

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



Joseph A. Post
Deputy General Counsel – NY

October 1, 2015

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

***Re: Matter 15-____ – Petition of Verizon New York Inc. for Orders of Entry
for 15 Multiple-Dwelling Unit Buildings in the City of New York***

Dear Secretary Burgess:

Enclosed please find the Petition of Verizon New York Inc. for Orders of Entry for 15 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 15 properties. Verizon requests that orders of entry be issued by the Commission directing the owner of each building to permit Verizon to install cable television facilities, as provided in Section 898.4(b)(9) of the Commission's Rules.

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.

Respondents: If you believe that your building was included in this Petition in error or you are now willing to allow 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,

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 Orders of
Entry for 15 Multiple-Dwelling Unit Buildings in
the City of New York**

Matter 15-_____

PETITION FOR ORDERS OF ENTRY

Verizon New York Inc. (“Verizon”) respectfully submits this Petition for Orders of Entry, pursuant to 16 NYCRR § 898.4, allowing Verizon to install fiber-optic facilities to provide cable television service at 15 multiple-dwelling unit (“MDU”) buildings in the City of New York. In support of this Petition, Verizon states as follows:

Specific Location of the Properties

1. Verizon seeks to install fiber-optic facilities to provide cable television service at the 15 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 and the number of living units in each MDU is set forth in Column D.

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 install fiber-optic facilities to provide cable television services to residents and businesses in each building. These fiber-optic facilities will also allow Verizon to provide voice telephony and broadband services in the building. Pre-installation surveys of each property have been completed. Column I of Exhibit 1 sets forth the type of installation that Verizon intends to use for each building.

Proof of Service of Notice of Intention to Install Cable Television Facilities and Service

4. After several unsuccessful attempts by Verizon to secure permission to start the proposed fiber-optic installation, each owner and/or managing agent received a letter from Verizon along with a Notice of Intent to Install Cable Television Facilities. 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 installations.

Indemnification

6. Verizon warrants that it will bear the entire cost of each installation. Verizon further warrants that it will indemnify the owner of each building for any damage that may be caused by Verizon in connection with the installation.

Installation Work Will Be Conducted without Prejudice to the Owner's Right to Receive Just Compensation

7. The proposed installation 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

8. Verizon's formal efforts to gain entry to the identified properties are set forth in Column H 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 install its facilities for reasons that may include, but are not necessarily limited to, refusals to permit access, delays by building owners or

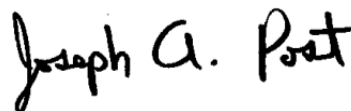
managing agents in communicating with Verizon or in reaching a decision, and requests to defer work by Verizon pending building renovations or other activity. Verizon will continue attempting to work cooperatively with building owners and managing agents to obtain access, and will periodically advise the Commission of the progress of such efforts.

Opportunity for the Owner to Answer the Petition

9. The owner of each building listed on 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 matters 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 install cable television facilities at each building, together with such other relief as the Commission may deem just and proper.

Respectfully submitted,



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

Counsel for Verizon New York Inc.

Dated: October 1, 2015

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

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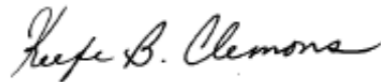
Matter 15-_____

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. 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
October 1, 2015

**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 Orders of Entry for 15 Multiple-Dwelling Unit Buildings in the City of New York was sent on October 1, 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
October 1, 2015

SERVICE LIST

250 East Houston Street Associates
c/o Park Square Associates
Attn: Michael Shaoul
60 East 42nd Street, #2217
New York, NY 10165

LESPMHA HDFC
Attn: Richard Ramirez
228 East 3rd Street
New York, NY 10009

27 LLC
c/o Duell LLC
Attn: Joseph Sclafani
5 East 57th Street, 10th Floor
New York, NY 10022

Hitchcock Plaza, Inc.
c/o R.C.R. Management, LLC
Attn: Ari Paul
155 Riverside Drive
New York, NY 10024

Southwest 141st Street HDFC, Inc.
c/o The Wavecrest Management Team Ltd.
Attn: Robert Spitz
87-14 116th Street
Richmond Hill, NY 11418

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

1005 Yankee Pride LLC
c/o Finkelstein Timberger East Real Estate LLC
Attn: Steven Finkelstein
111 Brook Street
Scarsdale, NY 10583

Pope John Paul II Senior HDFC
c/o Progress of Peoples Management Corp.
Attn: George Stathoudakis
191 Joralemon Street
Brooklyn, NY 11201

La Casa Nuestra HDFC
c/o El Barrio's Operation Fightback Inc.
Attn: Mariluz Hernandez
413 East 120th Street, #403
New York, NY 10035

Alba Realty Corp.
Attn: Sage Ossa
3005 Avenue N
Brooklyn, NY 11210

West 153rd Street HDFC
c/o WinnResidential (NY) LLC
Attn: Elizabeth Polanco
2534 Adam Clayton Powell Jr Blvd, 1st Floor
New York, NY 10039

Hampton Place Realty, LLC
Attn: Theodore Livanos
54-14 Roosevelt Avenue
Woodside, NY 11377

470 West 146 Street HDFC
Attn: Thelma Greene
470 West 146th Street
New York, NY 10031

Highbridge House Ogden LLC
c/o Stellar Management
Attn: Tobias Sahl
156 William Street, 10th Floor
New York, NY 10038

Claremont Park Associates, LP
c/o West Side Federation for Senior and Supportive
Housing, Inc.
Attn: Daniel Drosin
2345 Broadway
New York, NY 10024