

Mid Century Telephone Cooperative

Robocall Mitigation Plan

Revision Date: May 19, 2026

Mid Century Telephone Cooperative (Mid Century), OCN 1054, is a small/rural carrier eligible for the continuing extension of the STIR SHAKEN implementation deadline on Non-IP networks as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

Mid Century provides local service to fewer than 100,000 voice subscriber lines. The majority of customers are served on the non-IP portions of Mid Century's network which relies on technology that cannot initiate, maintain, carry, process, and terminate SIP calls.

Mid Century has contracted with Voyant Solutions LLC (Voyant) for cloud switching services for a portion of its customers.

The Mid Century network also has some IP-portions which originate calls via SIP connections to other carriers.

Principals, Affiliates, Subsidiaries, and Parent Companies

Mid Century Telephone Cooperative is a member-owned ILEC operating in Illinois serving 14 telephone exchanges. CenComm, Inc. is a wholly owned subsidiary of Mid Century Telephone Cooperative providing non-telecommunication services. Century Enterprises, Inc. is a wholly owned subsidiary of CenComm, Inc. providing telecommunication services in non-ILEC areas. James W. Broemmer, Jr is the CEO of Mid Century Telephone Cooperative and of its subsidiaries.

Robocall Mitigation Plan

STIR/SHAKEN Implementation

Mid Century has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Mid Century has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of the Mid Century network.

For calls originating from our third-party vendor Voyant, Mid Century relies on Voyant's infrastructure to perform the act of signing and attestation. Voyant has registered with the Policy Administrator and is an authorized service provider in the STIR|SHAKEN ecosystem. Voyant has implemented STIR|SHAKEN within the IP portions of its network and signs the calls originating on the IP portions of the Voyant network.

Call Analytics

Mid Century blocks calls originating from numbers that are not valid North American Numbering Plan (NANP) numbers, numbers that are listed as Do-Not-Originate, known numbers not allocated to a provider and numbers not assigned to an Mid Century subscriber or otherwise set aside for outbound call use.

Mid Century has contracted with Ribbon Communications (Ribbon) to provide robocall analytics and reputation scoring of inbound and outbound traffic on the Mid Century network. Ribbon's analytics identify patterns of suspected illegal robocalls and scores the calls based on their behavior and/or their status as suspected robocalls as reported to the Federal Communications Commission (FCC), Federal Trade Commission (FTC), and as reported by other carriers. Ribbon identifies calls originating from numbers that are in their Do-Not-Originate lists, are not valid North American Numbering Pan (NANP) numbers, and numbers listed in their Do-Not-Originate (DNO) database. Mid Century has access to the Ribbon IDH Manager where reports are available showing telephone numbers originating suspected illegal robocalls on its network, including from unassigned, inactive and do-not-originate TNs. Mid Century examines the reports and investigates and identifies the source of the calls as unlawful or legitimate.

For calls originating from our third-party vendor Voyant, Mid Century relies on Voyant's infrastructure to perform robocall analytics and reputation scoring of their network's inbound and outbound traffic. Voyant blocks suspected robocalls originating from their network, as well as calls from Do-Not-Originate lists and not valid North American Numbering Plan (NANP) numbers.

Investigation

Mid Century investigates calls identified by Voyant or Ribbon as suspicious calls or those that have abnormal call volumes, patterns, or activity consistent with illegal robocalls.

In addition, if Mid Century has any other reason to suspect illegal robocalling or spoofing is taking place over its network, Mid Century will work internally to identify the party that is using our network to originate, route, or terminate such calls and take appropriate action

Enforcement

Illegal robocalls and fraudulent spoofing are prohibited by our customers. If it is determined an Mid Century customer is using our network or our vendor Voyant's network to fraudulently spoof calls or to originate illegal robocalls, Mid Century will either warn the customer to stop such practices or terminate their service as allowed per Mid Century policy.

Know Your Customer (KYC)

Mid Century has procedures in place to prevent new & renewing customers from using our network or our vendor Voyant's network to originate illegal robocalls. Prior to activating or

modifying service for any customer that can originate outbound calls, Mid Century verifies customer identity and service legitimacy using documented account validation steps (e.g., identity/account verification questions and validation of contact and billing information). Mid Century escalates for additional review when origination patterns, requested service characteristics, or other indicators suggest elevated robocall risk. Mid Century retains onboarding/validation records consistent with company recordkeeping practices and will suspend, restrict, or terminate service if illegal robocalling is identified.

Upstream Provider Knowledge

Mid Century knows all the carriers from which it receives traffic and has confirmed that all the carriers are listed in the Robocall Mitigation Database. Mid Century has also reviewed the connected carrier's robocall mitigation plans to learn how the carriers monitor their originating traffic to mitigate illegal robocalls. Mid Century does not directly receive traffic from any foreign originating or intermediate provider. No provider uses Mid Century's network to carry or process a high volume of illegal traffic. In addition, Mid Century is now incorporating traceback and prohibited traffic language in all contractual agreements with new upstream carriers.

Mid Century contracts with Voyant for 3rd-party cloud switching services and has confirmed that Voyant's publicly filed mitigation plan meets or exceeds our standards. Mid Century's service agreement with Voyant mandates their full cooperation with the Industry Traceback Group and compliance with all STIR/SHAKEN mandates.

Traceback

Mid Century and its vendor Voyant commit to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers that we learn are using our service to originate calls. Mid Century and its vendor Voyant commit to responding to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, within twenty-four (24) hours.

Robocall Mitigation Database Eligibility

Mid Century nor its vendor Voyant have not ever been involved in any formal law enforcement or regulatory investigation into suspected unlawful robocalling..

Mid Century has not been prohibited from filing in the Robocall Mitigation Database (RMD).

RMD Updates / Material Changes

Mid Century commits to updating the FCC Robocall Mitigation Database filing information, including any material changes to the information provided in the certification process, within ten (10) business days of the change.

Customer Education

Mid Century posts information on its website to educate customers on how to protect themselves from becoming a victim of unlawful robocalls and to report complaints related to robocall activity.