July 29, 2026

Mr. Steven Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0480

Re: Case No. PU-26-15
In the Matter of the Annual Report to the North Dakota Public Service Commission for Essential Telecommunications Carrier Certification for Griggs County Telephone Company SAC 381615

Dear Mr. Kahl,

Pursuant to the Commission's Order of August 28, 2002, enclosed please find the following for filing in the above-referenced proceeding:

(1) The sworn affidavit required by the Commission in support of the annual certification pursuant to 47 C.F.R. § 54.314 that the Commission will file with the Federal Communications Commission on behalf of Griggs County Telephone Company SAC 381615.

(2) An annual report in compliance with North Dakota Administrative Code section 69-09 05-12.1, including a Request to Protect Trade Secret Information on behalf of Griggs County Telephone Company SAC 381615.

A copy of each of these documents has also been provided by email to ndpsc@nd.gov. In a separate sealed envelope, marked "Trade Secret - Private," is Griggs County Telephone Company's Trade Secret Exhibit A.

The Company respectfully requests that the Commission notify the FCC and USAC prior to October 1st of this year that Griggs County Telephone Company (SAC 381615) is eligible to receive Federal High-Cost support for 2026.

4 PU-26-65 Filed 07/29/2026 Pages: 14
ND Admin Code Section 69-09-05-12.1 Annual Report – Redacted
Griggs County Telephone Co. Study Area 381615
John Kuykendall, JSI Regulatory Advisor

Please contact the undersigned if further information is required.

Respectfully submitted,

John Kuykendall
JSI Regulatory Advisor
6404 Ivy Lane, Suite 700
Greenbelt, MD 20770
301-459-7590
Consultant on Behalf of Griggs County Telephone Company

BEFORE THE NORTH DAKOTA PUBLIC SERVICE COMMISSION IN CASE NO. PU-26-15 AND BEFORE THE FEDERAL COMMUNICATIONS COMMISSION IN WC DOCKET N0.10-90 AND WC DOCKET N0.14-58

AFFIDAVIT OF GRIGGS COUNTY TELEPHONE COMPANY CERTIFYING USE OF FEDERAL UNIVERSAL SERVICE SUPPORT

State of Minnesota)
)
County of Douglas)

Tyler Kilde, being first duly sworn on oath, does hereby declare and state upon affiant's own personal knowledge as follows:

1. Affiant is employed by **Griggs County Telephone Company (SAC 381615)** (hereinafter, the "Company") in the position of **President**.

2. The Company is an Eligible Telecommunications Carrier ("ETC") within the meaning of Section 214(e) of the Federal Telecommunications Act of 1996 (hereinafter, the "Act"), and the Company is eligible to receive federal high-cost universal service support (hereinafter, the "Support") pursuant to Section 254(e) of the Act. The North Dakota Public Service Commission (hereinafter, the "NDPSC") has designated the Company as an ETC.

3. Affiant is personally familiar with all of the Support received by the Company and with how the Company uses all of the Support that it receives.

4. The Company is filing this affidavit in compliance with the order of the Federal Communications Commission (hereinafter, the "FCC") dated May 23, 2001, in WC Docket Number 10-90 and WC Docket Number 14-58 (FCC 01-157) (hereinafter, the "Order"), as codified in 47 C.F.R. § 54.314, which requires certification to the FCC that all federal Support was used in the preceding calendar year and will be used in the coming calendar year by carriers within each state only for the provision, maintenance, and upgrading of facilities and services for which the support is intended, as required by Section 254(e) of the Act and 47 C.F.R. § 54.7. The Company is also filing this affidavit in compliance with the Orders of the NDPSC dated August 28, 2001, in Case No. PU-439-01-460 and dated August 28, 2002, in Case No. PU-439-02-441. This affidavit is filed to facilitate the Company's receipt of federal Support for all four quarters of **2026** and all quarters thereafter.

