

Federal Communications Commission Washington, D.C. 20554 <p style="text-align: center;">FCC 396-C</p>	OMB 3060-1033 September 2003	FOR FCC USE ONLY
<p>Multi-Channel Video Program Distributor EEO Program Annual Report</p> Read INSTRUCTIONS Before Filling Out Form		FOR COMMISSION USE ONLY FILE NO. - 20210930AED

SECTION I IDENTIFYING INFORMATION

A. Name of Operator:
 WAVEDIVISION VII, LLC

MSO Name:
 WAVE BROADBAND

B. Employment Unit's Mailing Address
 3700 MONTE VILLA PARKWAY
 SUITE 200

City BOTHELL	State WA	Zip Code 98021-
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E-Mail Address (if available)
 TRACY.BRUTCHER@WAVEBROADBAND.COM

FCC Registration Number:
 0016778524

Emp. Unit ID # 12133

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
 MARION, OR

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) 9/1/20-8/31/21

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 SR. VICE PRESIDENT HUMAN RESOURCES
Date 9/30/2021	Name of Respondent TRACY BRUTCHER
Telephone No. (include area code)	

5127381271

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	1	[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]

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: 12133	MSO NAME: WAVE BROADBAND
	OPR NAME: WAVEDIVISION VII, LLC

Approved by OMB
3060-1033

Exhibits

Exhibit 4

Description: MANAGER, MARKET DEVELOPMENT JOB DESCRIPTION

Attachment 4

Description
Manager, Market Development Job Description

Exhibit 14

Description: SIS QUESTION #2

WAVE BROADBAND SUPPORTS EQUAL EMPLOYMENT OPPORTUNITIES THROUGH MULTIPLE INITIATES. FIRST, FOR INTERNAL EMPLOYEES, OUR EQUAL EMPLOYMENT OPPORTUNITY VERBIAGE IS COMMUNICATED THROUGH OUR EMPLOYEE HANDBOOK LOCATED ON OUR INTRANET, AVAILABLE 24/7. SECOND, OUR EMPLOYEES HAVE ACCESS TO WAVE BROADBANDS HUMAN RESOURCE MANAGEMENT SYSTEM THAT HOUSES OUR OPEN POSITIONS 24/7, AND HAS AN EXTERNAL VIEW FOR OUR EXTERNAL CANDIDATES AS WELL. EACH INTERNAL AND EXTERNAL APPLICANT WHO APPLIES THROUGH WAVE BROADBANDS CAREER SITE OR THROUGH ITS PARTNER CAREER SITES LIKE INDEED, IS GREETED WITH THE EQUAL OPPORTUNITY EMPLOYER STATEMENT, CONTINUALLY ACKNOWLEDGING OUR COMMITMENT:

DIVERSE WORKFORCE /EEO: RCN/GRANDE/WAVE IS PROUD TO BE AN EQUAL OPPORTUNITY EMPLOYER. WE EMBRACE, SUPPORT, AND THRIVE ON EACH OTHERS DIFFERENCES TO MAXIMIZE THE EXPERIENCE OF OUR TEAMMATES AND OUR COMMUNITY. WE ARE COMMITTED TO PROVIDING AN ENVIRONMENT OF MUTUAL RESPECT WHERE EQUAL EMPLOYMENT OPPORTUNITIES ARE AVAILABLE TO ALL APPLICANTS AND TEAMMATES WITHOUT REGARD TO RACE, COLOR, RELIGION, SEX, PREGNANCY (INCLUDING CHILDBIRTH, LACTATION AND RELATED MEDICAL CONDITIONS), NATIONAL ORIGIN, AGE, PHYSICAL AND MENTAL DISABILITY, MARITAL STATUS, SEXUAL ORIENTATION, GENDER IDENTITY, GENDER EXPRESSION, GENETIC INFORMATION (INCLUDING CHARACTERISTICS AND TESTING), MILITARY AND VETERAN STATUS, AND ANY OTHER CHARACTERISTIC PROTECTED BY APPLICABLE LAW.

OUR INTERNAL/EXTERNAL JOB BOARDS, JOB DESCRIPTIONS, CROSS-CHANNEL ADVERTISEMENTS AND OTHER SOURCING ACTIVITIES ALL ADVERTISE WAVE AS AN EQUAL OPPORTUNITY EMPLOYER. THIS IS A STATEMENT WE TAKE SERIOUSLY, AND IS REFLECTED IN OUR ADVERTISING STRATEGY.

