

time and manner as Bell Atlantic's retail operations can access such information.⁵⁸⁶ We thus disagree with AT&T's suggestion that Bell Atlantic's inability to *actively* provide electronic jeopardy notices, instead of merely providing access to such information, reflects discriminatory access to its ordering functionality.⁵⁸⁷ We also disagree with NorthPoint's suggestion that Bell Atlantic must create a process for providing "notice *before* the due date that it is going to miss the due date."⁵⁸⁸ Although we recognize that a system designed to deliver jeopardy notification well in advance of missed appointments would lessen the impact of such misses, we reiterate that the standard sought in this instance is *nondiscriminatory* access to Bell Atlantic's OSS. Accordingly, we do not require Bell Atlantic to establish a system for creating and delivering jeopardy notifications to competing carriers that is superior to the system Bell Atlantic has for its own retail representatives or customers.

186. Although Bell Atlantic does not actually deliver jeopardy notices to competing carriers with respect to provisioning resale services, individual UNEs and UNE-P, we note that it has established a mechanism for actively providing such notices in connection with its hot cut process. Under the "due date minus two" procedure, Bell Atlantic is required to check for a competing carrier's dial tone two days before a hot cut due date and promptly to notify the carrier if there is a problem.⁵⁸⁹ The New York Commission recognizes that this "allows the [competitive LEC] the opportunity to notify its customer of potential delay and, if necessary, postpone the due date."⁵⁹⁰ We commend Bell Atlantic for developing this "due date minus two" jeopardy process, and find that it appears to be critical to the proper functioning of the hot cut process.

(d) Completion Notices

187. We conclude that Bell Atlantic provides order completion notification in a manner that affords an efficient competitor a meaningful opportunity to compete.⁵⁹¹ An order completion

⁵⁸⁶ In particular, we find that the regular access to Open Query System reports, in addition to real-time access to order status information through SOP and WFA, allows competing LECs access to obtain information about pending orders in substantially the same time as Bell Atlantic's retail operations.

⁵⁸⁷ See AT&T Comments at 22; AT&T Reply at 28; AT&T Crafton/Connolly Aff. at paras. 152-158; see also AT&T Dec. 15 *Ex Parte* Letter at 57.

⁵⁸⁸ See NorthPoint Comments at 16-17; see also Prism Comments at 12; Z-Tel Comments at 15.

⁵⁸⁹ See New York Commission Comments at 88; Bell Atlantic Application at 70; Bell Atlantic Reply at 10.

⁵⁹⁰ See New York Commission Comments at 88.

⁵⁹¹ The Commission has indicated in prior section 271 orders that a BOC should provide order completion notification in substantially the same time and manner as it provides such information to its retail operations. See *First BellSouth Louisiana Order*, 13 FCC Rcd at 6264-65; *BellSouth South Carolina Order*, 13 FCC Rcd at 603. See also *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20685-86 (instructing BOCs to provide competing carriers with order completion notices "in a timely and accurate manner.")

Commission's primary concern is to ensure that the information is accurate and reliable. See Bell Atlantic Miller/Jordan/Zanfini Reply Decl. at para. 52 (explaining that if a retail representative "has some need to check on a particular feature, he or she would pull up the customer's CSR or the service order."); New York Commission Comments at 42 (indicating that ordering metrics have no retail analogue). Given the New York Commission and

notice informs a competing carrier that Bell Atlantic completed the installation of the service requested by the particular order, which provides notice to the carrier that it has responsibility for the customer's care and may begin billing the customer for service.⁹⁹² Until the competing carrier receives a completion notice, the carrier does not know that the customer is in service, and cannot begin billing the customer for service or addressing any maintenance problems experienced by the customer.⁹⁹³ Thus, untimely receipt of order completion notices directly impacts a competing carrier's ability to serve its customers at the same level of quality that Bell Atlantic provides to its retail customers.⁹⁹⁴ Accordingly, the Commission has instructed a section 271 applicant to demonstrate that it provides competing carriers with order completion notices in a timely and accurate manner.⁹⁹⁵ The BOC must minimize any delay between the actual installation of service and the competing carrier's receipt of an order completion notice.⁹⁹⁶

188. We base our finding that Bell Atlantic provides sufficient order completion notification on Bell Atlantic's provision of both "billing completion" and "work completion" notices to competing carriers. Bell Atlantic sends billing completion notices when an order is recorded as completed in Bell Atlantic's billing systems.⁹⁹⁷ Specifically, after Bell Atlantic's Service Order Processor (SOP) passes order completion information to Bell Atlantic's billing systems (CRIS), the billing records are updated overnight and billing completion notices are sent the following day.⁹⁹⁸ In August 1999, Bell Atlantic began providing "work completion" notices (also referred to as a "provisioning completion" or "field completion" notice) to inform carriers of the completion of the work associated with an order.⁹⁹⁹ For orders requiring physical work, when

Bell Atlantic's conclusions that a retail analogue does not exist, and in absence of a credible retail analogue in the record, we find for purposes of this application that Bell Atlantic must demonstrate that it provides completion notification sufficient to allow an efficient competitor a meaningful opportunity to compete.

⁹⁹² See *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20685; *BellSouth South Carolina Order*, 13 FCC Rcd at 615; *Ameritech Michigan Order*, 12 FCC Rcd at 20650 n.512. See also *Performance Measurements NPRM*, 13 FCC Rcd at 12847.

⁹⁹³ *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20685-86.

⁹⁹⁴ *First BellSouth Louisiana Order*, 13 FCC Rcd at 6265 (indicating that "order status notices have a direct impact on a new entrant's ability to serve its customers, because they allow competing carriers to monitor the status of their resale orders and to track the orders both for their customers and their own records.").

⁹⁹⁵ *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20686. See also *First BellSouth Louisiana Order*, 13 FCC Rcd at 6265; *BellSouth South Carolina Order*, 13 FCC Rcd at 615.

⁹⁹⁶ *Second BellSouth Louisiana Order*, 13 FCC Rcd at 20685-86; *BellSouth South Carolina Order*, 13 FCC Rcd at 615.

⁹⁹⁷ See *Bell Atlantic Miller/Jordan Decl.* at para. 50; *Bell Atlantic Dowell/Canny Decl.* at para. 46 ("For every order completed in the Billing system, a completion notice has been sent.").

⁹⁹⁸ *Bell Atlantic Dowell/Canny Decl.* at para. 46.

⁹⁹⁹ *Bell Atlantic Dowell/Canny Decl.* at para. 48; *Bell Atlantic Miller/Jordan Decl.* at para. 51; see also *New York Commission Comments* at 49; *NYPSC Additional Guidelines Order* at 16 (noting that in Carrier Working Group meetings during August and September Bell Atlantic offered to notify competing carriers when the work completion has been entered into its service order processing system).