

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 Bandwidth Northwest, Inc.  
(formerly known as Northwest Telephone, Inc.)  
(Form 499 Filer ID 820522)**

**2008 CPNI Compliance Certification  
EB Docket No. 06-36**

Dear Ms. Dortch:

On behalf of Zayo Bandwidth Northwest, Inc. (formerly known as Northwest Telephone, Inc.), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the company's 2008 CPNI Certification.<sup>1</sup>

Very truly yours,



Brett P. Ferenchak

Enclosure

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

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<sup>1</sup> This certification covers the period from January 1, 2008 to May 29, 2008. A certification covering the period from May 30, 2008 to December 31, 2008, is being filed separately.

**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

<u>Names of company covered by this certification:</u>	<u>Form 499 Filer ID:</u>
Zayo Bandwidth Northwest, Inc. (formerly known as Northwest Telephone, Inc.)	820522

Name of signatory: Andrew D. Metcalfe

Title of signatory: Senior Vice President and General Manager of the Zayo Bandwidth Group's Northwest region

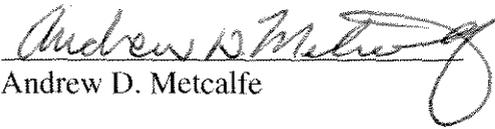
I, Andrew D. Metcalfe, was President of Northwest Telephone, Inc. (now known as Zayo Bandwidth Northwest, Inc.) ("Zayo-NW") until May 30, 2008, when Zayo-NW was acquired by Zayo Group, LLC. I am currently Senior Vice President and General Manager of the Zayo Bandwidth Group's Northwest region. No current corporate officer of Zayo-NW was an officer of Zayo-NW prior to May 30, 2008 and, therefore, no current corporate officer of Zayo-NW has personal knowledge of the representations in this Certification. For that reason, I alone am providing a declaration regarding this certification as the former President of Zayo-NW for the period of January 1, 2008 through May 29, 2008 (the "Period"). For the Period, I certify that I was an officer of Zayo-NW, and was acting as an agent of Zayo-NW, that I have personal knowledge that Zayo-NW established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.<sup>1</sup> See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining, for the Period, how Zayo-NW's procedures ensured that Zayo-NW is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

For the Period, Zayo-NW did 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 Zayo-NW's customers' CPNI.

Zayo-NW did not received any customer complaints during the Period concerning the unauthorized release of CPNI.

Signed

  
Andrew D. Metcalfe

<sup>1</sup> A separate certification covering the period from May 30, 2008 to December 31, 2008, is being filed by a current officer of Zayo-NW.

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

**Statement of CPNI Procedures and Compliance**

Prior to being acquired by Zayo Group, LLC on May 30, 2008, Zayo Bandwidth Northwest, Inc. (formerly known as Northwest Telephone, Inc.) (“Zayo-NW”) had the following operational procedures that protected its customers’ CPNI:

Zayo-NW 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 Zayo-NW 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. Zayo-NW 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, Zayo-NW 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 Zayo-NW, 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. For example, internal access to CDRs was limited to billing, technical and management personnel that required access to such records as part of their duties. In order to access CDRs, authorized employees had to provide a password.

Zayo-NW did not provide online access to customer accounts, thus no CPNI was available online.

Zayo-NW had authentication procedures for customers calling its customer service representatives. Zayo-NW’s switched voice service customers were authenticated by confirming (1) that the phone number from which the person calls is phone number for the account and/or (2) that the caller is on the list of persons authorized by the customer to make inquiries regarding the account. Zayo-NW’s transport services customers were authenticated by (1) requiring the caller to provide the circuit identification and/or (2) confirming that the caller is on the list of persons authorized by the customer to make inquiries regarding the account.

Zayo-NW did not provide call detail records (“CDR”) over the phone or by electronic mail. Instead, Zayo-NW only provided CDRs on diskette mailed to the address of record for an account or Zayo-NW personally delivered the record to the customer.

Zayo-NW's employee manual had a section devoted to protecting the confidentiality of customer information that includes CPNI and provides for disciplinary action if such policies are not followed.

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