

4100 Oklahoma Avenue
Trenton, MO 64683

Mid-States Services, LLC (“Mid-States Services”) is headquartered in Trenton, Missouri, and offers internet service within Iowa and Missouri. Mid-States Services delivers fiber and fixed wireless Internet to an estimated 2,900 customers. Mid-States Services also offers its customers Voice Over Internet Protocol (VoIP) services as a reseller of white-labeled services offered by Momentum Telecom Inc. (“Momentum”). Mid-States Services does not control the softswitch, number porting or call trunking for the associated calls. Accordingly, Mid-States Services does not have the facilities necessary to implement STIR/SHAKEN. Mid-States Services has, however, adopted this robocall mitigation plan to establish procedures intended to limit the potential for the origination, carrying, or processing of unlawful robocalls from its voice services.

PROCEDURES TO MITIGATE OR STOP ROBOCALLS

I. KNOW YOUR CUSTOMER

Mid-States Services follows the North American Numbering Council (NANC) - Call Authentication Trust Anchor Working Group guidelines and best practices for vetting caller identity [NANC CallerID Best Practices](#).

This includes confirming the identity of Mid-States Services’ customers – (i) contact person(s); (ii) business location; (iii) state or country of incorporation; (iv) federal tax identification; and (v) the nature of our customers’ businesses.

Mid-States Services’ services are targeted to residential and small business usage. These customers are configured for service either off systems that cannot generate more than a single call at a time or are otherwise limited in the number of concurrent calls that would render an illicit robocalling platform from operating in a cost-effective manner.

II. CONTRACTUAL TERMS

Customers using Mid-States Services’ services agree to abide by the rules and regulations set forth in our “Acceptable Use Policy” and “Internet Terms and Conditions” ([Acceptable Use Policy Internet Terms of Use](#)). Mid-States Services’ Acceptable Use Policy and Internet Terms and Conditions expressly prohibit customers/subscribers from engaging in illegal activity, creating a false Caller ID (i.e., spoofing) or robocalling.

Customers are informed that any suspicious activity will be investigated; and if the customer is engaging in, or has engaged in illegal robocalling, their service will be terminated.

III. TRACEBACK

Mid-States Services commits to respond fully, within 24 hours, to all traceback requests from the

Commission, law enforcement, and the Registered Traceback Consortium. In the event illegal robocallers use our system, Mid-States Services will cooperate with such entities' investigation.

IV. ROBOCALL MITIGATION

Mid-States Services underlying voice provider, Momentum, has committed to fully complying with Commission's robocall blocking requirements and has confirmed that it will block all calls and provider traffic that: (1) are identified in any public notice or order released by the FCC; (2) are substantially similar to the types of traffic identified in any public notice or order released by the Commission; or (3) include a caller ID number or name that is on DNO list issued by ITF. Momentum also blocks the traffic of all foreign providers and gateway providers that have not registered in the Robocall Mitigation Database.

V. KNOW YOUR UPSTREAM PROVIDER

Mid-States Services has an agreement in place with Momentum to resell Momentum's VoIP offering to Mid-States' customers. Mid-States Services has confirmed that Momentum is listed in the Robocall Mitigation Database and that Momentum has Know Your Upstream Provider provisions in place.

VI. CALL ANALYTICS SYSTEMS

Mid-States Services relies upon Momentum's call analytics systems 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 ITG'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.

In the event that 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.

In the event that 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.

VII. PLAN UPDATES

Mid-States Services will continue to monitor industry best practices and improve our internal processes to ensure our systems adapt to address the ongoing challenges affecting this industry.

