Federal Communications Commission Washington, D.C. 20554	OMB 3060-1033 September 2003	FOR FCC USE ONLY	
FCC 396-C	1		
Multi-Channel Video Program Distribu Annual Report	tor EEO Program	FOR COMMISSION USE ONLY FILE NO. B396 - 20140929AKY	
Read INSTRUCTIONS Before Filling	Out Form		
SECTION I IDENTIFYING INFORMATION		·	
A. Name of Operator: NORTHLAND COMMUNICATIONS CORPORATION	ON		
MSO Name: NORTHLAND COMMUNICATIONS CORPORATION	ON		
B. Employment Unit's Mailing Address 101 STEWART ST SUITE 700			
City SEATTLE	State WA	Zip Code 98101-	
FCC Registration Number: 0001579747			
Emp. Unit ID # 265			
Application Purpose			
New Program Report			
C Amendment to Program Report			
Supplemental Investigation Sheet (SIS) Attached			
C. County and State in which unit's employment office LIMESTONE COUNTY, TX	e is located		
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 se Supplemental Investigation Sheet, if attached	lected payroll period: Co	mplete ALL sections of the Form 396	-C and the
E. Pay Period Covered by this Report (inclusive date	es) 07/15-31/14		
F. Attachments: (See "Exhibit" buttons, below.)			
SECTION II COMMUNITY INFORMATION			
System Commun	nities Comprising Local E	mployment Unit	
Ident No. Name of Cor	nmunity	Location (State)	Туре
Review the list of communities served on the previous additions or deletions, using the format noted above.  OPERATORS AND NOT TO OTHER MVPD UNITS	NOTE: APPLICABLE O		

# **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]

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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?	• Yes C No
2.	Do you disseminate widely your EEO Program to job applicants, employees, and those with whom you regularly do business?	• Yes C 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?	• Yes • No
4.	Do you undertake to offer promotions to positions of greater responsibility in a nondiscriminatory manner?	• Yes • 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?	• Yes C 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?	• Yes O 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?	• Yes C 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?	⊙ Yes C 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?	⊙ Yes C 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 EXECUTIVE VICE PRESIDENT
Date	Name of Respondent
9/29/2014 Telephone No. (include area code)	RICHARD I. CLARK
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

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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	[Exhibit 12]	
o. Betvice Workers	[EAHOR 12]	
Part II Inquiries Concerning EEO Progr	ram and Practices	
Submit responses to the inquiries indicated describe the employment unit's activity and	d by a "check" Responses should be brief, but must provide sufficient and efforts in the area of inquiry.	information to
<ol> <li>Describe the employment unit's effor 76.75(b).</li> </ol>	ts to comply with the outreach provisions of 47 C.F.R. Section	[Exhibit 13]
2. ☐ Describe the employment unit's effor	ets to disseminate widely its equal employment opportunity program ose with whom it regularly does business.	[Exhibit 14]
	rational institutions, and other recruitment sources used to attract	[Exhibit 15]
<ol> <li>Explain the employment unit's efforts responsibility.</li> </ol>	s to promote in a nondiscriminatory manner to positions of greater	[Exhibit 16]
	ts to encourage entrepreneurs to conduct business in a arts of its operation and provide an analysis of the results of those	[Exhibit 17]
6. Report the findings of the employmen	nt unit's analysis of its efforts to recruit, hire and promote in a in any difficulties encountered in implementing its EEO program.	[Exhibit 18]
7. Describe the responsibility of each le	evel of the employment unit's management with respect to EO policy and explain the procedure for review and control of	[Exhibit 19]
	aployment unit conducts its continuing review of job structure and	[Exhibit 20]
9. Other Inquiries:		[Exhibit 21]
Part III EEO Public File Report		
	rt from the previous year. Cable entities are required to place y 47 C.F.R. Section 76.1702 in their public files.	[Exhibit 22]
	ME: NORTHLAND COMMUNICATIONS CORPORATION	
OPR NAM	IE: NORTHLAND COMMUNICATIONS CORPORATION	
		Approved by OMI 3060-103
Exhibits		

