February 29, 2016
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

RE: Bandwidth.com, Inc.
EB Docket No. 06-36; CY2015

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2015 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Bandwidth.com, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3031 or via email to sthomas@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/Sharon Thomas

Sharon Thomas
Consultant to Bandwidth.com, Inc.

cc: Lisa Jill Freeman - Bandwidth.com, Inc.
file: Bandwidth.com, Inc. - FCC - Other
tms: FCx1601

Enclosures
ST/im

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB Docket 06-36

Annual 64.2009(e) CPNI Certification	Covering calendar year 2015
Name of company(s) covered by this certification:	Bandwidth.com , Inc.
Form 499 Filer ID:	826134
Name of signatory:	Chris Chuang
Title of signatory:	Chief Operating Officer

1. I, Chris Chuang, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq*.

2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq*. of the Commission's rules.

3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Chris Chuang, Chief Operating Officer

2/26/16

Date

Attachments: Accompanying Statement explaining CPNI procedures

Attachment A
Statement of CPNI Procedures and Compliance

Bandwidth.com, Inc.
Statement of CPNI Procedures and Compliance

Bandwidth.com, Inc. (or "Company") has processes and procedures in place to safeguard its customers' CPNI, including call detail information, from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI. The Company trains its employees regarding its procedures for protecting CPNI on an ongoing basis and monitors the interactions of its employees with customers to ensure that procedures are being followed.

The Company does not use or permit access to CPNI to market any services outside of the total service approach as specified in 47 CFR §64.2005 and has trained its personnel that they are not to use CPNI for other marketing purposes. If the Company elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR Subpart U, including the institution of operational procedures to ensure that notification is provided and appropriate customer approval is obtained before CPNI is used or disclosed.

The Company does not disclose CPNI to any unauthorized agents, affiliates, joint venture partners or independent contractors, nor does it use CPNI to identify or track customers who call competing providers. The Company does not disclose or provide CPNI to third parties, unless the request is made pursuant to a valid subpoena, court order, or other legally authorized request.

The Company ensures that all access to CPNI is approved by a supervisor with knowledge of the FCC's CPNI requirements and has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI.

The Company does not disclose CPNI over the telephone in response to a customer-initiated telephone inquiry, unless: (1) the customer can provide the call detail information that is the subject of the inquiry without the assistance of a customer service representative; or (2) the Company calls the customer back at the telephone number of record either in response to a customer inquiry via telephone or email.

The Company has instituted authentication procedures to safeguard the disclosure of CPNI on-line. Upon initiation of service and account set up, the Company sends an email to the email address of record initially provided by the customer containing a temporary password that does not rely on account information or readily identifiable biographical information. The customer may then access his account online and establish a new password that does not rely on account information or readily identifiable biographical information. If a customer forgets his password, the company requires an email reset request from an email address of record and then resets the password and sends it to the customer's existing email address of record. Additionally, the Company has put into place procedures to notify customers whenever an account change is made, without revealing the changed information.

The Company does not disclose CPNI in-store to the extent that it may have any retail location arrangements.

In some instances involving large business subscribers with a dedicated account representative, the Company has agreements that address authentication procedures for disclosing CPNI that may differ from those described above.

The Company has procedures in place to notify law enforcement in the event of a breach of customers' CPNI and to ensure that the affected customers are not notified of the breach before the time period set forth in the FCC's rules, or, if applicable, when so authorized by law enforcement. Specifically, as soon as practicable, and in no case later than seven business days upon learning of a breach, the company will notify the U.S. Secret Service and the FBI by electronic means, as required by FCC regulations. The Company will not notify customers or disclose a breach to the public until seven full business days have passed after notification to the U.S. Secret Service and the FBI, unless it believes there is an extraordinarily urgent need to notify customers before seven days in order to avoid immediate and irreparable harm. In that instance, it will only notify such customers *after* consultation with the relevant investigating agency and will cooperate with the agency's request to minimize any adverse effects of the customer notification. If the Company receives no response from law enforcement after the seventh full business day, it will promptly proceed to inform the customers whose CPNI was disclosed of the breach. The Company will delay notification to customers or the public if requested to do so by the U.S. Secret Service or FBI. Notifications to law enforcement and customers are handled by a designated supervisor level employee responsible for managing the company's CPNI compliance.

Although it has not had any breaches, the Company has procedures in place to maintain records of all breaches discovered and notifications made to the USSS and the FBI, and to customers for a period of at least two years. Information regarding any breaches and notifications will be maintained by a designated supervisor level employee responsible for managing the company's CPNI compliance.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.