WE FURTHER OFFER RECRUITING TELEVISION COMMERCIALS THAT RUN ON OUR CABLE SYSTEM, NOTIFYING CANDIDATES OF OPPORTUNITIES AT WAVE, INCLUDING POSITIONS OF GREATER RESPONSIBILITY AND ENCOURAGING THEM TO APPLY. WE RUN OUR SPOTS ON A VARIETY OF STATIONS, INCLUDING THOSE THAT HAVE LARGE VIEWERSHIP AND THOSE THAT INCLUDE A DIVERSE VIEWERSHIP OF FEMALE AND MINORITY GROUPS. WE RAN 70,000 SPOTS ACROSS THE FOLLOWING 50 NETWORKS DURING THIS REPORTING PERIOD, WHICH INCLUDES BROAD AND DIVERSE VIEWERSHIP: AEN, AMC, APL, BET, BRVO, CMDY, CMT, CNBC, CNN, DISC, ENT,

ESP2, ESPN, FOOD, FOXD, FRFM, FS1, FX, FXX, FXNC, FYI, GOLF, HALL, HGTV, HIST, HLN, LIF, LMN, MLBN, MNBC, MTV, NBCS, NFLN, NGC, NICK, NSBA, NSCA, NSNN, OWN, OXYG, P12N, PAR, RTNW, SYFY, TBSC, TLC, TNT, TOON, TRAV, TRU, TVL, TWC, USA, VH1, AND WETV.

ADDITIONALLY, ALL EMPLOYEES ARE SUBJECT TO MANDATORY HARASSMENT TRAINING THAT DISCUSSES WAVE BROADBANDS COMMITMENT TO EQUAL EMPLOYMENT OPPORTUNITIES. SUBSEQUENTLY, ONCE A QUALIFIED EXTERNAL CANDIDATE HAS BEEN HIRED, OR AN INTERNAL EMPLOYEE HAS BEEN PROMOTED TO A SUPERVISORY ROLE, MANDATORY HARASSMENT PREVENTION TRAINING IS ASSIGNED AND MUST BE COMPLETED WITHIN A SPECIFIC TIME FRAME FROM THEIR DATE OF HIRE OR PROMOTION. ON AN ON-GOING BASIS, ALL OUR INTERNAL EMPLOYEES ARE ASSIGNED THE MANDATORY HARASSMENT TRAINING ONCE EVERY TWO YEARS.

LASTLY, WAVE BROADBAND REQUIRES ITS VENDORS TO HAVE AND PRODUCE THEIR EEO STATEMENT. WE ALSO PROVIDE OUR EEO STATEMENT TO VENDORS DISPLAYING OUR COMMITMENT TO BEING AN EQUAL OPPORTUNITY EMPLOYER.

Attachment 14

Exhibit 16

Description: SIS QUESTION #4

GUIDED BY OUR EQUAL EMPLOYMENT OPPORTUNITY COMMITMENT, WAVE BROADBAND DISTRIBUTES ALL JOB POSTINGS INTERNALLY AND EVALUATES INTERNAL EMPLOYEE APPLICANTS FOR JOBS FIRST FOR A SUCCESSFUL JOB SKILL MATCH TO ENCOURAGE PROMOTION. MANY OF OUR POSITIONS HAVE AN INTERNAL CAREER TRACK THAT CLEARLY OUTLINES THE STEPS AND EDUCATION REQUIREMENTS NEEDED TO PROGRESS WITHIN THE CHOSEN TRACK. ADDITIONALLY, A MONTHLY INTERNAL EMAIL IS SENT TO ALL EMPLOYEES WITHIN WAVE BROADBAND HIGHLIGHTING ALL OPEN POSITIONS INCLUDING ENTRY LEVEL ROLES UP THROUGH SENIOR LEVEL LEADERSHIP POSITIONS. MANY OF OUR INDIVIDUAL SITES ALSO POST OPEN ROLES INTERNALLY ON THE MULTI-MEDIA PLATFORMS ANTICIPATING MANY QUALIFIED CANDIDATES VIEW AND APPLY ACCORDINGLY.

