October 8, 2014

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

Re: Matter 14-____ – Petition of Verizon New York Inc. for Limited Orders of Entry for 18 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 18 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.

If any of the respondents believe that they have been included in this Petition in error or are now willing to allow a survey of their property in preparation for installation of Verizon’s cable television facilities at their building, they should contact me at the above email address.

Respectfully submitted,

Richard C. Fipphen
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Limited Orders of Entry for 18 Multiple-Dwelling Unit Buildings in the City of New York

Matter 14-_____

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 18 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 18 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, including proof of delivery (if available), 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
October 8, 2014
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Limited Orders of Entry for 18 Multiple-Dwelling Unit Buildings in the City of New York

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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
October 8, 2014
STATE OF NEW YORK
PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Limited Orders of Entry for 18 Multiple-Dwelling Unit Buildings in the City of New York

Matter 14-______

DECLARATION OF LAURA A. SHINE

A copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 18 Multiple-Dwelling Unit Buildings in the City of New York was sent on October 8, 2014 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
October 8, 2014

LAURA A. SHINE
SERVICE LIST

La Rochelle 75 I LLC
 c/o SG2 Management
 Attn: Noel Intner
 25 West 45th Street, Suite 505
 New York, NY 10036

Return To Home LLC
 c/o Buchbinder & Warren LLC
 Attn: Eon Ramoutar
 1 Union Square West, 4th Floor
 New York, NY 10003

Feenjon Corporation
 Attn: Robert Engelhardt
 103 MacDougal Street, Apt. 1
 New York, NY 10012

Dryden Hotel Assoc. LLC
 c/o Carlyle Construction Corp.
 Attn: Piet Quackenbush
 340 East 46th Street, Ground Floor
 New York, NY 10017

Southwest 141 Street HDFC
 c/o Wavecrest Management
 Attn: Robert Spitz
 87-14 116th Street
 Richmond Hill, NY 11418

Dardania Properties, LLC
 Attn: Hamdi Nezaj
 2126 Muliner Avenue
 Bronx, NY 10462

Rosebud Realty, LLC
 c/o Sky Management Corp.
 Attn: Benjamin Ohebsalom
 226 East 54th Street, Suite 402
 New York, NY 10022

690 East 182nd Street LLC
 c/o Quality One Management
 Attn: John Warren
 203 West 145th Street, Store Front
 New York, NY 10039

1560 GC LLC
 c/o Chestnut Holdings of New York
 Attn: Jonathan Wiener
 5676 Riverdale Avenue, Suite 307
 Bronx, NY 10471

1561-71 Sheridan Tenants Corp.
 Attn: Carlos Ramirez
 1046 McLean Avenue
 Yonkers, NY 10704
1411 Townsend Realty Corp.
c/o Langsam Property Services Corp.
Attn: Chris Barbieri
1601 Bronxdale Avenue
Bronx, NY 10462

765 East 175th Street LLC
c/o MGH Management
Attn: Shimon Rosen
1 Hillcrest Center Drive, Suite 230
Spring Valley, NY 10977

Townsend Avenue Corp.
c/o Levites Realty Corp.
Attn: Alexis Tejada
3640 Colear Avenue
Bronx, NY 10463

AP Amsterdam 1487 Teller LLC
c/o Chestnut Holdings of New York
Attn: Guillermo Perez
5676 Riverdale Avenue, Room 307
Bronx, NY 10471

1357 Boston Road Assoc.
c/o Property Management Group
Attn: Bruce Walker
3154 Albany Crescent, 2nd Floor
Bronx, NY 10463

Claremont Park LLC
c/o Cornell Pace Inc.
Attn: Celeste Vasquez
542 Main Street, Suite 200
New Rochelle, NY 10801

2101 Albermarle Inc.
c/o Hager Management
Attn: Naftali Hager
266 Broadway, Suite 604
Brooklyn, NY 11211

Hadrian LLC
c/o A.R. Walker & Co.
Attn: George Beane
225 West 80th Street, Apt. 2B
New York, NY 10024