

140 West Street  
6<sup>th</sup> Floor  
New York, NY 10007  
(212) 519-4717



**Joseph A. Post**  
Deputy General Counsel – NY

August 25, 2016

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

***Re: Matter 16-\_\_\_\_ – Petition of Verizon New York Inc. for Orders of Entry  
for 34 Multiple-Dwelling Unit Buildings in the City of New York***

Dear Secretary Burgess:

Enclosed please find the Petition of Verizon New York Inc. for Orders of Entry for 34 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 34 properties. Verizon requests that orders of entry be issued by the Commission directing the owner of each building to permit Verizon to install cable television facilities, as provided in Section 898.4(b)(9) of the Commission's Rules.

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).

**Respondents: If you believe that your building was included in this Petition in error or you are now willing to allow installation of Verizon's cable television facilities, the quickest and most efficient way of letting us know is to send an email to [228correspondence@verizon.com](mailto:228correspondence@verizon.com). We will review and follow up on your email promptly. Please include in the email message your name, company, telephone number, email address and the address of the building (as it appears on Exhibit 1 of the Petition).**

Respectfully submitted,

A handwritten signature in black ink that reads "Joseph A. Post".

Joseph A. Post

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of  
Entry for 34 Multiple-Dwelling Unit Buildings in  
the City of New York**

**Matter 16-\_\_\_\_\_**

**PETITION FOR ORDERS OF ENTRY**

Verizon New York Inc. (“Verizon”) respectfully submits this Petition for Orders of Entry, pursuant to 16 NYCRR § 898.4, allowing Verizon to install fiber-optic facilities to provide cable television service at 34 multiple-dwelling unit (“MDU”) buildings in the City of New York. In support of this Petition, Verizon states as follows:

**Specific Location of the Properties**

1. Verizon seeks to install fiber-optic facilities to provide cable television service at the 34 MDUs listed in Exhibit 1. Each MDU is a residential building; the address of each MDU is set forth in Columns B and C of Exhibit 1.

**Owners and Agents**

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

**Description of the Work to be Performed**

3. By this Petition, Verizon seeks permission to install fiber-optic facilities to provide cable television services to residents and businesses in each building. These fiber-optic facilities will also allow Verizon to provide voice telephony and broadband services in the building. Pre-installation surveys of each property have been completed. Column H of Exhibit 1 sets forth the type of installation that Verizon intends to use for each building.

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

4. After several unsuccessful attempts by Verizon to secure permission to start the proposed fiber-optic installation, each owner and/or managing agent received a letter from Verizon along with a Notice of Intent to Install Cable Television Facilities. Mailing dates of the notices for each building are set forth in Column G 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 installations.

### **Indemnification**

6. Verizon warrants that it will bear the entire cost of each installation. Verizon further warrants that it will indemnify the owner of each building for any damage that may be caused by Verizon in connection with the installation, and that it has insurance covering such installation, proof of which can be produced upon request.

### **Installation Work Will Be Conducted without Prejudice to the Owner's Right to Receive Just Compensation**

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

### **Summary of Verizon's Efforts to Gain Entry to the Buildings**

8. Verizon's formal efforts to gain entry to the identified properties are set forth in Column G of Exhibit 1. In addition to those efforts, Verizon has attempted to contact the owners and managing agents by telephone and/or e-mail to secure access to the properties, without success. Verizon has been unable to obtain access to install its facilities for reasons that may

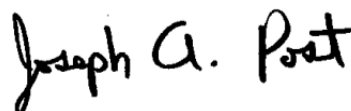
include, but are not necessarily limited to, refusals to permit access, delays by building owners or managing agents in communicating with Verizon or in reaching a decision, and requests to defer work by Verizon pending building renovations or other activity. Verizon will continue attempting to work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

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

9. The owner of each building listed on 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 matters 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 install cable television facilities at each building, together with such other relief as the Commission may deem just and proper.

Respectfully submitted,



JOSEPH A. POST  
140 West Street, 6<sup>th</sup> Floor  
New York, New York 10007  
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: August 25, 2016

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of  
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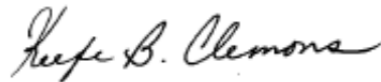
**Matter 16-\_\_\_\_\_**

**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. To the best of my knowledge, based on information provided 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  
August 25, 2016

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of  
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**DECLARATION OF LAURA A. SHINE**

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Orders of Entry for 34 Multiple-Dwelling Unit Buildings in the City of New York was sent on August 25, 2016 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  
August 25, 2016

## SERVICE LIST

Mill Berkley LLC  
c/o The Downtown LLC  
Attn: Henry Stallings  
190 East 7th Street  
New York, NY 10009

14 East 75th Street Inc.  
c/o Maxwell-Kates, Inc.  
Attn: Peter Pretsfelder  
9 East 38th Street, 6th Floor  
New York, NY 10016

SP 20 Park LLC  
c/o Stonehenge Management LLC  
Attn: Ray Seelall  
888 Seventh Avenue, 3rd Floor  
New York, NY 10106

LPF Sagamore, Inc.  
c/o Bozzuto Management Company  
Attn: Chris Johnson  
189 West 89th Street, Leasing Office  
New York, NY 10024

Washington Heights West Harlem HDFC  
c/o Heritage Health and Housing, Inc.  
Attn: Richard Fowler  
416 West 127th Street, Office  
New York, NY 10027

41 West 96th Street Corp.  
c/o Orsid Realty Corp.  
Attn: Phil Syskrot  
1740 Broadway, 2nd Floor  
New York, NY 10019

80 Fort Washington LP  
c/o Newcastle Realty Services, LLC  
Attn: Ashley Brun  
270 Madison Avenue, 19th Floor  
New York, NY 10016

JC Realty, LLC  
Attn: Costas Christoforou  
54 Annandale Drive  
Commack, NY 11725

2349 Benson LLC  
Attn: Giovanni DiMaggio  
2266 Bath Avenue, PMB 218  
Brooklyn, NY 11214

Mosconi & Oppizzi, LLC  
Attn: Louisa Mosconi  
2227 East 65th Street, 1st Floor  
Brooklyn, NY 11234

1439 Realty LLC  
c/o Lilmor Management LLC  
Attn: David Gluck  
2003 Avenue J, #1C  
Brooklyn, NY 11210

Foster Ocean Realty 2325, LLC  
Attn: Tzvi Hecht  
1208 Avenue M, #2236  
Brooklyn, NY 11230

Taryag Realty Corp.  
Attn: Joseph Weinreb  
935 Woodland Drive  
Lakewood, NJ 08701

87-01 Midland Parkway Realty Corp.  
c/o JC Management Services, LLC  
Attn: John Coco  
28-60 31st Street  
Astoria, NY 11102

Napa Partners, LLC  
Attn: Robin Ignico  
244 Fifth Avenue, #2201  
New York, NY 10001

Corona Ventura LLC  
c/o Ventura Land Corp.  
Attn: Steven Norman  
149-45 Northern Boulevard, #6V  
Flushing, NY 11354

Eve Realty Co. LLC  
Attn: Tricia Feggoudakis  
142-30 Sanford Avenue, #1U  
Flushing, NY 11355

James McKay, LLC  
Attn: Christopher Vasilakos  
7416 6th Avenue  
Brooklyn, NY 11209

Richmond Hill 108 LLC  
c/o Bronstein Properties, LLC  
Attn: Bill Gamba  
108-18 Queens Boulevard, #302  
Forest Hills, NY 11375

M & A Condominium  
c/o Kyrous Realty Group Inc.  
Attn: Harriet Kyrous  
263 West 38th Street, #15E  
New York, NY 10018



15 East 11th Street Condominium  
c/o Newmark Grubb Knight Frank  
Attn: Eric Bassin  
125 Park Avenue, 11th Floor  
New York, NY 10017

Whalsingham Holdings LLC  
c/o Prospect Heights Realty Corp.  
Attn: Ron McLaren  
616 Vanderbilt Avenue  
Brooklyn, NY 11238

Hoffman & Hoffman LLC  
c/o Bushburg Properties Inc.  
Attn: Joe Milstein  
3611 14th Avenue, #400  
Brooklyn, NY 11218

86th Apartment Corp.  
c/o Vintage Real Estate Services, Ltd.  
Attn: Jeffrey Friedman  
11-11 44th Drive  
Long Island City, NY 11101

51 Hamilton Place Realty Inc.  
Attn: Romulo Guerrero  
51 Hamilton Place, #3  
New York, NY 10031

Audubon Realty LLC  
c/o Successful Management Corp.  
Attn: Edwin Algarin  
145 West 71st Street, #1A  
New York, NY 10023

Ft. Washington Equities Ltd.  
Attn: Elbio Lopez  
369 East 62nd Street  
New York, NY 10065

Wadsworth Ventura Associates 367 LLC  
c/o Ventura Land Corp.  
Attn: Juan Feliciano  
149-45 Northern Boulevard, #6V  
Flushing, NY 11354

The Heights Condominium  
Attn: Rosa Gargano  
8311 Ridge Boulevard  
Brooklyn, NY 11209

Spartan Holdings, LLC  
c/o America Realty, LLC  
Attn: Joe Azoulay  
38-08 Bell Boulevard  
Bayside, NY 11361

50 Gramercy Park North Owners Corp.  
c/o Brown Harris Stevens Residential Management, LLC  
Attn: Arthur Ostafin  
770 Lexington Avenue, 5th Floor  
New York, NY 10065

Big Ideas Development LLC  
Attn: Kelly Raposo  
132 Woodpoint Road  
Brooklyn, NY 11211

Rallis Family Limited Partnership  
Attn: Irene Rallis  
141 78th Street  
Brooklyn, NY 11209

Rallis Family Limited Partnership  
Attn: Irene Rallis  
141 78th Street  
Brooklyn, NY 11209