WAVE ALSO OFFERS THE FOLLOWING OPPORTUNITIES FOR UNIT PERSONNEL TO FURTHER THEIR EDUCATION IN AREAS WHICH WILL BENEFIT THEIR WORK WITHIN THE COMPANY OR WHICH ARE REQUIRED FOR ADVANCEMENT TO POSITIONS OF GREATER RESPONSIBILITY:

NCTI TRAINING COURSES AND SCTE TRAINING COURSES ARE AVAILABLE TO ALL EMPLOYEES AND ARE PART OF THE INTERNAL CURRICULUM, WHICH WE OFFER FOR PURPOSES OF POSITION ADVANCEMENT/PROMOTION TO POSITIONS OF GREATER RESPONSIBILITY AS WELL FOR GENERAL KNOWLEDGE ENHANCEMENT, WHICH CAN BE REIMBURSED THROUGH OUR TUITION ASSISTANCE PROGRAM.

WAVE SUPPORTS MEMBERSHIP IN WICT (WOMEN IN CABLE TELECOMMUNICATIONS). CURRENTLY, WE HAVE ONE FEMALE LEADER PARTICIPATING IN A WOMEN IN TECHNOLOGY MENTOR PROGRAM THROUGH WICT. SHE IS PAIRED WITH A SR. LEADER WITHIN THE TELECOM INDUSTRY WHO IS NOT AN EMPLOYEE WITHIN OUR ORGANIZATION. THIS PARTNERSHIP CREATES A 1:1 MENTORING RELATIONSHIP TO DRIVE OUR EMPLOYEES GROWTH AND DEVELOPMENT. WICT IS A FEMALE FOCUSED ORGANIZATION IS RECOGNIZED NATIONALLY, WITH COMPANY MONETARY SUPPORT PROVIDED AT THE CORP. AND REGIONAL LEVELS. MEMBERSHIP CONSISTS OF EVENT PARTNERSHIPS, LEARNING OPPORTUNITIES, AND A FORMAL MENTORSHIP PROGRAM THAT CROSSES COMPANY BOUNDARIES. PARTNERSHIP WITH WICT PROVIDES OUR FEMALE (AND MALE) EMPLOYEES WITH INCREDIBLE GROWTH AND DEVELOPMENT PROGRAMS TO AUGMENT OUR INTERNAL TRAINING CURRICULA.

WAVE OFFERS INTERNAL TRAINING AND DEVELOPMENT PROGRAMS TAILORED TO VARIOUS LEVELS WITHIN AN EMPLOYEES CAREER, FROM FRONT LINE SUPERVISOR TO SENIOR LEADERSHIP. THESE COURSES ARE PROVIDED DURING THE SCOPE OF THE WORKDAY AT NO COST TO THE PARTICIPANT. THESE COURSES ARE OFTEN OFFERED TO EMPLOYEES ACROSS ALL REGIONS, CREATING OPPORTUNITY TO NETWORK AS WELL AS LEARN HOW OTHER AREAS OF THE BUSINESS ARE RUN THROUGH CLASSROOM/CO-HORT INTERACTION.

Attachment 16

Exhibit 18**Description: SIS QUESTION #6**

WAVE CONTINUES TO FOCUS ON PROMOTING AND RECRUITING WITHOUT REGARD TO MINORITY CLASSIFICATION THROUGH ITS PRACTICES AND TRAINING OPPORTUNITIES. APPROXIMATELY 25% OF WAVES NEW HIRES DURING THIS REPORTING PERIOD WERE A MEMBER OF A FEMALE OR MINORITY GROUP CLASSIFICATION.

WAVE BROADBANDS EQUAL OPPORTUNITY EMPLOYMENT POLICY (SEE BELOW) IS POSTED ON OUR INTERNAL WEBSITE WHICH IS AVAILABLE 24 HOURS A DAY, SEVEN DAYS A WEEK AND AVAILABLE TO ALL EMPLOYEES. EACH INTERNAL (AND EXTERNAL) APPLICANT WHO APPLIES THROUGH WAVE BROADBANDS CAREER SITE OR THROUGH ITS PARTNER CAREER SITES IS GREETED WITH THE EQUAL OPPORTUNITY EMPLOYER STATEMENT ACKNOWLEDGING OUR COMMITMENT:

