Multi-Channel Video Program Distributor EEO Program Annual Report

Read INSTRUCTIONS Before Filling Out Form

SECTION I IDENTIFYING INFORMATION

A. Name of Operator: WAVE DIVISION IV, LLC

B. Employment Unit's Mailing Address
401 KIRKLAND PARKPLACE
SUITE 500

City KIRKLAND
State WA
Zip Code 98033

FCC Registration Number: 0013428818
Emp. Unit ID # 2567

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 KITSAP, 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) 9/1/12-9/14/12
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 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]

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>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?</td>
</tr>
<tr>
<td>2.</td>
<td>Do you disseminate widely your EEO Program to job applicants, employees, and those with whom you regularly do business?</td>
</tr>
<tr>
<td>3.</td>
<td>Do you contact organizations, media, educational institutions, and other potential sources of applicants for referrals whenever job vacancies are available in your organization?</td>
</tr>
<tr>
<td>4.</td>
<td>Do you undertake to offer promotions to positions of greater responsibility in a nondiscriminatory manner?</td>
</tr>
<tr>
<td>5.</td>
<td>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?</td>
</tr>
<tr>
<td>6.</td>
<td>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?</td>
</tr>
<tr>
<td>7.</td>
<td>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?</td>
</tr>
<tr>
<td>8.</td>
<td>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?</td>
</tr>
<tr>
<td>9.</td>
<td>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?</td>
</tr>
</tbody>
</table>

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]

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

Date

Name of Respondent

Telephone No. (include area code)
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.

<table>
<thead>
<tr>
<th>Job Category</th>
<th>Number</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Officials and Managers</td>
<td>1</td>
<td>[Exhibit 4]</td>
</tr>
<tr>
<td>Professionals</td>
<td></td>
<td>[Exhibit 5]</td>
</tr>
<tr>
<td>Technicians</td>
<td></td>
<td>[Exhibit 6]</td>
</tr>
<tr>
<td>Sales Workers</td>
<td></td>
<td>[Exhibit 7]</td>
</tr>
<tr>
<td>Office and Clerical</td>
<td></td>
<td>[Exhibit 8]</td>
</tr>
<tr>
<td>Craft Workers (skilled)</td>
<td></td>
<td>[Exhibit 9]</td>
</tr>
<tr>
<td>Operatives (semi-skilled)</td>
<td></td>
<td>[Exhibit 10]</td>
</tr>
<tr>
<td>Laborers (unskilled)</td>
<td></td>
<td>[Exhibit 11]</td>
</tr>
<tr>
<td>Service Workers</td>
<td></td>
<td>[Exhibit 12]</td>
</tr>
</tbody>
</table>

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 minority organizations, organizations for women, media, educational institutions, and other recruitment sources used to attract minority and female 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]

<table>
<thead>
<tr>
<th>EMP UNIT ID: 2567</th>
<th>MSO NAME: WAVE BROADBAND</th>
</tr>
</thead>
<tbody>
<tr>
<td>OPR NAME: WAVEDIVISION IV, LLC</td>
<td></td>
</tr>
</tbody>
</table>

Approved by OMB 3060-1033

Exhibits

Attachment 4

<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office Manager Job Description</td>
</tr>
</tbody>
</table>

Exhibit 15

Description: ORGANIZATIONS USED FOR JOB VACANCIES

WAVE WIDELY DISSEMINATES ITS JOB VACANCIES IN KITSAP COUNTY. THIS INCLUDES:

WORKSOURCE WASHINGTON (UNEMPLOYMENT DEPARTMENT);
WAVE BROADBAND CAREER OPPORTUNITIES WEB SITE;
The LOCAL NEWSPAPER, KITSAP SUN;
CAREERBUILDER WEBSITE; AND
JOB FAIRS IN THE GREATER SEATTLE AREA ATTENDED BY THE KIRKLAND (WAVES HEADQUARTERS
EMPLOYMENT UNIT) HUMAN RESOURCES TEAM.

