

Amend

Print



# EEO Form 396-C

File No.: CB20001925

Filing Status: **Ready for Review**

**1879**

Reference  
Copy  
OMB Control  
No. 3060-1033

## General Information

**FCC Registration Number (FRN)**

0002944437

**Filing Year**

2022

**Employment Unit ID (EUID)**

1879

## Section I - Identifying Information

**Has the identifying information associated with this EUID changed?**

No

**Operator Legal Name**

CLEAR PICTURE, INC.

**Operator Address 1**

PO BOX 1000

**Operator City**

MASSILLON

**Operator state**

OH

**Operator Zip Code**

44648

**State of Employment Office**

OH

**County of Employment Office**

Wayne

**Application Purpose**

New Program Report

**Supplemental Investigation Sheet (SIS)**

**Required**

true

**Category of Respondent**

Six (6) or more full-time employees during the selected reporting period

**Reporting Period Start Date**

2022-08-14

**Reporting Period End Date**

2022-08-27

## Section II - Community Information

Section III - EEO Policy and Program Requirements

---

**Complied with outreach provisions**

Yes

**Disseminated widely EEO Program**

Yes

**Contacted multiple sources of applicants**

Yes

**Offered promotions in nondiscriminatory manner**

Yes

**Sought out entrepreneurs in a nondiscriminatory manner**

Yes

**Analyzed the results of efforts to recruit hire promote and use services**

Yes

**Defined responsibility of management**

Yes

**Conducted continuing program to exclude prejudice**

Yes

**Conducted continuing review of job structure**

Yes

Section IV - Additional Information

---

FCC FORM 396-C -- Supplemental Investigation Sheet PART I - PART I - Employee Job Descriptions

---

**Exhibit Employee Job Descriptions**

EEO SIS CPI 2022 JOB DESCRIPTION.doc

PART II - Inquiries Concerning EEO Program and Practices

---

**SIS Question 1**

EEO SIS CPI 2022 Inquiry#1.doc

**SIS Question 8**

EEO SIS CPI 2022 Inquiry#8.doc

PART III - EEO Public File Report

---

**EEO Public File Report for Previous Year**

EEO JOB HIRES-INITIATIVES CPI 2021-2022.pdf

Exhibits

---

**Exhibit Employee Job Descriptions**

EEO SIS CPI 2022 JOB DESCRIPTION.doc

**EEO Public File Report for Previous Year**

EEO JOB HIRES-INITIATIVES CPI 2021-2022.pdf

**SIS Question 1**

EEO SIS CPI 2022 Inquiry#1.doc

**SIS Question 7**

EEO SIS CPI 2022 Inquiry#7.doc

**SIS Question 8**

EEO SIS CPI 2022 Inquiry#8.doc

Certifications

---

I certify that to the best of my knowledge, information and belief, all statements contained in this filing are true and correct. 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).

## Certifier Information

---

**Certifying Official Name and Signature**

DAVID HOFFER

**Certifying Official Title**

COO

**Certifying Official Phone**

(330)833-4134

**Certifying Official Email**

dhoffer@mctvohio.com

**Certifying Date Signed**

2022-09-29

## **JOB DESCRIPTION:**

### PROFESSIONAL

#### Accountant

The Accountant's duties include:

- computerized bookkeeping
- payroll
- accounts payable
- general ledger
- financial statements
  - o reports to the chief financial office and outside CPA firm
  - o maintains bank accounts and transferring cash between accounts
  - o maintenance of employee information and files
  - o maintenance and implementation of FCC's EEO requirements
- completing 396-C each year
- updating EEO files continually
- maintenance of subscriber count information reports produced for internal and external use
- all of the above duties are done for two companies

## SIS NARRATIVE RESPONSE

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

We have developed an outline to be followed each time there is a full-time job opening. We recruit for every full-time job vacancy within the employment unit. It consists of the following:

1. Complete Job Format Includes:
  - a. Refer applicants to:
  - b. Job Title:
  - c. Start Date:
  - d. Hours:
  - e. Pay:
  - f. Qualifications and/or Required Skills
  - g. Deadline for applications:
2. The job format from #1 is reviewed by Human Resources and the hiring manager prior to posting the open position each time there is a vacancy in that position.
3. The job format from #1 above is e-mailed to all current employees and posted on the company intranet.
4. The job format from #1 above is posted on all bulletin boards.
5. The job format from #1 is posted on the company website, "mctvohio.com".
6. The job format from #1 above is distributed to all EEO contacts. A list of EEO contacts with name, address and phone number is kept on file. The EEO contacts list includes organizations that have requested notice of vacancies, consistent with 47 C.F.R. §76.75(b)(1)(ii).
7. Ads are placed in local newspapers.
8. When resumes and applications are received, the recruitment source is noted on a spreadsheet.
4. All applications are reviewed.
5. All of this information is recorded along with the final tally of the data. The data includes the recruitment source for every applicant, the recruitment source name, address, phone number, and the full-time position that was filled. All of this data is also placed in the public file as required.

