140 West Street 6th Floor New York, NY 10007 Tel (212) 519-4718 Fax (212) 962-1687 richard.fipphen@verizon.com

Richard C. Fipphen Assistant General Counsel



November 24, 2014

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

Re: Case 14-V-____ – Petition of Verizon New York Inc. for Orders of Entry for 41 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 41 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 41 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,

Pulse C. July

Richard C. Fipphen

STATE OF NEW YORK PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 41 Multiple-Dwelling Unit Buildings in the City of New York

Case 14-V	
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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 41 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 41 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.

<u>Installation Work Will Be Conducted without Prejudice to the Owner's Right to Receive Just Compensation</u>

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,

Pulm C. Tyl

RICHARD C. FIPPHEN

140 West Street, 6th Floor

New York, New York 10007

(212) 519-4718

Counsel for Verizon New York Inc.

Dated: November 24, 2014

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STATE OF NEW YORK PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 41 Multiple-Dwelling Unit Buildings in the City of New York

Case 14-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 November 24, 2014

STATE OF NEW YORK PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 41 Multiple-Dwelling Unit Buildings in the City of New York

Case 14-V-____

DECLARATION OF LAURA A. SHINE

A copy of the Petition of Verizon New York Inc. for Orders of Entry for 41 Multiple-Dwelling Unit Buildings in the City of New York was sent on November 24, 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 24, 2014

SERVICE LIST

131 East 66th Street Corporationc/o Brown Harris StevensAttn: Linda Segreto770 Lexington Avenue, 4th Floor

New York, NY 10065

Irvine Realty Group Inc.

Attn: Paul Irvine

122 East 55th Street, Suite 3

New York, NY 10022

D.A. Realty Corp.

Attn: Anthony Errico, Jr. 885 10th Avenue, Suite 1A New York, NY 10019

Dora Collazo Plaza LP c/o Loisaida Enterprises Corp. Attn: Mildred Robles 308 East 8th Street

New York, NY 10009

237th Street Holdings, LLC

Attn: John O'Shea 2 Southway

Bronxville, NY 10708

985 Land Holding LLC c/o Rose Associates, Inc.

Attn: Scott Warshaw

200 Madison Avenue, 5th Floor

New York, NY 10016

JNPJ Tenth Ave LLC

c/o Westside Management Group

Attn: Orchid Mora 163 West 74th Street New York, NY 10023

East 24th Street Holding Co., LLC

Attn: Michael Catsimalis

20-22 45th Street

Long Island City, NY 11105

Andrews Building Corp.

Attn: Ken McKenna

666 Broadway, 12th Floor

New York, NY 10012

Beekman Place Condo c/o Maxwell-Kates, Inc. Attn: Regina Sztrykler 9 East 38th Street, 6th Floor

New York, NY 10016

Ansonia Court Tenants Corp. c/o TKR Property Management

Attn: Alan Kurtz 430 16th Street Brooklyn, NY 11215

Marion Ave. LLC Attn: Michael Laub 825 East 233rd Street Bronx, NY 10466

293 CPW LLC c/o ABC Properties Attn: Ian DeFronze 152 West 57th Street, 12th Floor

New York, NY 10019

Andrew Jackson Condo c/o First Service Residential Attn: Shanetta McNealy 622 Third Avenue, 14th Floor New York, NY 10017

Elegante Condo c/o Armco Management Attn: Michael Candan 88-30 51st Avenue, Office Elmhurst, NY 11373 Caton Towers Owners Corp. c/o Century Operating Corp. Attn: James Flaherty 440 9th Avenue, 15th Floor New York, NY 10001

4182 Tenants Corp. c/o Midboro Management Inc. Attn: Linda Romolo 333 7th Avenue, 5th Floor New York, NY 10001

1855 7 Avenue HDFC c/o Andrews Building Corp. Attn: Nancy Diamond-Frazee 666 Broadway, 12th Floor New York, NY 10012

Raven Court Realty, LLC Attn: Billy Haugh 164-18 43rd Avenue, Apt. 6A Flushing, NY 11358

Boulevard Towers Condo c/o Medallion Real Estate LLC Attn: Victor Fein 112-18 Queens Boulevard Forest Hills, NY 11375 The Towers Condo c/o First Management Corporation

Attn: James Demetriou 34-03 Broadway Astoria, NY 11106 Dorrice D'Anna

c/o Patrick J. Falci Management Co. Inc.

Attn: Patrick Falci

164-11 Northern Boulevard

Flushing, NY 11358

Rutland Road Associates LP

c/o The Amistad Management Corp.

Attn: William Lucas

43 North Central Avenue, 2nd Floor

Valley Stream, NY 11580

176 Canal Corporation c/o Raber Enterprises, LLC Attn: Lance Steinberg

175 Canal Street, 2nd Floor

New York, NY 10013

Nadco Associates LLC

c/o Gatsby Enterprises LLC

Attn: Joshua Adler

347 5th Avenue, Suite 300

New York, NY 10016

Tai Hop Lee Realty Corp.

Attn: Ding Wai

200 Mullberry Street

New York, NY 10012

Jordan Wooster Street Associates LLC

c/o Schur Management Co.

Attn: S J Schur

2432 Grand Concourse, Suite 400

Bronx, NY 10458

436 Realty LLC

c/o Salon Realty Corp.

Attn: Angelo Ortiz

316 East 89th Street, Lower Level

New York, NY 10128

426 West Broadway House Condominium

c/o The Lovett Company, LLC

Attn: Ellen Kornfeld 109-15 14th Avenue

College Point, NY 11356

Lafayette Studios Corp.

c/o Andrews Building Corp.

Attn: Jacquelene Latif

666 Broadway, 12th Floor

New York, NY 10012

The East 35th Street Condominium c/o Wavecrest Management Team Ltd.

Attn: Roger Stuart 87-14 116th Street Richmond Hill, NY 11418

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

35 West 82nd Street, Inc. c/o Argo Real Estate LLC Attn: Barry Benami 50 West 17th Street, 6th Floor New York, NY 10011

100 St. Nicholas HDFC c/o Chappaqua Realty Attn: Rita Blanco 4 South Evarts Avenue Elmsford, NY 10523

Gladys Smith Attn: Mark Smith 134 Foltim Way Congers, NY 10920 Emraldd 97 LLC c/o Cornerstone Management Systems Inc.

Attn: Allen Abbani

271 Madison Avenue, Suite 800

New York, NY 10016

The Copley Condominium c/o Orsid Realty Corp.
Attn: Dennis Nagel
1740 Broadway, 2nd Floor
New York, NY 10019

Fox 153 Realty LLC
Attn: Leonard Fox
271 Madison Avenue, Suite 1101
New York, NY 10016

Rosa Parks Condominium c/o Maxwell-Kates, Inc. Attn: Adam Hirschfield 9 East 38th Street, 6th Floor New York, NY 10016

Kedro Realty LLC Attn: Thomas Sideris 38-08 Bell Boulevard, 2nd Floor Bayside, NY 11361 The 220 West 93rd Street Condominium c/o Samson Management LLC

Attn: Gregory Haye

97-77 Queens Boulevard, Suite 710

Rego Park, NY 11374