disclosure about its finances that are sometimes required by state and federal regulators. I am aware that some of the forty-nine states where Granite is licensed to offer local exchange services do require some disclosure of company-wide financial information part of licensing and/ or annual reporting requirements. In connection with those requests, Granite's long-standing policy is that Granite requests that company-wide information being disclosed is done so with a specific request that the information be treated confidentially, and not be publicly disclosed.
9. Making the information publicly available could impair Granite's business operations. Granite's customers and competitors would have access to Granite's operating costs and operating margins. Customers would use precisely that type of information to negotiate lower prices for Granite's products and services, which may affect Granite's ability to offer low-priced products and services as broadly as

Granite currently does so.

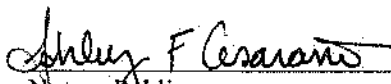
10. Forcing Granite to reveal this type of information could put Granite in a distinct competitive disadvantage. If Granite's competitors have Granite's specific revenue and line information, they may be able to use that information to analyze and possibly determine how much Granite is obligated to charge for its products and services. This may lead to competitors gaining an advantage over Granite in competitive bidding situations, and would unfairly prejudice Granite in situations where Granite lacked the same information about other companies bidding to furnish the same services.
11. Public disclosure of Granite's costs, operating expenses, and margins also jeopardizes Granite's ability to negotiate with Granite's suppliers, vendors and other providers of services. Granite engages in business primarily by reselling underlying services of other carriers which offer their products to Granite based, in part, on what they believe Granite is able to pay for such services. Giving such carriers access to Granite's underlying costs and margin will undermine Granite's efforts to negotiate the most favorable terms for Granite — costs that directly affect prices offered by Granite to its end users, including businesses located in Missouri. Disclosing the sensitive information threatens Granite's ability to offer low cost, highly reliable products and services in Missouri and elsewhere.

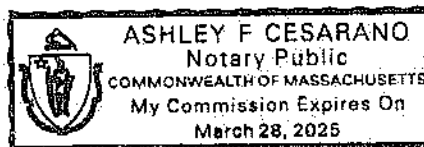
SIGNED UNDER THE PENALTIES OF PERJURY, this 12<sup>th</sup> day of April, 2021.

  
By: Michael B. Galvin  
Executive Vice President & General Counsel  
Granite Telecommunications, LLC

COMMONWEALTH OF MASSACHUSETTS  
COUNTY OF NORFOLK, ss

On this 12<sup>th</sup> day of April 2021, before me, the undersigned notary public, personally appeared Michael B. Galvin, the person whose name is signed on the preceding who affirmed to me that the contents of the document are truthful and accurate to the best of his knowledge or belief.

  
Notary Public



Granite Telecommunications, LLC

**Company Name**

(Provide the full name of the company as certificated or registered with the Missouri Public Service Commission, including any Commission approved d/b/a, if applicable. Please do not abbreviate.)

**TELECOMMUNICATIONS COMPANY OR IVOLP PROVIDER  
ANNUAL REPORT  
TO THE  
MISSOURI PUBLIC SERVICE COMMISSION**

**For the Calendar Year of  
January 1 - December 31, 2020**

This filing is required pursuant to Commission Rule 20 CSR 4240-28.012 and/or Section 392.210 RSMO.

**Please select how the company is certificated and/or registered with the Commission (check all that apply):**

- ☐ Incumbent Local Telecommunications Company (ILEC)
- ☒ Competitive Local Exchange Telecommunications Company (CLEC)
- ☒ Interexchange or Local Non-Switched Telecommunications Company (IXC)
- ☐ Interconnected Voice over Internet Protocol Service Provider (IVoIP)

**If more than one certificate or registration is held by the company you must file an annual report in the Commission's Electronic Filing and Information System (EFIS) for each certificate or registration. In such situations, we anticipate the annual reports to be identical; however please verify the following:**

- ☐ The various annual reports filed in EFIS are **identical**.
- ☐ The various annual reports filed in EFIS are **different**.
- ☒ Not applicable *(Company only has one certificate or registration; therefore only one annual report was filed in EFIS.)*

**Please choose one of the following filing options to indicate the security level of the filing:**

- ☒ **Public submission** (NOT Confidential)
- ☐ **Non-Public submission** (Confidential) (See instructions for special requirements.)  
For this filing to be considered Confidential, additional submission of materials is required, pursuant to Commission Rule 20 CSR 4240-2.135.

