

140 West Street
6th Floor
New York, NY 10007
Tel (212) 519-4718
richard.fipphen@verizon.com

Richard C. Fipphen
Assistant General Counsel



November 13, 2014

Honorable 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 13 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 13 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,

A handwritten signature in black ink, appearing to read "Richard C. Fipphen".

Richard C. Fipphen

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited
Orders of Entry for 13 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 13 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 13 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

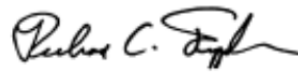
8. Verizon’s formal efforts are set forth in Column H of Exhibit 1.

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
November 13, 2014

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited
Orders of Entry for 13 Multiple-Dwelling Unit
Buildings in the City of New York**

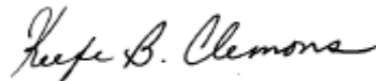
Matter 14-_____

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
November 13, 2014

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited
Orders of Entry for 13 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 13 Multiple-Dwelling Unit Buildings in the City of New York was sent on November 13, 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.


LAURA A. SHINE

Dated: New York, New York
November 13, 2014

SERVICE LIST

Amdar Company, LLC
c/o Manocherian Brothers
Attn: Jeffrey Manocherian
150 East 58th Street, 28th Floor
New York, NY 10155

Bristol East Co.
c/o Caprice Management
Attn: John Chadrijian
320 East 58th Street
New York, NY 10022

80th Realty LLC
c/o Glenwood Management Corp.
Attn: Neil Israel
1200 Union Turnpike
New Hyde Park, NY 11040

530 Herzl LLC
c/o Norwax Associates
Attn: Benny Sanchez
1046 McLean Avenue, 2nd Floor
Yonkers, NY 10704

Caralex Holding LLC
Attn: Caroline Berley
950 Third Avenue, Suite 2700
New York, NY 10022

85 D Realty LLC
c/o Heller Realty
Attn: Mark Brucato
745 5th Avenue
New York, NY 10151

410 St. Nicholas LLC
Attn: David Blu
95 Delancey Street, Apt. Front 4
New York, NY 10002

1236 Associates LLC
c/o M.B. Kings Realty Corp.
Attn: Gani Bajraktari
617 East 188th Street
Bronx, NY 10458

MMIKP Bronx Realty LLC
Attn: Steven Melowsky
1085 East 12th Street
Brooklyn, NY 11230

Lafayette Limited Partnership
c/o Krislen Management Corp.
Attn: Kristina Hosch
1500 White Plains Road
Bronx, NY 10462

Ellery Court Senior HDFC
c/o MHR Management, Inc.
Attn: Carmen Rodriguez
1191 Broadway, 1st Floor
Brooklyn, NY 11221

BSD 26 Maeem LLC
c/o Talass & Co. Inc.
Attn: Abraham Talasazan
485 7th Avenue, Suite 777
New York, NY 10018

300 East 79th Street Condominium
c/o Jordan Cooper & Associates
Attn: Paul T. Brensilber
440 Ninth Avenue, Suite 1500
New York, NY 10001