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February 24, 2011

Via ECFS

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

Re: Fiberlink, LLC (Form 499 Filer ID 825302)
Zayo Bandwidth Central, LLC (Form 499 Filer ID 825140)
Zayo Bandwidth Indiana, LLC (Form 499 Filer ID 825561)
Zayo Bandwidth Northeast, LLC (Form 499 Filer ID 823186)
Zayo Bandwidth Northeast Sub, LLC (Form 499 Filer ID 823184)
Zayo Bandwidth Northwest, Inc. (Form 499 Filer ID 820522)
Zayo Bandwidth Tennessee, LLC (Form 499 Filer ID 827082)
Zayo Bandwidth, LLC (Form 499 Filer ID 828003)
Local Fiber, LLC (Form 499 Filer ID 823360)

2011 CPNI Compliance Certification covering calendar year 2010
EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of Fiberlink, LLC, Zayo Bandwidth Central, LLC, Zayo Bandwidth Indiana, LLC, Zayo Bandwidth Northeast, LLC, Zayo Bandwidth Northeast Sub, LLC, Zayo Bandwidth Northwest, Inc., Zayo Bandwidth Tennessee, LLC, Zayo Bandwidth, LLC and Local Fiber, LLC (the "Zayo Bandwidth Entities"), and pursuant to 47 C.F.R. § 64.2009(e), enclosed is the Zayo Bandwidth Entities' CPNI Certification for calendar year 2010.

Respectfully submitted,



Jean L. Kiddoo
Brett P. Ferenchak

Counsel for the Zayo Bandwidth Entities

Enclosure

cc: Best Copy and Printing, Inc. (FCC@BCPIWEB.COM)

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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 2011 covering the prior calendar year 2010.

Date filed: February 24, 2011

<u>Names of companies covered by this certification:</u>	<u>Form 499 Filer ID:</u>
Fiberlink, LLC ¹	825302
Zayo Bandwidth Central, LLC ² (formerly known as Citynet Fiber Network, LLC)	825140
Zayo Bandwidth Indiana, LLC ¹ (formerly known as Indiana Fiber Works, LLC)	825561
Zayo Bandwidth Northeast, LLC ² (formerly known as PPL Telcom, LLC)	823186
Zayo Bandwidth Northeast Sub, LLC ² (formerly known as PPL Prism, LLC)	823184
Zayo Bandwidth Northwest, Inc. ¹ (formerly known as Northwest Telephone, Inc.)	820522
Zayo Bandwidth Tennessee, LLC (formerly known as Memphis Networx, LLC)	827082
Zayo Bandwidth, LLC	828003
Local Fiber, LLC ³	823360

Name of signatory: Christopher P. Yost

Title of signatory: General Counsel and Assistant Secretary

Certification:

I, Christopher P. Yost, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have

¹ On February 28, 2010, Fiberlink, LLC, Zayo Bandwidth Indiana, LLC and Zayo Bandwidth Northwest, Inc. merged with and into Zayo Bandwidth, LLC ("ZB"), with ZB surviving the mergers. ZB is, therefore, the successor in interest to these companies and provides this certification with respect to their CPNI compliance during calendar year 2010.

² On May 19, 2010, Zayo Bandwidth Northeast Sub, LLC merged with and into Zayo Bandwidth Northeast, LLC ("Zayo-NE") with Zayo-NE surviving the merger and Zayo Bandwidth Central, LLC and Zayo-NE merged with and into ZB, with ZB surviving the mergers. ZB is, therefore, the successor in interest to these companies and provides this certification with respect to their CPNI compliance during calendar year 2010.

³ On February 12, 2010, Local Fiber, LLC notified the Universal Service Administration Company ("USAC") that it no longer provided telecommunications services and relinquished its 499 Filer ID.

established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

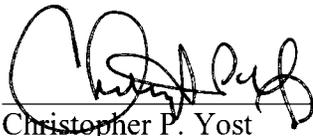
Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001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

The companies have 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.

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

The companies represent and warrant that the above certification is consistent with 47 C.F.R § 1.17 which requires truthful and accurate statements to the Commission. The companies also acknowledge 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.

Signed



Christopher P. Yost

General Counsel and Assistant Secretary

CERTIFICATION OF CPNI FILING BY THE ZAYO BANDWIDTH ENTITIES
FEBRUARY 24, 2011
EB Docket No. 06-36; EB-06-TC-060

Statement of CPNI Procedures and Compliance

Zayo Bandwidth, LLC, Zayo Bandwidth Tennessee, LLC, Local Fiber, LLC and the following entities that were merged into Zayo Bandwidth, LLC during calendar year 2010--Fiberlink, LLC, Zayo Bandwidth Central, LLC, Zayo Bandwidth Indiana, LLC, Zayo Bandwidth Northeast, LLC, Zayo Bandwidth Northeast Sub, LLC and Zayo Bandwidth Northwest, Inc.--(collectively, the "Zayo Bandwidth Entities") provide wholesale bandwidth services to other carriers, government and enterprise customers and large business customers.

The Zayo Bandwidth Entities do 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 do the Zayo Bandwidth Entities allow affiliates or third parties access to CPNI for marketing-related purposes. If any of the Zayo Bandwidth Entities 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. The Zayo Bandwidth Entities 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 Zayo Bandwidth Entities will also adopt the requisite record-keeping requirements should they use CPNI in the future for marketing-related purposes.

Consistent with the Commission's rules, the Zayo Bandwidth Entities use, disclose, and permit access to CPNI without customer approval for the purposes of: (1) billing and collecting for services rendered; (2) protecting the rights and property of the Zayo Bandwidth Entities, 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.

Zayo Bandwidth Entities do not engage in marketing when a customer makes an inbound call to one of the Zayo Bandwidth Entities. Should the Zayo Bandwidth Entities change this practice, the companies will, in accordance with the CPNI rules, obtain a customer's oral authorization that the Zayo Bandwidth Entities' 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 representative of the Zayo Bandwidth Entities 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.

The Zayo Bandwidth Entities will not provide CPNI without proper customer authentication and do 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, the Zayo Bandwidth Entities authenticate the

customer using a variety of methods. The Zayo Bandwidth Entities will inform customers of change of address in a manner that conforms with the relevant rules.

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

The Zayo Bandwidth Entities provide training concerning CPNI compliance. All employees of the Zayo Bandwidth Entities are required to maintain the confidentiality of all information, including customer information that is obtained as a result of their employment by the Zayo Bandwidth Entities. Employees of the Zayo Bandwidth Entities 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.