DIVERSE WORKFORCE /EEO: RCN/GRANDE/WAVE IS PROUD TO BE AN EQUAL OPPORTUNITY EMPLOYER. WE EMBRACE, SUPPORT, AND THRIVE ON EACH OTHERS DIFFERENCES TO MAXIMIZE THE EXPERIENCE OF OUR TEAMMATES AND OUR COMMUNITY. WE ARE COMMITTED TO PROVIDING AN ENVIRONMENT OF MUTUAL RESPECT WHERE EQUAL EMPLOYMENT OPPORTUNITIES ARE AVAILABLE TO ALL APPLICANTS AND TEAMMATES WITHOUT REGARD TO RACE, COLOR, RELIGION, SEX, PREGNANCY (INCLUDING CHILDBIRTH, LACTATION AND RELATED MEDICAL CONDITIONS), NATIONAL ORIGIN, AGE, PHYSICAL AND MENTAL DISABILITY, MARITAL STATUS, SEXUAL ORIENTATION, GENDER IDENTITY, GENDER EXPRESSION, GENETIC INFORMATION (INCLUDING CHARACTERISTICS AND TESTING), MILITARY AND VETERAN STATUS, AND ANY OTHER CHARACTERISTIC PROTECTED BY APPLICABLE LAW.

SUPERVISORS AND MANAGERS ARE RESPONSIBLE FOR IMPLEMENTING OUR EEO PRINCIPLES IN ALL ASPECTS OF THEIR WORK. IN ALIGNMENT WITH THE FCCS EEO POLICIES AND OUR OWN EEO COMMITMENT, WHEN VACANCIES ARISE, WE RECRUIT BROADLY IN OUR COMMUNITIES TO ENSURE THAT INFORMATION ABOUT OUR EMPLOYMENT OPPORTUNITIES IS WIDELY DISSEMINATED. THE COMPANY REACHES THE BROADEST RANGE OF POTENTIAL CANDIDATES THROUGH VARIOUS SOURCES WHICH INCLUDE BROADCAST AND CABLE TELEVISION ADVERTISING, INTERNET POSTINGS, COMPANY WEB SITE, EMPLOYEE REFERRALS, AND OTHER RECRUITING SOURCES.

WE ALSO PARTICIPATE IN OTHER ACTIVITIES THAT ARE REASONABLY CALCULATED TO FURTHER THE GOAL OF DISSEMINATING INFORMATION OF EMPLOYMENT OPPORTUNITIES IN A NONDISCRIMINATORY MANNER, WHICH INCLUDE THE DISSEMINATION OF JOB VACANCY LITERATURE, HIGHLIGHTING OUR CAREER SITE AT EVENTS THROUGHOUT OUR COMMUNITIES, BOTH VIRTUALLY AND IN-PERSON. TO SUPPORT OUR EMPLOYEES IN MAXIMIZING THEIR CAREERS, WE PROVIDE THEM WITH COMPANY-FUNDED OPPORTUNITIES FOR GROWTH AND ADVANCEMENT. WE OFFER TUITION REIMBURSEMENT FOR CAREER RELEVANT DEGREE PROGRAMS AND WE ALSO OFFER RELEVANT COURSES THROUGH NCTI WHICH INCLUDE WAGE INCREASES FOR SUCCESSFUL COMPLETION.

PROGRESSION PLANS HAVE BEEN ESTABLISHED FOR CERTAIN POSITIONS TO PROVIDE CLEAR GUIDELINES FOR EMPLOYEES REGARDING THE SKILL SETS, TRAINING, AND PERFORMANCE OBJECTIVES THAT MUST BE MET TO PROGRESS WITHIN THESE POSITIONS. WAVE BROADBANDS MANAGEMENT FOCUSES ON PROVIDING INTERNAL CANDIDATES WITH OPPORTUNITIES TO PROMOTE TO OTHER POSITIONS WITHIN THE COMPANY.

CHALLENGES FOR THIS REPORTING PERIOD INCLUDE HIRING IN A JOB MARKET THAT IS NEGATIVELY IMPACTED BY THE COVID PANDEMIC WHILE PIVOTING THE IN-PERSON HIRING STEPS TO A FULLY VIRTUAL APPROACH. THIS VIRTUAL APPROACH INCLUDED THE TRANSITION TO ON-LINE JOB FAIRS AS WELL AS UTILIZING A 100% VIRTUAL INTERVIEWING PLATFORM.

Attachment 18

Exhibit 22

Description: PORTLAND UNIT - 2020 2021 REPORT

Attachment 22

Description

Portland Unit - 2020 2021 Report
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