

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

Joseph A. Post
Deputy General Counsel – NY



August 20, 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 27 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 27 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 27 Multiple-Dwelling Unit
Buildings in the City of New York**

Matter 15-_____

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 27 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 27 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 and the number of living units in each MDU is set forth in Column D.

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 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 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. 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

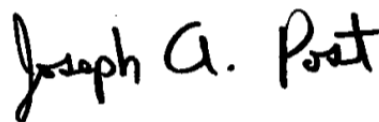
communicating with Verizon or in reaching a decision, and requests to defer the survey by Verizon pending building renovations or other activity. Verizon will continue attempting to work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission 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,



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
August 20, 2015

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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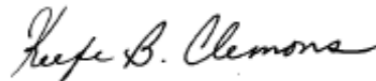
Matter 15-_____

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
August 20, 2015

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

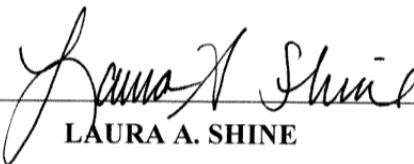
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DECLARATION OF LAURA A. SHINE

A copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 27 Multiple-Dwelling Unit Buildings in the City of New York was sent on August 20, 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.


LAURA A. SHINE

Dated: New York, New York
August 20, 2015

SERVICE LIST

Norgate Development Associates LP
c/o Essex Plaza Management Associates
Attn: Fred Lambert
757 Bushwick Avenue
Brooklyn, NY 11221

Francine Towers Owners Corp.
c/o SMRC Mgmt LLC
Attn: William Goddad
80 Maiden Lane, #2204
New York, NY 10038

Ralvin Realty LLC
c/o Jovian Management Co., Inc.
Attn: Anthony Puma
2930 Westchester Avenue
Bronx, NY 10461

The Franklin Owners Corp.
c/o Elite Management, Inc.
Attn: Robert Mozilo
250-04 Jericho Turnpike, 2nd Floor
Floral Park, NY 11001

83-25 Vietor Owners Corp.
c/o First Management Corp.
Attn: James Demetriou
34-03 Broadway
Astoria, NY 11106

1766-68 Second Avenue LLC
c/o Sackman Enterprises, Inc.
Attn: Yolanda Rivera
165 West 73rd Street
New York, NY 10023

Two-One-Eight-One Associates, LLC
Attn: Martin Rooney
4318 Martha Avenue
Bronx, NY 10470

JSM Realty LLC
Attn: Kevin Farmer
3240 East Tremont Avenue
Bronx, NY 10461

1791 Walton Avenue LLC
c/o Finkelstein-Timberger LLC
Attn: Harley Friedman
111 Brook Street, 2nd Floor
Scarsdale, NY 10583

Woodycrest Investors LLC
c/o The Lightstone Group
1985 Cedar Bridge Avenue, #1
Lakewood, NJ 08701

Rraci Realty Corp.
Attn: Djavid Raci
3055 Decatur Avenue, #B2
Bronx, NY 10467

K.S. Realty, LP
Attn: Steven Klein
3225 Johnson Avenue
Bronx, NY 10463

Table Run Estates, Inc.
Attn: Condeta Desgoutte
1339 Bristow Street
Bronx, NY 10459

AV Realty of New York, LLC
c/o Victory Holding of N.Y. Inc.
Attn: Shahriar Victory
10 Cuttermill Road, #300
Great Neck, NY 11021

145 82nd Street Associates, LLC
c/o Transworld Equities Associates, LLC
Attn: Dan Forrester
122 East 42nd Street, #4705
New York, NY 10168

248 McKibben Realty, LLC
c/o Carnegie Management Inc.
Attn: Isaac Jacobs
545 Broadway, 4th Floor
Brooklyn, NY 11206

Noll Street Associates, LP
c/o Ridgewood Bushwick Management Corp.
Attn: Ismael Feliciano
217 Wyckoff Avenue
Brooklyn, NY 11237

Parcrook LLC
c/o Parkway Realty Associates LLC
Attn: Margareta Miller
4711 12th Avenue, #A8
Brooklyn, NY 11219

SG 73 LLC
c/o SMRC Mgmt LLC
Attn: Marc Goodman
80 Maiden Lane, #2204
New York, NY 10038

Lenox180 LLC
c/o M and I Management
Attn: Joe Gugenhime
2071 Flatbush Avenue, #48
Brooklyn, NY 11234

S & B Realty Associates LLC
Attn: Pessie Schweid
160 Rutledge Street, #5
Brooklyn, NY 11211

4910 Equities LLC
c/o 4910 Realty Corp.
Attn: Henry Miesels
4910 15th Avenue
Brooklyn, NY 11219

Stamford Equities LLC
c/o Stamford Realty Corp.
Attn: Henry Miesels
5000 15th Avenue
Brooklyn, NY 11219

610 West 136th Street HDFC
Attn: Miguelina Tineo
610 West 136th Street
New York, NY 10031

Lew Realty LLC
c/o Matel Realty LLC
Attn: Sol Eiferman
303 East 6th Street
New York, NY 10003

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

55 Winthrop St. LLC
c/o Lilmor Management LLC
Attn: Jason Korn
2003 Avenue J, #1C
Brooklyn, NY 11210