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New York, NY 10007
(212) 519-4717
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Joseph A. Post
Deputy General Counsel
State Regulatory Affairs – NY

September 16, 2019

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

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

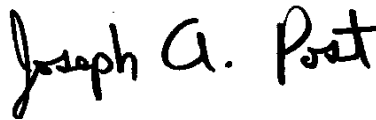
Dear Secretary Burgess:

Enclosed please find the Petition of Verizon New York Inc. for Limited Orders of Entry for 33 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,



Joseph A. Post

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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

Matter 19-_____

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 33 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 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 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

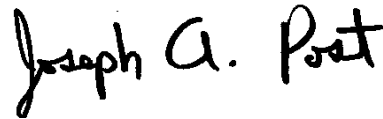
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

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
September 16, 2019

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited
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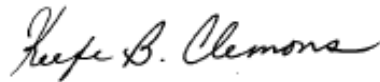
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AFFIRMATION OF KEEFE B. CLEMONS

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
September 16, 2019

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

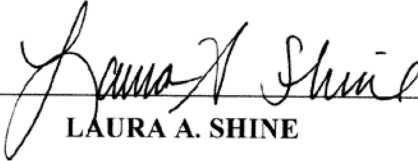
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DECLARATION OF LAURA A. SHINE

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 33 Multiple-Dwelling Unit Buildings in the City of New York was sent on September 16, 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 16, 2019

SERVICE LIST

Beacon Broadway Company, LLC
Attn: Thomas Travers
2130 Broadway, #203
New York, NY 10023

Dan Realty LLC
Attn: Dinko Popovic
2275 Barker Avenue, Ground Floor Office
Bronx, NY 10467

David Katz, LLC
Attn: David Katz
1388 Coney Island Avenue
Brooklyn, NY 11230

L.A.L. Rive Management Company, LLC
c/o L.A.L. Property Management Corp.
Attn: Raquel Hernandez
3190 Riverdale Avenue, #3
Bronx, NY 10463

PV Realty Group, LLC
Attn: Peter Lelcay
33 Bajart Place
Yonkers, NY 10705

3221 Third Ave. Realty Inc.
Attn: Eusebio Pena
3221 3rd Avenue
Bronx, NY 10451

52 LLC
c/o Duell LLC
Attn: Michael Kcira
5 East 57th Street, 10th Floor
New York, NY 10022

214 West 17 Apartment Corp.
c/o CFA Management Inc.
Attn: Carole Ferrara
20 West 22nd Street, #712
New York, NY 10010

Sansue Realty Associates, LLC
c/o N.S.K. Management, LLC
Attn: Marcos Taveras
459 6th Avenue
Brooklyn, NY 11215

817 Carroll, Ltd.
Attn: Morris Indig
817 Carroll Street
Brooklyn, NY 11215

541 Bergen Street LLC
c/o N.S.K. Management, LLC
Attn: Marcos Taveras
459 6th Avenue
Brooklyn, NY 11215

363 N.Y. Associates LLC
Attn: Christian Rodriguez
549 Empire Boulevard, #100
Brooklyn, NY 11225

558 Ralph Avenue Realty Inc.
c/o Newgent Management LLC
Attn: Abdullah Fersen
20 South Broadway, Mezzanine
Yonkers, NY 10701

50 S. Oxford LLC
c/o New York City Management LLC
Attn: John Catalic
381 Park Avenue South, 15th Floor
New York, NY 10016

86 Realty Property LLC
c/o Affordable Housing Real Estate Corp.
Attn: Enrique Valasquez
549 Empire Boulevard, #100
Brooklyn, NY 11225

Drucilla McLeod
149 Midwood Street
Brooklyn, NY 11225

39 KGS LLC
c/o KBL Management LLC
Attn: Raphael Lipschitz
1214 Cortelyou Road
Brooklyn, NY 11218

287 East 18th Street LLC
c/o Highcastle Management LLC
Attn: Philisha James
270 Madison Avenue, 19th Floor
New York, NY 10016

Jul Enterprises Inc.
Attn: Khemraj Mosaphir
109-14 Van Wyck Expressway
South Ozone Park, NY 11420

A145 Realty Corp.
Attn: Simy Graus
1221 44th Street
Brooklyn, NY 11219

BK Height LLC
Attn: Qing Zheng
6809 New Utrecht Avenue
Brooklyn, NY 11219

Catena Daskalakis
371 86th Street, #1F
Brooklyn, NY 11209

Hudson View Condominium
Attn: James Wu
30 Melbourne Road
Great Neck, NY 11021

Robert Caniglia
24-28 42nd Street
Astoria, NY 11103

260 Columbus Avenue Condominium
c/o ABS Partners Real Estate LLC
Attn: Michael Sass
200 Park Avenue South, 10th Floor
New York, NY 10003

388 Manhattan Avenue Corp.
c/o Yuco Management, Inc.
Attn: Catherine Yu
200 Park Avenue, 11th Floor
New York, NY 10166

Peach Realty LLC
Attn: Joyce Bolds
116 Winthrop Street, #6
Brooklyn, NY 11225

Cida Realty Corp.
Attn: Daryll Jones
154 Washington Avenue
Brooklyn, NY 11205

536 East 13th Street Condominium
c/o Citadel Property Management Corp.
Attn: Mark Elman
513 East 13th Street
New York, NY 10009

New York B Realty Corp.
Attn: David Most
49-16 169th Street
Fresh Meadows, NY 11365

2447 & 2449 LLC
Attn: Mirjane Kodra
1340 Siegfried Place
Bronx, NY 10465

Habtom Kaleab
1264 White Plains Road
Bronx, NY 10472

Nora Montan
1236 Ward Avenue
Bronx, NY 10472