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**Richard C. Fipphen**  
Assistant General Counsel



February 3, 2015

Honorable Kathleen H. Burgess  
Secretary  
New York Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

***Re: Matter 15- \_\_\_\_ – Petition of Verizon New York Inc. for Limited Orders  
of Entry for 25 Multiple-Dwelling Unit Buildings in the City of New York***

Dear Secretary Burgess:

Enclosed please find the Petition of Verizon New York Inc. for Limited Orders of Entry for 25 Multiple-Dwelling Unit Buildings in the City of New York.

Each respondent named in the Petition has been served with a paper copy of the Petition and accompanying Exhibit 1. Due to its size, a paper copy of Exhibit 2 has not been provided to each respondent. Instead, Exhibit 2 has been posted on a public webpage and can be found at [http://www22.verizon.com/about/community/nypsc\\_petitions.htm](http://www22.verizon.com/about/community/nypsc_petitions.htm).

If any of the respondents believe that they have been included in this Petition in error or are now willing to allow a survey of their property in preparation for installation of Verizon's cable television facilities at their building, they should contact me at the above email address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard C. Fipphen".

Richard C. Fipphen

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
Orders of Entry for 25 Multiple-Dwelling Unit  
Buildings in the City of New York**

**Matter 15-\_\_\_\_\_**

**PETITION FOR LIMITED ORDERS OF ENTRY**

Verizon New York Inc. (“Verizon”) respectfully submits this Petition for Limited Orders of Entry, pursuant to 16 NYCRR § 898.4, allowing Verizon to conduct a pre-installation survey at 25 multiple-dwelling unit buildings (“MDUs”) in the City of New York. In support of this Petition, Verizon states as follows:

**Specific Location of the Properties**

1. Verizon seeks to conduct a pre-installation survey, in preparation for future installation of cable television facilities, at the 25 MDUs listed in Exhibit 1. Each MDU is a residential building; the number of living units in each MDU is set forth in column D of Exhibit 1. The owner or managing agent of each MDU listed on Exhibit 1 has either: (1) failed to respond to Verizon’s letters requesting access for purposes of performing a pre-installation survey, or (2) affirmatively denied Verizon’s request for access. Column I of Exhibit 1 sets forth the type of response received for each building.

**Owners and Agents**

2. The names of the current owners and managing agents of each MDU are listed in Columns E, F and G of Exhibit 1.

### **Description of the Work to be Performed**

3. By this Petition, Verizon seeks permission to enter each MDU to conduct a pre-installation survey, in preparation for future installation of Verizon's cable television facilities at the MDU, to allow Verizon to provide cable television service to residents in the MDU.

### **Proof of Service of Notice of Intention to Install Cable Television Facilities and Service**

4. Each MDU owner and/or managing agent received two letters from Verizon. Each letter was accompanied by a Notice of Intention to Install Cable Television Facilities and Service, as required by 16 NYCRR Part 898. Mailing dates of the notices for each building are set forth in Column H of Exhibit 1. Supporting documentation is provided in Exhibit 2.

### **Name of the Individual Responsible for Installation**

5. Alyson Seigal, Verizon, 140 West Street, New York, NY, is the person primarily responsible for the proposed pre-installation surveys.

### **Indemnification**

6. Verizon warrants that it will bear the entire cost of each survey. Verizon further warrants that it will indemnify the owner of each MDU for any damage that may be caused by Verizon in connection with the survey.

### **Pre-Installation Survey Work will be Conducted Without Prejudice to the Owner's Right to Receive Just Compensation**

7. The proposed pre-installation survey work will be conducted without prejudice to the rights of the owner of each MDU to receive just compensation in accordance with 16 NYCRR § 898.2.

### **Summary of Verizon's Efforts to Gain Entry to the Buildings for the Pre-Installation Surveys**

8. Verizon's formal efforts are set forth in Column H of Exhibit 1.

**Opportunity for the Owner to Answer the Petition**

9. The owner of each MDU listed in Exhibit 1 has twenty (20) days from receipt of this Petition to file an answer. The answer must be responsive to this Petition and may set forth any additional matter not contained herein.

**WHEREFORE**, Verizon respectfully requests that the Commission grant Verizon the relief requested herein and issue an Order pursuant to 16 NYCRR § 898.4 permitting Verizon to conduct a pre-installation survey at each MDU, together with such other relief as the Commission may deem just and proper.

Respectfully submitted,



RICHARD C. FIPPHEN  
140 West Street, 6<sup>th</sup> Floor  
New York, New York 10007  
(212) 519-4718

Counsel for Verizon New York Inc.

