

Interbusiness Corp.

Robocall Mitigation Plan

December 24, 2024

Introduction: Interbusiness Corp. ("The Company"), pursuant to Sections 64.6301 and 64.6305 of the Commission's rules, 47 C.F.R. §§ 64.6301, 64.6305 and the Commission's "Best Practices" as amended, adopts this Robocall Mitigation Plan ("Plan").

Interbusiness, Corp. and its dbas: Sierra Internet Services, and Spacestar Communications do not condone or permit spam, spoofed or robocalls. The Company is committed to combating illegal robocalls and complying with all FCC requirements under applicable regulations. This Robocall Mitigation Plan outlines the policies and procedures we have implemented to prevent the origination of illegal robocalls on our network and to promote secure, legitimate communication.

The Company views these policies and procedures as constituting "reasonable steps" to avoid the origination of illegal robocalls on its network and in addition to following these steps the Company commits to responding to all traceback requests from the FCC, law enforcement, and the Industry Traceback Group (ITG), within 24 hours, and to cooperate with such entities in investigating and stopping any illegal robocallers that may use its service to originate calls.

STIR/SHAKEN Implementation. The Company's network carriers have fully implemented STIR/SHAKEN. The Company has 3 upstream providers (network carriers) Vitelity, Anveo, and Bulk-VS. We have been with them for more than 10 years in the case of Vitelity and Anveo, and 5 years in the case of Bulk-VS.

Extension: The Company falls under a plain language definition of a Small Voice Service Provider, pursuant to Section 64.6304(a)(2) of the Commission's rules, 47 C.F.R. § 64.6304(a)(2), and has received extensions pursuant to that Section.

The company does not own or operate the underlying infrastructure. The company relies on network carriers for both incoming and outgoing calls. The Company is not a foreign voice service provider, is not an intermediate or gateway provider, and does not act as a wholesale provider originating calls on behalf of another provider or providers. The Company does not maintain an operating company number and does not have direct access to telephone numbers from the North American Numbering Plan Administrator (NANPA) and/or the National Pooling Administrator.

Certification: The Company certifies that it has not been prohibited from filing in the Robocall Mitigation Database. The Company certifies that it independently reviews its underlying carrier subscriber traffic analytics and does not separately engage a third-party analytics provider.

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The Company has less than 20 customers.

Reasonable Steps to Prevent Robo Calling:

Know Your Customer and Upstream Provider

The Company follows the best practices for vetting caller identity described by the NANC Call Authentication Trust Anchor Working Group.

The Company fully vets all subscribers before providing service to the subscriber. The Company obtains specific subscriber information including service locations and principals, if commercial subscribers, and verifies location for all subscribers. In addition The Company compares information provided by the subscriber against underlying carrier records to verify accuracy and authentication and validate subscriber information. All of our customers are well known to us.

The company monitors its subscribers' traffic for call, originating number and terminating number irregularities in conjunction with its underlying carriers, and should irregularities be determined, will immediately contact the subscriber as part of its investigatory process.

As a small voice service provider, The Company coordinates with its underlying carriers to monitor The Company's subscribers' traffic, identify traffic anomalies including, but not limited to, unusually high call volumes to different telephone numbers and disparate geographic areas, over the course of one or more hours, for which The Company will investigate, and to immediately block subscriber service if robocalling is suspected. Confirmation of deliberate illegal activity will result in immediate subscriber service termination.

The Company monitors the usage of its network and examines call detail records (CDRs) on a recurring basis for the purpose of detecting suspicious call activity and/or calling patterns. When network usage patterns consistent with illegal robocalls are detected or the Company otherwise suspects illegal robocalling or spoofing is taking place on its network, it immediately seeks to identify the party that is originating, terminating, or routing these calls so that it may take appropriate action.

In conjunction with its underlying carriers, The Company refuses to accept traffic from unlisted and delisted providers from the Commission's Robocall Mitigation Database.

We have increased our monitoring of CDR records from our carriers to quickly identify spam and robo calls.

Company Information:

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Interbusiness Corp is an independent corporation, owned by James Nelson. It is not a part of any corporate group or related to any other company.

Network Traffic Investigation and Traceback Requests:

Consistent with its commitment above, The Company reiterates that it will respond fully to all traceback requests from the Commission, law enforcement, and the industry traceback consortium as soon as possible and at no time exceeding 24 hours from the time of the request and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

History of Robocall Mitigation Plan Investigation and Enforcement

The Company is a respondent to enforcement action in Docket Number EB-TCD-24-00036891, In the Matter of 2,411 Robocall Mitigation Database Filers. Paragraph 7 of that Order directed The Company to cure its deficiency by updating its certification and submitting an updated robocall mitigation plan. This robocall mitigation plan and its corresponding certification cure the deficiencies in The Company's prior certification. Paragraph 11 further ordered The Company to file a written response to that Order, which The Company filed separately. The Company has no further history of robocall mitigation plan investigation.

Sincerely,

/s/ James A. Nelson

President

Last modification 1/9/25