

ANY INQUIRIES CONCERNING  
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**Haviland Telephone Company, Inc.**  
106 North Main Street  
PO Box 308  
Haviland, KS 67059

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Re: Statement of Equal Employment Opportunity Program**

Dear Ms. Dortch:

Haviland Telephone Company, Inc., a licensee under Parts 101 of the Commission's Rules, herewith submits its Statement of Equal Employment Opportunity Program which it has formally adopted pursuant to Rule Sections 101.311 of the Commission's Rules, requiring common carrier licensees to maintain non-discriminatory employment practices.

We hereby assure the Commission, as we shall assure all employees, that no person shall be discriminated against in employment because of sex, race, color, religion, or national origin. Moreover, we shall carefully observe in all respects the provisions of the FCC's Rules by implementing a program of equal employment practices which shall meet the rule requirements.

In this regard, we shall inform all supervisory personnel at every level of management that our equal employment opportunity policy must be conscientiously and comprehensively applied throughout the company's operations. We shall also institute

procedures whereby we can review the activities of our supervisory personnel and thereby insure that this program is fully carried out and is enforced at all levels of the company's operations.

At the same time, the implementation of this equal employment opportunity program will be brought to the attention of all our employees and all recognized employee organizations. We will urge all of our employees at every level of the company's operations to cooperate fully so that this equal employment opportunity program may have the most beneficial effect upon our company's operations.

Furthermore, sources of prospective employees, such as employment agencies and labor unions, will be advised of the initiation of this program, and they will be urged to cooperate by referring all qualified applicants to us. These sources of prospective employees will be advised that they may not take into account - nor will we consider - sex, race, color, religion, or national origin in either the referral, hiring, or training of any applicant or prospective employee.

Additionally, and in conformance with the Commission's Rules, we will conduct a continuing campaign to exclude every form of discrimination or prejudice based upon

sex, race, color, religion, or national origin from our personnel policies, practices, and working conditions. As part of this program, we shall review our job structure and employment practices on a continuing basis. Moreover, we will adopt prospective recruitment, training, job design, and other measures, insofar as they may be needed, to provide equal employment opportunities to employees to advance within the company to the best of their ability.

To attain these goals, we are adopting specific practices in conformance with the provisions of the FCC's Rules. With regard to applicants for employment, we shall post notices in our offices informing applicants for employment of their equal employment rights and their right to notify the Equal Employment Opportunity Commission, the Federal Communications Commission, or other appropriate agency if they believe they have been discriminated against. Moreover, if a substantial number of potential applicants are Spanish-surnamed Americans, we shall post this notice in both Spanish and English.

We shall also ensure that our employment application materials contain a notice in bold type informing prospective employees that, in the event they believe they have been discriminated against, they may notify the Equal Employment Opportunity Commission,

the Federal Communications Commission, or other appropriate agency of any discrimination.

Those employees who make decisions on hiring, placement, and promotion will be instructed that minority employees and females are to be considered without discrimination, and those job areas in which there is little or no minority or female representation should be reviewed to determine whether this results from any possible discrimination. Those employees responsible for hiring will also be instructed that all applicants for all jobs are to be considered without discrimination.

Finally, to attain the goals previously set forth herein, we are adopting as our policy and as guides to management and supervisory employees the following specific provisions of the FCC's Rules. These will be circulated throughout our management and to supervisory employment personnel; will be taken into full consideration by all concerned; observed in our recruiting, hiring, training, placement, and promotion of employees; and implemented by appropriate specific actions as necessary to achieve the objectives of our stated employment policy.

We shall adopt guidelines, including the following measures, to whatever extent possible, to assure non-discrimination in recruiting:

- (a) Placing employment advertisements in media which have significant circulation among minority-group enrollments.
- (b) Recruiting through schools and colleges with significant minority-group enrollments.
- (c) Maintaining systematic contacts with minority and human relations organizations, leaders, and spokesmen to encourage referral of qualified minority or female applicants.
- (d) Encouraging present employees to refer minority or female applicants.
- (e) Making known to the appropriate recruitment sources in our immediate area that qualified minority members are being sought for consideration whenever we are hiring.

We shall also adopt guidelines including the following measures to whatever extent possible, to assure non-discrimination in selection and hiring:

- (a) Cooperating with the union or unions representing our employees in the development of programs to assure qualified minority persons or females of equal opportunity for employment, and including an effective non-discrimination clause in new or re-negotiated union agreements.
- (b) Avoiding use of selection techniques or tests which have the effect of

discriminating against minority groups or females.

We shall adopt guidelines including the following measures, as appropriate, to assure non-discrimination in placement and promotion:

- (a) Giving minority groups and female employees equal opportunity for positions which lead to higher positions. We will also inquire as to the interest and skills of all lower-paid employees with respect to any of the higher-paid positions, followed by assistance, counseling, and effective measures to enable employees with interest and potential to qualify themselves for such positions.
- (b) Reviewing seniority practices to insure that such practices are non-discriminatory and do not have a discriminatory effect.
- (c) Avoiding use of selection techniques or tests which have the effect of discriminating against minority groups or females.

Finally, we shall adopt guidelines including the following measures, as appropriate, to assure non-discrimination in other areas of employment practices:

- (a) Examining rates of pay and fringe benefits for present employees with equivalent duties, and adjusting any inequities found by reason of sex, race, color, religion, or national origin.

(b) Providing opportunity to perform overtime work on a basis that does not discriminate against qualified minority group or female employees.

We feel that these measures will meet both the letter and the spirit of the Commission's equal employment opportunity Rules and we will implement and follow them conscientiously and to the very best of our ability.

Very truly yours,

**HAVILAND TELEPHONE COMPANY**

By:   
\_\_\_\_\_  
Officer

Dated: May 31, 2018