Dated: New York, New York  
February 3, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
Orders of Entry for 25 Multiple-Dwelling Unit  
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**Matter 15-\_\_\_\_\_**

**AFFIRMATION OF KEEFE B. CLEMONS**

Keefe B. Clemons, an attorney admitted to practice in the courts of the State of New York, affirms under penalty of perjury, pursuant to CPLR 2106, as follows:

1. I am an officer of the petitioner Verizon New York Inc.
2. I am not a party to this action.
3. I have read the foregoing Petition and I know its contents. To the best of my

knowledge, based on information provided to me by employees of the Petitioner and its affiliates, the foregoing Petition is true.



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**KEEFE B. CLEMONS**

Dated: New York, New York  
February 3, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

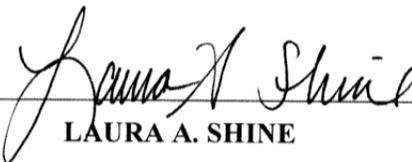
**Petition of Verizon New York Inc. for Limited  
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**Matter 15-\_\_\_\_\_**

**DECLARATION OF LAURA A. SHINE**

A copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 25 Multiple-Dwelling Unit Buildings in the City of New York was sent on February 3, 2015 by First Class U.S. Mail to the persons on the attached Service List.

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

  
LAURA A. SHINE

Dated: New York, New York  
February 3, 2015

## SERVICE LIST

Brendan O'Sullivan  
146 Valentine Street  
Yonkers, NY 10704

3410 Kingsbridge LLC  
Attn: David Radoncic  
3425 Kingsbridge Avenue  
Bronx, NY 10463

163rd Street Improvement Council, Inc.  
Attn: Cassandra Perry  
490 East 167th Street  
Bronx, NY 10456

6555 Realty LLC  
c/o Edel Family Management Corp.  
Attn: Michael Edelstein  
2207 Coney Island Avenue  
Brooklyn, NY 11223

Lantower Realty LLC  
Attn: Ralph Mandelbaum  
3150 Bailey Avenue  
Bronx, NY 10463

Highbridge Community HDFC  
Attn: Mark Mazzella  
1465 Nelson Avenue  
Bronx, NY 10452

Hema LLC  
c/o Matel Realty LLC  
Attn: Tenna Rubinfeld  
303 East 6th Street  
New York, NY 10003

Oxford Realty LLC  
c/o Harlington Realty Co. LLC  
Attn: Jeff Stern  
156A East 83rd Street  
New York, NY 10028

280 Crown St. LLC  
c/o Hager Management Inc.  
Attn: Naftali Hager  
266 Broadway, Suite 604  
Brooklyn, NY 11211

300 Sullivan Place LLC  
c/o IMK Management LLC  
Attn: Isaac Heimovits  
1522 41st Street  
Brooklyn, NY 11218

Montgomery Realty Associates, LLC  
c/o Hager Management Inc.  
Attn: Naftali Hager  
266 Broadway, Suite 604  
Brooklyn, NY 11211

305 Linden LLC  
Attn: Joe Gugenheim  
2071 Flatbush Avenue, Suite 28  
Brooklyn, NY 11234

265 Hawthorne Street HDFC  
c/o Pratt Area Community Counsel  
Attn: Stephanie Blue  
201 Dekalb Avenue  
Brooklyn, NY 11205

Linden166 LLC  
Attn: Joe Gugenheim  
2071 Flatbush Avenue, Suite 28  
Brooklyn, NY 11234

Marine Equities Washington LLC  
c/o Meridian Properties, LLC  
Attn: James Demetriades  
310 85th Street, Apt. 2  
Brooklyn, NY 11209

Gus Sideratos Associates, L.P.  
Attn: Gus Sideratos  
8371 Shore Road  
Brooklyn, NY 11209

311 East 25th Owners Corp.  
c/o Empire Management  
Attn: Jonathan Nagin  
347 5th Avenue, 16th Floor  
New York, NY 10016

60 Ellwood, LLC  
Attn: Edith Cardona  
1601 Bronxdale Avenue, Apt. 201  
Bronx, NY 10462

4966 B'way Realty Inc.  
Attn: Nikitas Drakotos  
5047 Broadway  
New York, NY 10034

Katmick Realty LLC  
Attn: Michael Frank  
52-27 35th Street  
Long Island City, NY 11101

8520 Realty LLC  
Attn: George Butsikaris  
9210 4th Avenue  
Brooklyn, NY 11209

1389 Construction Corp.  
Attn: Inez Dickens  
2153 7th Avenue  
New York, NY 10027

1610-1618 St Nicholas Ave, LLC  
Attn: Nick Conway  
31-10 37th Avenue, Apt. 500  
Long Island City, NY 11101

574 West Realty, LLC  
Attn: Jeri Glaser  
574 West 192nd Street, Basement  
New York, NY 10040

4260 Broadway Condominium  
c/o Argo Real Estate LLC  
Attn: Hedda Lennon  
50 West 17th Street  
New York, NY 10011