



June 24, 2003

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Reply Comments in CC Docket No. 95-116,
*Telephone Number Portability, Petition for Declaratory Ruling of the Cellular
Telecommunications & Internet Association***

Dear Ms. Dortch:

This letter is sent to you in support of the Comments filed by the Rural Telecommunications Group (RTG) on June 13, 2003 in the above-referenced proceeding in response to a Petition for Declaratory Ruling of the Cellular Telecommunications and Internet Association regarding the implementation of local number portability (LNP). ENMR•Plateau, through a family of companies, provides both local exchange and Commercial Mobile Radio Services (CMRS) in rural areas of New Mexico and Texas and will be profoundly impacted by the actions of the Federal Communications Commission (FCC) in this proceeding. The following issues are of particular concern to ENMR•Plateau and will impact its ability to provide affordable and reliable telecommunications services:

1. Without proper mechanisms, such as local interconnection facilities between the donor and recipient carrier, and well-planned direction, local number portability will only add to consumer confusion and distrust.
2. This confusion will contribute to greater irritation and costs to customers, especially if customers receive no warning that they are incurring toll charges for what were in the past local calls.
3. Rural carriers should not be required to implement LNP absent a *bona fide* request from another carrier as discussed by RTG.
4. Number portability should not negatively impact intercarrier compensation issues currently pending before the FCC or require rural carriers to incur costs for delivering calls outside their franchised or licensed service areas.

5. Should the Commission expand the scope of current LNP mandates, the Commission should also ensure that the rules do not penalize small and rural carriers by requiring, among other things, one-way porting from small to larger carriers.
6. Wireless number portability should not lead to greater expenses to be incurred by rural carriers to modify their networks to support nationwide roaming. Such roaming support is a matter for contractual negotiations between carriers.

These are just a few of the issues that concern this company. Along with RTG, we respectfully request that the Commission make clear its requirements regarding the implementation of LNP by rural carriers.

Thank you for examining these concerns and carefully reviewing the comments filed by RTG.

Respectfully,



Tom M. Phelps
Chief Executive Officer