February 6, 2015

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

Re: Case 15-V-____ – Petition of Verizon New York Inc. for Orders of Entry for 30 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 30 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 30 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.

If any of the respondents believe that they have been included in this Petition in error or are now willing to allow 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 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 30 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 30 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 in Exhibit 1 has either: (1) failed to respond to Verizon’s letters requesting access to install fiber-optic facilities to provide cable television service, 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 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 J 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 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 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.

**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 the rights of the owner of each building 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 H 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.

**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,

[Signature]

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

Counsel for Verizon New York Inc.

Dated: February 6, 2015
STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION  

Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York  

Case 15-V-______

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.

______________________________
KEEFE B. CLEMONS

Dated: New York, New York
February 6, 2015
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York

Case 15-V-_______

DECLARATION OF LAURA A. SHINE

A copy of the Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York was sent on February 6, 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 6, 2015

[Signature]
LAURA A. SHINE
SERVICE LIST

Corner 1st and 15th, LLC
c/o Sg2 Management LLC
Attn: Aaron Feldman
25 West 45th Street, Suite 505
New York, NY 10036

Highline Properties, LLC
Attn: Afshin Dilmanian
35 North Tyson Avenue, Room 102
Floral Park, NY 11001

108-110 Duane LLC
c/o Taube Management Realty LLC
Attn: Frank Fish
655 Third Avenue, 29th Floor
New York, NY 10017

Perla's Pueblo Condominium
c/o Barton Management LLC
Attn: Georgia Lombardo-Barton
10 East 39th Street, Suite 906
New York, NY 10016

Kimberly Condominium
c/o ABC Management Corporation
Attn: Seth Weinstein
152 West 57th Street, 12th Floor
New York, NY 10019

Greenpoint Associates
c/o Related Management Company, LP
Attn: Betty Perry
1450 Gateway Boulevard
Far Rockaway, NY 11691

2403 Hoffman Street, LLC
c/o H.S.C. Management Corp.
Attn: Josh Koppell
850 Bronx River Road
Yonkers, NY 10708

2155 Morris, LLC
Attn: Jay Newhouse
16 Squadron Boulevard, Room 106
New City, NY 10956

Avuben Realty LLC
Attn: Jay Rawicki
2557 Marion Avenue, Room 1B
Bronx, NY 10458

Nelson-Anderson Affordable Housing L.P.
c/o Sandra Erickson Real Estate Inc.
Attn: Sandra Erickson
1394 Clay Avenue, Apt. 1C
Bronx, NY 10456
709–715 Fairmont Place Owner, LLC
c/o Langsam Properties Services
Attn: Edith Cardona
1601 Bronxdale Avenue
Bronx, NY 10462

834 Fifth Avenue Corporation
c/o Brown Harris Stevens Residential Management, LLC
Attn: Eamon Early
770 Lexington Avenue, 4th Floor
New York, NY 10065

The MHG Family Limited Partnership
c/o Rialto Management Corp.
Attn: Scott Lerman
872 Madison Avenue, Apt. 2A
New York, NY 10021

Park-81st Corp.
c/o Tudor Realty Services Co.
Attn: Sam Hess
250 Park Avenue South, 4th Floor
New York, NY 10003

Momco Enterprises LLC
c/o Pan Am Equities Inc.
Attn: John Cacaj
18 East 50th Street, 10th Floor
New York, NY 10022

Suru Realty LLC
c/o Cornerstone Management Systems, Inc.
Attn: Allen Abbani
271 Madison Avenue, Suite 800
New York, NY 10016

Suru Realty LLC
c/o Cornerstone Management Systems, Inc.
Attn: Allen Abbani
271 Madison Avenue, Suite 800
New York, NY 10016

222 Riverside Drive Condominium
c/o Douglas Elliman Property Management
Attn: Martin Brooks
675 Third Avenue
New York, NY 10017

Bridge No. 50 Condominium
Attn: Salvatore Fanara
50 Bridge Street, Suite 501
Brooklyn, NY 11201

53-63 Partners, LP
c/o The Scharfman Organization
Attn: Mark Scharfman
111 North Central Park Avenue, Suite 400
Hartsdale, NY 10530