

Federal Communications Commission Washington, D.C. 20554  <p style="text-align: center;"><b>FCC 396-C</b></p>	OMB 3060-1033 September 2003	FOR FCC USE ONLY
<p><b>Multi-Channel Video Program Distributor EEO Program Annual Report</b></p> <p>Read INSTRUCTIONS Before Filling Out Form</p>		FOR COMMISSION USE ONLY FILE NO. <b>B396 - 20171011ACX</b>

**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-
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FCC Registration Number:  
 0003755394

Emp. Unit ID # 990186

**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  
 KING COUNTY, WA

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) 09/1-15/17

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 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]

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#### 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 EXECUTICE VICE PRESIDENT
Date 10/11/2017	Name of Respondent RICHARD CLARK
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).

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### 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             | 1 | [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           |   | [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]

<b>EMP UNIT ID:</b> 990186	<b>MSO NAME:</b> NORTHLAND COMMUNICATIONS CORPORATION
	<b>OPR NAME:</b> NORTHLAND COMMUNICATIONS CORPORATION

Approved by OMB  
3060-1033

**Exhibits**

**Exhibit 7**

**Description:** JOB DESCRIPTION-SALES WORKERS

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**Attachment 7**

Description
<a href="#">Job Description, Sales Workers</a>

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**Exhibit 13**

**Description:** RESPONSE TO QUESTION 1- EXHIBIT 13

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**Attachment 13**

Description
<a href="#">Question 1</a>

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**Exhibit 16**

**Description:** RESPONSE TO QUESTION 4 -EXHIBIT 16

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**Attachment 16**

Description
<a href="#">Question 4</a>

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**Exhibit 19**

**Description:** RESPONSE TO QUESTION 7- EXHIBIT 19

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**Attachment 19**

Description
<a href="#">Question 7</a>

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**Northland Communications Corporation**  
**Employment Unit No. 990186**  
**Supplemental Investigation Sheet**  
**Part I – Employee Job Descriptions**  
**Exhibit 7**

Northland Communications Corporation’s Employment Unit No. 990186 in Seattle, Washington does not employ individuals in the category of “Sales Workers.”

**Northland Communications Corporation**  
**Employment Unit No. 990186**  
**Supplemental Investigation Sheet**  
**Part II -- Inquiries Concerning EEO Program and Practices**  
**Response to Question No. 1**  
**Exhibit 13**

Northland Communications Corporation's Employment Unit No. 990186 in Seattle, Washington uses the following methods to comply with the outreach provisions of 47 C.F.R. Section 76.75(b):

1. The system recruits for all full-time job vacancies in its operation. It notifies a variety of sources, through its Resource Recruitment List, regarding its vacancies including minority and women organizations, educational institutions, media, and other recruitment sources who have requested notification of vacancies. This system's recruitment process does not provide preferential treatment to any individual or group based on race, national origin, color, religion, age or gender.
2. The system has engaged in Supplemental Outreach Initiatives including:
  - a. Establishment of training programs designed to enable unit personnel to acquire skills that could qualify them for higher level positions through:
    - i. NCD program which is designed to provide employees with a means to accelerate their skill levels, improve their wage earnings, and qualify them for higher level positions. NCD provides home study courses, on-the-job training and performance evaluations. It is currently available for technical staff and allows employees to reach skill levels in the following job positions: a) Service Technician, b) Senior Service Technician, c) System Technician, d) Senior System Technician and e) Plant Operations Manager.
    - ii. Sales Certification Program provides a means for customer service/sales associates to improve their product knowledge and customer service skills, wages and overall success with the company. It is available to all office staff.
    - iii. Education Assistance Program which is designed to encourage all employees to participate in educational programs to further their job-related skills and improve their performance by providing tuition assistance. The Educational Assistance Program supports educational program with job-related skills, thus enhancing employee qualifications and providing better opportunities for advancement.
  - b. Participation in job banks, Internet programs, and other programs designed to promote outreach generally (i.e., that are not primarily directed to providing notification of specific job vacancies) through the following:

**Northland Communications Corporation**  
**Employment Unit No. 990186**  
**Supplemental Investigation Sheet**  
**Part II -- Inquiries Concerning EEO Program and Practices**  
**Response to Question No. 1**  
**Exhibit 13**

- i. Once a year, Northland reaffirms its commitment to equal opportunity, as the Featured Employer on SCTE, WICT, and on Monster.com's Diversity banner. The postings include a link to Northland's website or its profile for the site that includes information regarding Northland's policy for equal opportunity in employment and business transactions. This posting is viewable for one-month.

**Northland Communications Corporation**  
**Employment Unit No. 990186**  
**Supplemental Investigation Sheet**  
**Part II -- Inquiries Concerning EEO Program and Practices**  
**Response to Question No. 4**  
**Exhibit 16**

It is Northland Communications Corporation's Employment Unit No. 990186 in Seattle, Washington'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 posting in the office lunch room, visible to all employees and through the company website.
- f. Career advancement opportunities are available to all qualified employees. Northland fosters career advancement through the company's 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 on the bulletin board in the employee kitchen.



**Northland Communications Corporation**  
**Employment Unit No. 990186**  
**Supplemental Investigation Sheet**  
**Part II -- Inquiries Concerning EEO Program and Practices**  
**Response to Question No. 7**  
**Exhibit 19**

Northland Communications Corporation's Employment Unit No. 990186 in Seattle, WA's description of responsibility of each level of the employment unit's management with respect to application and enforcement of its EEO policy includes the following operations and procedures:

1. The Vice President, Human Resources and General Counsel are responsible for application and enforcement of the EEO policy at the Employment Unit. Responsibilities include:
  - a. Review and acknowledgment of the company's EEO manual.
  - b. Annual program review of the EEO policies where the Employment Unit is required to complete a checklist verifying its compliance with the company's EEO policies and program.
  - c. Post notices to applicants and employees regarding the Employment Unit's commitment to EEO.
  - d. Ensure that all candidates who are interviewed are reminded of their EEO rights by asking them to review and complete the company's employment application, which discusses their EEO rights and reviews the company's EEO Policy.
  - e. Manage the recruiting process including:
    - i. Making a good faith effort to conduct broad and inclusive outreach by advertising with media having significant circulation in the community and by supplementing this advertising by using recruitment sources that further outreach for each and every full-time position.
    - ii. Ensuring that hiring decisions are made in a non-discriminatory manner.

Northland Communications Corporation's Employment Unit No. 990168 in Seattle, WA's procedures for review and control of managerial and supervisory performance are as follows:

1. The Vice President, Human Resources is responsible for the Employment Unit's positive application and enforcement of the EEO policies of the company.
2. The Vice President, Human Resources' performance with respect to the EEO policies is subject to review by legal counsel.
3. The Vice President, Human Resources supervisory performance is subject to review by the Executive Vice President.
4. All managers who make employment decisions are expected to abide by the letter and spirit of the company's EEO program.