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| Federal Communications Commission Washington, D.C. 20554 | OMB 3060-1033 September 2003 | FOR FCC USE ONLY |
| FCC 396-C | | |
| Multi-Channel Video Program Distributor EEO Program Annual Report | | FOR COMMISSION USE ONLY FILE NO. B396 - 20190926AAF |
| Read INSTRUCTIONS Before Filling Out Form | | |

SECTION I IDENTIFYING INFORMATION

A. Name of Operator:

NORTHLAND COMMUNICATIONS CORPORATION

MSO Name:

NORTHLAND COMMUNICATIONS CORPORATION

B. Employment Unit's Mailing Address

101 STEWART ST SUITE 700

| | | |
|-----------------|-------------|--------------------|
| City SEATTLE | State WA | Zip Code 98101- |
|-----------------|-------------|--------------------|

FCC Registration Number:

0001568971

Emp. Unit ID # 5604

Application Purpose

- New Program Report
 Amendment to Program Report

 Supplemental Investigation Sheet (SIS) Attached

C. County and State in which unit's employment office is located

BONNER COUNTY, ID

D. Category of Respondent (check applicable box)

- Fewer than six (6) full-time employees during the selected payroll period: Complete Sections I, II and V
 Six (6) or more full-time employees during the selected payroll period: Complete ALL sections of the Form 396-C and the Supplemental Investigation Sheet, if attached

E. Pay Period Covered by this Report (inclusive dates) 07/15-07/31/19

F. Attachments: (See "Exhibit" buttons, below.)

SECTION II COMMUNITY INFORMATION

System Communities Comprising Local Employment Unit

| Ident No. | Name of Community | Location (State) | Type |
|-----------|-------------------|------------------|------|
|-----------|-------------------|------------------|------|

Review the list of communities served on the previous year's submission and attach as Exhibit A any [Exhibit 1] additions or deletions, using the format noted above. NOTE: APPLICABLE ONLY TO CABLE OPERATORS AND NOT TO OTHER MVPD UNITS.

SECTION III EEO POLICY AND PROGRAM REQUIREMENTS

Check YES or NO to each of the following questions. If answer to any question below is NO, attach as Exhibit B an explanation. [Exhibit 2]

| |
|--|
| 1. Have you complied with the outreach provisions of the FCC's MPVD Equal Employment Opportunity Rule, |
|--|

| | | |
|----|---|---|
| | 47 C.F.R. Section 76.75(b), during the twelve month period prior to filing this form? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 2. | Do you disseminate widely your EEO Program to job applicants, employees, and those with whom you regularly do business? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 3. | Do you contact organizations, media, educational institutions, and other potential sources of applicants for referrals whenever job vacancies are available in your organization? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 4. | Do you undertake to offer promotions to positions of greater responsibility in a nondiscriminatory manner? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 5. | To the extent possible, do you seek out entrepreneurs in a nondiscriminatory manner and encourage them to conduct business with all parts of your organization? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 6. | Do you analyze the results of your efforts to recruit, hire, promote, and use services in a nondiscriminatory manner and use these results to evaluate and improve your EEO program? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 7. | Do you define the responsibility of each level of management to ensure a positive application and vigorous enforcement of your policy of equal employment opportunity and maintain a procedure to review and control managerial and supervisory performance? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 8. | Do you conduct a continuing program to exclude every form of prejudice or discrimination based upon race, color, religion, national origin, age, or sex from your personnel policies and practices and working conditions? | <input checked="" type="radio"/> Yes <input type="radio"/> No |
| 9. | Do you conduct a continuing review of job structure and employment practices and maintain positive recruitment training, job design, and other measures needed to ensure genuine equality of opportunity to participate fully in all organizational units, occupations, and levels of responsibility? | <input checked="" type="radio"/> Yes <input type="radio"/> No |

SECTION IV ADDITIONAL INFORMATION

You may provide as Exhibit C any additional information that you believe might be useful in evaluating your efforts to comply with the Commission's EEO provisions. There is no requirement to provide additional data or information.

[Exhibit 3]

SECTION V CERTIFICATION

This report must be certified as follows:

- A. By the individual owning the reporting system if individually owned;
- B. By a partner, if a partnership; or
- C. By an officer, if a corporation or association.

