

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 - 20140929AKX
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: 0001579747			
Emp. Unit ID # 2493			
Application Purpose			
<input checked="" type="radio"/> New Program Report <input type="radio"/> Amendment to Program Report			
<input checked="" type="checkbox"/> Supplemental Investigation Sheet (SIS) Attached			
C. County and State in which unit's employment office is located GRANT COUNTY, WA			
D. Category of Respondent (check applicable box)			
<input type="radio"/> Fewer than six (6) full-time employees during the selected payroll period: Complete Sections I, II and V <input checked="" type="radio"/> 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) 07/15-31/14			
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 EXECUTIVE VICE PRESIDENT
Date 9/29/2014	Name of Respondent RICHARD I. 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).

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]

EMP UNIT ID: 2493	MSO NAME: NORTHLAND COMMUNICATIONS CORPORATION
	OPR NAME: NORTHLAND COMMUNICATIONS CORPORATION

Approved by OMB
3060-1033

Exhibits

Exhibit 7

Description: PART 1: EMPLOYEE JOB DESCRIPTIONS

Attachment 7

Description

Part 1: Employee Job Descriptions

Exhibit 13**Description:** PART 2: QUESTION 1

Attachment 13

Description

Part 2: Question 1

Exhibit 18**Description:** PART 2: QUESTION 6

Attachment 18

Description

Part 2: Question 6

Exhibit 19**Description:** PART 2: QUESTION 7

Attachment 19

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. 2493
Supplemental Investigation Sheet
Part I – Employee Job Descriptions
Exhibit 7

Northland Communications Corporation’s Employment Unit No. 2493 located in Moses Lake, WA does not employ any individuals in the category of “Sales Workers.”

Northland Communications Corporation
Employment Unit No. 2493
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. 2493 in Moses Lake, WA 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 three (3) 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 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. 2493
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, NAMIC, and on Monster.com's 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 and on the system's local community channel.
- 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. 2493
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. 2493
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. 2493 in Moses Lake, Washington 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.



2014 EEO Public File Report
MOSES LAKE – FCC EMPLOYMENT UNIT #2493

THIS REPORT COVERS OCTOBER 1, 2013 THROUGH SEPTEMBER 30, 2014.

Total Number of Full-Time Vacancies Filled During This Period: 3

Total Number of People Interviewed For Full-Time Vacancies During This Period: 6

FULL-TIME POSITIONS FILLED

#	Position Title	Number Hired	Recruitment Source of Successful Applicant(s)	Recruitment Source(s) Used to Fill the Vacancy <i>Please see attached Recruitment Resource List for recruitment source contact information.</i>	Number of Interviewees Referred by Each Recruitment Source	Total Number Interviewed
1	Technical Services Rep.	1	Internal Promotion	Internal Promotion	n/a	n/a
2	Business Manager	1	Work Source	Work Source Big Bend Community College OIC of Washington Glass Door.com Craigslis Northland Communications Website Northland Communications Community Channel Spokane Review Cable360.net Columbia Basin Herald Monster.com Linkedin Referral Internet (source unknown)	2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 1 1	4
3	Sales Associate	1	Referral	Work Source Big Bend Community College OIC of Washington Craigslis Northland Communications Website Referral Walk-in Columbia Basin Herald	0 0 0 0 0 1 1 0	2



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, 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: Positioning 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
Columbia Basin Herald	815 W. 3 rd Ave. Moses Lake, WA 98837	Jamie	(509) 765-2844	No	0
Work Source	309 E 5 th Ave Moses Lake, WA 98837	Eileen	(509) 766-2559	No	2
Big Bend Community College	7662 Chanute St. NE Moses Lake, WA 98837		(509) 762-2135	No	0
OIC of Washington	PO Box 1517 Moses Lake, WA 98837	Jody	(509) 764-8120	No	0
Craigslist	Moseslake.craigslist.org			No	0
Northland Communications Website	101 Stewart St., Suite 700 Seattle, WA 98101 www.yournorthland.com/moses lake	HR	(206) 621-1351	No	0
Northland Communications Community Channel	317 S. Ash St. Moses Lake, WA 98837	Debbie	(509) 765-6151	No	0
Glassdoor.com	www.glassdoor.com	N/A	N/A	No	0
The Spokane Review (On-line)	999 W Riverside Spokane, WA 99201		(800) 338-8801		0



2014 EEO Public File Report
MOSES LAKE – FCC EMPLOYMENT UNIT #2493

Name of Recruitment Source	Address	Contact Person	Telephone Number	Entitled to Notification [Yes/No]	Total Number of Interviewee Referrals
Cable360.net	www.cable360.net	N/A	N/A	No	0
Monster.com	www.monster.com	N/A	N/A	No	0
LinkedIn	www.linkedin.com	N/A	N/A	No	0
Referral	N/A	N/A	N/A	N/A	2
Walk-in	N/A	N/A	N/A	N/A	1
Unknown	N/A	N/A	N/A	N/A	1