5. The Company hereby certifies that all federal high-cost support provided to **Griggs County Telephone Company (SAC 381615)** was used in the preceding calendar year of **2025** and will be used in the coming calendar year of **2027** only for the provision, maintenance, and upgrading of facilities and services for which the support is intended pursuant to and consistent with Section 254(e) of the Act and 47 C.F.R. § 54.7. The

Company will use the support for the following services, as designated in 47 C.F.R. § 54.101, throughout the Company's study area: (a) voice grade access to the public switched network or its functional equivalent; (b) minutes of use for local service at no additional charge; (c) access to emergency services; and (d) toll limitation services to qualifying low-income consumers.

Dated this 28th day of July, **2026**.

Griggs County Telephone Company
(SAC 381615)

By: _____
Tyler Kilde
President

State of Minnesota)
)
County of Douglas)

On this 28 day of July, **2026**, before me, a Notary Public in and for said County and State, personally appeared **Tyler Kilde**, known to me to be the **President** of **Griggs County Telephone Company (SAC 381615)**, the corporation that is described in and that executed the within instrument, and acknowledged to me that such corporation executed the same.

KYRSTEN E GRAHAM
Notary Public - Minnesota
My Commission Expires Jan. 31, 2029

_____
Notary Public
For the State of Minnesota

My commission expires: 01/31/2029

ANNUAL REPORT TO THE NORTH DAKOTA PUBLIC SERVICE COMMISSION

ESSENTIAL TELECOMMUNICATIONS CARRIER CERTIFICATION

The undersigned, on behalf of the telecommunications company named below (the Company), does hereby state and certify, as follows:

1. The Company will provide service on a timely basis to requesting customers within the Company's designated service area where the Company's network already passes the potential customer's premises, and
2. The Company will provide service, within a reasonable period of time, if the potential customer is within the Company's designated service area but outside the Company's existing network coverage, if service can be provided at a reasonable cost by:
    a. Modifying or replacing the requesting customer's equipment;
    b. Deploying a roof-mounted antenna or other equipment;
    c. Adjusting the nearest cell tower;
    d. Adjusting network or customer facilities;
    e. Reselling services from another carrier's facilities to provide service; or
    f. Employing, leasing, or constructing an additional cell site, cell extender, repeater, or other similar equipment.
3. The Company is able to remain functional in emergency situations and has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.
4. The Company is satisfying and will satisfy applicable consumer protection and service quality standards. (If wireless service is involved, the Company has and will comply with the Cellular Telecommunications and Internet Association's Consumer Code for wireless service. If a wireless service complies with another standard, that is explained herein.)
5. If the Company is a non-incumbent local exchange carrier, it will offer a local usage plan comparable to the one offered by the incumbent local exchange carrier in the designated service area.
6. The Company acknowledges that the North Dakota Public Service Commission (the Commission) may require it to provide equal access to long distance carriers in the event that no other eligible telecommunications carrier is providing equal access within the proposed designated service area. (If wireless carriage is involved, the Company acknowledges that the Federal Communications Commission may require the Company

to provide equal access to long distance carriers in the event no other eligible telecommunications carrier is providing equal access within the designated service area.)

7. The Company has met and will meet the requirements of eligible telecommunications carrier advertising. This includes:

    a. A full description of available services in the Company's official telephone directory, including the process to be used by customers to qualify for lifeline and link-up service.

    b. Advertising of the availability of universal service in media of general circulation in the Company's designated service area. Availability may be advertised in newspapers, company newsletters, company or civic internet sites, bill stuffers, direct mailings, or other means intended to convey availability throughout the designated service area.

Exhibit A Information

(Reference to Exhibit A in this document is not intended to waive any rights this company has to claim that Exhibit A contains confidential and proprietary information.)

The following information is provided in Exhibit A attached hereto and incorporated herein by reference:

1. A description of the amount of high-cost universal service support received by the Company in the prior calendar year and a description of how that support was used for the provision, maintenance, or upgrading of the Company's facilities and services. (An explanation of any changes from reports previously provided to the Commission is also included.)

