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.

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,

Richard C. Fipphen
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,

[Signature]

RICHARD C. FIPPHEN
140 West Street, 6th 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 Buildings in the City of New York

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.

[Signature]

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 Orders of Entry for 25 Multiple-Dwelling Unit Buildings in the City of New York

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.

Dated: New York, New York
February 3, 2015

[Signature]
LAURA A. SHINE
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