

Federal Communications Commission Washington, D.C. 20554 FCC 396-C	OMB 3060-1033 September 2003	FOR FCC USE ONLY
Multi-Channel Video Program Distributor EEO Program Annual Report Read INSTRUCTIONS Before Filling Out Form		FOR COMMISSION USE ONLY FILE NO. -

SECTION I IDENTIFYING INFORMATION

A. Name of Operator:
 ACE TELEPHONE ASSOCIATION

MSO Name:

B. Employment Unit's Mailing Address
 207 E CEDAR

City	State	Zip Code
HOUSTON	MN	55943-

FCC Registration Number:

Emp. Unit ID # 599970

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
 HOUSTON, MN

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) 8/11/13 - 8/24/13

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 additions or deletions, using the format noted above. [Exhibit 1]
 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 CEO
Date 9/12/2013	Name of Respondent TODD ROESLER
Telephone No. (include area code) 5078966292	

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	<input type="text"/>	[Exhibit 4]
2. Professionals	<input type="text"/>	[Exhibit 5]
3. Technicians	1	[Exhibit 6]
4. Sales Workers	<input type="text"/>	[Exhibit 7]
5. Office and Clerical	<input type="text"/>	[Exhibit 8]
6. Craft Workers (skilled)	<input type="text"/>	[Exhibit 9]
7. Operatives (semi-skilled)	<input type="text"/>	[Exhibit 10]
8. Laborers (unskilled)	<input type="text"/>	[Exhibit 11]
9. Service Workers	<input type="text"/>	[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.

- Describe the employment unit's efforts to comply with the outreach provisions of 47 C.F.R. Section 76.75(b). [Exhibit 13]
- 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]
- Name the organizations, media, educational institutions, and other recruitment sources used to attract applicants whenever job vacancies become available. [Exhibit 15]
- Explain the employment unit's efforts to promote in a nondiscriminatory manner to positions of greater responsibility. [Exhibit 16]
- 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]
- 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]
- 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: 599970	MSO NAME:
	OPR NAME: ACE TELEPHONE ASSOCIATION

Approved by OMB
3060-1033

Exhibits

Exhibit 1

Description: COMMUNITIES SERVED

THERE HAVE BEEN NO ADDITIONS OR DELETIONS TO THE COMMUNITIES SERVED OVER THE PAST YEAR.

Attachment 1

Exhibit 6

Description: COMBINATION TECHNICIAN

SUMMARY

PERFORM ACTIVITIES CONCERNED WITH SELECTION AND INSTALLATION OF TELEPHONE FACILITIES AND SPECIAL EQUIPMENT ON CUSTOMER'S PREMISES TO MEET CUSTOMER'S COMMUNICATION REQUIREMENTS BY PERFORMING THE FOLLOWING DUTIES.

ESSENTIAL DUTIES AND RESPONSIBILITIES INCLUDE THE FOLLOWING. OTHER DUTIES MAY BE ASSIGNED.

INSTALL AND REPAIR COMMUNICATION FACILITIES AS WELL AS DRAWING UP AND SPLICING BURIED SERVICE DROPS TO CUSTOMER PREMISE.

TEST AND INSPECT AND CONFIGURE MODEMS AND SET TOP BOXES TO APPLY TO DIFFERENT CUSTOMERS SERVICES.

INSTALL AND TROUBLESHOOT ACE WIRELESS SERVICES, IPTV, INTERNET AND POTS.

UP SELL ACES SERVICES.

INSPECT CUSTOMER PREMISES TO ASCERTAIN SPACE AVAILABLE FOR INSTALLATION OF EQUIPMENT AND TO DETERMINE TYPE AND QUANTITY OF DESIGNATED EQUIPMENT THAT CAN BE INSTALLED TO PROVIDE SPECIFIC COMMUNICATION FACILITIES.

MAINTAIN EQUIPMENT AND ANALYZE OPERATIONAL MALFUNCTIONING WITH TESTING DEVICES TO LOCATE AND DIAGNOSE NATURE OF DEFECT AND ASCERTAIN REPAIRS TO BE MADE.

ASSIST IN CONSTRUCTION AND MAINTENANCE OF OUTSIDE PLANT FACILITIES.

HANDLE SPECIALIZED DUTIES SUCH AS INSTALLING WIRELESS SERVICES, SURVEILLANCE OR SECURITY SYSTEMS, ETC. AS NEEDED.

CLIMB POLES TO INSTALL OR REPAIR OUTSIDE SERVICE LINES.

LOCATE CABLE.

ASSIST OTHER DEPARTMENTS AS NEEDED.

Attachment 6

Description
Combination Technician

Exhibit 16

Description: PROMOTIONS

EMPLOYEES ARE NOTIFIED OF POSITION OPENINGS VIA INTERNAL JOB POSTINGS THAT ALL EMPLOYEES RECEIVE VIA EMAIL. ALL EMPLOYEES HAVE A COMPANY PROVIDED COMPUTER WHERE THEY RECEIVE COMPANY EMAIL SO EVERYONE IS NOTIFIED OF ALL INTERNAL OPENINGS.