MOREOVER, WAVE PARTICIPATES IN MULTIPLE COMMUNITY EVENTS, SUCH AS WORKSOURCE KITSAP COUNTY JOB FAIR, KITSAP COUNTY FAIR AND RODEO, HOME BUILDERS ASSOCIATION HOME SHOW AND MILITARY APPRECIATION DAY THROUGHOUT THE YEAR AT WHICH COMPANY PERSONNEL DISCUSS JOB OPENINGS AND DISTRIBUTE EMPLOYMENT APPLICATIONS THAT INCLUDES AN EEO NOTICE.

Attachment 15

Exhibit 17

Description: EMPLOYMENT UNIT'S EFFORTS TO ENCOURAGE ENTREPRENEURS TO CONDUCT BUSINESS

WAVE REQUIRES VENDORS AND CONTRACTORS TO CONDUCT BUSINESS WITH ALL PARTS OF ITS OPERATION(S) IN A NON-DISCRIMINATORY MANNER. WAVES STANDARD CONTRACTOR RETENTION AGREEMENT REQUIRES ALL VENDORS TO COMPLY WITH WAVES VENDOR CODE OF CONDUCT PRIOR TO ENGAGING IN BUSINESS WITH WAVE. THE PERTINENT TEXT FROM WAVES VENDOR CODE OF CONDUCT IS SET FORTH BELOW:

EQUALLY OPPORTUNITY EMPLOYER. WAVE PROMOTES A COOPERATIVE AND PRODUCTIVE WORK ENVIRONMENT BY SUPPORTING THE CULTURAL AND ETHNIC DIVERSITY OF ITS WORKFORCE. WAVE IS COMMITTED TO PROVIDING EQUALLY OPPORTUNITY TO ALL EMPLOYEES AND APPLICANTS FOR EMPLOYMENT. THIS COMMITMENT IS REFLECTED IN ALL ASPECTS OF OUR DAILY OPERATIONS. WAVE RECRUITS, HIRES, TRAINS, PAYS, PROMOTES, AND DISCIPLINES EMPLOYEES WITHOUT REGARD TO RACE, COLOR, SEX, SEXUALLY ORIENTATION, RELIGION, NATIONAL ORIGIN, MARITAL STATUS, AGE, DISABILITY, OR VETERAN STATUS. EQUALLY OPPORTUNITY OPPORTUNITY IS REQUIRED BY LOCAL, STATE, AND FEDERAL LAWS, AS WELL AS BY WAVE POLICY. WAVE EXPECTS ITS VENDORS TO SHARE ITS COMMITMENT TO EQUALLY OPPORTUNITY. THE VENDORS COMMITMENT
MAY INCLUDE IDENTIFYING, PROCUREMENT, AND PAYING FOR ANY REASONABLE ACCOMMODATION THAT MAY BE REQUIRED FOR A DISABLED REPRESENTATIVE OF THE VENDOR TO PERFORM HIS OR HER ESSENTIAL JOB FUNCTIONS WHILE ON WAVE PROPERTY OR WORKING ON WAVE-RELATED BUSINESS.

WAVES VENDOR CODE OF CONDUCT DESCRIBES WAVES COMMITMENT TO A COOPERATIVE AND PRODUCTIVE WORK ENVIRONMENT BY SUPPORTING THE CULTURAL AND ETHNIC DIVERSITY OF ITS WORKFORCE AND WAVES EXPECTATION THAT THE VENDOR SHARE WAVES COMMITMENT TO CONDUCT BUSINESS IN A NON-DISCRIMINATORY MANNER. WAVES STANDARD CONTRACTOR AGREEMENT ALSO REQUIRE ALL VENDORS TO COMPLY WITH ALL APPLICABLE LAWS AND REGULATIONS, INCLUDING LAWS AND REGULATIONS RELATED TO EEO. WAVES CONDUCTS ITS BUSINESS OPERATIONS IN A DE-CENTRALIZED FASHION, AFFORDING A CONSIDERABLE DEGREE OF AUTONOMY TO ITS LOCAL MANAGERS TO RETAIN CONTRACTORS AND DEAL WITH VENDORS. THIS AUTONOMY ALLOWS MANAGERS TO PROMOTE WAVES COMMITMENT TO EQUAL OPPORTUNITY AND DIVERSITY ON A LOCAL BASIS IN MAKING DECISIONS REGARDING THE RETENTION OF VENDORS AND CONTRACTORS. WAVES REQUIRE ITS MANAGER TO ADHERE TO WAVES PRINCIPLES REGARDING THE RETENTION OF MINORITY BUSINESS ENTERPRISES AND WOMAN BUSINESS ENTERPRISES, COMPLIANCE WITH FCC RULES AND REGULATIONS AND TO BE FAMILIAR WITH FEDERAL, STATE AND LOCAL REGULATIONS REGARDING DISCRIMINATION. WAVES CORPORATE MANAGEMENT TEAM PERIODICALLY DISCUSS WAVES PRINCIPLES OF NON-DISCRIMINATION WITH ITS LOCAL MANAGERS IN AN ON-GOING EFFORT TO PROMOTE CULTURAL AND ETHNIC DIVERSITY IN WAVES WORKPLACE AS WELL AS AMONG THE VENDORS AND CONTRACTORS WAVES RETAINS. WAVES SUPPORTS THE EFFORTS OF MINORITY-OWNED BUSINESSES, SMALL BUSINESS ENTERPRISES AND ENTREPRENEURS IN THE COMMUNITIES IT SERVES BY RETAINING SUCH FIRMS WHENEVER REASONABLY POSSIBLE.

Attachment 17

Exhibit 19
Description: THE RESPONSIBILITY OF EACH LEVEL OF THE EMPLOYMENT UNITS MANAGEMENT

WAVES REQUIRE ITS HIRING MANAGERS TO FOLLOW ESTABLISHED COMPANY PROCEDURES AND TO OBSERVE EEOC AND FCC REQUIREMENTS TO AVOID DISCRIMINATION IN HIRING ON THE BASIS OF: RACE, COLOR, RELIGION, NATIONAL ORIGIN, GENDER, AGE, MARITAL STATUS, VETERAN STATUS, SEXUAL ORIENTATION, AND THE PRESENCE OF A NON-JOB RELATED HANDICAP OR DISABILITY, OR ANY OTHER LEGALLY PROTECTED STATUS. WAVES REGIONAL DIRECTOR, SVP, HUMAN RESOURCES, AND WAVES CHIEF OPERATING OFFICER ENFORCE THIS REQUIREMENT THROUGH REVIEW OF THE PROCESS AND FINAL CANDIDATE(S).

JOB POSTINGS ARE FIRST REVIEWED AND APPROVED BY THE SVP, HR AND THE COO, INTERVIEW CANDIDATES ARE SELECTED FOR INTERVIEWS BASED ON QUALIFICATIONS AND SKILL REQUIREMENTS IDENTIFIED IN THE JOB POSTING. IN ADDITION, WAVES SELECT INTERVIEW CANDIDATES BASED ON PREVIOUS WORK HISTORY, INDUSTRY AND JOB-RELATED EXPERIENCE, NETWORK OR CO-WORKER RECOMMENDATIONS, AND JOB-RELATED ABILITIES. MOREOVER, REGIONAL MANAGERS ALSO ENSURE COMPLIANCE BY INTERVIEWING FINAL CANDIDATES AND REVIEWING THE ENTIRE APPLICANT FLOW LOG PRIOR TO SENDING IT TO THE SVP, HR FOR FINAL APPROVAL AND JOB OFFER. REVIEW AND CONTROL OF MANAGEMENT AND SUPERVISORY PERFORMANCE IS FURTHER ACCOMPLISHED THROUGH REGULAR MANAGEMENT PERFORMANCE REVIEWS IN WHICH REGIONAL MANAGERS MEET WITH THEIR SUPERVISORS TO REVIEW AMONG OTHER THINGS COMPLIANCE WITH WAVES RECRUITING AND HIRING POLICIES. IN ADDITION, REGIONAL HUMAN RESOURCES REPRESENTATIVES ROUTINELY MEET WITH HIRING MANAGERS TO ENSURE COMPLIANCE WITH WAVES EEO POLICY AND ADHERENCE TO WAVES RECRUITING AND HIRING PRACTICES.

Attachment 19

Exhibit 22
Description: PORT ORCHARD PUBLIC FILE REPORT
<table>
<thead>
<tr>
<th>Description</th>
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<tbody>
<tr>
<td>Port Orchard Public File Report</td>
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