

140 West Street  
6<sup>th</sup> Floor  
New York, NY 10007  
Tel (212) 519-4718  
richard.fipphen@verizon.com

**Richard C. Fipphen**  
Assistant General Counsel



April 29, 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 34 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 34 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).

**Respondents: Please contact me at [richard.fipphen@verizon.com](mailto:richard.fipphen@verizon.com) 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. Please include in the email message your name, company, address, telephone number, and the address of the building.**

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 34 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 34 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 34 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**

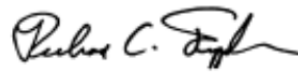
8. Verizon’s formal efforts are set forth in Column H of Exhibit 1.

**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  
April 29, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
Orders of Entry for 34 Multiple-Dwelling Unit  
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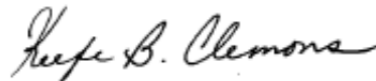
**Matter 15-\_\_\_\_\_**

**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  
April 29, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

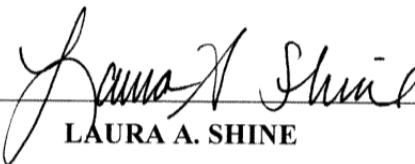
**Petition of Verizon New York Inc. for Limited  
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**Matter 15-\_\_\_\_\_**

**DECLARATION OF LAURA A. SHINE**

A copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 34 Multiple-Dwelling Unit Buildings in the City of New York was sent on April 29, 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  
April 29, 2015

## SERVICE LIST

Riverview Tenants Corp.  
c/o Maxwell-Kates, Inc.  
Attn: Katia Raab  
9 East 38th Street, 6th Floor  
New York, NY 10016

Evita Realty Corp.  
Attn: Al Lazar  
1139 East 12th Street  
Brooklyn, NY 11230

2013 Amsterdam Avenue Housing Association, LP  
c/o Metropolitan Realty Group, LLC  
Attn: Scott Jaffee  
60 Cuttermill Road, #200  
Great Neck, NY 11021

12 West 96th Street Corporation  
c/o Orsid Realty Corp.  
Attn: Evan McCrann  
1740 Broadway, 2nd Floor  
New York, NY 10019

Morningside Housing Associates, LP  
c/o Nelson Management Group  
Attn: Adam Nadel  
118-35 Queens Boulevard, 14th Floor  
Forest Hills, NY 11375

Twenty-Two Forty Associates LLC  
Attn: Robert Farhadian  
381 Park Avenue South, #1001  
New York, NY 10016

First Street Development LLC  
c/o Granite International Management LLC  
Attn: Catherine Economakis  
138 Atlantic Avenue  
Brooklyn, NY 11201

75-89 Wadsworth Associates LLC  
c/o Lemle & Wolff, Inc.  
Attn: Kasmin Garcia  
5925 Broadway  
Bronx, NY 10463

300 Wadsworth LLC  
c/o R.C.R. Management LLC  
Attn: Morris Schreiber  
155 Riverside Drive, #1D  
New York, NY 10024

701 West Associates, LP  
Attn: Blanca Buduen  
1841 Broadway, #1000  
New York, NY 10023

Peter B. Realty, LLC  
Attn: Moshe Piller  
1276 50th Street  
Brooklyn, NY 11219

720 West Partners LLC  
c/o Heritage Realty, LLC  
Attn: Brian Newman  
619 West 54th Street, #10A  
New York, NY 10019

Barry Martin 4410 Corp.  
Attn: Ina Feinstein  
4422 Broadway, #330  
New York, NY 10040

500 West 190th Street LLC  
c/o Washington Towers LLC  
Attn: Alex Kohn  
514 West 184th Street, Basement  
New York, NY 10033

Haven Equities, Inc.  
c/o Plymouth Management Group, Inc.  
Attn: Jack Lerner  
1776 Broadway, #1006  
New York, NY 10019

124 Realty LLC  
c/o Edel Family Management Corp.  
Attn: Florence Edelstein  
2207 Coney Island Avenue  
Brooklyn, NY 11223

Overlook Terrace LLC  
c/o Rotner Management Corp.  
Attn: Ken Rotner  
330 East 71st Street, #1E  
New York, NY 10021

Golson Realty Corporation  
Attn: James Golson  
1841 Broadway, #1206  
New York, NY 10023

560 West 165th Street Associates, LP  
c/o Volunteers of America  
Attn: Sandra Marquez  
560 West 165th Street  
New York, NY 10032

Bennett Apartments LLC  
Attn: David Kupperman  
63-07 Saunders Street, #1F  
Rego Park, NY 11374



ZM Force LLC  
Attn: Zef Perllleshi  
748 Astor Avenue  
Bronx, NY 10467

Pelham 1540, LLC  
c/o Pelican Management, Inc.  
Attn: Thomas Frye  
524 North Avenue  
New Rochelle, NY 10801

172nd Street Realty, LLC  
c/o MP Management LLC  
Attn: Moshe Piller  
1276 50th Street  
Brooklyn, NY 11219

777 Management Corp.  
Attn: Jose Lopez  
233 West 230th Street  
Bronx, NY 10463

Saint Paul the Apostle Senior HDFC  
c/o Progress of Peoples Management Corp.  
Attn: George Stathoudakis  
191 Joralemon Street, 8th Floor  
Brooklyn, NY 11201

40-30 Realty Group, LLC  
c/o Douglaston Realty Management  
Attn: Panos Papadoniou  
42-01 235th Street  
Douglaston, NY 11363

Kansas Leasing LLC  
c/o Kings & Queens Residential LLC  
Attn: Gary Flamenbaum  
97-77 Queens Boulevard, #1210  
Rego Park, NY 11374

Theodore Realty Co., LLC  
Attn: Antonios Feggoudakis  
142-30 Sanford Avenue, #1U  
Flushing, NY 11355

Carlton Development Corp.  
Attn: Leslie Orgel  
95-25 Queens Boulevard, #1014  
Rego Park, NY 11374

86-06 35 Avenue Realty Co., LLC  
c/o Pinnacle Group  
Attn: Tal Sharon  
1 Penn Plaza, #4000  
New York, NY 10119

First Flatiron LLC  
Attn: Michael Namer  
15 West 18th Street, #200  
New York, NY 10011

1265 Broadway LLC  
Attn: Hersel Torkian  
1650 Broadway, #901  
New York, NY 10019

SoBro Harlem HDFC  
Attn: Deborah Johnson  
555 Bergen Avenue, 3rd Floor  
Bronx, NY 10455

Gansevoort Cooperative Corp.  
c/o Andrea Bunis Management, Inc.  
Attn: Ramon Parra  
45 West 45th Street, #901  
New York, NY 10036