

140 West Street
7th Floor
New York, NY 10007
(212) 519-4717



Joseph A. Post
Deputy General Counsel – NY

December 19, 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 19 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 19 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". 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 19 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 19 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 19 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. Donald Olsen, 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

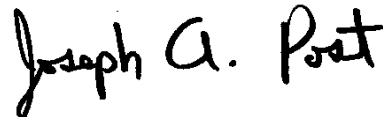
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

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, 7th Floor
New York, NY 10007
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: New York, New York
December 19, 2018

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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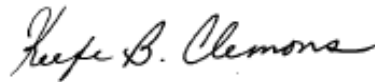
Matter 18-_____

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.



KEEFE B. CLEMONS

Dated: New York, New York
December 19, 2018

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

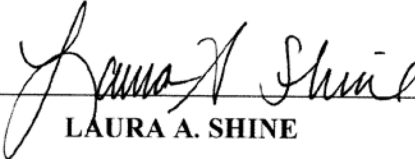
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DECLARATION OF LAURA A. SHINE

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 19 Multiple-Dwelling Unit Buildings in the City of New York was sent on December 19, 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
December 19, 2018

SERVICE LIST

Zizi Realty LLC
c/o Pine Management, Inc.
Attn: Thomas Rohlman
78 Manhattan Avenue, Basement Office
New York, NY 10025

Explore Realty Corp.
Attn: Wanda Nicholson
50 Court Street, #512
Brooklyn, NY 11201

The Westport Condominium
Attn: Igor Borkin
2955 Brighton 4th Street, #3C
Brooklyn, NY 11235

251 Cypress LLC
c/o 2337 Washington LLC
Attn: Alex Garcia
1422 St. Peter Avenue, Store Front
Bronx, NY 10461

The East River House Condominium
c/o Misra Group, LLC
Attn: Charles Arnold
174 5th Avenue, #305
New York, NY 10010

East 82nd Street Realty LLC
Attn: Antonio Ventura
1586 First Avenue
New York, NY 10028

360 Baltic Street Condominium
c/o United Management Corp.
Attn: Meir Bouskila
166 Montague Street
Brooklyn, NY 11201

Maria Lan
336 54th Street, #1R
Brooklyn, NY 11220

869 42nd Street Realty Corp.
Attn: Hone Wong
2115 Homecrest Avenue
Brooklyn, NY 11229

3M Associates Limited Liability Company
c/o N.S.K. Management, LLC
Attn: Marcos Taveras
459 6th Avenue
Brooklyn, NY 11215

3420 Newkirk Avenue LLC
Attn: Alex Kohen
514 West 184th Street, Basement #2
New York, NY 10033

1574 LLC
c/o CRE Management Corp.
Attn: Charles Eisen
320 Roebling Street, #726
Brooklyn, NY 11211

816 56th Street Corp.
Attn: Miriam Chan
816 56th Street
Brooklyn, NY 11220

Anthony Realty LLC
Attn: Joseph Franco
101 West 69th Street, #1C
New York, NY 10023

Jay Shim
252 West 72nd Street
New York, NY 10023

321 Clinton Ave. Housing Corp.
Attn: Anne Von Hemert
321 Clinton Avenue, #10
Brooklyn, NY 11205

238 Wallabout Street Corp.
Attn: Moshe Klein
147 Wallabout Street
Brooklyn, NY 11206

Amsterdam Partners LLC
c/o Manor Management LLC
Attn: Steve Gross
5114 Fort Hamilton Parkway
Brooklyn, NY 11219

The 380 Kings Highway Condominium
c/o 380 C1 LLC
Attn: Kristina Valler
380 Kings Highway, #C1
Brooklyn, NY 11223