

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



Joseph A. Post
Deputy General Counsel – NY

October 14, 2016

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

Re: Matter 16-____ – Petition of Verizon New York Inc. for Limited Orders of Entry for 29 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 29 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.

Respondents: If you believe that your building was included in this Petition in error or you are now willing to allow a survey of the property in preparation for 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. 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 Limited
Orders of Entry for 29 Multiple-Dwelling Unit
Buildings in the City of New York**

Matter 16-_____

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 29 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 29 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 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 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 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, and that it has insurance covering such pre-installation survey work, proof of which can be produced upon request.

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 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 for the Pre-Installation Surveys

8. Verizon's formal efforts 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 survey the properties 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 the survey by Verizon pending building renovations or other activity. Verizon will continue attempting to

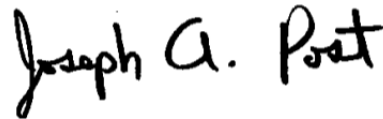
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

Opportunity for the Owner to Answer the Petition

9. The owner of each 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,

A handwritten signature in black ink that reads "Joseph A. Post". The signature is written in a cursive, slightly slanted style.

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

Counsel for Verizon New York Inc.

Dated: New York, New York
October 14, 2016

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited
Orders of Entry for 29 Multiple-Dwelling Unit
Buildings in the City of New York**

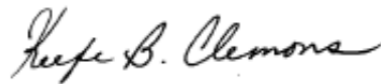
Matter 16-_____

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.



KEEFE B. CLEMONS

Dated: New York, New York
October 14, 2016

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited
Orders of Entry for 29 Multiple-Dwelling Unit
Buildings in the City of New York**

Matter 16-_____

DECLARATION OF LAURA A. SHINE

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 29 Multiple-Dwelling Unit Buildings in the City of New York was sent on October 14, 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
October 14, 2016

SERVICE LIST

Norfolk Apartments LP
c/o Stanton Norfolk Inc.
Attn: Hsueh Lam Yan
141 Norfolk Street, Ground Floor
New York, NY 10002

1202 Avenue U Realty Corp.
Attn: William Ryan
P.O. Box 90007
Staten Island, NY 10309

WHGA Mannie L. Wilson Towers HDFC
c/o West Harlem Group Assistance
Attn: Rhonda Spain
1652 Amsterdam Avenue, Front 1
New York, NY 10031

East of Manhattan Apts., Inc.
c/o Associated Development Corp.
Attn: Thomas Naples
213-09 41st Avenue, #1E
Flushing, NY 11361

Hilltop Village Cooperative #One, Inc.
c/o AKAM Associates, Inc.
Attn: Jay Strobing
87-50 204th Street, Management Office
Hollis, NY 11423

84 Associates
Attn: Florence Rose
140 Crabapple Road
Manhasset, NY 11030

Vicki's Realty LLC
Attn: Georgia Babulas
56-45 Van Cleef Street
Flushing, NY 11368

Richmond Hall Realty, Corp.
Attn: Alexander Assejew
89-03 104th Street, #3B
Richmond Hill, NY 11418

Twenty-Three-One-Nought-W, LLC
Attn: Martin Rooney
4318 Martha Avenue, 2nd Floor
Bronx, NY 10470

Bainbridge Avenue Properties
c/o Norwax Associates Inc.
Attn: Carlos Ramirez
73 Market Street, #376
Yonkers, NY 10710

2850 Creston, LLC
c/o CYA Management
Attn: Cheryl Saunders
11 Avenue F, 3rd Floor
Brooklyn, NY 11218

PIO/VIP HDFC
c/o Building Management Associates, Inc.
Attn: Latoya Allen
885 Bruckner Boulevard
Bronx, NY 10459

Crotona Park Estates HDFC, Inc.
Attn: Yesenia Santana
920 Prospect Avenue, Management Office
Bronx, NY 10459

Roo Realty Corp.
Attn: Surajam Samaroo
416 Theriot Avenue, #1
Bronx, NY 10473

Townsend Avenue Enterprises LP
c/o Prestige Management Inc.
Attn: Roselyn Gaspard
54 East 179th Street, Ground Floor
Bronx, NY 10453

CPE HDFC, Inc.
c/o Advantage Property Management Services LLC
Attn: Latisha Baker
477 Madison Avenue, 6th Floor
Bronx, NY 10022

203 43rd Owners Corp.
c/o Harlington Realty Co. LLC
Attn: Jeff Stern
156A East 83rd Street
New York, NY 10028

58-35 Utopia Parkway Corp.
Attn: Paul Alicanti
58-35 182nd Street, #3A
Flushing, NY 11365

Stella 78 LLC
Attn: Salvatore Gaudio
30 Shelter Rock Road
Manhasset, NY 11030

United Cerebral Palsy HDFC
c/o Joseph Belsky House
Attn: Elaine Hudson
140 Lawrence Avenue
Brooklyn, NY 11230

Greater Harlem HDFC
c/o ELH Mgmt. LLC
Attn: Mathew Czachor
16 Court Street, #800
Brooklyn, NY 11241

870 St. Nicholas Ave. LLC
c/o Liberty Realty & Management
Attn: Edwin Torres
653 East 189th Street
Bronx, NY 10458

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

4717 Realty LLC
c/o Theo Management Corporation
Attn: George Theodosopoulos
254-24 Northern Boulevard
Little Neck, NY 11362

110 Corona LLC
Attn: Medhat Mohamed
64-05 211th Street
Bayside, NY 11364

68-DTK Realty, LLC
c/o Gabriel Management Corp.
Attn: David Kra
25-83 Francis Lewis Boulevard
Bayside, NY 11358

Audley Street Realty LLC
c/o MJB Corporation
Attn: David Waxenberg
73 Market Street, #376
Yonkers, NY 10710

Beige Family Realty Company LLC
Attn: Dick Roche
120-08 Jamaica Avenue
Richmond Hill, NY 11418

915 84th Street LLC
c/o Lilmor Management LLC
Attn: David Gluck
2003 Avenue J, #1C
Brooklyn, NY 11210