

Federal Communications Commission Washington, D.C. 20554	OMB 3060-1033 September 2003	FOR FCC USE ONLY
<b>FCC 396-C</b>		
<b>Multi-Channel Video Program Distributor EEO Program Annual Report</b>		FOR COMMISSION USE ONLY FILE NO. B396 - 20190926AAH
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-
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FCC Registration Number:

0001579747

Emp. Unit ID # 5637

**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

OCONEE COUNTY, SC

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
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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,
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	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).

#### Exhibits

##### Exhibit 1

Description: F. ATTACHMENTS

##### Attachment 1

Description
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<a href="#">Employment Unit Corporate Restructuring</a>
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**Exhibit 3**

**Description:** SECTION IV: ADDITIONAL INFORMATON

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**Attachment 3**

Description
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<a href="#">Exhibit 3</a>
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**Northland Cable Television, Inc.**

**Employment Unit No. 5637**

**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. 5637**  
**Part IV – Additional Information**  
**Exhibit 3**

This Employment Unit made 19 hires during the past reporting period, the vast majority of which were conducted in compliance with the unit's customary broad outreach. There were three positions, however, in May and June 2019, that were filled outside the normal hiring process.

Two positions were filled by a manager new to the Company who was not familiar with the Company's standard hiring practices and, due to pressing business demands, took hiring steps without the standard prior coordination with Human Resources. A third position was filled outside the normal broad outreach, because the normal postings were delayed due to confidentiality concerns, and the hiring need was immediate. As a result, internal changes have been made so as not to delay the recruiting process in the future, including posting for positions in a confidential manner to ensure that broad outreach is conducted and that business operations are not delayed.

Again, these few outreach lapses in the prior reporting period were aberrations, with the Employment Unit making the vast majority of its hires consistent with established outreach procedures