



April 27, 2023

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

Re: Granite Telecommunications, LLC  
FEIN04-3643290  
Annual Report Year End 2022

To Whom It May Concern:

In compliance with the 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—837-5168.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael B. Galvin". The signature is stylized with a large, looping initial "M" and a trailing flourish.

Michael B. Galvin  
Chief Administrative Officer  
Granite Telecommunications, LLC  
100 Newport Avenue Extension  
Quincy, MA 02171

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

**BEFORE THE PUBLIC SERVICE COMMISSION**

**AFFIDAVIT OF MICHAEL B. GALVIN  
IN SUPPORT OF CONFIDENTIAL TREATMENT  
OF PORTIONS OF THE TELECOMMUNICATIONS ANNUAL  
REPORT FOR 2022  
BY GRANITE TELECOMMUNICATIONS, LLC**

1. My name is Michael B. Galvin. I am the Chief Administrative Officer 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 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 2022.
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

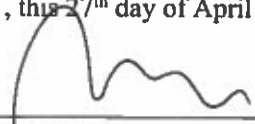
Granite's finance, tax and legal departments). Each of the employees who have access to this information have entered into written confidentiality and / or non-disclosure agreements that prevent them from disclosing the information. Many senior Granite personnel, including personnel in key sales and 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 Connecticut. Disclosing the sensitive information threatens Granite's ability to offer low cost, highly reliable products and services in Connecticut and elsewhere.

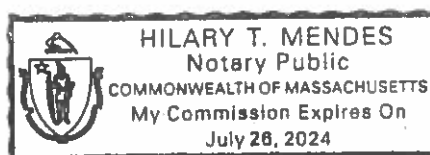
SIGNED UNDER THE PENALTIES OF PERJURY, this 27<sup>th</sup> day of April 2023.

  
By: Michael B. Galvin  
Chief Administrative Officer  
Granite Telecommunications, LLC

COMMONWEALTH OF MASSACHUSETTS  
COUNTY OF NORFOLK, ss

On this 27<sup>th</sup> day of April 2023, 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/IVoIP ANNUAL REPORT  
TO THE  
MISSOURI PUBLIC SERVICE COMMISSION**

**For the Calendar Year of  
January 1 - December 31, 2022**

This filing is required pursuant to Commission Rule 20 CSR 4240-28.012 and 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 unsure of the company's authorization, see list of companies at: [https://psc.mo.gov/Forms/Telecommunications\\_Forms](https://psc.mo.gov/Forms/Telecommunications_Forms)

**A company's annual report must be filed for each certificate or registration held by the company.**

We anticipate the annual reports will be identical; however please verify:

- ☐ The various annual reports filed in EFIS are **identical**.  
☐ The various annual reports filed in EFIS are **different**.  
☒ Not applicable (*Company only has one authorization*)

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

- ☒ **Public**  
☐ **Confidential** (See instructions for how to file an annual report under seal)

Issue Date: 02-27-23

PUBLIC

For use when filing under seal.

Annual Report of Granite Telecommunications, LLC  
for the calendar year of January 1 - December 31, 2022

1. Provide the following company information:

100 Newport Avenue Extension  
Company Street

617-837-4332  
Telephone Number

Quincy, MA 02171  
Company Mailing Address  
(if different from street address)

www.granitenet.com  
Company Website Address (if no website insert "none")

Quincy, MA 02171  
City State Zip

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

☒ Yes ☐ No

3. Provide the following information for the person completing this annual report:

Name: Jonathon Parker-Stafford  
Email Address: taxdept@granitenet.com  
Telephone: 617-837-4332

Street Address:  
100 Newport Avenue Extension  
Quincy, MA 02171

I am (check as appropriate): ☒ An employee of the company ☐ A third-party preparer

I am listed in EFIS as the company's annual report contact: ☒ Yes ☐ No

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

Title
<u>CEO</u>
<u>CAO</u>
<u>CFO</u>

Name
<u>Robert T. Hale, Jr.</u>
<u>Michael Galvin</u>
<u>Jonathon Parker-Stafford</u>

5. ILECs, CLECs and IVoIP companies are required to provide the following Relay Missouri assessment information:

Amount remitted to the Relay Missouri fund for 2022 calendar year <sup>1</sup>		
Revenue Collected From Relay Missouri Surcharge		\$14,716.74
Amount Retained for Billing and Collecting the Surcharge		\$360.00
Relay Missouri Revenue Remitted to Relay Missouri Fund		\$14,356.74

Per line value of Relay Missouri Surcharge applied in December 2022: \$0.10

6. ILECs, CLECs and IVoIP companies are required to provide the following Missouri USF assessment information:

Amount remitted to the Missouri USF fund for 2022 calendar year <sup>2</sup>		\$0.00
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*The amounts for Item Nos. 5 and 6 should reflect the time period associated with the payment and not dependent on when a payment is made. For example this amount can include a payment made in 2023 for a time period within 2022.*

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*For use when filing under seal.*

<sup>1</sup> For information about the Relay Missouri assessment see [https://psc.mo.gov/Telecommunications/Assessments\\_and\\_Filing\\_Requirements](https://psc.mo.gov/Telecommunications/Assessments_and_Filing_Requirements)

<sup>2</sup> For information about the Missouri USF assessment see [www.missouriurf.com](http://www.missouriurf.com).