Public

For use when filing under seal.

Excel Issue Date: 11/08/2019

1. State in full the company's information below:

100 Newport Avenue Extension

Company Street Address

(617) 837-4332

Telephone Number

Company Mailing Address (if different from street address)

Quincy MA 02171

City

State

Zip

2. The company's contact information in EFIS has been reviewed (and updated as applicable).

☒ Yes

☐ No

3. Annual Report Contact Information:

List the contact information of the person completing the form, whether an employee or a third-party preparer. This may differ from the address in Item No. 1.

John Prinner

Name

100 Newport Avenue Extension

Street Address

Mailing Address

Quincy MA 02171

City

State

Zip

(617) 837-4332

Telephone Number

taxdept@granitenet.com

Email Address

4. Identify the company's top three principal or general officers at the end of the year.

Title
<u>CEO</u>
<u>COO</u>
<u>CFO</u>

Name
<u>Robert T. Hale Jr.</u>
<u>Rand Currier</u>
<u>John Prinner</u>

## 5. Please provide the following revenue information:

Row	RETAIL END USER REVENUES	**	MO Intrastate (Column A)	**	**	Total Company (Column B)	**
1.	<b>Local Service</b> (Basic local telecommunications service, IVoIP service and features associated with these services)	**		**	**		**
2.	<b>Interexchange Service</b> (Message toll services, 800 services, interexchange operator services).	**		**	**		**
3.	<b>Non-Switched Services</b> (Dedicated non-switched private line services typically used by business customers. <i>Do not include special access or private line services provided to other telecommunications or IVoIP service providers which are reported in Row 7).</i>						
4.	<b>Bundled Voice Service</b> (If telecommunications or IVoIP service is bundled with non-regulated services then a company may apply either of two methods in reporting bundled revenue in Column A. Method 1: Report bundled revenue in Column A based on the unbundled rate for telecommunications or IVoIP service; or Method 2: Report all bundled revenue in Column A.)						
5.	<b>Retail Uncollectibles.</b> (Amount is typically a negative number.)	**		**	**		**
6.	<b>RETAIL END-USER TOTAL</b> (Row 1+2+3+4+5) Revenue in Column A will be provided to Missouri USF Administrator for assessment purposes.)	**	\$ 0.00	**	**	\$ 0.00	**
<b>WHOLESALE CARRIER'S CARRIER AND UNIVERSAL SERVICE FUND REVENUES</b>							
7.	<b>Revenue from services provided for resale as telecommunications or IVoIP services from another telecommunications or IVoIP service provider.</b> This row typically includes revenue associated with switched access service, special access service, billing and collection service. NECA settlements, if any, should be reported solely in Column B.	**		**	**		**
8.	<b>Miscellaneous Carrier's Carrier Revenue</b> (Remaining Carrier's Carrier Revenue provided in FCC Form 499-A, Block 3 that is not reported in Row 7).						
9.	<b>Wholesale Uncollectibles.</b> (Amount is typically a negative number.)						
10.	<b>Federal USF Revenue</b> (List federal USF revenue in Column B; however, any Connect America Fund Intercarrier Compensation funding used to replace revenue caused by mandatory intrastate switched access rate reductions should be reported in Column A.)						
11.	<b>State USF Revenue</b>						
12.	<b>TOTAL REVENUES</b> (Row 6+7+8+9+10+11) The Total Revenue in Column A should match the Total Gross Intrastate Operating Revenue reported on the Missouri PSC's Statement of Revenue form.	**	\$ 0.00	**	**	\$ 0.00	**

Revenue reporting clarifications:

**Total Company Revenue (Column B)** = Missouri Intrastate revenue in Column A + Interstate revenues + International revenues.

