

140 West Street, 7th Floor
New York, NY 10007
(212) 519-4717
joseph.a.post@verizon.com

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

September 6, 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 25 Multiple-Dwelling Unit Buildings in the City of New York**

Dear Secretary Burgess:

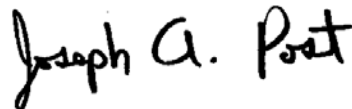
Enclosed please find the Petition of Verizon New York Inc. for Orders of Entry for 25 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 25 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 25 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 25 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 25 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

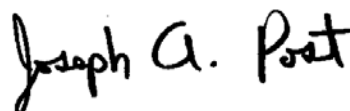
include, but are not necessarily limited to, refusals to permit access, delays by building owners or managing agents in communicating with Verizon or in reaching a decision, and requests to defer work by Verizon pending building renovations or other activity. Verizon will continue attempting to work 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: September 6, 2019

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Orders of
Entry for 25 Multiple-Dwelling Unit Buildings in
the City of New York**

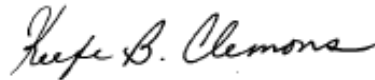
Matter 19-_____

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.



KEEFE B. CLEMONS

Dated: New York, New York
September 6, 2019

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

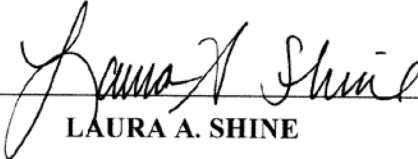
**Petition of Verizon New York Inc. for Orders of
Entry for 25 Multiple-Dwelling Unit Buildings in
the City of New York**

Matter 19-_____

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 25 Multiple-Dwelling Unit Buildings in the City of New York was sent on September 6, 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
September 6, 2019

SERVICE LIST

Stellar Sutton, LLC
c/o Stellar Management
Attn: Bobby Guttenberg
156 William Street, 10th Floor
New York, NY 10038

160 Front Street Associates LLC
c/o Samson Management LLC
Attn: Christian Toriello
97-77 Queens Boulevard, #710
Rego Park, NY 11374

Linmar Group, LLC
c/o Abington Holding, LLC
Attn: Linda Berley
950 Third Avenue, 27th Floor
New York, NY 10022

319 East 53rd Street, LLC
c/o J. R. Equities Inc.
Attn: Frank Iurato
38 East 29th Street, 10th Floor
New York, NY 10016

The Blindery Condominium
c/o AKAM Associates, Inc.
Attn: Cynthia DeJesus
260 Madison Avenue, 12th Floor
New York, NY 10016

518 East 80th Street Co., LLC
c/o Rialto Management Corp.
Attn: Scott Lerman
872 Madison Avenue, #2A
New York, NY 10021

Clinton Housing West 46th Partners, LP
c/o Clinton Housing Development Company, Inc.
Attn: Dennis Hsaio
403 West 40th Street
New York, NY 10018

NYCHA Triborough Preservation HDFC
c/o C&C Apartment Management LLC
Attn: Estella Hernandez
1735 Park Avenue, #300
New York, NY 10035

NYCHA Triborough Preservation HDFC
c/o C&C Apartment Management LLC
Attn: Estella Hernandez
1735 Park Avenue, #300
New York, NY 10035

360 Cabrini Owners Corp.
c/o Blue Woods Management Group, Inc.
Attn: Donald Wilson
3 West Main Street, #205
Elmsford, NY 10523

Battiggi Asset Management Trust
c/o Alco Realty Co.
Attn: Albino Battiggi
53-21 240th Street
Douglaston, NY 11362

60 East 88th Street Condominium
c/o Metropolitan Hudson Management Group, Inc.
Attn: Victor Kavey
22-01 78th Street
East Elmhurst, NY 11370

2305 University Avenue LLC
c/o Finkelstein Timberger East Real Estate LLC
Attn: Roger Tate
111 Brook Street, 2nd Floor
Scarsdale, NY 10583

MMIKP Bronx Realty, LLC
c/o Sharp Management Corp.
Attn: David Greenwald
2365 Nostrand Avenue, 2nd Floor
Brooklyn, NY 11210

1049 GC Realty LLC
c/o JLP Metro Management Inc.
Attn: Louis Popovic
3397 East Tremont Avenue
Bronx, NY 10461

Jovada Realty Corp.
Attn: John Morales
4 Horizon Road, #1009
Fort Lee, NJ 07024

321 West 55th Street Apartments, Inc.
c/o Gumley-Haft LLC
Attn: Beth Ocera
415 Madison Avenue, 5th Floor
New York, NY 10017

2 Grove Street Apartment Corporation
c/o The Andrews Organization
Attn: Leonard Vogt
666 Broadway, 12th Floor
New York, NY 10012

226 West 111th Street HDFC
Attn: Gloria Dietz
226 West 111th Street
New York, NY 10026

869 & 913 Thomas S. Boland LLC
Attn: Ludovik Benedek
1663 8th Avenue
Brooklyn, NY 11215

Delf Estates, Inc.
Attn: Adam Kaufman
229 West 105th Street, #1
New York, NY 10025

587 Riverside Associates, LLC
c/o Noam Corporation
Attn: Josh Kirscher
1428 36th Street, #219
Brooklyn, NY 11218

492 Convent Avenue HDFC
Attn: Candle Johnson
492 Convent Avenue, #1
New York, NY 10031

Jose Tur
572 West 187th Street, #5
New York, NY 10033

136-21st Street, Jackson Heights, Inc.
c/o Garden Heights Property Management, Inc.
Attn: Joseph Brunken
7827 37th Avenue, #9
Jackson Heights, NY 11372