Attachment 7

**Description:** PART 1: EMPLOYEE JOB DESCRIPTIONS

Exhibit 7

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# Description

Part 1: Employee Job Descriptions

Exhibit 13

**Description:** PART 2: QUESTION 1

## **Attachment 13**

Description

Exhibit 18

Part 2: Question 1

**Description:** PART 2: QUESTION 6

### **Attachment 18**

Part 2: Question 6

Exhibit 19

**Description:** PART 2: QUESTION 7

#### Attachment 19

Attacimient 17		
	Description	
Part 2: Question 7		

Exhibit 22

**Description: PART 3: EEO PUBLIC FILE REPORT** 

#### **Attachment 22**

Description				
Part 3: EEO Public File Report				

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Northland Communications Corporation Employment Unit No. 0265 Supplemental Investigation Sheet Part I – Employee Job Descriptions Exhibit 7

Northland Communications Corporation's Employment Unit No. 0265 located in Mexia, TX does not employ any individuals in the category of "Sales Workers."

Northland Communications Corporation Employment Unit No. 0265 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. 0265 in Mexia, TX 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. During the reporting period, this employment unit had six (6) open full-time positions. 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. NOTC 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. NOTC 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) Installer, b) Customer Service Technician, c) System Technician, d) Senior Technician and e) Plant 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 jobrelated 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:
    - i. Once a year, Northland reaffirms its commitment to equal opportunity, as the Featured Employer on SCTE, WICT, NAMIC, and on Monster.com's

Northland Communications Corporation Employment Unit No. 0265 Supplemental Investigation Sheet Part II -- Inquiries Concerning EEO Program and Practices Response to Question No. 1 Exhibit 13

Diversity and Inclusion newsletter. 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.

- ii. Once a year, the employment unit posts its policy for equal opportunity in employment and business transactions in the local newspaper.
- c. Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination.
  - i. Video training is reviewed by employment unit management regarding prevention of discrimination and harassment. After review, employment unit management complete an acknowledgement of viewing the training material, and their responsibilities as a member of management not to engage in the behavior and to ensure others do not engage in this behavior.

Northland Communications Corporation Employment Unit No. 0265 Supplemental Investigation Sheet Part II -- Inquiries Concerning EEO Program and Practices Response to Question No. 6 Exhibit 18

On an annual basis, management at the employment unit is required to complete a checklist verifying its compliance with the company's EEO policies and program. This checklist reviews the employment unit's efforts regarding dissemination, broad and inclusive outreach, supplemental outreach, record keeping, ongoing analysis, nondiscriminatory hiring and promotion policies, and dealing with contractors and complaints. A representative of the company's Human Resources team reviews the checklist and follows-up with the employment unit as appropriate.

The employment unit utilizes a recruitment resource list that has been compiled indicating organizations to contact for every full-time open position. Media used for recruitment purposes contain no indication, implicit or explicit, of a preference for one race, national origin, color, religion, age or sex over another. Advertisements for open positions note that the employment unit is an equal employment opportunity employer.

Pay increases and promotions are made regardless of race, color, religion, national origin, age, sex, or the presence of a disability. Employees are encouraged to apply for higher position in the employment unit when such openings become available. Training is provided to employees to help them qualify for higher positions.

With the implementation of the companies EEO policies and program, this employment unit, in its good faith estimation, has not encountered any problems in implementing its EEO program.

Northland Communications Corporation Employment Unit No. 0265 Supplemental Investigation Sheet Part II -- Inquiries Concerning EEO Program and Practices Response to Question No. 7 Exhibit 19

The Business Manager for Northland Communications Corporation's Employment Unit No. 0265 in Mexia, Texas is responsible for the application and enforcement of the company's EEO policy at this unit. The Business Manager's responsibilities include:

- Reviewing and acknowledging the company's EEO manual.
- Conducting an annual EEO policy program review, during which the Business Manager is required to complete a checklist verifying the unit's compliance with the company's EEO policies and program.
- Posting notices for job applicants and employees regarding the Employment Unit's commitment to EEO.
- Ensuring 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 identifies the company's EEO Policy.
- Conducting an annual EEO meeting during which employees are reminded of the company's EEO policies and requirements, and how the policy is enforced.
- Posting an annual advertisement in the local newspaper informing the public of the Employment Unit's commitment to EEO.