6. The employment unit continually reviews the effectiveness of its EEO recruitment program by:
  - a. Compiling a significant and up-to-date outreach contact list, adding new contacts who request to be included in our outreach efforts, adding potential new contacts and resources we discover through our own efforts and keeping current all existing contact information. Periodically we evaluate the effectiveness of our outreach contacts. Based on leads generated for new employment opportunities we will add new outreach organizations and institutions from our area or neighboring states. To keep our outreach contact list as expansive and inclusive as possible, we do not remove contacts that have not produced past results because one never knows if and when a seemingly unproductive contact will produce a positive result in the future. We do, however, remove organizations that cease operations, cease job related activities or request to be removed from our outreach contact list.
  - b. Periodically we will conduct a thorough review of our outreach plan to make sure the vacancy is made known and available to as many potential job seekers as possible. After the plan is launched we monitor responses from our outreach contact list and media to determine if we are receiving an effective response. If the response is not effective we alter the plan to increase its effectiveness and continue doing so in an effort to produce an adequate pool of candidates and until the vacancy has been filled. After the position has been filled we analyze the original plan and any of its iterations to determine if any deficiencies in our EEO recruitment efforts were uncovered. If so, we note those deficiencies and develop a plan to correct them for the next active hiring opportunity.
7. During the 2021-2022 EEO period, the employment unit conducted the following activities, fulfilling the requirements for 3 initiatives:
  - a. The employment unit conducts a paid internship program each summer that is designed to assist members of the community in acquiring the skills needed for multichannel video programming distributor employment. The participants help maintain the power supplies out in the service area by mowing and cleaning around them. Other participants work in the stock room, learning about converters that go out in the system with our installers.
  - b. In the past year, there were 2 training programs designed to enable unit personnel to acquire skills needed for higher level positions. One program involved our Customer Care Department. There is training available for Senior Customer Care Representatives. A number of employees were able to take advantage of that training and apply for the positions. There is also a Preventative Maintenance Technician training program, with lots of hands-on experience on the upkeep of our cable system.

The employment unit sponsored a Business After Hours event last month in affiliation with the local Chamber of Commerce. Local businesses visited our facility and were taken on tours. It makes other local businesses aware of what we do and the positions available that run the company.

## SIS NARRATIVE RESPONSE

**Inquiry #7:** Describe the level of 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.

The responsibility of each level of management with applying and enforcing EEO policies involves two levels. The employment unit has several managers or department heads. These managers report directly to the president and the chief operating officer of the employment unit and receive guidance from human resources.

Each manager is responsible for the employees directly under them. Managers are responsible for making recommendations to human resources, the president and the chief operating officer on training, placement and promotion of employees without discrimination.

Human resources, the president and chief operating officer are responsible for enforcing and applying EEO policies, which include, but are not limited to, hiring, training, seniority, promotions, pay, benefits, selection techniques and tests. They are responsible for reviewing the recommendations from the managers, and making decisions based on those recommendations, after determining that no discrimination exists.

The employment unit has several procedures in place that help to review and control management's performance in enforcing its EEO policies. The chief operating officer meets weekly with individual managers, when time permits. Many times, correspondence is conducted through e-mail. There are weekly "Senior Team" meetings with the president and her direct reports, along with monthly staff meetings involving the same group. Hiring and EEO related topics are frequently discussed as a regular agenda item in these meetings.

We are an equal opportunity employer that supports and subscribes to a policy of nondiscrimination in all aspects of employment. We do not discriminate on the basis of race, color, religion, national origin, sex, age, height, weight, marital status, disability or any other reason prohibited by applicable laws. Under Ohio State law, an employee may not be discriminated against in employment because of disability that can be reasonably accommodated to enable that employee to perform the job. Employees who feel accommodations is needed to perform their job must notify their Supervisor in writing of the need for accommodation within 182 days after the date the employee knew or reasonably should have known that an accommodation was needed. We will make accommodations that do not pose an undue hardship. Each manager knows our policy from our monthly manager meetings to send all the openings to all our recruitment sources. We post openings at our offices and on our websites.

