

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 - 20190926AAM
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 # 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) 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. 990186**

**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. 990186**  
**Part IV – Additional Information**  
**Exhibit 3**

This Headquarters Unit experienced unique changes during this year's EEO reporting period leading to a few instances of hiring outside of the Unit's customary broad outreach. At the very beginning of the period (October 1, 2018), Northland Communications Corporation was purchased by Mega Broadband Investments Holdings, LLC ("Buyer"). In connection with the acquisition, two individuals *already employed by Buyer* assumed the positions of Chief Executive Officer and Chief Financial Officer upon closing of the acquisition. Given the underlying transaction, Northland submits that these placements should be considered "internal promotions," rather than new hires.

Exigent circumstances led to an additional hire outside the customary outreach this past August. At that time, an affiliate of the company had signed an agreement to purchase substantially all of the assets of Eagle Communications, Inc. Shortly after the agreement was signed, it became clear that additional resources were required immediately to close the acquisition in a timely manner. The Director of Acquisitions and Special Projects position was created to facilitate the imminent closing, and it was immediately filled by an individual already known to company management. Finally, the abrupt and unexpected separation from employment of the company's prior COO in July (several weeks prior to closing of the Eagle Communication Inc. acquisition described above) presented another exigent circumstance. As a result of the proximity to closing, and the demands from ongoing operations and extensive build-out plans, the new COO was hired outside the customary outreach.

Notwithstanding these unique situations, Northland has maintained a rigorous EEO program and has in place measures to ensure broad outreach in its ongoing hiring at this Unit. We are committed to making all hires in the coming year through our customary broad outreach.