2. An estimate of the amount of federal high-cost universal service support the Company anticipates receiving in the following calendar year (the calendar year following this report) and a description of how that support is projected to be used for the provision, maintenance, or upgrading of the Company's facilities and services pursuant to Section 254 of the Telecommunications Act of 1996.

3. Exhibit A also contains, for the prior calendar year and the subsequent calendar year (the calendar year following this report), identification of specific construction or upgrade projects; a description of how service will be improved by each project; the start date and completion date for each improvement; the amount of investment for cash improvement; the specific geographic area where each improvement was made or will be made; and the estimated population that will be served by each improvement. (For an incumbent local exchange carrier (ILEC), this information is submitted at the study area level. For another eligible carrier, this information is submitted at the study area level of the ILEC. If a

study area level or designated service area includes geographic areas in more than one state, the information is also submitted at the North Dakota level.)

4. Detailed information of any outage, as that term is defined in 47 C.F.R. § 4.5, of at least thirty (30) minutes in duration for each designated service area for any facilities the Company owns, operates, leases, or otherwise utilizes that potentially affect:

   a. At least ten percent (10%) of the end users served in a designated service area, or

   b. A 911 special facility, as defined in 47 C.F.R. § 4.5(e).

   This report includes:

   a. The date and time of the onset of the outage,

   b. A brief description of the outage and its resolution,

   c. The particular services affected,

   d. The geographic areas affected by the outage,

   e. Steps taken to prevent a similar outage in the future, and

   f. The number of customers affected.

   (If applicable, a copy of the FCC outage report that includes this information may be attached.)

5. The number of requests for service from potential customers within the designated service area that were unfilled during the past year. A detail of how the Company attempted to provide service to those potential customers is also included.

6. The number of complaints per thousand handsets or lines.

I hereby certify that the above information is true and correct and is submitted on behalf of the Company named below. The information is submitted in the year **2026**.

Griggs County Telephone Company
(SAC 381615)

By: _____
Tyler Kilde
Its: **President**

STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION

APPLICATION OF GRIGGS COUNTY TELEPHONE COMPANY (SAC 381615) TO PROTECT TRADE SECRETS AND CONFIDENTIAL INFORMATION SUBMITTED WITH 2026 ETC ANNUAL REPORT	CASE NO. PU-26-15

APPLICATION FOR TRADE SECRET PROTECTION

Griggs County Telephone Company (SAC 381615) ("Griggs" or "the Company") hereby submits this Request to Protect Trade Secrets and Confidential Information in conjunction with its Annual Report to the North Dakota Public Service Commission, Essential Telecommunications Carrier Certification ("Annual Report"). The Company requests the information contained in Exhibit A, Items 1 through 4, attached to the Company's Annual Report to the North Dakota Public Service Commission ("Commission"), be treated as a confidential trade secret protected from public disclosure pursuant to North Dakota Century Code § 44-04-18 et seq.

Consistent with North Dakota Administrative Code § 69-02-09-02, Trade Secret Exhibit A is a separate document, submitted in a sealed envelope marked Trade Secret - Private. Copies of the Annual Report and Public versions of Exhibit A, with the Trade Secret responses to Items 1 through 4 excised, have also been filed electronically and via Overnight Delivery.

THE TRADE SECRET EXHIBITS

A. Trade Secret Response to Exhibit A, Item 1

Item 1 to Trade Secret Exhibit A contains a description and the amount of high-cost universal service support received by the Company in 2025 and a description of how

that support was used for the provision, maintenance, or upgrading of the Company's facilities and services.

B. Trade Secret Response to Exhibit A, Item 2

Item 2 to Trade Secret Exhibit A includes an estimate of the amount of federal high-cost universal service support the Company anticipates receiving in 2027 and a description of how that support is projected to be used for the provision, maintenance, or upgrading of the Company's facilities and services pursuant to Section 254 of the Telecommunications Act of 1996.