During both types of meetings, rates of pay and fringe benefits for employees having the same duties are discussed and examined. Seniority, promotions and selection techniques are also reviewed. By meeting as often as possible, and the additional use of e-mail for correspondence, potential issues, if any, come to light very quickly and any inequities based upon race, national origin, color, religion, age or sex discrimination are eliminated.

## SIS NARRATIVE RESPONSE

### **Inquiry #8:**

Describe the manner in which the employment unit conducts its continuing review of job structure and employment practices.

The responsibility of each employment to continuously review the job structure and employment practices occurs in the following ways:

1. Job Descriptions
  - a. Each position in the company has a written job description
  - b. When a vacancy occurs for a position, the job description is reviewed by human resources and the hiring manager. Updates are made as necessary.
  - c. The job description is reviewed with each new employee during interviews and upon hiring of the new employee.
  
2. Department Meetings
  - a. Each employment unit (department) conducts weekly meetings with their employees. Job responsibilities and employment practices are often reviewed in these weekly meetings. Any changes to the job structure are discussed with human resources and the job description is updated when appropriate.
  
3. Human Resources
  - a. Human Resources will investigate and discuss all questions related to job structure and employment practices when employees raise such questions. Any changes to the structure or employment practices are implemented and communicated to management.
  
4. Safety
  - a. The Safety Coordinator is informed of any safety related accident, injury or near miss.
  - b. The Safety Coordinator investigates each incident (4a) and makes any appropriate changes to the job description and practices, communicating these changes to all affected employees and management.
  
5. Employee Handbook
  - a. The employee handbook outlines all employment practices at MCTV.
  - b. All employees must review the employee handbook and acknowledge their review.
  - c. The employee handbook's current revision is always saved on the company intranet and available to all employees.
  - d. The employee handbook is reviewed annually for updates by human resources.
  - e. Any changes to employment practices are updated in the employee handbook and all employees are notified of these changes.



## EEO PUBLIC FILE REPORT

This Report covers full-time vacancy recruitment data for the period: 9/1/2021-8/31/2022.

1) Employment Unit: \_\_\_\_\_ 1879 \_\_\_\_ CLEAR PICTURE INC \_\_\_\_\_

3) EEO Contact Information for Employment Unit:

Mailing Address: PO BOX 1000, MASSILLON, OH 44648	Telephone Number: 330-833-4134
	Contact Person/Title: STEVE BUSHMAN
	E-mail Address: sbushman@mctvohio.com

4) Full-Time Job Vacancies Filled in the Employment Unit:

JOB TITLE	RECRUITMENT SOURCE REFERRING HIREE
1. I&R TECHNICIAN 2/21/2022	WEBSITE AND WALK-INS
2. I&R TECHNICIAN 8/8/2022	WEBSITE AND WALK-INS
3. _____	_____
4. _____	_____
5. _____	_____
6. _____	_____
7. _____	_____
8. _____	_____





## 2021-2022 Initiatives

During the 2021-2022 EEO period, Clear Picture engaged in the following initiatives:

Each summer, we have several paid internships. The participants help maintain the power supplies out in the service area by mowing and cleaning around them. Other participants work in the stock room, learning about converters that go out in the system with our installers.

In the past year, there were 2 training programs designed to enable unit personnel to acquire skills needed for higher level positions. One program involved our Customer Care Department. There is training available for Senior Customer Care Representatives. A number of employees were able to take advantage of that training and apply for the positions. There is also a Preventative Maintenance Technician training program, with lots of hands-on experience on the upkeep of our cable system.

Clear Picture sponsored a Business After Hours event last month in affiliation with the local Chamber of Commerce. Local businesses visited our facility and were taken on tours. It makes other local businesses aware of what we do and the positions available that run the company.

Clear Picture founded an event 25 years ago that is still an annual tradition in our community today. The Fun Fest is for kids of all ages. Many local organizations and businesses, in addition to Clear Picture, offer activities that provide valuable health, safety and educational information to parents while entertaining the children.

Another activity that Clear Picture provides, involves the Boy Scouts. A scout group is given a tour of our headend facility by one of our headend engineers. It is always a favorite with the group.

Clear Picture disseminates information in various areas that we are an equal opportunity employer. Our website always has a statement to the effect that we afford equal opportunity in employment and business dealings to all qualified persons. Our local origination channel continuously runs an ad that states that Clear Picture is an equal opportunity employer.

Clear Picture is a generous company. From the very beginning, we have always taken care of the communities we serve. It can involve something as small as advertising in local school sports programs, to major sponsors of building improvements of charitable organizations, to outright donations for organizations of all sizes. Our communities know Clear Picture cares.