

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



**Joseph A. Post**  
Deputy General Counsel – NY

June 21, 2018

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

***Re: Matter 18-\_\_\_\_ – Petition of Verizon New York Inc. for Limited Orders of Entry for 24 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 24 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](mailto: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". The signature is written in a cursive, slightly slanted style.

Joseph A. Post

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
Orders of Entry for 24 Multiple-Dwelling Unit  
Buildings in the City of New York**

**Matter 18-\_\_\_\_\_**

**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 24 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 24 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

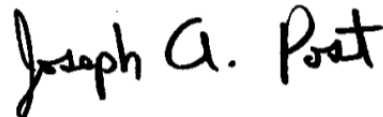
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

**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, 6<sup>th</sup> Floor  
New York, NY 10007  
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: New York, New York  
June 21, 2018

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
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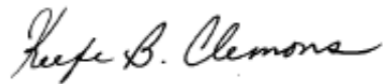
**Matter 18-\_\_\_\_\_**

**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.



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**KEEFE B. CLEMONS**

Dated: New York, New York  
June 21, 2018

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

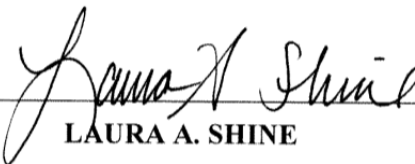
**Petition of Verizon New York Inc. for Limited  
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**DECLARATION OF LAURA A. SHINE**

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 24 Multiple-Dwelling Unit Buildings in the City of New York was sent on June 21, 2018 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  
June 21, 2018

## SERVICE LIST

Shpelrub Realty LLC  
Attn: Mitchell Shpelfogel  
2753 Coney Island Avenue, #215  
Brooklyn, NY 11215

Kipling Arms LLC  
c/o David Eisenstein Real Estate Corp.  
Attn: Isaac Eisenstein  
244 West 54th Street, #702  
New York, NY 10019

LNJ Mazel Realty LLC  
c/o Hager Management Inc.  
Attn: Jacob Hager  
266 Broadway, #604  
Brooklyn, NY 11211

3368 Shore Parkway Condominium  
c/o Dependable Property Management Inc.  
Attn: Leo Katz  
1980 Bergen Avenue  
Brooklyn, NY 11234

European House Condominium  
Attn: Bella Lurye  
2827 Brown Street, #3A  
Brooklyn, NY 11235

Digs on Briggs LLC  
Attn: Dreifus Uri  
207 Rockaway Turnpike  
Lawrence, NY 11559

Miriam Barredo  
422 West 55th Street  
New York, NY 10019

142-144 Sackett Street Condominium  
c/o MD Squared Property Group, LLC  
Attn: Michael Mintz  
801 2nd Avenue, #404  
New York, NY 10017

The Armory Condominium  
Attn: Michael O'Keefe  
1405 8th Avenue, #2B  
Brooklyn, NY 11215

Clescina Ackie  
404 East 48th Street, #B2  
Brooklyn, NY 11203

45 Parade Properties LLC  
Attn: Aaron Cynamon  
1470 Flatbush Avenue  
Brooklyn, NY 11210

1705 & 1715 Caton Associates LLC  
Attn: Sam Farkas  
5414 New Utrecht Avenue, 2nd Floor  
Brooklyn, NY 11219

Key, LLC  
Attn: Moses Kaiser  
4707 New Utrecht Avenue  
Brooklyn, NY 11219

Maimonides Medical Center  
c/o MMC Management Corp.  
Attn: Derek Goins  
950 49th Street  
Brooklyn, NY 11219

Dah Lee Trading Corp.  
Attn: Lily Chow  
1186 Sheepshead Bay Road  
Brooklyn, NY 11235

334 Foster Avenue LLC  
c/o Ador Housing and Development LLC  
Attn: Eliezer Spira  
5318 New Utrecht Avenue  
Brooklyn, NY 11219

Jag Realty Group Ltd.  
Attn: Richard Battaglino  
67 Sullivan Street, #2  
New York, NY 10012

361 Sterling Place Owners, Inc.  
Attn: Katherine Caldwell  
361 Sterling Place, #201  
Brooklyn, NY 11238

Golden Gates Associates  
c/o Essex Management Company LLC  
Attn: Sydney Engel  
1060 Broad Street, Management Office  
Newark, NJ 07102

NME HDFC, Inc.  
c/o Advantage Property Management Services LLC  
Attn: Lakesha Baker  
2844 8th Avenue, Ground Floor  
New York, NY 10039



Nickel Luma  
1639 Nostrand Avenue, Lower Level  
Brooklyn, NY 11226

AAH Holdings LLC  
Attn: Sam Aron  
PO Box 250109  
Brooklyn, NY 11225

The Sunset Condominium  
Attn: Anthony Tepedino  
81 Parrott Place  
Brooklyn, NY 11228

Harbor Tech, LLC  
c/o Noam Corporation  
Attn: Solomon Gottlieb  
1428 36th Street, #219  
Brooklyn, NY 11218