June 2, 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 40 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 40 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: Please contact me at richard.fipphen@verizon.com 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. Please include in the email message your name, company, address, telephone number, and the address of the building.

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 40 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 40 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,

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
June 2, 2015
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Limited Orders of Entry for 40 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.

____________________________________
KEEFE B. CLEMONS

Dated: New York, New York
June 2, 2015
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Limited Orders of Entry for 40 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 40 Multiple-Dwelling Unit Buildings in the City of New York was sent on June 2, 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.

[Signature]

LAURA A. SHINE

Dated: New York, New York
June 2, 2015
SERVICE LIST

Argus Realty 4600 LLC
Attn: Hanna Goldberg
1314 Ocean Parkway, #1B
Brooklyn, NY 11230

Buckingham Hall Plaza LLC
c/o Park Management Inc.
Attn: Jacob Greenwald
571 East New York Avenue
Brooklyn, NY 11225

777 St. Marks Realty, LLC
Attn: Yonah Hilpon
829 Greenwood Avenue, #1C
Brooklyn, NY 11218

1298 David Inc.
c/o Meridian Properties, LLC
Attn: James Dimitriades
310 85th Street, #A2
Brooklyn, NY 11209

919 Park Place Owners Corp.
c/o SMRC Mgmt LLC
Attn: William Goodard
80 Maiden Lane, #2204
New York, NY 10038

5580 Realty LLC
Attn: Troy Blount
438 Kingston Avenue
Brooklyn, NY 11225

Clean Realty LLC
Attn: Samuel Charles
438 Kingston Avenue
Brooklyn, NY 11225

270 Pulaski Nominee Corp.
c/o St. Nicks Alliance Corp.
Attn: Ivette Alerte
2 Kingsland Avenue, 2nd Floor
Brooklyn, NY 11211

Monsignor Alexis Jarka Hall HDFC, Inc.
c/o People’s Firehouse, Inc.
Attn: Daniel Rivera
113 Berry Street
Brooklyn, NY 11249

Zeida Realty Corp.
c/o Dada Maya, Inc.
Attn: Michael Bluth
4309 13th Avenue
Brooklyn, NY 11219
99 Ocean Empire LLC
  c/o Ocean Empire Management
  Attn: Joseph Hertz
  99 Ocean Drive
  Brooklyn, NY 11225

Lenox Road LLC
  c/o Emcee Management Corp.
  Attn: Michael Cantor
  7401 Ridge Boulevard, #1B
  Brooklyn, NY 11209

B. Clark Associates, Inc.
  Attn: Barry Hersko
  1268 52nd Street
  Brooklyn, NY 11219

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  Brooklyn, NY 11219

SG 39 LLC
  c/o SMRC Mgmt LLC
  Attn: William Goodard
  80 Maiden Lane, #2204
  New York, NY 10038

Prospect Realty Group LLC
  c/o Meridian Properties, LLC
  Attn: James Dimitriades
  310 85th Street, #A2
  Brooklyn, NY 11209

755 Realty, LLC
  c/o J.K. Management Corp.
  Attn: Jacob Kempler
  303 Beverly Road, Pr2
  Brooklyn, NY 11218

I.L. Realty, LLC
  Attn: Ivan Leist
  3857 Kings Highway, #1C
  Brooklyn, NY 11234

Hampton House Company LP
  Attn: Arnold Marshel
  1500 Paerdegat Avenue
  Brooklyn, NY 11236

Rush 21 Realty LLC
  Attn: Isaac Stern
  1407 48th Street
  Brooklyn, NY 11219
600 East 21st Street LLC
   c/o Proto Property Services LLC
   Attn: Duane Almodovar
   3601A Fieldston Road
   Bronx, NY 10463

310 Beverly Owners Corp.
   c/o Allstate Realty Associates
   Attn: Joseph Spitzer
   5420 13th Avenue
   Brooklyn, NY 11219

465 East 7th Street LLC
   c/o Jonas Equities, Inc.
   Attn: Lowell Goldberg
   725 Church Avenue
   Brooklyn, NY 11218

800 Cortelyou Owner's Corp.
   c/o Newport Management Company LLC
   Attn: Mordechai Eisenberg
   5614 15th Avenue, #1A
   Brooklyn, NY 11219

Netana Realty Co. LLC
   c/o SKS Enterprises LLC
   Attn: Susan Sahim
   347 5th Avenue, #910
   New York, NY 10016

Lang Development Corp.
   Attn: Penny Priceman
   9707 4th Avenue, #1G
   Brooklyn, NY 11209

Bay Parkway Holdings LLC
   Attn: Adi Joseph
   1301 Cornaga Avenue, #D
   Far Rockaway, NY 11691

649 Second Avenue Owners Corp.
   Attn: Dustin Elbaum
   649 2nd Avenue
   New York, NY 10016

143 West 75th Street LLC
   c/o Veltri Realty Management LLC
   Attn: Theresa Veltri
   27 West 70th Street, #2A
   New York, NY 10023

HW 400 Ocean Realty LLC
   c/o Malek Management
   Attn: Robert Malek
   1491 Coney Island Avenue
   Brooklyn, NY 11230
470 Realty NY LLC  
c/o Malek Management  
Attn: David Malek  
1491 Coney Island Avenue  
Brooklyn, NY 11230

Halmoni Realty Corp.  
Attn: Pong Cho Kong  
244 Fifth Avenue  
New York, NY 10001

Nagle 184 LLC  
Attn: Simon Roseman  
1 Hillcrest Center Drive, #230  
Spring Valley, NY 10977

MN Urban 207 LLC  
Attn: Augustino Cafone  
234 West 147th Street  
New York, NY 10039

Wonko Realty Corp.  
Attn: Josh Allen  
9601 Shore Road  
Brooklyn, NY 11209

JanJan Realty Corp.  
Attn: Ron Wong  
1626 Park Avenue, 4th Floor  
New Hyde Park, NY 11040

Richard Gardens, Inc.  
c/o Halstead Management Company, LLC  
Attn: Peter Pantelic  
770 Lexington Avenue  
New York, NY 10065

B&T Realty Associates, LLC  
Attn: Edith Fried  
1841 58th Street  
Brooklyn, NY 11204

GMG Realty Corp.  
Attn: Isaac Feldberg  
1225 Ocean Parkway  
Brooklyn, NY 11230

The Howard Owners, Inc.  
c/o FirstService Residential New York, Inc.  
Attn: Ata Yavalar  
622 Third Avenue, 14th Floor  
New York, NY 10017