

Robocall Mitigation Program Description

Company: Network Builders IT (NBIT)

Role in the Call Chain: Voice Service Provider serving end-users

STIR/SHAKEN Status: No STIR/SHAKEN Implementation by filer

This document is intended for upload to the FCC Robocall Mitigation Database (RMD). It reflects NBIT's role as a reseller of hosted voice services to end-user business customers.

1. Overview

Network Builders IT (NBIT) provides hosted voice services to end-user business customers as a reseller. NBIT does not control the underlying network infrastructure necessary to implement STIR/SHAKEN authentication on the network used to originate calls. NBIT's robocall mitigation program is designed to take reasonable steps to prevent illegal robocalls from being originated using its services and to promptly investigate and address suspicious calling activity. This mitigation program applies to all calls originated by NBIT's customers using NBIT-provided voice services.

2. Customer Vetting and Onboarding

NBIT uses affirmative measures to reduce the risk that new and renewing customers will use its services to originate illegal calls. These measures include collecting and reviewing customer identity and business information during onboarding, confirming the customer's business purpose and expected use of voice services, reviewing whether requested services or anticipated calling patterns appear inconsistent with the stated business use, and rejecting, delaying, or escalating orders that present elevated fraud or robocall risk. NBIT also re-reviews customers when material changes in ownership, use case, or calling behavior are identified.

3. Monitoring and Response to Suspicious Traffic

NBIT reviews customer traffic for indicators of suspicious or potentially unlawful robocall activity, including unusual call patterns, abnormal spikes in outbound volume, short-duration or high-velocity campaigns, and activity inconsistent with the customer's stated use case. When suspicious activity is identified, NBIT may investigate, contact the customer, require additional information, suspend service, or terminate service as appropriate. These measures are intended to reduce the risk that NBIT's services are used to originate illegal robocalls.

4. Analytics

NBIT uses upstream-provider tools and internal review processes to help identify suspicious traffic patterns for investigation. Where available, these tools are used to support monitoring and escalation of potentially unlawful calling activity.

5. Know-Your-Upstream-Provider Procedures

NBIT relies on an upstream provider for the underlying hosted voice platform and network functionality. NBIT maintains knowledge of its upstream provider relationship through contractual arrangements, provider account documentation, operational contacts, and routine business review. NBIT works with its upstream provider when investigating suspicious traffic or compliance issues and maintains sufficient information to understand from whom its traffic and service capabilities are sourced.

6. Traceback Cooperation

NBIT commits to respond fully and within 24 hours to traceback requests from the FCC, law enforcement, and the industry traceback consortium, and to cooperate with investigations of suspected illegal robocalls. NBIT will maintain current contact information in the Robocall Mitigation Database for personnel responsible for robocall mitigation matters.

7. STIR/SHAKEN Explanation

NBIT is a reseller serving end-user customers and does not control the underlying network infrastructure necessary to implement STIR/SHAKEN authentication. For that reason, NBIT has not implemented STIR/SHAKEN on any portion of its own network and is filing accordingly in the Robocall Mitigation Database.

8. Ongoing Review

NBIT reviews this robocall mitigation program and updates its Robocall Mitigation Database filing when required. NBIT will update this description and related filing information when material changes occur.

Prepared for FCC Robocall Mitigation Database submission - draft based on information provided by NBIT.