**IVoIP revenue:** If unable to distinguish Missouri Jurisdictional revenue in Column A then a safe harbor percentage can be applied to total revenue that corresponds to the FCC's safe harbor percentage.

**Retail non-switched private line service revenue:** All of a customer's non-switched private line service revenue can be reported in Column B if 10% of more of the customer's private line network traffic is considered interstate traffic.

Public

For use when filing under seal.

## 6. Line Quantities for Basic Local Telecommunications &/or IVoIP Services

[illegible]

**About reporting line quantities:**

1. Report line quantities for basic local telecommunications service and/or IVolP service as those terms are defined in 386.020(4) and (23).
2. Lines include analog and digital. For DS-1 or higher band-width facilities a voice grade equivalency must be used. For channelized service report the number of channels subscribed to by the customer. For non-channelized facilities, filers are instructed to use a good-faith estimate of the number of voice grade equivalent lines used for voice service.
3. Exchange refers to areas as listed in ILEC tariffs. *(Exchanges are not always the same as rate centers, wire centers and central offices.)*
4. Per 392.550(7)(c) IVolP line quantities must be filed on a confidential basis. See instructions for how to file annual report information on a confidential basis.

Public  
For use when filing under seal.



**Relay Missouri Assessment<sup>1</sup>****Annual Totals**

7.	Revenue Collected From Relay Missouri Surcharge	**		**
	Amount Retained for Billing and Collecting the Surcharge	**		**
	Relay Missouri Revenue Remitted to Relay Missouri Fund	**		**

8. Please indicate the per line value of the Relay Missouri Surcharge applied to your customers in December.

0.04

9. If your firm did not impose the Relay Missouri Surcharge, please explain:

<sup>1</sup> ILECs, CLECs and IVoIP providers are required to complete this page; however, companies classified solely as IXC's are not expected to complete this page.

Public

For use when filing under seal.

Annual Report of

Granite Telecommunications, LLC

for the calendar year of January 1 - December 31, 2020

**VERIFICATION**

The foregoing report must be verified by the Oath of the President, Treasurer, General Manager or Receiver of the company. The Oath required may be taken before any person authorized to administer an oath (Notary Public) by the laws of the State in which the same is taken.

**OATH**State Of MassachusettsCounty Of Norfolk

} ss:

John Prinner

makes oath and says that

Name of Affiant (Company Official/Representative)

s/he is

CFOOfficial Title of the Affiant (Company Official/Representative)

of

Granite Telecommunications, LLCExact Legal Title or Name of the Respondent (Certificated Company Name)and is located at 100 Newport Avenue ExtensionAddress and Telephone Number of the Affiant (Company Official/Representative)

that s/he has 1) examined the foregoing report; to the best of his or her knowledge, information, and belief, all statements of fact contained in the said report are true and the said report is a correct statement of the business and affairs of the above-named respondent, and 2) examined (and updated as applicable) the company's contact information in EFIS; to the best of his or her knowledge, information, and belief, all listed contacts are correct.

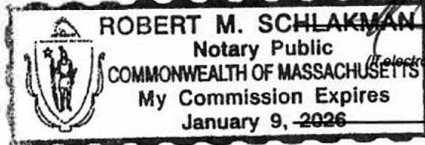
from January 1, 2020, to and including December 31, 2020  
Month/Day Year Month/Day Year

[Signature]  
 Signature of Affiant (Company Official/Representative)  
 (If electronic signatures are used, you must use "s/" before the name.)

Subscribed and sworn to before me, a Notary Public, in and for the State and County above named,

this 13<sup>th</sup> day of April, 2021

My Commission expires



Signature of Notary Public

(If electronic signatures are used, you must use "s/" before the name.)

Notary Commission Number

Missouri Revised Statutes § 392.210 or §393.140

See the Instructions for more information to complete this page.