

February 27, 2009

Via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

Re: Zayo Managed Services, LLC (Form 499 Filer ID 826128)

**2007 CPNI Compliance Certification
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Zayo Managed Services, LLC, and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2008 CPNI Certification.

Very truly yours,



Brett P. Ferenchak

Enclosure

cc: Best Copy and Printing, Inc. (via e-mail)

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Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008.

Date filed: February 27, 2009

Name of company covered by this certification: Zayo Managed Services, LLC (formerly known as VoicePipe Communications, LLC)

Form 499 Filer ID: 826128

Name of signatory: John L. Scarano

Title of signatory: President

I, John L. Scarano, 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.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year, nor did any pretexters attempt to access the company's customers' CPNI.

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

Signed 

John L. Scarano
President

CERTIFICATION OF CPNI FILING
FEBRUARY 27, 2009
EB Docket No. 06-36; EB-06-TC-060

Statement of CPNI Procedures and Compliance

Zayo Managed Services, LLC (“ZMS”) provides integrated voice, data and video services to public and private sector companies. ZMS does not have any employees of its own but is managed by its indirect parent, Zayo Group, LLC (together with the ZMS, the “Company”).

ZMS does not use or permit access to CPNI to market any services outside of the “total services approach” as specified in 47 CFR §64.2005. Nor does the Company allow affiliates or third parties access to CPNI for marketing-related purposes. If ZMS elects to use CPNI in a manner that does require customer approval, it will follow the applicable rules set forth in 47 CFR §64.2001 *et seq.*, including the institution of operational procedures to ensure that the appropriate notification is provided and customer approval is obtained before CPNI is used or disclosed. ZMS will develop and implement an appropriate tracking method to ensure that customers’ CPNI approval status can be verified prior to using CPNI for marketing-related purposes. The Company will also adopt the requisite record-keeping requirements should it use CPNI in the future for marketing-related purposes.

Consistent with the Commission’s rules, ZMS uses, discloses, and permits access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of ZMS, other users, and other carriers from unlawful use; (3) providing inside wiring, installation, maintenance, and repair services; and (4) providing or marketing services that are within the same class of services to which the customer already subscribes.

ZMS does not engage in marketing when a customer makes an inbound call to ZMS. Should the ZMS change this practice, the company will, in accordance with the CPNI rules, obtain a customer’s oral authorization that ZMS’s customer service representatives may access a customer’s CPNI during the course of an inbound or outbound telephone conversation, solely for the duration of that conversation. Each such ZMS representative will be required to provide the disclosures demanded by 64.2008(c) of the CPNI rules including informing customers of their right to deny access to the CPNI before requesting this one-time consent.

ZMS will not provide CPNI without proper customer authentication and does not provide call detail records over the phone. Call detail records are provided exclusively via e-mail or U.S. mail, to the postal or electronic address of record. In order to authenticate a customer’s identity prior to disclosing CPNI, ZMS authenticates the customer using a variety of methods. ZMS will inform customers of change of address in a manner that conforms with the relevant rules.

ZMS has implemented procedures to provide law enforcement with notice should a breach of CPNI occur. After notifying law enforcement and unless directed otherwise, ZMS will notify affected customers. ZMS will maintain a record of any CPNI-related breaches for a period of at least two years.

The Company provides training concerning CPNI compliance. All employees of the Company are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by the Company. Employees of the Company who do not abide by these policies or otherwise permit the unauthorized use or disclosure of CPNI will be subject to discipline, including possible termination.