I certify that to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

| | |
|---|-----------------------------------|
| Signed | Title CHIEF FINANCIAL OFFICER |
| Date 9/26/2019 | Name of Respondent ROD SIEMERS |
| Telephone No. (include area code) 2066211351 | |

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

FORM FCC 396-C - SUPPLEMENTAL INVESTIGATION SHEET

Part I Employee Job Descriptions

Give brief job descriptions for employees in the job categories specified below. The number specified in the box indicates the number of different job descriptions that are to be submitted for each category. Job descriptions should include the position title and a brief

description of the major duties and responsibilities of the individual(s) in the position.

| | | |
|------------------------------|---|--------------|
| 1. Officials and Managers | | [Exhibit 4] |
| 2. Professionals | | [Exhibit 5] |
| 3. Technicians | | [Exhibit 6] |
| 4. Sales Workers | | [Exhibit 7] |
| 5. Office and Clerical | | [Exhibit 8] |
| 6. Craft Workers (skilled) | | [Exhibit 9] |
| 7. Operatives (semi-skilled) | | [Exhibit 10] |
| 8. Laborers (unskilled) | | [Exhibit 11] |
| 9. Service Workers | 1 | [Exhibit 12] |

Part II Inquiries Concerning EEO Program and Practices

Submit responses to the inquiries indicated by a "check" Responses should be brief, but must provide sufficient information to describe the employment unit's activity and efforts in the area of inquiry.

- 1. Describe the employment unit's efforts to comply with the outreach provisions of 47 C.F.R. Section 76.75(b). [Exhibit 13]
- 2. Describe the employment unit's efforts to disseminate widely its equal employment opportunity program to job applicants, employees, and those with whom it regularly does business. [Exhibit 14]
- 3. Name the organizations, media, educational institutions, and other recruitment sources used to attract applicants whenever job vacancies become available. [Exhibit 15]
- 4. Explain the employment unit's efforts to promote in a nondiscriminatory manner to positions of greater responsibility. [Exhibit 16]
- 5. Describe the employment unit's efforts to encourage entrepreneurs to conduct business in a nondiscriminatory manner with all parts of its operation and provide an analysis of the results of those efforts. [Exhibit 17]
- 6. Report the findings of the employment unit's analysis of its efforts to recruit, hire and promote in a nondiscriminatory manner and explain any difficulties encountered in implementing its EEO program. [Exhibit 18]
- 7. Describe the responsibility of each level of the employment unit's management with respect to application and enforcement of its EEO policy and explain the procedure for review and control of managerial and supervisory performance. [Exhibit 19]
- 8. Describe the manner in which the employment unit conducts its continuing review of job structure and employment practices. [Exhibit 20]
- 9. Other Inquiries: [Exhibit 21]

Part III EEO Public File Report

Attach a copy of the EEO public file report from the previous year. Cable entities are required to place annually such information as is required by 47 C.F.R. Section 76.1702 in their public files. [Exhibit 22]

| | |
|--------------------------|---|
| EMP UNIT ID: 5604 | MSO NAME: NORTHLAND COMMUNICATIONS CORPORATION |
| | OPR NAME: NORTHLAND COMMUNICATIONS CORPORATION |

Approved by OMB
3060-1033

Exhibits

Exhibit 1
Description: F. ATTACHMENTS

Attachment 1

| Description |
|-------------|
|-------------|

[Employment Unit Corporate Restructuring](#)**Exhibit 12****Description:** RESPONSE TO PART I EMPLOYEE JOB DESCRIPTIONS**Attachment 12**

| Description |
|---|
| Exhibit 12, Service Workers |

Exhibit 16**Description:** RESPONSE TO PART II, QUESTION 4**Attachment 16**

| Description |
|---|
| Exhibit 16 Response to Question 4 |

Exhibit 17**Description:** RESPONSE TO PART II, QUESTION 5**Attachment 17**

| Description |
|---|
| Exhibit 17 Response to Question 5 |

Exhibit 20**Description:** RESPONSE TO PART II, QUESTION 8**Attachment 20**

| Description |
|---|
| Exhibit 20 Response to Question 8 |

Exhibit 22**Description:** RESPONSE TO PART III, EEO PUBLIC FILE REPORT**Attachment 22**

| Description |
|---|
| Exhibit 22 EEO Public File Report |

Northland Cable Television, Inc.
Employment Unit No. 5604
F. Attachments
Exhibit 1

