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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

March 6, 2020

Honorable Michelle L. Phillips
Secretary
New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223

**Re: Matter 20-____ - Petition of Verizon New York Inc. for Limited Orders
of Entry for 27 Multiple-Dwelling Unit Buildings in the City of New York**

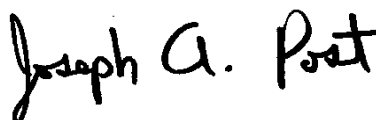
Dear Secretary Phillips:

Enclosed please find the Petition of Verizon New York Inc. for Limited Orders of Entry for 27 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 27 Multiple-Dwelling Unit
Buildings in the City of New York**

Matter 20-_____

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 27 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 27 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. Juan Escobedo, 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 caused 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

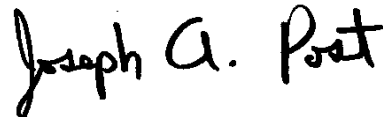
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

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
March 6, 2020

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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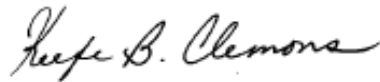
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AFFIRMATION OF KEEFE B. CLEMONS

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
March 6, 2020

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

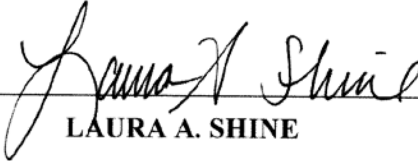
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DECLARATION OF LAURA A. SHINE

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 27 Multiple-Dwelling Unit Buildings in the City of New York was sent on March 6, 2020 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
March 6, 2020

SERVICE LIST

Quad Realty LLC
c/o Matel Realty LLC
Attn: Sol Eiferman
303 East 6th Street, Office
New York, NY 10003

1825 Summerfield LLC
c/o Stephen Ficano Enterprises Inc.
Attn: Stephen Ficano
587 Seneca Avenue
Ridgewood, NY 11385

2986 Marion LLC
Attn: Gani Bajraktari
617 East 188th Street, 1st Floor
Bronx, NY 10458

SF Mt. Hope LLC
Attn: Moshe Stahl
1399 Coney Island Avenue
Brooklyn, NY 11230

134 West End Avenue Condominium
Attn: Valerian Sikhuashvili
134 West End Avenue, #2A
Brooklyn, NY 11235

3360 Shore Parkway Condominium
c/o Waterstone Group LLC
Attn: Bernard Rubin
5014 16th Avenue, #526
Brooklyn, NY 11204

Star Mountain Properties, LLC
Attn: Kenneth Sternberg
270 Madison Avenue, #1400
New York, NY 10016

2007 Cornerstone LLC
Attn: Howard Choi
200 Old Palisade Road, #29C
Fort Lee, NJ 07024

902 President Street Housing Corporation
Attn: Lunk Sun Wong
902 President Street, #1
Brooklyn, NY 11215

Lori-Laine Enterprises LLC
Attn: Jonathan Nelson
232 Hancock Street
Brooklyn, NY 11216

State University of New York
Attn: William Gerdes
440 Lenox Road, #108
Brooklyn, NY 11203

944 42nd Realty Corp.
c/o Realm Realty Management, LLC
Attn: Joseph LaRocca
944 42nd Street, #A1
Brooklyn, NY 11219

Jiang & He LLC
c/o Ritz Property Management LLC
Attn: Denny Chen
677 56th Street
Brooklyn, NY 11220

David Stein
25 West 90th Street
New York, NY 10024

Broadway 151 Manager LLC
c/o ELH Mgmt. LLC
Attn: Lamont Baker
16 Court Street, #800
Brooklyn, NY 11241

STF 247 Audubon Avenue Holding LLC
c/o Barberry Rose Management Company, Inc.
Attn: Asti Rosario
1024 Broadway, 1st Floor
Woodmere, NY 11598

Heights 178 LLC
c/o Bronstein Properties, LLC
Attn: Ray Seelall
108-18 Queens Boulevard, #302
Forest Hills, NY 11375

31-16 32nd St. LLC
Attn: George Stamoulis
13-07 142nd Street
Whitestone, NY 11357

Ira Benlevi
111-03 76th Drive
Queens, NY 11375

Fulton Estates LLC
Attn: Kalm Zimmer
447 Nostrand Avenue
Brooklyn, NY 11216

Myrtle 684 LLC
Attn: Steve Spira
2071 Flatbush Avenue, #48
Brooklyn, NY 11234

Galaxy Towers Apartments Inc.
Attn: Syed Farrukh
2 Dutchess Court
Dix Hills, NY 11746

Fifth Avenue Realty Inc.
c/o IDS Management LLC
Attn: Vladislav Marom
320 7th Avenue, #212
Brooklyn, NY 11215

The 502 New York Avenue Condominium
Attn: Meir Kahanov
502 New York Avenue, #6A
Brooklyn, NY 11225

43-12 Broadway, LLC
Attn: Bobbi Macropoulos
3702 Astoria Boulevard, 6th Floor
Astoria, NY 11103

East River North Renewal HDFC, Inc.
Attn: Celia Ramirez
426-34 East 118th Street, #1E
New York, NY 10035

Grand Central Condominium
c/o Jeanrich Management Inc.
Attn: Rey Nieto
10-87 Jackson Avenue
Long Island City, NY 11101