

Midwest Energy Cooperative dba Midwest Energy & Communications Robocall Mitigation Certification and Plan

Midwest Energy Cooperative dba Midwest Energy & Communications (Midwest or Company), a voice service provider, submits this robocall mitigation certification and attached Robocall Mitigation Plan pursuant to section 64.6305 of the FCC's rules. Midwest has taken specific reasonable steps, as set forth below, to avoid originating and processing illegal robocall traffic.

Alianza, Inc. (Alianza) is Midwest's underlying voice service provider. Company relies on procedures, policies, and safeguards implemented by Alianza to ensure that Company's residential and business customers are sufficiently protected against robocall and spoofing activities.

STIR/SHAKEN

Midwest is a voice provider without a STIR/SHAKEN obligation; our underlying voice service provider has certified "Complete" STIR/SHAKEN implementation.

Enforcement

All voice traffic that originates on our network is subject to the attached Robocall Mitigation Plan. Midwest reserves the right to modify and/or supplement its robocall mitigation plan to adapt to risks and to improve the overall effectiveness of its program.

Midwest and/or any entity for which the filing entity shares common ownership, management, directors, or control have never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program. Midwest has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

Midwest commits to cooperate with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any robocallers that use our service to originate unlawful robocalls. Midwest will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investigating and stopping any robocallers that use its service to carry, process, or originate robocalls.

Identifying and Other Information

Midwest Energy Cooperative dba Midwest Energy & Communications
60590 Decatur Road
Cassopolis, Michigan 49031
(269) 445-1031

- Other business names in use: None
- All business names previously used: Midwest Connections
- Midwest is not a foreign voice service provider.
- Principals: Midwest Energy & Communications is a rural electric cooperative (member-owned). It is governed by a nine-person board of directors (elected to three-year terms) and managed by the following officers (biographies added at the end of this document):

- **Management**

- Mr. Terry Rubenthaler – President/Chief Executive Officer
 - terry.rubenthaler@teammidwest.com
- Mr. Todd Crandall - Chief Financial Officer
 - todd.crandall@teammidwest.com
- Ms. Kerri Wade – Vice President, Employee Engagement
 - kerri.wade@teammidwest.com
- Ms. Candy Riem – Vice President, Marketing & Member Services
 - candy.riem@teammidwest.com
- Mr. David Allen – Vice President, Regulatory & Gas Operations
 - dave.allen@teammidwest.com
- Mr. Chad Ritchie – Vice President, Electric Operations
 - chad.ritchie@teammidwest.com

- **Board of Directors**

- Mr. Clarence Barth – Chairman
 - clarence.barth@teammidwest.com
- Mr. Dan Bodette – Vice Chairman
 - dan.bodette@teammidwest.com
- Mr. Ron Armstrong – Secretary
 - ron.armstrong@teammidwest.com
- Mr. John Green – Treasurer
 - john.green@teammidwest.com
- Mr. Fred Turk
 - fred.turk@teammidwest.com
- Mr. Jim Wiseley
 - jim.wiseley@teammidwest.com
- Ms. Erika Escue-Cadieux
 - erika.escue-cadieux@teammidwest.com
- Mr. Gerry Bundle
 - gerry.bundle@teammidwest.com
- Mr. Jeff Diehl
 - jeff.diehl@teammidwest.com

- Affiliates: None
- Subsidiaries: Midwest Energy, Inc.; Midwest Propane, LLC
- OCN: None

- Person within company responsible for addressing robocall mitigation-related issues:

Ms. Candy Riem, Vice President, Marketing & Member Services
Marketing & Communications
60590 Decatur Road, Cassopolis, Michigan 49031
(269) 445-1008

I, David H. Allen, Vice President, Regulatory & Gas Operations for Midwest Energy & Communications submits this certification on behalf of the Company, which has implemented the STIR/SHAKEN authentication framework as indicated in the Robocall Mitigation Database. Pursuant to section 1.16 of the FCC's rules, I certify, under penalty of perjury that the information and statements contained herein are true and correct to the best of my knowledge and belief.



Signature

Date

Robocall Mitigation Program

Company has implemented know-your-customer and specific reasonable steps, including traffic monitoring, to mitigate the risk of carrying or processing illegal robocalls on behalf of its customers.

As a reseller, Company relies on Alianza's call analytics to monitor call traffic. Alianza, has implemented a proprietary fraud detection and mitigation process through which it analyzes high-volume network traffic to evaluate compliance with a variety of fraud detection indicators and fraud detection best practices. Through this fraud detection and mitigation process, Alianza will notify individual customers of potentially fraudulent activity occurring in any of that customer's subscriber accounts. Alianza may take remedial action against any subscriber's account to prevent or remediate robocalling or 3 other fraudulent activity. If Alianza takes any such action, its fraud detection system triggers notification to the customer of that action and any remedial steps that may be taken to restore service.

Our Acceptable Use Policy, Company strictly prohibits the "unlawful" and "harmful" activities. Midwest may take action to stop such conduct, including issue a warning, suspending or terminating service. Midwest will also refer potential violations of laws to the proper authorities and assist with law enforcement investigations.

Know-Your-Customer. Our end user customers also subscribe to our electric utility services. Our customers are members of the local, rural communities we operate in. Therefore, we know our customers and do not consider our network at high risk of originating illegal robocalls. As part of our standard operating procedure, we conduct due diligence on new and renewing voice customers by collecting personal identifiable information. Also, Alianza engages in a discovery process with each potential customer to understand the customer's subscriber base.