Together with the corporate office, the Business Manager manages the recruiting process for new employees. The Business Manager conducts broad and inclusive outreach by advertising with media having significant circulation in the community, and by supplementing this advertising with other recruitment sources that further expand the outreach for each and every full-time position. The Business Manager also ensures that hiring decisions are made in a non-discriminatory manner.

As discussed above, the Business Manager is responsible for the employment unit's positive application and enforcement of the company's EEO policies. In turn, the Business Manager's performance with respect to the EEO policies is subject to review by the VP, Human Resources and by legal counsel. The Business Manager's supervisory performance is also subject to review by the Executive Vice President. All managers who make employment decisions are expected to abide by the letter and spirit of the company's EEO program.



MEXIA – FC	C EMPLOYMENT	<b>UNIT #265</b>
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This Report covers	OCTOBER 1, 2013 THROUGH S	SEPTEMBER 30, 2014
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Total Number of Full-Time Vacancies Filled During This Period:6	
Total Number of People Interviewed For Full-Time Vacancies During This Period:	21

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

# **FULL-TIME POSITIONS FILLED**

#	Position Title	Number Hired	Recruitment Source of Successful Applicant(s)	Recruitment Source(s) Used to Fill the Vacancy Please see attached Recruitment Resource List for recruitment source contact information.	Number of Interviewees Referred by Each Recruitment Source	Total Number Interviewed
1	Installer	3	Walk-in (x2)	Texas State Technical College	0	14
			Mexia Daily News	Navarro College	0	
				NAACP	0	
				Mexia Business & Professional Org.	0	
				League of Individual Women	0	
				Heart of Texas Council	0	
				Ebony Ladies Social Club	0	
				Baylor University	0	
				Mexia Daily News	6	
				Groesbeck Journal	0	
				Walk-in	7	
				Employee Referral	1	

**Equal Opportunity Employer** I:\EEO\2014 Public File\Mexia14.doc



MEXIA - FCC EMPLOYMENT UNIT #265

#	Position Title	Number Hired	Recruitment Source of Successful Applicant(s)	Recruitment Source(s) Used to Fill the Vacancy Please see attached Recruitment Resource List for recruitment source contact information.	Number of Interviewees Referred by Each Recruitment Source	Total Number Interviewed
2	Senior	1	Walk-in	Texas University	0	1
	Technician			Craigslist	0	
				Palestine Herald Press	0	
				Tyler Morning Telegraph	0	
				The Athens Review	0	
				Waco Tribune	0	
				Texas Worksource	0	
				SCTE	0	
				Northland Communications Website	0	
				League of Individual Women	0	
				Heart of Texas Council	0	
				Ebony Ladies Social Club	0	
				Texas Business Women of Limestone	0	
				County		
				Baylor University	0	
				Texas State Technical College	0	
				Limestone County NAACP	0	
				Groesbeck Journal	0	
				Walk-in	1	



MEXIA - FCC EMPLOYMENT UNIT #265

#	Position Title		Recruitment Source of Successful	<b>\</b>	Number of Interviewees Referred	Total Number
		Hired		the Vacancy Please see attached Recruitment		Interviewed
			Applicant(s)	Resource List for recruitment source	by Each Recruitment Source	interviewed
				contact information.	Source	
2	Sales Associate	1	Walk-in		0	2
3	Sales Associate	1	vvaik-in	Texas University	0	2
				Craigslist	0	
				League of Individual Women	0	
				Heart of Texas Council	0	
				Ebony Ladies Social Club	0	
				Texas Business Women of Limestone	0	
				County		
				Baylor University	0	
				Texas State Technical College	0	
				Limestone County NAACP	0	
				Mexia Daily News	0	
				Texas Workforce	0	
				Groesbeck Journal	0	
				Navarro College	0	
				Northland Communications Website	0	
				Northland Community Channel	0	
				Walk-in	2	
4	Installer	1	Walk-in	Northland Communications Website	1	4
				Walk-in	3	
				Mexia Business & Professional	0	
				Women		
				Baylor University	0	
				Ebony Ladies Social Club	0	
				Navarro College	0	
				Craigslist	0	
				Texas State Technical College	0	
				Mexia Daily News	0	
				League of Individual Women	0	
				McLennan County College	0	
				Teague Chronicle	0	
				Fairfield Recorder	0	
				Heart of Texas Council	0	



