



140 West Street, 7th Floor  
New York, NY 10007

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State Regulatory Affairs – NY  
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March 1, 2021

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

***Re: Matter 21-\_\_\_\_\_ – Petition of Verizon New York Inc. for Limited Orders  
of Entry for 25 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 25 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](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 Limited  
Orders of Entry for 25 Multiple-Dwelling Unit  
Buildings in the City of New York**

**Matter 21-\_\_\_\_\_**

**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 25 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 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 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

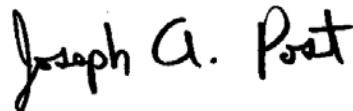
work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

**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 stylized font.

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: New York, New York  
March 1, 2021

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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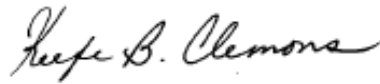
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**AFFIRMATION OF KEEFE B. CLEMONS**

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.



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**KEEFE B. CLEMONS**

Dated: Boston, Massachusetts  
March 1, 2021

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

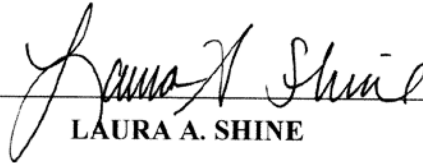
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**DECLARATION OF LAURA A. SHINE**

I have taken steps to ensure that a copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 25 Multiple-Dwelling Unit Buildings in the City of New York was sent on March 1, 2021 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 1, 2021

## SERVICE LIST

JPKJ Realty LLC  
Attn: Danny Chow  
183 State Street  
Brooklyn, NY 11201

Fifth and Fifty-Fifth Condominium  
c/o St. Regis New York Operating LLC  
Attn: Sean Lagrotteria  
2 East 55th Street  
New York, NY 10022

Diego Beekman Mutual Housing Association HDFC  
c/o The Dweck Law Firm  
Attn: H.P. Sean Dweck  
10 Rockefeller Plaza, #1015  
New York, NY 10020

Rapid Condominium  
Attn: Mike Voller  
2800 East 29th Street, #205  
Brooklyn, NY 11235

Brierre Family LLC  
Attn: Antonine Brierre  
86-09 Homelawn Street  
Jamaica, NY 11432

Ave "Z" Realty Management, Inc.  
Attn: Edward Kraven  
2677 Coney Island Avenue  
Brooklyn, NY 11235

Jasmine Court HDFC  
c/o South Bronx Overall Economic Development  
Corp.  
Attn: Jennifer Gilbert  
555 Bergen Avenue, 3rd Floor  
Bronx, NY 10455

131 E. 81st St. Owners' Corp.  
c/o New Bedford Management Corp.  
Attn: Conor O'Brien  
210 East 23rd Street, 5th Floor  
New York, NY 10010

H - O Realty Corporation  
c/o Comprehensive Management of Manhattan, LLC  
Attn: Sheena Holness  
1776 Broadway, #1720  
New York, NY 10019

514 East 13 Street HDFC  
Attn: Siaka Kone  
514 East 13th Street, #2R  
New York, NY 10009

Prospect Equities Operating, LLC  
c/o ELH Mgmt. LLC  
Attn: Nicola McCalmon  
16 Court Street, #800  
Brooklyn, NY 11201

670 President Street Housing Corp.  
Attn: Elizabeth Peters  
670 President Street, #5A  
Brooklyn, NY 11215

Metropolitan Management LLC  
c/o Elysee Investment  
Attn: Avi Dishi  
571 West 183rd Street  
New York, NY 10033

928 President Street, LLC  
c/o Berman Realty  
Attn: Marc Berman  
105 7th Avenue  
Brooklyn, NY 11215

321 Flatbush Ave. Corp.  
Attn: Chris King  
321 Flatbush Avenue  
Brooklyn, NY 11217

528 Carlton Realty, LLC  
c/o Plaza Heights Management LLC  
Attn: Ronald McLaren  
618 Vanderbilt Avenue  
Brooklyn, NY 11238

1578 Union Street Realty Corp.  
c/o Excalibur Equities  
Attn: Shahla Tahkhisi  
88-08 Liberty Avenue  
Ozone Park, NY 11417

Tennis Court LLC  
c/o Chestnut Holdings of New York, Inc.  
Attn: Ben Rieder  
5676 Riverdale Avenue, #307  
Bronx, NY 10471

Tzvi Ilowitz Lifetime Trust  
Attn: Tzvi Ilowitz  
1187 44th Street  
Brooklyn, NY 11219

4901 Realty, LLC  
c/o The Salomon Group, LLC  
Attn: Samuel Salomon  
1627 50th Street  
Brooklyn, NY 11204



378 94th Street Realty LLC  
Attn: Michael Psaras  
8406 Ridge Boulevard  
Brooklyn, NY 11209

Post 168 LLC  
Attn: Xin Tuan Liu  
209 Paulding Avenue  
Staten Island, NY 10314

Monica Pope  
27 James P. Kelly Way, #7  
Middletown, NY 10940

Ri Yi Zheng  
1031 Rutland Road  
Brooklyn, NY 11212

2667 Kingsbridge Terraca Corp.  
Attn: Franc Gjini  
1858 Colden Avenue, #2R  
Bronx, NY 10462