Know-Your-Upstream Provider. Midwest relies on Know-Your-Upstream Provider processes adopted by Alianza, who states that it has “existing Tier-1 carrier service providers” from which it facilitates the provision of carrier services to its service provider customers. Alianza has confirmed those carriers are listed in the Robocall Mitigation Database. Alianza has provided detailed onboarding and fraud detection guidance to require and enable its customers to comply with the obligation to prevent and mitigate illegal robocalls.

Traceback. Company will respond fully and in a timely manner to all traceback requests from the Commission, law enforcement, and the industry traceback consortium, and cooperate with such entities in investing and stopping any robocallers that use our network to originate robocalls.

Midwest Energy & Communications Leadership Team

Mr. Terry Rubenthaler, PE President/Chief Executive Officer

Executive Profile

Mr. Rubenthaler is a registered Professional Engineer with 30 years of electric utility experience. He maintains proficiency in deploying modern systems including Demand Side Management (DSM), Supervisory Control & Data Acquisition (SCADA) and Automated Metering Infrastructure (AMI). Mr. Rubenthaler’s skill set is ideally suited to evaluating smart grid potential and opportunities for growth of our fiber system. He is adept at developing and implementing short-and-long range engineering studies focused on both our electrical and telecommunications lines of business.

Professional Experience

Midwest Energy & Communications, Cassopolis, MI – 1995 to Present

Chief Technology Officer

Dawson Public Power District, Lexington, NE – 1991 to 1995

Electrical Engineer

Education

University of Nebraska – Lincoln, Lincoln, NE – 1990

BS – Electrical Engineering

Mr. Todd Crandall, CPA Chief Financial Officer

Executive Profile

Mr. Crandall is a CPA with 25 years of professional experience in the functions of accounting and finance. His primary expertise lies in the areas of strategic planning, budgeting design and implementation, pricing and profitability strategies, and process engineering. Mr. Crandall possesses a deep knowledge of rural telecommunications operations including voice, video, broadband, and security services.

Professional Experience

Chief Financial Officer, Midwest Energy & Communications, Cassopolis, MI, 2016 to Present

Chief Financial Officer, West Kentucky & Tennessee Telecommunications, Mayfield, KY, 2011 to 2016

Chief Financial Officer, Twin Valley Telephone, Miltonvale, KS, 2008 to 2011

Education

Colorado State University, Fort Collins, Colorado

Master of Business Administration, 1998

Bachelor of Science in Business Administration, Accounting Concentration, 1990

Ms. Kerri Wade
Vice President, Employee Engagement

Executive Profile

Ms. Wade is a Senior Professional in Human Resources, responsible for the formulation of human resources policies and programs for the entire organization. Particular experience in compensation, employee relations, recruitment and retention, labor relations, organization development and planning, employee recognition and activities, government compliance, and training.

Professional Experience

Midwest Energy & Communications, Cassopolis MI – 1997 to Present

Vice President of Employee Engagement

Edward Lowe Foundation, Cassopolis, MI – 1994 to 1996

Receptionist

Certifications

HR Certification Institute – 2009

Senior Professional in Human Resources

Ms. Candy Riem
Vice President, Marketing, Member Solutions

Executive Profile

Ms. Riem is a business development professional responsible for providing new product and service development and integration. With respect to broadband deployment, Ms. Riem is coordinating interface with key vendors including Alianza, who provides voice services for our members. She oversees comprehensive public relations endeavors, assists our Marketing group with the development of sales/marketing campaigns designed to inform and build awareness of organizational activities, and develops strategies to increase sales of Cooperative and subsidiary products and services. Ms. Riem provides exceptional customer service to members and other customers via face-to-face communications, call center operations, Internet exchanges and contract services.

Professional Experience

Midwest Energy & Communications, Cassopolis, MI – 1998 to Present

Vice President, Marketing, Member & Information Systems

1st Source Bank, South Bend, IN – 1993 to 1998

Deposit Processing Supervisor

Education

Bethel College – 2007

BA – Organizational Management

Mr. David H. Allen
Vice President, Regulatory & Gas Operations

Executive Profile

Mr. Allen has twenty-three years of experience working with electric and natural gas utilities. Additionally, he has worked in banking and with both public and private economic development agencies in Michigan. His knowledge in helping commercialize business start-ups is an asset as Midwest Energy looks to deploy new technologies and lines of business on behalf of its members. Additionally, Mr. Allen maintains extensive contacts in both our state and national capitals.

Professional Experience

Midwest Energy & Communications, Cassopolis, MI – 2008 to Present

Vice President, Regulatory & Gas Operations

FNB Financial, Three Rivers, MI – 2006 – 2008

Vice President, Business Development Officer

St. Joseph County Economic Development Corporation, Centreville, MI – 2003 – 2005

Executive Director

Southwest Michigan First, Kalamazoo, MI – 2002

Manager, Business Retention

SEMCO Energy, Battle Creek, MI – 1988 – 2001

Manager, Central District Operations & Public Affairs

Education

Western Michigan University, Kalamazoo, MI – 1986

MPA – Public Administration

University of Wisconsin – Madison, Madison, WI – 1983

BA – International Relations & Political Science