

HomeWorks Connect
Robocall Mitigation Certification and Program
Revised February 2025

Tri-County Electric Cooperative dba HomeWorks Connect (“HomeWorks” or “Company”) submits this Robocall Mitigation Plan pursuant to Section 64.6305 of the Federal Communications Commission’s (“Commission” or “FCC”) rules.

HomeWorks is a broadband provider that resells VoIP services of Momentum Telecom, Inc. (“Momentum”). HomeWorks relies on procedures, policies, and safeguards implemented by Momentum to ensure that its residential and business customers are protected against robocall and spoofing activities.

STIR/SHAKEN Implementation.

HomeWorks is a voice provider without a STIR/SHAKEN obligation; Momentum has certified “Complete” STIR/SHAKEN implementation.

Company Information

- Tri-County Electric Cooperative dba HomeWorks Connect
7973 East Grand River Avenue, Portland, MI 48875
- Other business names in use: HomeWorks, HomeWorks Connect, HomeWorks Tri-County Electric Cooperative
- All business names previously used: Tri-Co Services dba Rural TV of Michigan
- OCN: None
- HomeWorks Connect is not a foreign voice service provider
- Individual responsible for addressing robocall mitigation-related issues:
Tom Manting, CIO
Department: IT
7973 East Grand River Avenue, Portland, MI 48875
(517) 647-1236; tmanting@homeworks.org

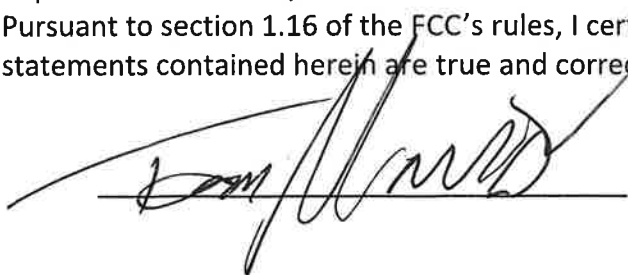
HomeWorks (and/or any entity for which the filing entity shares common ownership, management, directors, or control) has never been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoings due to transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program.

HomeWorks has not been prohibited by the Commission from filing in the Robocall Mitigation Database.

Traceback

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

I, Tom Manting, CIO, for HomeWorks Connect submit 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.

A handwritten signature in black ink, appearing to read "Tom Manting", is written over a horizontal line. The signature is stylized with a large, sweeping initial "T" and a long, horizontal stroke extending to the right.

Robocall Mitigation Plan

HomeWorks takes specific reasonable steps, as detailed herein, to avoid originating illegal robocall traffic. HomeWorks 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.

As a reseller, the Company relies on Momentum's call analytics to monitor call traffic. Momentum has implemented its own call analytics to identify unlawful traffic originated by its retail customers and the end users of its wholesale customers' services. Momentum's call analytics can detect call patterns that indicate robocall activity, including, but not necessarily limited to, an unusually large number of calls from the same number, an excessive number of short duration calls, and calls that stop attempting to connect after a single ring. Momentum's call analytics also can detect where the calling number is invalid, unallocated, or on Industry Traceback Group's Do Not Originate ("DNO") list.

If Momentum's call analytics detect any of the above-described issues, an internal report is generated that summarizes the issues presented and the applicable wholesale or retail customer that is responsible for the underlying calls. If Momentum's analytics report indicates potential illegal robocall activity by a wholesale end user customer, Momentum alerts the wholesale customer's contact representative and asks the customer to investigate the issue and thereafter inform Momentum (i) when the issue is resolved and (ii) what actions the wholesale customer took in resolving the issue. If Momentum's analytics report indicates potential illegal robocall activity by one of its own retail customers, Momentum conducts its own investigation into the customer and the calls at issue. After concluding its investigation, Momentum will take action commensurate with the severity of the customer's offense, including, but not limited to, providing the customer with a warning or terminating the customer's service and/or reporting the misconduct to the appropriate authorities.

Our Acceptable Use Policy prohibits utilizing our network for deceptive purposes, engaging in fraudulent activities, and violating local, state, or federal laws. We will block originating traffic identified as illegal robocalls.

HomeWorks has adopted know-your-customer processes. HomeWorks vets our new and renewing customers. To verify residential customers, HomeWorks collects contact information, a photo ID to verify identity, and runs credit checks. We will confirm the identity of new or renewing business customers by collecting information including a contact person for the business, the physical location of the business, the state and/or country of incorporation, and the federal tax ID. When we install service, HomeWorks reviews caller ID and call records.

We also rely on Momentum's know-your-customer processes. Momentum vets the identity of its wholesale customers prior to entering into a contract for VoIP services. Momentum's wholesale customers are expected to vet their end user subscribers consistent with the FCC's robocall mitigation rules. Momentum's wholesale contracts prohibit the use of its services to originate unlawful traffic.

Momentum also vets the identity of the customers to whom it provides retail telephone service when: (i) approving an application for service; (ii) provisioning network connectivity; (iii) entering into a contract agreement; or (iv) granting the right to use telephone number resources. Momentum collects from retail customers their name and address, physical location, contact information, and, for business and enterprise customers, their jurisdiction of incorporation, federal tax ID, and nature of business. Momentum may also

utilize third-party agencies to gauge credit and/or fraud risks associated with a potential customer. Momentum's policy is to request additional information from the customer if Momentum cannot validate the customer based on the initial information provided. Momentum will not provide service if a new customer's identification cannot be verified. Through its retail terms of service, Momentum requires its enterprise customers to comply with all applicable laws in relation to its voice services, explicitly prohibiting any abusive or unlawful use of the service.

With respect to know-your-upstream provider processes, Momentum has provided that it knows all of the upstream providers from which it directly receives traffic and has insight into its upstream providers' policies and procedures related to identifying and blocking unlawful robocall traffic through Momentum's review of these providers' robocall mitigation plans. Momentum confirms that all upstream providers from which it receives traffic are listed in the Robocall Mitigation Database. We have confirmed that Momentum is registered in the Robocall Mitigation Database.

Traceback. HomeWorks 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 illegal robocalls. HomeWorks will respond fully within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium.