

**Antietam Broadband, Inc.
Washington County, MD
EEO Unit # 600568**

2020 FCC SIS Document: QUESTIONS 1, 3, AND 7

Question 1: Describe the employment unit's efforts to comply with the outreach provisions of 47 C.F.R. Section 76.75(b).

Antietam Broadband is committed to making affirmative outreach efforts consistent with Commission regulations. In order to achieve broad outreach when recruiting to fill vacancies, this unit uses a mix of national, regional, and local recruitment sources compliant with outreach provisions of 47 C.F.R. Section 76.75(b).

The recruitment initiatives for this reporting period were tied to community outreach. Our ability to participate in traditional job fairs in 2020 was not possible due to the COVID crisis. Antietam Media Services graciously offered their services to produce the "Together We Rise" video for the Joint Information Counsel that is comprised of the local chamber and other business owners to deliver a message of hope to the community as they began to reopen. Please see below:

https://vimeo.com/449755689?1&ref=fb-share&fbclid=IwAR2vtrcaSyfGGKCKLf5YnM3dv20Ibot0SROA_lslpFAwX1WJkaPjIo8Q2tw

Antietam ran this marketing spot over the Summer of 2020 outlining our pledge to our customers and our community, which does reference our desire to fill our jobs with local applicants when possible. The attached Mp4 produced in November 2019 was also broadcast on various stations to advertise our telecom executive opening.

<https://www.youtube.com/watch?v=fIRRG5YI2CE>



Antietam Sales Job
HD.mp4

Antietam Broadband was happy to partner with Washington County Public Schools and Hagerstown Community College, providing families without Internet access connectivity to support remote learning. Antietam will provide to student families free:

- 25 Mbps, symmetrical Internet access
- Wi-Fi device
- Installation

To make this easy for families, this program eliminates the application process for our current discount programs and Edu-Net. Families only need to provide Antietam Broadband with their name, add contact information and school the child is attending to determine service availability. This link provides further explanation about the program in the community connections section.

<https://www.antietambroadband.com>

Additionally, Schurz Communications, our parent company, pays for educational licenses for Antietam associates to acquire skills that could qualify them for higher level positions through affiliation with the National Cable Television Institute- NCTI. NCTI training helps increase their industry and technological knowledge base, which allows for hourly pay increases for successful completion of each tier of learning, that was designed in 2019. This property had 28 associates take 101 different courses in NCTI during the reporting period. A copy of this graduate report can be provided.

Question 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.

Antietam Broadband works with a broad spectrum of recruitment sources to distribute its job vacancy information to its existing employees, its local community, and beyond to attract minority and female applicants. **(The local and national diversity sources list will be attached.)**

The company will post notifications of its job openings for this employment unit on the Schurz Communications website, which allows employees to view job openings as soon as they are posted. Associates can post for positions through their employee dashboard on the HR system called Ulti Pro.

When appropriate, this unit places advertisements for open full-time positions in the following local media outlets, which is only a sample of websites used in the Tri State area of Maryland, West Virginia, and Pennsylvania (Maryland Employment Service-Washington County, Washington County One Stop Job Center, Western Maryland Consortium, Dept. of Veteran's Affairs- Martinsburg, WV, Martinsburg American Job Center, and the Montgomery County Commission for Women).

Another outlet that could attract minority and female applicants is our involvement with the program- "Prime Time for Women" that is produced by Antietam. This program focuses on females from all backgrounds and seeks to celebrate and connect women that are entering the second phase of their life to explore new possibilities.

Through these methods, job vacancies are distributed throughout the country, both online and at local workforce agency offices and career centers. This system provides Antietam Broadband with an efficient, seamless method for all its employment units to access a broad and diverse potential applicant pool when recruiting to fill its job vacancies.

Question 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

Schurz Communications is committed to a rigorous and compliant EEO program and has established compliance responsibility at each level of the employment unit's leadership team. Each manager responsible for hiring and promoting employees is instructed in the company's EEO program and obligations under the FCC rules.

The Corporate People and Culture (HR)Team that supports all the broadband systems is responsible for ensuring that the unit's EEO program is properly implemented. The People and Culture Recruiting Specialist transmits recruitment and hiring data as necessary to the respective 5 General Managers for review to ensure that the unit's promotion and hiring practices are not discriminatory.

This includes, but is not limited to: 1) arranging EEO training for management personnel and an ongoing review of the unit's EEO compliance; 2) ensuring that recruitment logs are maintained; 3) making sure recruitment lists are updated to achieve broad outreach in the community; 4) recording data regarding the referrals from each recruitment source used, the selected interviewees, and the successful applicant; 5) producing the unit's EEO annual report on an annual basis and making sure the report is placed in the unit's public inspection file; 6) ensuring that the unit's FCC EEO reporting obligations are met; and 7) ensuring that the unit's EEO policies are disseminated.

The People and Culture Manager keeps the Antietam leadership team informed of their responsibilities under Schurz's EEO policy, addresses EEO questions and concerns from the general managers and employees, and reviews activities such as promotions, hiring, and terminations to ensure compliance with the EEO policy.

The People and Culture Manager also does all the investigations related to any allegations of discrimination and harassment for all the broadband systems. She would also provide recommendations to the General Manager for these locations, if allegations were made against his exempt staff. Allegations against the General Manager would be surfaced to the Senior Vice President of the Broadband Division.