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

**Richard C. Fipphen**  
Assistant General Counsel



June 12, 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 19 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 19 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 that reads "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 19 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 19 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 19 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**

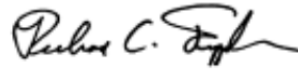
8. Verizon’s formal efforts are set forth in Column H of Exhibit 1.

**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  
June 12, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

**Petition of Verizon New York Inc. for Limited  
Orders of Entry for 19 Multiple-Dwelling Unit  
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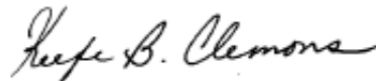
**Matter 15-\_\_\_\_\_**

**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  
June 12, 2015

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

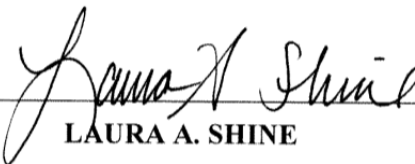
**Petition of Verizon New York Inc. for Limited  
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**Matter 15-\_\_\_\_\_**

**DECLARATION OF LAURA A. SHINE**

A copy of the Petition of Verizon New York Inc. for Limited Orders of Entry for 19 Multiple-Dwelling Unit Buildings in the City of New York was sent on June 12, 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  
June 12, 2015

## SERVICE LIST

2001 Avenue P, LLC  
c/o Benson Management LLC  
Attn: Jason Korn  
2003 Avenue J, #1C  
Brooklyn, NY 11210

P. Bigg Realty LLC  
c/o Benson Management LLC  
Attn: Jason Korn  
2003 Avenue J, #1C  
Brooklyn, NY 11210

1401 Elm LLC  
c/o DiMaggio Realty Corp.  
Attn: Carlo DiMaggio  
2285 Ocean Avenue  
Brooklyn, NY 11229

217 Quentin Road Partners LLC  
c/o Marin Management Corp.  
Attn: Martin Hollander  
157 East 25th Street  
New York, NY 10010

Parkville Realty Associates LLC  
c/o Langsam Property Services Corp.  
Attn: Michael Bayne  
1601 Bronxdale Avenue, #201  
Bronx, NY 10462

840 Realty LLC  
c/o Benson Management LLC  
Attn: Jason Korn  
2003 Avenue J, #1C  
Brooklyn, NY 11210

A. Fried and A. Gedailovich, LLC  
Attn: Edith Fried  
1841 58th Street  
Brooklyn, NY 11204

Nanci Realty LLC  
c/o Katz Realty Group  
Attn: Ronald Katz  
45-17 Marathon Parkway  
Little Neck, NY 11362

2320 Realty Corp.  
Attn: Julius Mazurek  
1464 47th Street  
Brooklyn, NY 11219

ASJM Realty Associates LLC  
c/o Burke Leighton Management LLC  
Attn: Alfred Sayegh  
2564 Bedford Avenue  
Brooklyn, NY 11226

Farragut LLC  
c/o Hy-Max Realty LLC  
Attn: Robert Solomon  
1890 Ocean Avenue, #A7  
Brooklyn, NY 11230

Aqueduct Realty LLC  
Attn: Charles Rosenwasser  
1208 Avenue M, #2483  
Brooklyn, NY 11230

Findlay House Inc.  
Attn: Christopher Pignone  
1175 Findlay Avenue, Office  
Bronx, NY 10456

Wilton Associates Limited Partnership  
c/o Prestige Management Inc.  
Attn: Clayton Johnson  
1200 Zerega Avenue  
Bronx, NY 10462

210 Properties Associates, LLC  
Attn: Nicolas Whittaker  
210 East 51st Street, #A4  
Brooklyn, NY 11203

363 Third Ave., LLC  
c/o R.E.D.I. Management Corp.  
Attn: Mindi Friedman  
247 West 36th Street, #303  
New York, NY 10018

5510 13th Realty LLC  
Attn: Yaakov German  
1345 45th Street  
Brooklyn, NY 11219

PackProd International Condominium Association  
c/o Andrews Building Corporation  
Attn: Eileen Bosman  
666 Broadway, 12th Floor  
New York, NY 10012

2 Thayer Street Realty Corp.  
Attn: Susan Moy  
1324 Avenue V  
Brooklyn, NY 11229