The Employment Unit was owned by Northland Communications Corporation (“NCC”) through December 31, 2018. Effective January 1, 2019, as part of a corporate restructuring, NCC’s wholly owned subsidiary, Northland Cable Television, Inc. (“NCTV”), was merged into NCC, with NCTV being the surviving corporation. This report covers all relevant time periods for the employment unit regardless of ownership.

Northland Cable Television, Inc.
Employment Unit No. 5604
Supplemental Investigation Sheet
Part I – Employee Job Descriptions
Exhibit 7

Northland Cable Television’s Employment Unit No. 5604 in Sandpoint, Idaho does not employ individuals in the category of “Service Workers.”

Northland Cable Television, Inc.
Employment Unit No. 5604
Supplemental Investigation Sheet
Part II -- Inquiries Concerning EEO Program and Practices
Response to Question No. 4
Exhibit 16

It is Northland Cable Television's Employment Unit No. 5604 in Sandpoint, Idaho's policy to promote from within the organization to the greatest extent practical. Northland's Management and each Manager provide promotional and upgrading opportunities to all qualified employees on a non-discriminatory basis through the following actions:

- a. Managers who make decisions on placement and promotion are instructed on the company's EEO policy (the "EEO Policy") and are required to acknowledge, in writing, their review and understanding of the EEO Policy and EEO program and that they will abide by its mandates. The employment unit's efforts to promote in a nondiscriminatory manner to positions of greater responsibility are guided by the EEO program.
- b. Managers work to ensure that individuals who make decisions on hiring, placement and promotion consider all applicants without discrimination.
- c. Managers endeavor to give all those who apply equal opportunity to compete for higher paid positions. Managers encourage employees to obtain training in order to qualify for higher-paid positions, followed by assistance and counseling during annual employee reviews, and provide effective measures to enable employees with interest and potential to qualify themselves for such positions through informal and formal training.
- d. Managers provide opportunities to perform overtime work regardless of race, color, religion, national origin, age, sex or the presence of disability.
- e. Job vacancies are circulated internally through verbal notification during employee meetings, through Northland's website, office job board and digital poster in the office.
- f. Career advancement opportunities are available to all qualified employees. Northland fosters career advancement through the company's training programs: a) NCD training program that enables unit personnel to acquire skills that could qualify them for higher level positions, b) Sales Certification Program that supports and rewards unit personnel who demonstrate outstanding sales, product knowledge and customer service skills and qualify to earn additional compensation and c) Education Assistance program that encourages employees to further job related skills and improve performance.
- g. All employees are notified of their right to equal opportunity to compete for higher paid positions for which they are qualified through a Notice to Employees and Applicants ("EEO Notice"). The EEO Notice is displayed in a location visible to all employees in the employee hallway.

Northland Cable Television, Inc.
Employment Unit No. 5604
Supplemental Investigation Sheet
Part II -- Inquiries Concerning EEO Program and Practices
Response to Question No. 5
Exhibit 17

It is the policy of Northland Cable Television, on behalf of Employment Unit No. 5604, Sandpoint, ID to send an annual letter (please see Exhibit 17a) to certain minority and female-owned businesses within approximately 75 to 100 miles of the system office to determine whether they can provide a needed product or service. If an organization responds to Northland's letter, system personnel are instructed to consider these minority and female-owned businesses whenever they are seeking a new product or service. The letter notifies each minority and female-owned business that supporting minority and female-owned businesses is a part of Northland's Equal Employment Opportunity Policy, and the system affords equal opportunity in employment and business transactions regardless of race, color, religion, sex, national origin, age, disability or any other protected classes.

The system also places an annual advertisement (please see Exhibit 17b) in the local/community newspaper explaining Northland's EEO policy and encouraging business relationships with minority and female entrepreneurs.