ANY AND ALL EMPLOYEES ARE ENCOURAGED TO APPLY. EMPLOYEES ARE GIVEN AN OPPORTUNITY TO RECORD AND DISCUSS CAREER PATH GOALS WITH THEIR SUPERVISOR/MANAGER ON THEIR ANNUAL EVALUATION FORM EACH YEAR. THEY ARE ALSO ABLE TO DISCUSS THEIR CAREER PATH OR GOALS AT ANY TIME DURING THE YEAR WITH THOSE SAME INDIVIDUALS AS WELL.

GENERALLY, ALL INTERNAL APPLICANTS ARE INTERVIEWED FOR POSITIONS APPLIED FOR. THIS GIVES THE APPLICANT A BETTER UNDERSTANDING OF THE POSITION REQUIREMENTS AND ALSO FOR THE MANAGER/SUPERVISOR TO BE MADE AWARE OF THE SKILLS AND EXPERIENCE THE APPLICANT POSSESSES.

Attachment 16

Exhibit 19**Description:** RESPONSIBILITY OF MANAGEMENT

THE CEO AND HUMAN RESOURCES MANAGER HAVE THE RESPONSIBILITY TO ENFORCE THE EXPECTATION THAT EVERY SUPERVISOR AND EVERY MANAGER UNDERSTANDS AND APPLIES OUR EEO POLICY.

EVERY SUPERVISOR AND MANAGER'S JOB DESCRIPTION CLEARLY STATES THAT THEY ARE REQUIRED TO CARRY OUT SUPERVISORY RESPONSIBILITIES IN ACCORDANCE WITH THE ORGANIZATION'S POLICIES AND APPLICABLE LAWS. OUR EMPLOYEE REFERENCE GUIDE CLEARLY STATES OUR EEO AND NON-DISCRIMINATION POLICIES.

ALL NEW EMPLOYEES ARE GIVEN A SEPARATE RESPECT IN THE WORKPLACE POLICY THAT OUTLINES OUR EQUAL EMPLOYMENT OPPORTUNITY POLICIES AND NOTIFIES THEM THAT WE WILL NOT TOLERATE ANY UNLAWFUL DISCRIMINATION OR HARRASSMENT. THE POLICY SPECIFICALLY ADDRESSES THE FOLLOWING AREAS: GENERAL EQUAL OPPORTUNITY POLICY; SEXUAL AND UNLAWFUL HARRASSMENT; DISABILITY ACCOMMODATION AND DISCRIMINATION/HARRASSEMENT REPORTS.

Attachment 19**Exhibit 20****Description:** JOB STRUCTURE AND EMPLOYMENT PRACTICES

THE HUMAN RESOURCES MANAGER AND THE CEO ARE JOINTLY RESPONSIBLE FOR ENSURING OUR JOB STRUCTURES AND EMPLOYMENT PRACTICES ARE NON-DISCRIMINATORY. WE ARE COMMITTED TO ENSURING OUR RECRUITMENT, SENIORITY AND PAY PRACTICES ARE NON DISCRIMINATORY. OUR BOARD OF DIRECTORS HAS ADOPTED AS PART OF OUR WRITTEN COMPENSATION PHILOSOPY A COMMITTMENT TO ENSURE GENDER EQUALITY IN OUR COMPENSATION PRACTICES.

WE HAVE ASO HIRED A COMPANY WHO SPECIALIZES IN COMPENSATION AND COMPILES LARGE AMOUNTS OF DATA INTO SURVEYS USED BY MANY COMPANIES. THIS ENSURES OUR POSITIONS ARE GRADED ACCORDING TO NATIONAL AND REGIONAL DATA. WE PERFORM A FULL COMPENSATION REVIEW EVERY THREE YEARS. ON A YEARLY BASIS, WE ARE GIVEN A RECOMMENDATION OF THE RANGE MOVEMENT FOR ALL PAY RANGES ACCORDING TO NATIONAL TRENDS.

CHANGES TO POSITION REQUIREMENTS ARE RE-EVALUATED AND GRADED AS NEEDED.

THE HUMAN RESOURCES MANAGER IS WELL TRAINED IN EQUAL AOPPORTUNITY AND OVERSEES ALL RECRUITMENT, JOB DESIGN, COMPENSATION AND BENEFITS PROGRAMS AND SENIORITY PRACTICES TO ENSURE ALL PRACTICES MEET EQUAL EMPLOYMENT OPPORTUNITY STANDARDS. IN ADDITION, AN EMPLOYMENT LAW ATTORNEY REVIEWS OUR EMPLOYMENT POLICY HANDBOOK AND INDIVIDUAL TERMINATIONS FOR COMPLIANCE WITH EOE.

Attachment 20
