

Alhambra-Grantfork Telephone Company

114 Wall Street PO Box 207 Alhambra, IL 62001

618 488 2165

May 29, 2003

Fawn Romig
Sprint
Industry Compliance and Operational Network Support
6580 Sprint Parkway
Mailstop: KSOPHW0516-5B360
Overland Park, KS 66251

Via Email jadria01@sprintspectrum.com and U.S. Mail

Dear Ms. Romig:

Alhambra-Grantfork Telephone Company ("Alhambra-Grantfork") received your letter dated May 16, 2003, which contains a Bona Fide Request ("BFR") from Sprint PCS for local number portability ("LNP"). Alhambra-Grantfork believes that a number of issues need to be addressed before Alhambra-Grantfork will deploy LNP.

It is Alhambra-Grantfork's understanding that Sprint PCS does not have NXXs in Alhambra-Grantfork's service territory. Before any LNP arrangement can be put in place between Sprint and Alhambra-Grantfork, technical and regulatory issues associated with porting numbers on an intermodal basis between wireless and wireline carriers and with porting numbers outside of Alhambra-Grantfork's rate center boundaries to Sprint PCS must be resolved. The Cellular Telecommunications & Internet Association has petitioned the FCC for a declaratory ruling on this issue. Simply stated, it is problematic to address the requested intermodal porting until such time as the FCC addresses the long list of technical issues that must be resolved prior to intermodal LNP being able to function properly.

Should the technical issues associated with intermodal LNP be addressed, you should be aware that Alhambra-Grantfork is a rural telecommunications carrier as defined in Section 3 (47 U.S.C Sec. 153) of the Telecommunications Act ("the Act"). Accordingly, Alhambra-Grantfork is exempt from the requirements of Section 251(c) of the Act. Therefore, if Sprint PCS's BFR for LNP is accompanied by requests for services covered by Section 251(c) of the Act, Alhambra-Grantfork would expect Sprint PCS to follow the procedures outlined in Section 251(f)(1)(b) if it seeks to have Alhambra-Grantfork's rural exemption terminated.

As a rural carrier, Alhambra-Grantfork has the option to petition the relevant state commission for suspensions and modifications of the services covered under Sections 251(b) and (c) of the Act, including LNP. Suspensions and modifications of Section 251(b) may be granted if the requirement is unduly economically burdensome, is technically infeasible, would lead to significant adverse economic impact on end users,

and/or is inconsistent with the public interest, convenience, and necessity. Alhambra-Grantfork has performed a rough estimate of the cost of deploying LNP and has found that such a requirement would likely be economically burdensome, would cause adverse impact on Alhambra-Grantfork's end users, and would be inconsistent with the public interest given the high cost of LNP deployment, the small customer base of Alhambra-Grantfork, and the low expected use of LNP in our service territory.

If, after consideration of the above, Sprint PCS still intends to pursue its LNP request of Alhambra-Grantfork, please provide a detailed description of the type of interconnection requested by Sprint PCS and an estimate of the number of ported lines Sprint PCS expects in the affected area over the next five (5) years. Should you have any questions, please call me at 618-488-2165 or send me an e-mail at aqtcal@agtelco.com.

Sincerely,

Alvin Wilkening
General Manager