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New York, NY 10007  
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Joseph A. Post  
Deputy General Counsel  
State Regulatory Affairs – NY

August 27, 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 36 Multiple-Dwelling Unit Buildings in the City of New York**

Dear Secretary Burgess:

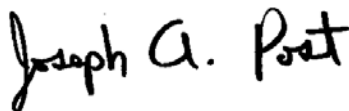
Enclosed please find the Petition of Verizon New York Inc. for Orders of Entry for 36 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 36 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](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,



Joseph A. Post

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of  
Entry for 36 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 36 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 36 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

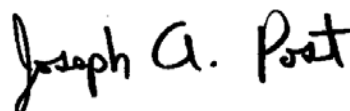
include, but are not necessarily limited to, refusals to permit access, delays by building owners or managing agents in communicating with Verizon or in reaching a decision, and requests to defer work by Verizon pending building renovations or other activity. Verizon will continue attempting to work 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, 7<sup>th</sup> Floor  
New York, NY 10007  
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: August 27, 2019

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of  
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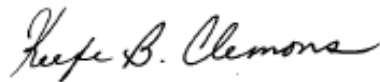
**Matter 19-\_\_\_\_\_**

**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  
August 27, 2019

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

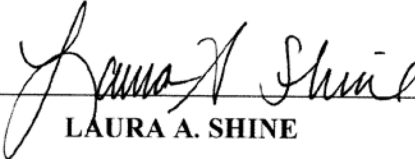
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**DECLARATION OF LAURA A. SHINE**

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Orders of Entry for 36 Multiple-Dwelling Unit Buildings in the City of New York was sent on August 27, 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 27, 2019

## SERVICE LIST

CP III Electra, LLC  
c/o Greystar  
Attn: Chase Green  
354 East 91st Street, #308  
New York, NY 10128

85 D Realty LLC  
c/o Heller Realty, LLC  
Attn: Kevin Padgett  
745 5th Avenue, #1250  
New York, NY 10151

Fresh Pond Holdings LLC  
c/o EK Realty, LLC  
Attn: Jacob Eisenstein  
939 8th Avenue, #301  
New York, NY 10019

Jet Realty, LLC  
Attn: Jerry Papafloratos  
3651 Bell Boulevard, #202  
Bayside, NY 11361

32-15 Greenpoint Ave. Realty Corp.  
Attn: John Paravalos  
105 Clay Street  
Brooklyn, NY 11222

The Stuyvesant Park Condominium  
c/o Time Equities, Inc.  
Attn: Sherri O'Keefe  
55 Fifth Avenue, 15th Floor  
New York, NY 10003

667 E. 187th St. Bronx LLC  
c/o JLP Metro Management Inc.  
Attn: Anton Popovic  
3397 East Tremont Avenue  
Bronx, NY 10461

Beaumont Management Group LLC  
Attn: Moses Silver  
4910 13th Avenue  
Brooklyn, NY 11219

2271 Morris Gold LLC  
c/o City House Management LLC  
Attn: Anuradha Kumar  
40-49 72nd Street  
Woodside, NY 11377

Neighborhood Restore HDfC  
c/o Fordham-Bedford Housing Corp.  
Attn: Rafael Mendez  
2751 Grand Concourse, Office  
Bronx, NY 10468

915 Tremont, Ltd.  
c/o Exclusive Realty Corp.  
Attn: Ignacio Castillo  
270 North Avenue, #708  
New Rochelle, NY 10801

Riverdale Court Inc.  
c/o Pohl Management LLC  
Attn: Arnold Pohl  
151 East 62nd Street, #2A  
New York, NY 10065

2407 Beaumont LLC  
Attn: Pedro Guillermo  
36 West 37th Street, 2nd Floor  
New York, NY 10018

Point 2400 Holdings LLC  
Attn: Aaron Mechlovics  
825 8th Avenue, #18N  
New York, NY 10019

2395 Belmont Realty Corp.  
Attn: Adalid Orozco  
2395 Belmont Avenue, #1S  
Bronx, NY 10458

1154 Realty LLC  
c/o Mdays Realty LLC  
Attn: Kenneth Rosenblum  
1475 President Street, Office  
Brooklyn, NY 11213

Park Monroe II Rehab HDFC  
c/o Shinda Management Corporation  
Attn: Bernard Walker  
221-10 Jamaica Avenue, 3rd Floor  
Queens Village, NY 11428

789 McDonough Street HDFC  
c/o H.S.C. Management Corp.  
Attn: Michael Smith  
102 Gramatan Avenue  
Mount Vernon, NY 10550

564-580 Park Plaza Condominium  
c/o Stone Edge Management Inc.  
Attn: Berish Ekstein  
60 Rutledge Street, #214  
Brooklyn, NY 11249

Riverdale Residence LLC  
c/o YHT Management Inc.  
Attn: Moshe Deutsch  
320 Roebling Street, #205  
Brooklyn, NY 11211



U.S. Brownsville III HDFC  
c/o Urban Strategies, Inc.  
Attn: Gwen Munroe  
294 Sumpter Street, 1st Floor  
Brooklyn, NY 11233

Freddie Ellis As Co-Trustee  
c/o Fred Ellis Real Estate  
Attn: George Cora  
P.O. Box 150255  
Brooklyn, NY 11215

C & D Realty, LLC  
Attn: Abraham Williams  
436 Belmont Avenue  
Brooklyn, NY 11207

JVA Houses Limited Partnership  
c/o Northeast Brooklyn HDFC  
Attn: Gabriel Pacheco  
132 Ralph Avenue  
Brooklyn, NY 11233

2025 Regent Place LLC  
c/o Cedar Hudson Management  
Attn: Judah Stern  
1449 37th Street, #608  
Brooklyn, NY 11218

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

Van Dorn Realty LLC  
c/o Royal Realty Corp.  
Attn: Dan Mogolesko  
One Bryant Park, 49th Floor  
New York, NY 10036

West End Firm, LLC  
Attn: Rafaela Herrera  
315 West 102nd Street, #B  
New York, NY 10025

Fort Washington Intercontinental Associates, LLC  
c/o Stellar Management  
Attn: Ramses Capellan  
156 William Street, 10th Floor  
New York, NY 10038

HPDC2 HDFC, Inc.  
c/o The Wavecrest Management Team Ltd.  
Attn: Steven Bastian  
87-14 116th Street  
Richmond Hill, NY 11418

Shangri-La Condominium  
c/o Exe Management Inc.  
Attn: Stella Tan  
61-43 186th Street  
Fresh Meadows, NY 11365

67-05 75th Street Corp.  
c/o ABC Realty  
Attn: Jeffrey Wien  
152 West 57th Street, 12th Floor  
New York, NY 10019

170 West 85 Street HDFC  
Attn: Dean Segal  
170 West 85th Street, Ground Floor  
New York, NY 10024

Sophia Condominium  
c/o Top Quality Management Inc.  
Attn: Mendy Deutsch  
755 Kent Avenue, #720  
Brooklyn, NY 11249

Whitestone Tower Condominium  
Attn: George Xu  
3506 Leavitt Street, #2A  
Flushing, NY 11354

Bristol Hopkinson LLC  
c/o Mhany Management Inc.  
Attn: Ismene Speliotis  
1 Metro Tech Center North, 11th Floor  
Brooklyn, NY 11201