C. Trade Secret Response to Exhibit A, Item 3

Item 3 to Trade Secret Exhibit A includes detailed information regarding the Telecommunications Infrastructure projects that the Company completed in 2025 and those forecasted for 2027.

D. Trade Secret Response to Exhibit A, Item 4

Item 4 to Trade Secret Exhibit A contains detailed information about each outage of over 30 minutes in duration experienced by the Company in its ETC-designated service area in 2025, including the geographic area, the start and end time, a description, the resolution, the services affected, the number of customers affected, and steps taken to prevent similar situations.

THE CONFIDENTIAL EXHIBITS ARE AFFORDED TRADE SECRET PROTECTION BY THE FCC AND UNDER NORTH DAKOTA LAW

North Dakota's Open Records Law (N.D.C.C. § 44-04-18 et seq.) provides that information "otherwise specifically provided by law"[1] is not included in the requirement that information must be made publicly available. The Open Records Law also contains

[1] N.D.C.C. § 44-04-18(1) (emphasis added).

a specific exception – Section 44-04-18.4(1) – which provides a safeguard for confidential information (the "Confidential Exception") and defines what information should be confidential by its nature. The information in Trade Secret Exhibit A falls within the "otherwise specifically provided by law" exception because its information is treated as confidential by the regulations and orders of the Federal Communications Commission ("FCC"). Moreover, the information in the Confidential Exhibits falls within the statutorily defined Confidential Exception.

A. The FCC Treats this Information as Confidential

There is strong precedent for treating the information in Trade Secret A as not included in the requirement for public disclosure. The "term 'law' as used in [N.D.C.C. § 44-04-18(1)] includes federal statutes and applicable federal regulations, as well as state law."[2] The kinds of information in Trade Secret Exhibit A, Items 1 through 4, are stated to be confidential by the FCC under 47 C.F.R. §§ 0.457 and 0.459 and its orders.[3] With Badlands Cellular of North Dakota Limited Partnership's Confidential Exhibits A-1, A-2, A-3, and C-1, the Commission determined that information materially similar to Trade

[2] N.D. Op. Atty. Gen. L-32, 1998 WL 1058327 (Mar. 30, 1998).

[3] See In the Matter of Federal-State Joint Board on Universal Service, Petition of Cingular Wireless, LCC for Designation as an Eligible Telecommunications Carrier in the State of Georgia, Protective Order, CC Docket No. 96-45, Order, DA 07-3627 (rel. Aug. 15, 2007) ¶ 1 (granting a protective order to keep service improvement plan information like that contained in Confidential Exhibits A-1, A-2, and A-3 confidential); see also In the Matter of Federal-State Joint Board on Universal Service, Corr Wireless Communications, LLC Petition for Designation as an Eligible Telecommunications Carrier in the State of Alabama, Protective Order, CC Docket No. 96-45, Order, DA 07-3629 (rel. Aug. 15, 2007); In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications, ET Docket No. 04-35, Report and Order and Further Notice of Proposed Rulemaking, FCC 04-188, 19 FCC Rcd. 16830 (rel. Aug. 19, 2004) (explaining why outage information similar to that contained in Confidential Exhibit C-1 is considered confidential for reasons of national security).

Secret Exhibit A, Items 1 through 4, is protected under federal regulation.[4] The Company previously applied for Trade Secret treatment in similar cases designated Case Nos. PU-09-592, PU-10-548, PU-11-461, and PU-12-402. On September 27, 2012, the Commission issued its Order Granting Trade Secret Protection with respect to three of these cases: Case Nos. PU-09-592, PU-10-548 and PU-11-461. Thus, the Commission should also grant trade secret protection in this case and consider the Company's current Trade Secret Exhibit A, Items 1 through 4, to be confidential under the exception in N.D.C.C. § 44-04-18(1) for information "otherwise specifically provided by law" as non-public.

