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New York, NY 10007
(212) 519-4717
joseph.a.post@verizon.com

Joseph A. Post
Deputy General Counsel
State Regulatory Affairs – NY

August 8, 2019

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

**Re: Matter 19-____ - Petition of Verizon New York Inc. for Orders of Entry
for 33 Multiple-Dwelling Unit Buildings in the City of New York**

Dear Secretary Burgess:

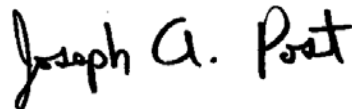
Enclosed please find the Petition of Verizon New York Inc. for Orders of Entry for 33 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 33 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://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 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,



Joseph A. Post

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of
Entry for 33 Multiple-Dwelling Unit Buildings in
the City of New York**

Matter 19-_____

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 33 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 33 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 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 H 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 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 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, and that it has insurance covering such installation, proof of which can be produced upon request.

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

7. The proposed installation 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

8. Verizon's formal efforts to gain entry to the identified properties 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 install its facilities for reasons that may

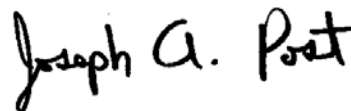
include, but are not necessarily limited to, refusals to permit access, delays by building owners or managing agents in communicating with Verizon or in reaching a decision, and requests to defer work by Verizon pending building renovations or other activity. Verizon will continue attempting to work 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 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,



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

Counsel for Verizon New York Inc.

Dated: August 8, 2019

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of
Entry for 33 Multiple-Dwelling Unit Buildings in
the City of New York**

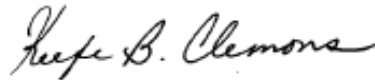
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AFFIRMATION OF KEEFE B. CLEMONS

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
August 8, 2019

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

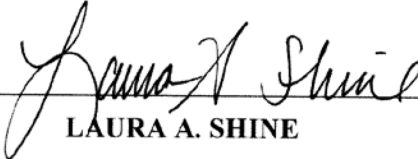
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DECLARATION OF LAURA A. SHINE

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Orders of Entry for 33 Multiple-Dwelling Unit Buildings in the City of New York was sent on August 8, 2019 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
August 8, 2019

SERVICE LIST

72 Orange Street Tenants Corp.
c/o First Management Corp.
Attn: James Demetriou
34-03 Broadway
Astoria, NY 11106

The Rockefeller University
Attn: Alexander Kogan
1230 York Avenue
New York, NY 10065

Gotham Towne House Owners Corp.
c/o FirstService Residential New York, Inc.
Attn: Janine Celbollero
622 Third Avenue, 14th Floor
New York, NY 10017

600 West 218th Street Associates, LLC
c/o Samson Management LLC
Attn: Andre Williams
97-77 Queens Boulevard, #710
Rego Park, NY 11374

The Herkimer Executive House, Inc.
c/o Midas Property Management Corp.
Attn: Michael Padernacht
3605 Sedgwick Avenue, Office 1
Bronx, NY 10463

3086 32nd Street LLC
c/o Lidia Management Corp.
Attn: Anthony Pistilli
35-01 30th Avenue, #300
Astoria, NY 11103

BRG 3752, LLC
c/o BRG Management LLC
Attn: Jonah Rosenberg
150 Great Neck Road, #402
Great Neck, NY 11021

705-7 East 179 Street HDFC
Attn: Milton Goya
705 East 179th Street, #42 - Management Office
Bronx, NY 10457

CAP 2322 Grand LLC
c/o CAPX Realty Services LLC
Attn: Michael Rubin
413B Central Avenue
Cedarhurst, NY 11516

Rajput LLC
Attn: Daniyal Tariq
2683 Morris Avenue, #H
Bronx, NY 10468

Andrews 103 LLC
c/o Residential Management (NY), Inc.
Attn: Sam Becker
1651 Coney Island Avenue, 4th Floor
Brooklyn, NY 11230

1236 Grand Concourse LLC
c/o JLP Metro Management Inc.
Attn: Anton Popovic
3397 East Tremont Avenue, 2nd Floor
Bronx, NY 10461

Quadrant Properties HDFC, Inc.
c/o Lemle & Wolff, Inc.
Attn: Kathy Lugo
5925 Broadway
Bronx, NY 10463

Intervale Avenue II Associates, LP
c/o The Wavecrest Management Team Ltd.
Attn: Judy Cordero
87-14 116th Street
Richmond Hill, NY 11418

Prospect Development Group, LP
c/o Lemle & Wolff, Inc.
Attn: Jose Diaz
5925 Broadway
Bronx, NY 10463

Miguel Sosa Estates, LP
c/o Grenadier Realty Corp.
Attn: Jorge Vazquez
1945 Vyse Avenue, Management Office
Bronx, NY 10460

Prospect Development Group, LP
c/o Lemle & Wolff Inc.
Attn: Jose Diaz
5925 Broadway
Bronx, NY 10463

Mount Morris HDFC
c/o ELH Mgmt. LLC
Attn: LaMont Baker
16 Court Street, #800
Brooklyn, NY 11241

Concourse Heights LLC
Attn: Ilias Ballenela
19 Hillside Avenue
Roslyn Heights, NY 11577

Clark Street Tenants Incorporated
c/o Advanced Management Services Ltd.
Attn: Lynnjoy Nevarez
26 Court Street, #804
Brooklyn, NY 11242

116 Pacific Street, LLC
c/o Trezza Management, Inc.
Attn: Madeline Trezza
224 Pacific Street, Basement
Brooklyn, NY 11201

732 Washington LLC
Attn: George Gayle
261 Adelphi Street
Brooklyn, NY 11205

Melrose Street HDFC, Inc.
c/o Riseboro Community Partnership Inc.
Attn: Ismael Feliciano
217 Wyckoff Avenue
Brooklyn, NY 11237

101 Wyckoff Condominium
c/o ABC Management
Attn: Jason Brecher
152 West 57th Street, 12th Floor
New York, NY 10019

Pat Realty LLC
c/o Dira Realty LLC
Attn: Wayne Whitford
438 Kingston Avenue
Brooklyn, NY 11225

Congregation Yehuda and Meir Tzvi
c/o Baycrest Development & Management LLC
Attn: Yosef Mandelbaum
4403 15th Avenue, #116
Brooklyn, NY 11219

47 Realty I LLC
c/o Katz Management LLC
Attn: Eli Wulliger
5314 16th Avenue, #272
Brooklyn, NY 11204

EQR-228 West 71st, LLC
c/o Equity Residential Management, LLC
Attn: Carmen Miller
238 West 71st Street, Leasing Office - 1st Floor
New York, NY 10023

292 Riverside Drive Owners Corp.
c/o MD Squared Property Group, LLC
Attn: Victor Thompson
801 2nd Avenue, #404
New York, NY 10017

L&L Realty Equities, LLC
Attn: Charlie Lewner
12 East 49th Street, 11th Floor
New York, NY 10017

25 Cooper, LLC
c/o Edel Family Management Corp.
Attn: Tanya Goldman
2207 Coney Island Avenue
Brooklyn, NY 11223

WE 2299 ACP LLC
c/o Pad Management LLC
Attn: Ita Kolic
233 Broadway, #1470
New York, NY 10279

Oaks at La Tourette Condominium Section II
c/o Dawning Real Estate Incorporated
Attn: Janet Carpenter
1150 South Avenue, #301A
Staten Island, NY 10314