140 West Street 6th Floor New York, NY 10007 Tel (212) 519-4718 Fax (212) 962-1687 richard.fipphen@verizon.com

Richard C. Fipphen Assistant General Counsel



February 6, 2015

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

Re: Case 15-V-____ – Petition of Verizon New York Inc. for Orders of Entry for 30 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 30 Multiple-Dwelling Unit Buildings in the City of New York.

Verizon has completed pre-installation surveys at each of the 30 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.

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

Respectfully submitted,

Pulse C. July

Richard C. Fipphen

STATE OF NEW YORK PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York

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 30 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 30 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 in Exhibit 1 has either: (1) failed to respond to Verizon's letters requesting access to install fiber-optic facilities to provide cable television service, 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 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 J 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.

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

7. The proposed installation work will be conducted without prejudice to the rights of the owner of each building 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.

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,

Pulm C. Top

RICHARD C. FIPPHEN 140 West Street, 6th Floor

New York, New York 10007

(212) 519-4718

Counsel for Verizon New York Inc.

Dated: February 6, 2015

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STATE OF NEW YORK PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York

Case 15-V-____

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.

KEEFE B. CLEMONS

Dated: New York, New York February 6, 2015

STATE OF NEW YORK PUBLIC SERVICE COMMISSION

Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York

Case 15-V-____

DECLARATION OF LAURA A. SHINE

A copy of the Petition of Verizon New York Inc. for Orders of Entry for 30 Multiple-Dwelling Unit Buildings in the City of New York was sent on February 6, 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 February 6, 2015

SERVICE LIST

Corner 1st and 15th, LLC c/o Sg2 Management LLC Attn: Aaron Feldman

25 West 45th Street, Suite 505

New York, NY 10036

Highline Properties, LLC Attn: Afshin Dilmanian

35 North Tyson Avenue, Room 102

Floral Park, NY 11001

108-110 Duane LLC

c/o Taube Management Realty LLC

Attn: Frank Fish

655 Third Avenue, 29th Floor

New York, NY 10017

Perla's Pueblo Condominium c/o Barton Management LLC Attn: Georgia Lombardo-Barton 10 East 39th Street, Suite 906

New York, NY 10016

Kimberly Condominium

c/o ABC Management Corporation

Attn: Seth Weinstein

152 West 57th Street, 12th Floor

New York, NY 10019

Greenpoint Associates

c/o Related Management Company, LP

Attn: Betty Perry

1450 Gateway Boulevard

Far Rockaway, NY 11691

2403 Hoffman Street, LLC

c/o H.S.C. Management Corp.

Attn: Josh Koppell 850 Bronx River Road

Yonkers, NY 10708

2155 Morris, LLC

Attn: Jay Newhouse

16 Squadron Boulevard, Room 106

New City, NY 10956

Avuben Realty LLC

Attn: Jay Rawicki

2557 Marion Avenue, Room 1B

Bronx, NY 10458

Nelson-Anderson Affordable Housing L.P.

c/o Sandra Erickson Real Estate Inc.

Attn: Sandra Erickson 1394 Clay Avenue, Apt. 1C

Bronx, NY 10456

709-715 Fairmont Place Owner, LLC c/o Langsam Properties Services

Attn: Edith Cardona 1601 Bronxdale Avenue Bronx, NY 10462

The MHG Family Limited Partnership c/o Rialto Management Corp.

Attn: Scott Lerman

872 Madison Avenue, Apt. 2A

New York, NY 10021

Momco Enterprises LLC c/o Pan Am Equities Inc.

Attn: John Cacaj

18 East 50th Street, 10th Floor

New York, NY 10022

Suru Realty LLC

c/o Cornerstone Management Systems, Inc.

Attn: Allen Abbani

271 Madison Avenue, Suite 800

New York, NY 10016

Bridge No. 50 Condominium

Attn: Salvatore Fanara 50 Bridge Street, Suite 501

Brooklyn, NY 11201

834 Fifth Avenue Corporation

c/o Brown Harris Stevens Residential Management, LLC

Attn: Eamon Early

770 Lexington Avenue, 4th Floor

New York, NY 10065

Park-81st Corp.

c/o Tudor Realty Services Co.

Attn: Sam Hess

250 Park Avenue South, 4th Floor

New York, NY 10003

Suru Realty LLC

c/o Cornerstone Management Systems, Inc.

Attn: Allen Abbani

271 Madison Avenue, Suite 800

New York, NY 10016

222 Riverside Drive Condominium

c/o Douglas Elliman Property Management

Attn: Martin Brooks 675 Third Avenue New York, NY 10017

53-63 Partners, LP

c/o The Scharfman Organization

Attn: Mark Scharfman

111 North Central Park Avenue, Suite 400

Hartsdale, NY 10530

Convent 1 LLC

c/o Chestnut Holdings of New York, Inc.

Attn: Ben Rieder

5676 Riverdale Avenue, Suite 307

Bronx, NY 10471

Chinatown Preservation HDFC, Inc.

c/o Stanton Norfolk Inc.

Attn: Sue Yan

141 Norfolk Street

New York, NY 10002

Les Pieds Nickle's Inc.

c/o 49 Greene LLC

Attn: Lindsay Raggio

641 Lexington Avenue, 32nd Floor

New York, NY 10022

Unity Court HDFC

c/o JLP Metro Management Inc.

Attn: Louis Popovic

3397 East Tremont Avenue

Bronx, NY 10461

351 West 125 Limited Partnership

c/o New Castle Realty Services

Attn: Andrew Bauman 270 Madison Avenue

New York, NY 10016

City of New York

c/o Friedman Management Corp.

Attn: Kenneth Friedman

225 West 34th Street, Suite 2010

New York, NY 10122

3612 Broadway Partners LLC

c/o REM Residential

Attn: Victoria Guzman

36 West 37th Street, 8th Floor

New York, NY 10018

Symaco Inc.

c/o Envi Interiors & Property Management Corp.

Attn: Vivienne Sy

254 Canal Street, Suite 2002

New York, NY 10013

1185 Lebanon St. LLC

c/o Park Avenue South Management

Attn: Maurice McKenzie

507 West 186th Street, Suite A4

New York, NY 10033

Ventana Condominium

c/o First Service Residential

Attn: Michael Mintz

622 3rd Avenue, 14th Floor

New York, NY 10017