

140 West Street  
6<sup>th</sup> Floor  
New York, NY 10007  
Tel (212) 519-4717

**Joseph A. Post**  
Deputy General Counsel – NY



July 20, 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 [228correspondence@verizon.com](mailto:228correspondence@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, telephone number, email address and the address of the building (as it appears on Exhibit 1 of the Petition).**

Respectfully submitted,

A handwritten signature in black ink that reads "Joseph A. Post".

Joseph A. Post

**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 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**

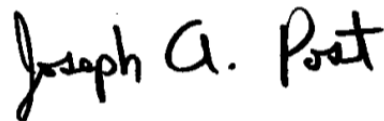
8. Verizon’s formal efforts are set forth in Column H of Exhibit 1.

**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,

Handwritten signature of Joseph A. Post in black ink.

JOSEPH A. POST  
140 West Street, 6<sup>th</sup> Floor  
New York, New York 10007  
(212) 519-4717

Counsel for Verizon New York Inc.

Dated: New York, New York  
July 20, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

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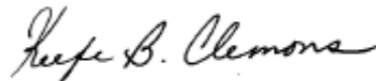
**Matter 15-\_\_\_\_\_**

**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  
July 20, 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 July 20, 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  
July 20, 2015

## SERVICE LIST

Midwood Realty Associates  
c/o Allstate Realty Associates  
Attn: Joseph Spitzer  
5420 13th Avenue  
Brooklyn, NY 11219

Brighton Realty LLC  
Attn: Joshua Lazarus  
20 Robert Pitt Drive, #204  
Monsey, NY 10952

151 West, LLC  
c/o Pelican Management, Inc.  
Attn: Marc Goldfarb  
524 North Avenue  
New Rochelle, NY 10801

Washington Heights West Harlem HDFC  
c/o Heritage Health and Housing, Inc.  
Attn: Richard Fowler  
416 West 127th Street, Office  
New York, NY 10027

FTG Realty Corp.  
Attn: Frank Battaglia  
2503 Eastchester Road  
Bronx, NY 10469

45 Holding Corp.  
Attn: Reinaldo Romero  
349 East 149th Street  
Bronx, NY 10451

Cosmopolitan Associates I LLC  
Attn: Alina Camacho  
47-01 49th Street  
Woodside, NY 11377

55th Street Apartments, Inc.  
c/o J&C Lamb Management Corp.  
Attn: Charles Johnson  
4 Park Avenue, Mezzanine  
New York, NY 10016

Webb Avenue Company, LLC  
c/o Pelican Management, Inc.  
Attn: Josh Goldfarb  
524 North Avenue  
New Rochelle, NY 10801

2956 Bainbridge Associates, LLC  
c/o Bajraktari Realty Corp.  
Attn: Gani Bajraktari  
617 188th Street  
Bronx, NY 10458

2975 Realty LLC  
Attn: Nue Marku  
2975 Marion Avenue, #B  
Bronx, NY 10458

Edenwald Associates, LLC  
c/o Schur Management Co., Ltd.  
Attn: Sonia Igelsias  
2432 Grand Concourse  
Bronx, NY 10458

Rivka Realty Corp.  
Attn: Ira Mack  
2388 Valentine Avenue  
Bronx, NY 10458

1901 Hennessy LLC  
Attn: Howard Miller  
1293 East 5th Street, #1G  
Brooklyn, NY 11230

1506 Wallco, LLC  
c/o Tryax Realty Management  
Attn: Miguel Leon  
1476 Walton Avenue  
Bronx, NY 10452

Urban Renaissance Collaboration LP  
c/o Promesa Homefirst HDFC, Inc.  
Attn: Linda Rodriguez  
2804 Third Avenue, 1st Floor  
Bronx, NY 10455

ELG1275 LLC  
Attn: Yechiel Weinberger  
5014 16th Avenue, #257  
Brooklyn, NY 11204

Bronx Care Associates, LP  
c/o Langsam Property Services Corp.  
Attn: Linda Hernandez  
1601 Bronxdale Avenue, #201  
Bronx, NY 10462

Reb Shteir Realty LLC  
c/o Hilltop Management Group  
Attn: David Kramer  
2273 65th Street  
Brooklyn, NY 11204

FR Real Estate Development LP  
c/o PRB Realty Corp.  
Attn: Elsie Ortiz  
1158 Intervale Avenue, Ground Floor  
Bronx, NY 10459



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

878 East 176th Street Owner, LLC  
c/o Kinsey Equities, LLC  
Attn: James Kinsey  
350 Seventh Avenue, #302  
New York, NY 10001

Kashtan Realty LLC  
c/o JRC Management LLC  
Attn: Richard Podpirka  
93-54 Queens Boulevard, #1D  
Rego Park, NY 11374

East Tremont Realty Corp.  
c/o East Tremont Ave. Holdings LLC  
Attn: Michael Black  
1301 Cornaga Avenue  
Far Rockaway, NY 11691

3145 Brighton Fourth Owners Corp.  
c/o United Management Corp.  
Attn: Arthur Wiener  
166 Montague Street  
Brooklyn, NY 11201

MBD Silva Taylor HDFC, Inc.  
c/o The Wavecrest Management Team Ltd.  
Attn: Ron Roman  
87-14 116th Street  
Richmond Hill, NY 11418

Riverstone Condominium  
c/o Goodman Management Co., Inc.  
Attn: Richard Goodman  
5683 Riverdale Avenue, #203  
Bronx, NY 10471

240 Crown LLC  
c/o Icon Management Group LLC  
Attn: Abraham Vallach  
4620 16th Avenue  
Brooklyn, NY 11204

564-580 Park Plaza Condominium  
c/o Stone Edge Management Inc.  
Attn: Barry Ekstein  
134 Broadway  
Brooklyn, NY 11249

75 Ocean Empire LLC  
c/o Ocean Empire Management LLC  
Attn: Joseph Hertz  
328 St. Marks Avenue  
Brooklyn, NY 11238

180 East 17th Street Company, LLC  
c/o Metropolitan Property Services, Inc.  
Attn: Robert Giaziano  
141-50 85th Road  
Jamaica, NY 11435

Michael Lemon  
c/o Leeds Associates, LLC  
Attn: Stacey Shurgin  
215 West 83rd Street  
New York, NY 10024

Linden Gardens Condominium  
Attn: Jonathan Samet  
1360 East 14th Street, 2nd Floor  
Brooklyn, NY 11230

Granville Payne HDFC, Inc.  
c/o The Wavecrest Management Team Ltd.  
Attn: Joseph Figueroa  
87-14 116th Street  
Richmond Hill, NY 11418