## 7. Please provide the following revenue information:

If no revenue was collected for any box insert \$0.

Row	RETAIL END USER REVENUES	**	Missouri Intrastate (Column A)	**	**	Missouri Interstate & International (Column B)	**	**	Missouri Total Company <sup>3</sup> (Column C)	**
1.	<b>Voice Local Service</b> (Basic local telecommunications service, IVoIP service <sup>4</sup> including revenue with other features associated with these services. Includes any bundled service whereby these services are bundled with other non-regulated services. <sup>5</sup> )	**		**	**		**	**		**
2.	<b>Interexchange Service</b> (Message toll services, 800 services, interexchange operator services).	**		**	**		**	**		**
3.	<b>Non-Switched Services</b> <sup>6</sup> (Dedicated non-switched private line services typically used by business customers. Do not include special access or private line services provided to other telecommunications or IVoIP service providers which are reported in Row 6).									
4.	<b>Retail Uncollectibles.</b> (Amount is typically a negative number.)	**		**	**		**	**		**
5.	<b>RETAIL END-USER TOTAL</b> (Row 1+2+3+4) Revenue in Column A will be provided to Missouri USF Administrator for assessment purposes.)	**		**	**		**	**		**
	<b>WHOLESALE AND UNIVERSAL SERVICE FUND REVENUES</b>									
6.	<b>Wholesale Revenue</b> <sup>7</sup>	**		**	**		**	**		**
7.	<b>Wholesale Uncollectibles.</b> (Amount is typically a negative number.)									
8.	<b>Federal USF Revenue</b> (This revenue will be usually listed in Column B; however, list in column A any Connect America Fund Intercarrier Compensation funding used to replace revenue caused by mandatory intrastate switched access rate reductions.)									
9.	<b>State USF Revenue</b>									
10.	<b>TOTAL REVENUES</b> (Row 5+6+7+8+9) The Total Revenue in Column A should match the Total Gross Intrastate Operating Revenue reported on the Missouri PSC's Statement of Revenue form.	**		**	**		**	**		**

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<sup>3</sup> Total Company Revenue (Column C) = Column A revenue + Column B revenue.<sup>4</sup> 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 of 35.1% intrastate and 64.9% interstate or as otherwise adjusted by the FCC.<sup>5</sup> Bundled Service Revenue: 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.<sup>6</sup> Retail Non-Switched Private Line Service Revenue: If 10% of more of the customer's private line network traffic is considered interstate traffic then 100% of the customer's non-switched private line service revenue can be classified as interstate traffic.<sup>7</sup> Wholesale Revenue: Revenue from telecommunications or IVoIP services sold to other service providers including revenue associated with switched access service, special access service, billing and collection and any remaining carrier's carrier revenue provided in FCC Form No. 487, Block 3. NECA settlements should be reported in Column B.

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

Exchange	Line Quantities (as of December 31, 2022)*					
	**	Residential	**	**	Business	**
				**		**
Totals:						

\* Line quantities can be provided for a date other than December 31, 2022 if the date is within the month of December.

**Clarifications about reporting line quantities:**

1. Report line quantities for basic local telecommunications service and/or IVoIP service as those terms are defined in Section 386.020(4) and (23), RSMo.
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.
4. IVoIP line quantities must be filed on a confidential basis per Section 392.550(7)(c) RSMo. See instructions for how to file on a confidential basis.

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## VERIFICATION

Note: Prefer Affiant to be President, Treasurer, General Manager or Receiver of Company \*

Company Name: Granite Telecommunications, LLC

Annual Report for calendar year **2022**

Affiant Information	
<b>Name</b>	Jonathon Parker-Stafford
<b>Title</b>	CFO
<b>City, State</b>	Quincy, MA

**Under penalty of perjury, I declare the information contained in this annual report is true and correct to the best of my knowledge and belief.**

\* If Affiant is not the President, Treasurer, General Manager or Receiver of the company then explain Affiant's ability to verify the accuracy of the information presented:

6/5/2023

Date

/s/ Jonathon Parker-Stafford

Signature of Affiant

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

**Missouri Revised Statutes §392.210, §393.140 and §509.030**