



ROBOCALL MITIGATION PLAN

Updated February 23, 2024

Midwest Fiber Networks, LLC (“MWFN”) is a broadband provider and voice service provider with a STIR/SHAKEN implementation obligation. We utilize First Communication as a third-party provider of VoIP services. Therefore, MWFN relies on procedures, policies and safeguards implemented by First Communication to ensure that our residential and business voice service customers are sufficiently protected against robocall and spoofing activities. First Communication has implemented STIR/SHAKEN within its network and signs the originating calls on behalf of MWFN’s customers. First Communication utilizes the Transunion and Neustar STIR/SHAKEN platforms

Know Your Customer

Per Commission guidelines and requirements, MWFN follows several processes and procedures to ensure that we have accurate and current information regarding all of our voice service customers. These include:

- Obtaining Service Agreements
- Vetting our new and returning customers by gathering contact information
- If the customer applies in person, a photo ID is requested to verify applicant identity.

Upstream Provider Knowledge

MWFN, through First Communication, knows all of the carriers from which it receives traffic.

Traceback

MWFN is committed to cooperating with the Commission, law enforcement, and the industry traceback consortium in investigating and stopping any illegal robocallers. We will respond to traceback requests from the Commission, civil and criminal law enforcement, and the industry traceback consortium fully and in a timely manner within twenty-four (24) hours.

STIR/SHAKEN

As a white label service provider for First Communication VoIP services, MWFN relies on the STIR/SHAKEN process implemented by First Communication.

Robocall Mitigation Program

MWFN follows all policies and procedures of our third-party provider First Communication’s Robocall Mitigation Program.

Robocall Mitigation Database Eligibility

MWFN has not been involved in any recent, formal law enforcement or regulatory investigation into suspected unlawful robocalling and has not been prohibited from filing in the Robocall Mitigation Database.