

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



Joseph A. Post
Deputy General Counsel – NY

November 8, 2017

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

Re: Matter 17- ____ – Petition of Verizon New York Inc. for Limited Orders of Entry for 19 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 19 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://www.verizon.com/nypscpetitions>.

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 19 Multiple-Dwelling Unit
Buildings in the City of New York**

Matter 17-_____

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 19 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 19 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

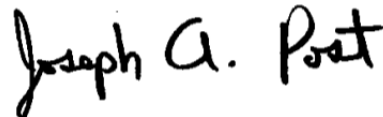
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

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, NY 10007
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: New York, New York
November 8, 2017

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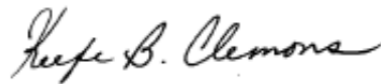
Matter 17-_____

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
November 8, 2017

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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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 Limited Orders of Entry for 19 Multiple-Dwelling Unit Buildings in the City of New York was sent on November 8, 2017 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
November 8, 2017

SERVICE LIST

Bridgeview Garden Apartments, LLC
Attn: Halil Brkani
52 Duncan Street
Staten Island, NY 10304

285 Driggs Avenue Condominium
c/o Leiter Property Management
Attn: Durim Hasangjekaj
750 Grand Street, #5S
Brooklyn, NY 11211

KT Owners, LLC
c/o Metropolitan Property Services, Inc.
Attn: Halil Ljesnjanin
141-50 85th Road
Briarwood, NY 11435

FCG 710 Avenue S LLC
Attn: Moses Berkowitz
199 Lee Avenue, #162
Brooklyn, NY 11211

Gleason LLC
c/o SKYC Management LLC
Attn: Shimon Greisman
1419 60th Street
Brooklyn, NY 11219

Sajo Realty Corp.
Attn: Isaac Rubinfeld
1413 Avenue J, 2nd Floor
Brooklyn, NY 11230

2465 Crotona LLC
c/o Rose Hill Asset Management Corp.
Attn: John Colangelo
1133 Westchester Avenue, #N006
White Plains, NY 10604

949 Park Avenue Condominium
c/o Camelot Property Management Services Corp.
Attn: Valerie Fiume
3 West 30th Street, 5th Floor
New York, NY 10001

321 West 55th Street Apartments, Inc.
c/o Gumley-Haft LLC
Attn: Beth Ocera
415 Madison Avenue, 5th Floor
New York, NY 10017

299 Henry Apartment Corp.
c/o Adventure Properties, Inc.
Attn: George Likokas
70 Clark Street, #1A
Brooklyn, NY 11201

225 15th Street Realty LLC
Attn: Theodhori Dhiamanti
138 Union Street, #1B
Brooklyn, NY 11231

93 Sixth Avenue Corp.
Attn: Mokthar Issa
261 Flatbush Avenue
Brooklyn, NY 11217

125 Prospect Park West Tenants Corp.
c/o TKR Property Services, Inc.
Attn: Anthony Cucurullo
430 16th Street
Brooklyn, NY 11215

The Waterview Condominium II
c/o All Care Management
Attn: Simon Eisenfeld
85 Skillman Street
Brooklyn, NY 11205

170 Lexington LLC
Attn: Richard Wong
9 Oliver Street, #2
New York, NY 10038

Delter Realty LLC
c/o Pine Management, Inc
Attn: Thomas Rohlman
78 Manhattan Avenue, Basement Office
New York, NY 10025

M.R.B. Realty Corp.
c/o Giamco Realty Corp.
Attn: Michael Brusco
142 West 92nd Street, #1B
New York, NY 10025

Etan LLC
Attn: Joseph Cohen
124-19 Metropolitan Avenue
Kew Gardens, NY 11415

The 297 Driggs Avenue Condominium
c/o Building Equity Management LLC
Attn: Jarred Mimc
1261 Broadway, #812
New York, NY 10001