**Northland Cable Television, Inc.
Employment Unit No. 5604
Supplemental Investigation Sheet
Part II -- Inquiries Concerning EEO Program and Practices
Response to Question No. 5
Exhibit 17a**

“Date”

“Name”

“Company”

“Address”

“City, State Zip”

Dear “Name”:


Northland Cable Television (“Northland”) is dedicated to providing the best possible telecommunication service to our subscribers, as well as supporting the communities we serve.

It is the policy of Northland to afford equal opportunity in employment and business transactions regardless of race, color, religion, sex, national origin, age, or disability. Supporting local minority and female-owned businesses is a part of our Equal Employment Opportunity Policy. We are therefore sending you this letter to inform you of Northland’s policy and to encourage future opportunities for Northland to conduct business with your company.

Sincerely,

Jane Doe

**Northland Cable Television, Inc.
Employment Unit No. 5604
Supplemental Investigation Sheet
Part II -- Inquiries Concerning EEO Program and Practices
Response to Question No. 5
Exhibit 17b**



NORTHLANDSM

**NOTICE OF EQUAL EMPLOYMENT
OPPORTUNITY POLICY**

It is the policy of Northland Communications and its affiliates to afford equal opportunity in employment and business transactions to all qualified individuals regardless of race, color, religion, sex, national origin, age, or disability, and any other protected classes. All employees and applicants are afforded equal opportunity with respect to all aspects of employment, including recruitment, hiring, compensation, training, advancement and all other terms, conditions, and privileges of employment.

Any organization that wishes to qualify as a Referral Organization (to refer qualified applicants for employment) should contact Northland in writing, giving the organization's mailing address, e-mail address (if any), telephone number and contact person and stating what kind of vacancies it is interested in. Northland will notify qualified Referral Organizations of employment opportunities in accordance with their request. All personnel and business decisions will be made in accordance with the principles of Northland's equal employment opportunity. www.yournorthland.com

Northland Cable Television, Inc.
Employment Unit No. 5604
Supplemental Investigation Sheet
Part II -- Inquiries Concerning EEO Program and Practices
Response to Question No. 8
Exhibit 20

Northland Cable Television's Employment Unit No. 5604 in Sandpoint, Idaho conducts its continuing review of job structure and other employment practices by:

1. Strategic Review – Periodically, the overall job structure of Employment Unit operations are reviewed by upper management for efficiency and analysis of the overall job structure's application to the company's evolving operations.
2. System Site Visits - System offices are periodically visited by upper management and representatives from the corporate office. During these visits and together with Employment Unit local management, operations are reviewed, and when business necessities arise, job structure is changed to accommodate changing business needs. An example of this type of change includes the updating and revision of Northland technical training program.
3. Employment practices are periodically reviewed by the divisional office, corporate office and, when appropriate, legal counsel prior to changes being made. These employment practices reviews include:
 - a. Evaluation of new positions;
 - b. Evaluation of position eliminations and terminations;
 - c. Evaluation and modification of disciplinary procedures;
 - d. Evaluation of company employment policies and procedures; and,
 - e. Evaluation of promotions, demotions, transfers and wage increases.
4. The Employment Unit's operating procedures are periodically reviewed by Employment Unit management, regional management and/or the corporate office and updated accordingly.



THIS REPORT COVERS OCTOBER 1, 2018 THROUGH SEPTEMBER 30, 2019.

Total Number of Full-Time Vacancies Filled During This Period: 0

Total Number of People Interviewed For Full-Time Vacancies During This Period: 0

This Employment Unit did not fill any full-time vacancies during the reporting period listed above.

SUPPLEMENTAL OUTREACH INITIATIVES

1. Training Programs: a) NCD training program that enables unit personnel to acquire skills that could qualify them for higher level positions, b) Sales Certification Program that provides a means for Sales Associates and Call Center Agents to improve their product knowledge, customer service and sales skills and their earnings and c) Education Assistance program that encourages employees to further job related skills and improve performance.
2. Participation in Internet and other programs designed to promote outreach: Posting on Featured Employer on SCTE and WICT and in the local newspaper regarding Equal Opportunity commitment and policies.