B. The Confidential Exhibits Fall within the Confidential Exception

All information contained in the exhibits falls clearly within The Confidential Exception. N.D.C.C. § 44-04-18.4(1) states that:

> (1) Trade secret, proprietary, commercial, and financial information is confidential if it is (2) of a privileged nature and (3) it has not been previously publicly disclosed. (Emphasis and numbering added.)

The act defines "Trade secret" as follows:

> "Trade secret" means information, including a formula, pattern, compilation, program, device, method, technique, technical know-how or process, that:
>
> > 1. Derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons that can obtain economic value from its disclosure or use; and

[4] Badlands Cellular of North Dakota Limited Partnership, 2007 High-Cost Universal Service Support Annual Report, Case No. PU-07-587, North Dakota RSA No. 3 Limited Partnership, 2007 High-Cost Universal Service Support Annual Report, Case No. PU-07-588, North Central RSA 2 of ND Limited Partnership, 2007 High-Cost Universal Service Support Annual Report, Case No. PU-07-590, North Dakota 5 - Kidder Limited Partnership, Case No. PU-07-591; Northwest Dakota Cellular of North Dakota Limited Partnership, Case No. PU-07-592, Bismarck MSA Limited Partnership, Case No. PU-07-593, Order Granting Trade Secret Protection (rel. March 12, 2008) at 5.

> 2. Is the subject of efforts that are reasonable under the circumstances to maintain the secrecy of the information.[5]

Trade Secret Exhibit A, Items 1 through 4, meet each element of the Confidential Exception under North Dakota Statutes. First, they fall squarely within the definition of a "trade secret." The Company derives value from competitors not knowing the information contained in Trade Secret Exhibit A, Items 1 through 4, as competitors could obtain economic value from the disclosure. Given this potential, the Company closely safeguards the information by prohibiting employee disclosure and restricting access to the information contained within the Exhibits. Second, the information in Trade Secret Exhibit A, Items 1 through 4, is "of a privileged nature" because "disclosure of the information is likely ... to cause substantial harm to the competitive position of the person from whom the information was obtained."[6] The Company would be substantially harmed if the information in Trade Secret Exhibit A, Items 1 through 4, were made public. Finally, the information in the Trade Secret Exhibit A, Items 1 through 4, has not been disclosed publicly. This means the information should be treated as confidential and not disclosed to the public.

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[5] N.D.C.C. § 44.04-18.4.

[6] See N.D. Op. Atty. Gen. L-77, 1998 WL 1058291 (June 17, 1998).

IV. CONCLUSION

The Company respectfully requests that Trade Secret Exhibit A, Items 1 through 4, be held confidential pursuant to N.D.C.C. § 44-04-18 et seq.

Dated: July 29, 2026

Respectfully submitted,

John Kuykendall
JSI Regulatory Advisor
6404 Ivy Lane, Suite 700
Greenbelt, MD 20770
301-459-7590

Consultants on Behalf of Griggs County
Telephone Company (SAC 381615)

PUBLIC

EXHIBIT A

This Exhibit A is supplemented by a non-public Exhibit A labeled "Trade Secret – Private." The Company does not waive any rights to Trade Secret Protection by referencing this "Trade Secret – Private" information in this form.

1. The amount of high-cost universal support the Company received in the prior calendar year and estimate of the amount of high-cost universal support it anticipates receiving in the next calendar year (the calendar year following the date of this report) are listed below:

   Year 2025 Federal Universal Service Receipts:

High Cost Loop Support	$
Local Switching Support	$
CAF BLS	$
Connect America Fund (CAF ICC)	$ 175,560
A-CAM II	$ 1,627,865
TOTAL	$ 1,803,425

2. The number of requests for service from potential customers within the designated service area that were unfilled in the past year was zero.

3. The number of complaints per one thousand handsets or lines was zero.

Company Name: Griggs County Telephone Company (SAC 381615)