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February 27, 2009
VIA ECFS

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

RE: EB Docket No. 06-36
2008 CPNI Certification Filing for Bandwidth.com, Inc.

Dear Ms. Dortch:

In accordance with Federal Communications Commission's Public Notice of January 7, 2009, and pursuant to 47 C.F.R. § 64.2009(e), Bandwidth.com, Inc. hereby files its Certification of Customer Proprietary Network information (CPNI) for the year 2008 and supporting Statement. As directed by the Public Notice, please include this Certification in EB Docket No. 06-36.

Please contact me at 407-740-3031 or sthomas@tminc.com if you have any questions about this filing.

Sincerely,

Sharon Thomas
Consultant to
Bandwidth.com, Inc.

ST/im.
Enclosure

cc: Best Copy and Printing FCC@BCPIWEB.COM
FCC Enforcement Bureau (2 Copies)
J. Campbell, Bandwidth.com, Inc.
File: Bandwidth.com, Inc.- FCC CPNI
TMS: FCCX0901

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 for 2008

Name of company covered by this certification: Bandwidth.com, Inc.

Form 499 Filer ID: 826134

Name of signatory: Joseph Campbell

Title of signatory: Vice President - Operations

I, Joseph Campbell, certify and state that:

1. I am the Vice President - Operations of Bandwidth.com, Inc. (the "Company") and, acting as an agent of the Company, I have personal knowledge of Bandwidth.com, Inc.'s operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.

2. I hereby certify that, to the best of my knowledge, information and belief, Bandwidth.com, Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.

3. Attached to this certification as Exhibit A 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.

4. The Company has not taken any actions against data brokers in the last year.

5. The Company did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

Joseph Campbell, Vice President - Operations

2/27/09
Date

Exhibit 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.

Bandwidth.com, Inc. 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 Bandwidth.com 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 or provide CPNI to third parties.

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.

The Company has put into place procedures to notify customers whenever an account change is made.

Bandwidth.com does not have any retail locations and therefore does not disclose CPNI in-store.

Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and to ensure that 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.

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 .

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