#### SUPPLEMENTAL OUTREACH INITIATIVES

- 1. Training Programs: a) NOTC 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 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, and d) Video training reviewed by employment unit management regarding prevention of discrimination and harassment.
- 2. Participation in Internet and other programs designed to promote outreach: Positing on Featured Employer on WICT and NAMIC, Monster.com and local newspapers/local origination channel regarding Equal Opportunity commitment and policies.

### RECRUITMENT RESOURCE LIST

Name of Recruitment Source	Address	Contact Person	Telephone Number	Entitled to Notification [Yes/No]	Total Number of Interviewee Referrals
Navarro College	901 Martin Luther King Way, Mexia, TX 3200 W 7 <sup>th</sup> Lane Corsicana, TX 75110		(903) 874-6501 (254) 562-3848	No	0
McLennan County College	1400 College Dr. Waco, TX 76708		(254) 299-8000	No	0
League of Individual Women	P.O. Box 285 Mexia, TX 76667	E. Busby	(254) 562-2033	No	0
Limestone County NAACP	P.O. Box 612 Mexia, TX 76667	E. Busby	(254) 562-5614	No	0
Ebony Ladies Social Club	408 E. Hopkins Mexia, TX 76667			No	0
Texas State Technical College	3801 Campus Drive Waco, TX 76705	C. Gayeske	(254) 867-4844	No	0
Baylor University	1201 S. 9 <sup>th</sup> Waco, TX 76798	Dr. J. Hardick	(254) 710-1011	No	0



MEXIA – FCC EMPLOYMENT UNIT #26	5
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Name of Recruitment Source	Address	Contact Person	Telephone Number	Entitled to Notification [Yes/No]	Total Number of Interviewee Referrals
Heart of Texas Council of Governments	1514 S. New Rd Waco, TX 76711	M. McDow	(254) 756-7822	No	0
Mexia Business & Professional Women Org.	1304 Tamarisk Mexia, TX 76667			No	0
Mexia Daily News	P.O. Box 431 Mexia, TX 76667	L. Copley	(254) 532-2862	No	6
Northland Communications Website	101 Stewart St., Suite 700 Seattle, WA 98101 www.yournorthland.com	HR	(206) 621-1351	No	1
Groesbeck Journal	PO Box 440 Groesbeck, TX 76642		(254) 729-5103	No	0
Texas Workforce Commission	517 E. Main St Teague, TX 75860		(254) 739-2887	No	0
Walk-in	n/a	n/a	n/a	n/a	13
Employee Referral	n/a	n/a	n/a	n/a	1
Texas University	1 University Station Austin, TX 78712	Career Services	(512) 471-1217	No	0
Craigslist	dallas.craigslist.org waco.craigslist.org galveston.craigslist.org	n/a	n/a	No	0
Palestine Herald Press	519 N. Elm St. Palestine, TX 75801	C. Veretto	(903) 729-0281	No	0
Texas Business Women of Limestone County	PO Box 70 Round Rock, TX 78680			No	0
Tyler Morning Telegraph	410 W. Erwin Tyler, TX 75702	B. Wilburn	(903) 596-6202	No	0
The Athens Review	201 S. Prairieville Athens, TX 75751		(877) 670-3400	No	0



# 2014 EEO Public File Report MEXIA – FCC EMPLOYMENT UNIT #265

Name of Recruitment Source	Address	Contact Person	Telephone Number	Entitled to Notification [Yes/No]	Total Number of Interviewee Referrals
Waco Tribune	PO Box 2588 Waco, TX 76702	G. Allen	(800) 678-8742	No	0
Texas Worksource	1416 S. New Rd. Waco, TX 76711			No	0
Teague Chronicle	319 Main St. Teague, TX		(254) 739-2141	No	0
Fairfield Recorder	101 E Commerce st. Fairfield, TX		(903) 389-3334	No	0
SCTE	www.scte.org	n/a	n/a	No	0