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**Richard C. Fipphen**  
Assistant General Counsel



March 4, 2015

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

***Re: Matter 15- \_\_\_\_ – Petition of Verizon New York Inc. for Limited Orders  
of Entry for 10 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 10 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://www22.verizon.com/about/community/nypsc\\_petitions.htm](http://www22.verizon.com/about/community/nypsc_petitions.htm).

If any of the respondents believe that they have been included in this Petition in error or are now willing to allow a survey of their property in preparation for installation of Verizon's cable television facilities at their building, they should contact me at the above email address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard C. Fipphen".

Richard C. Fipphen

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
Orders of Entry for 10 Multiple-Dwelling Unit  
Buildings in the City of New York**

**Matter 15-\_\_\_\_\_**

**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 10 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 10 MDUs listed in Exhibit 1. Each MDU is a residential building; the number of living units in each MDU is set forth in column D of Exhibit 1. The owner or managing agent of each MDU listed on Exhibit 1 has either: (1) failed to respond to Verizon’s letters requesting access for purposes of performing a pre-installation survey, or (2) affirmatively denied Verizon’s request for access. Column I of Exhibit 1 sets forth the type of response received for each building.

**Owners and Agents**

2. The names of the current owners and managing agents of each MDU are listed in Columns E, F and G 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 H of Exhibit 1. Supporting documentation is provided in Exhibit 2.

**Name of the Individual Responsible for Installation**

5. Alyson Seigal, 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.

**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 the rights of the owner of each MDU 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**

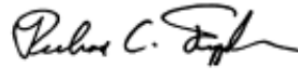
8. Verizon’s formal efforts are set forth in Column H of Exhibit 1.

**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,



RICHARD C. FIPPHEN  
140 West Street, 6<sup>th</sup> Floor  
New York, New York 10007  
(212) 519-4718

Counsel for Verizon New York Inc.

Dated: New York, New York  
March 4, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
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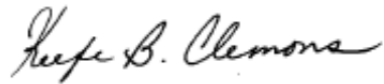
**Matter 15-\_\_\_\_\_**

**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. I have read the foregoing Petition and I know its contents. To the best of my

knowledge, based on information provided to me 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  
March 4, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

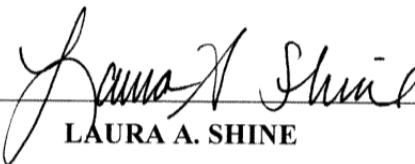
**Petition of Verizon New York Inc. for Limited  
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**Matter 15-\_\_\_\_\_**

**DECLARATION OF LAURA A. SHINE**

A copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 10 Multiple-Dwelling Unit Buildings in the City of New York was sent on March 4, 2015 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 4, 2015

## SERVICE LIST

220 W 98 Realty LLC  
c/o The Expansion Group  
Attn: Elliot Small  
250 West 57th Street, Suite 1401  
New York, NY 10107

Chizuk Beth Associates, LP  
c/o EK Realty LLC  
Attn: Jacob Eisenstein  
939 Eighth Avenue, #301  
New York, NY 10019

Townsend Realty Estates LLC  
Attn: Sam Rosen  
1276 50th Street  
Brooklyn, NY 11219

Reservoir Associates, LLC  
Attn: Kale Hoffman  
825 East 233rd Street  
Bronx, NY 10466

Drylawson Realty Corp.  
Attn: David Green  
1419 Avenue J  
Brooklyn, NY 11230

LMKW Washington Associates LLC  
c/o C & C Apartment Management  
Attn: Nick Papakostopoulos  
1735 Park Avenue, Suite 300  
New York, NY 10035

KPP II Cambreleng II Avenue LLC  
c/o KPP Management LLC  
Attn: Maria Minelli  
1140 Avenue of the Americas, # 9  
New York, NY 10036

Jo-Al Real Estate, Inc.  
c/o Elite Management  
Attn: Jose Olivares  
973 Amsterdam Avenue  
New York, NY 10025

200 West 85th Street, LLC  
c/o Brusco Group  
Attn: John Brusco  
163 West 74th Street  
New York, NY 10023

F.E. Nadal Corporation  
Attn: Frank Nadal  
140 Cabrini Boulevard  
New York, NY 10033