

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



Joseph A. Post
Deputy General Counsel – NY

November 29, 2017

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

Re: Matter 17-____ – Petition of Verizon New York Inc. for Limited Orders of Entry for 20 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 20 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://www.verizon.com/nypscpetitions>.

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

Matter 17-_____

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 20 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 20 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.

Owners and Agents

2. The names of the current owners and managing agents of each MDU are listed in Columns D, E and F 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 G 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, and that it has insurance covering such pre-installation survey work, proof of which can be produced upon request.

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 G 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

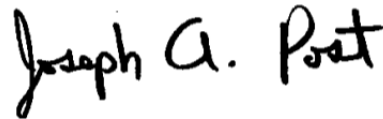
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

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,

A handwritten signature in black ink that reads "Joseph A. Post". The signature is written in a cursive, slightly slanted style.

JOSEPH A. POST
140 West Street, 6th Floor
New York, NY 10007
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: New York, New York
November 29, 2017

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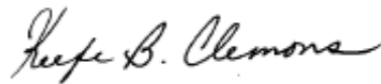
Matter 17-_____

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. To the best of my knowledge, based on information provided by employees of the

Petitioner and its affiliates, the foregoing Petition is true.



KEEFE B. CLEMONS

Dated: New York, New York
November 29, 2017

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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DECLARATION OF LAURA A. SHINE

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 20 Multiple-Dwelling Unit Buildings in the City of New York was sent on November 29, 2017 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 29, 2017

SERVICE LIST

Stavroula Gargaroni
144 Daniel Low Terrace
Staten Island, NY 10301

Barnard College
Attn: Joseph Miele
3009 Broadway, Front 1
New York, NY 10027

680 Ft. Washington Ave. Realty LLC
c/o Rotner Management Corp.
Attn: Kenneth Rotner
330 East 71st Street, #1E
New York, NY 10021

166 Delancey LLC
c/o United American Land, LLC
Attn: Jason Laboz
430 West Broadway, 3rd Floor
New York, NY 10012

Lex & Third 116th St. Corp.
Attn: Vincent Garrow
15 East 40th Street, #304
New York, NY 10016

2695 Heath Realty, LLC
c/o Gjonaj Management LLC
Attn: Victor Gjonaj
3331 White Plains Road
Bronx, NY 10467

11 East 92nd Street Tenants Corp.
c/o Taube Management Realty, LLC
Attn: Ilona Wisniewska
750 3rd Avenue, 9th Floor
New York, NY 10019

Alex Tolchin
37 Carol Court
Staten Island, NY 10309

Jovin II, LLC
c/o Jovin Management & Consulting LLC
Attn: John Arena
7304 Fifth Avenue, #195
Brooklyn, NY 11209

6817 Colonial Tenants Corp.
c/o Bay Ridge Management Corp.
Attn: David Whitmore
9011 5th Avenue
Brooklyn, NY 11209

684 RSD LLC
c/o Cobblestone Management, Inc.
Attn: Rachel Phipps
1080 Bergen Street, P.O. Box 287
Brooklyn, NY 11216

725-4th Realty LLC
c/o YCK Management LLC
Attn: Isaac Kurtz
1303 53rd Street, #119
Brooklyn, NY 11219

Tamp Realty Company, LLC
Attn: Philip Widlanski
70 West 71st Street, #2D
New York, NY 10023

Brusco West 78th Street, LLC
c/o West Side Management Corp.
Attn: Michael Brusco
163 West 74th Street
New York, NY 10023

Northside Condominium
c/o Esquire Management Corp.
Attn: Joseph Elmore
1716 Coney Island Avenue, 4th Floor
Brooklyn, NY 11230

Butler Gardens Condominium
Attn: Ross Charters
101 Butler Street, #1R
Brooklyn, NY 11231

1365 E. 14 Realty Inc.
Attn: Goldy Fuchs
5008 16th Avenue
Brooklyn, NY 11204

Perla Realty LLC
Attn: Guillermo Pascal
1567 Lincoln Place, #A
Brooklyn, NY 11233

175 Ardmere Avenue LLC
Attn: Roland Krifca
157 Four Corners Road
Staten Island, NY 10304

Fawn Ridge Condominium
Attn: Marlene Biondo
822 Rossville Avenue, #9
Staten Island, NY 10309