



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

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## ENFORCEMENT BUREAU CONDUCTS 2019 EEO AUDITS

On June 13, the Enforcement Bureau (Bureau) sent the second group of Equal Employment Opportunity (EEO) audit letters for 2019 to randomly selected radio stations. In accordance with section 73.2080(f)(4) of the Commission's EEO rules<sup>1</sup> the Bureau annually audits the EEO programs of randomly selected broadcast licensees. Each year, approximately five percent of all radio and television stations are selected for EEO audits.

Attached are a list of the radio stations included in this audit, as well as the text of the June 13, 2019 audit letter. The list and the letter can also be viewed by accessing the Enforcement Bureau's current EEO headline page on the FCC website at <http://www.fcc.gov/encyclopedia/equal-employment-opportunity-headlines>

To request materials in accessible formats for people with disabilities (Braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer and Governmental Affairs Bureau at 202-418-0530 (voice) or 202-418-0432 (TTY).

Enforcement Bureau Contact: Lewis Pulley at 202-418-1450

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<sup>1</sup> 47 CFR § 73.2080(f)(4)



**Federal Communications Commission**  
Washington, D.C. 20554

June 13, 2019

Dear Licensee:

1. In accordance with 47 CFR § 73.2080(f)(4), the station employment unit (the Unit) that includes your above-referenced station (the Station) has been randomly selected for an audit of its Equal Employment Opportunity (EEO) program. A copy of Section 73.2080 of the Commission's rules is attached at the end of this letter for your reference.
2. If the Unit is not required under our rules to have an EEO recruitment program due to the nature of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you are required to provide only a list of the Unit's full-time employees, identified only by job title (no names should be provided), the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a)-(d) below regarding brokers and brokered stations for instructions for situations in which the applicable employment unit has fewer than five full-time employees.
3. **Audit Data Requested.** If the Unit employs five or more full-time employees (and all units, for Question 3(e)), provide the following information, including an explanation regarding any requested information that you are unable to provide:

(a) Copies of the Unit's two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit's most recent EEO public file report must be linked to either the Unit's site or the general corporate site, pursuant to Section 73.2080(c)(6).

(b) For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). However, to reduce your burden of

responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).

(c) In accordance with Section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

(d) Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

(f) In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with Section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.

(h) In accordance with Section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

(j) Among items we do not need in your response to this letter are copies of applicants' resumes, your company training manuals, posters, employee handbooks, or corporate guidebooks. If you believe any of the information in various corporate manuals or posters are relevant to any part of this audit letter, you may summarize what is in them. If you believe this letter requires you to provide an unusually burdensome volume of documentation, you may contact us prior to the response deadline to discuss possible ways of condensing your response.

#### 4. **Time Brokerage.**

(a) **Licensee of brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to Question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must respond to Question 4(b) below. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 3 above, and also forward the letter to the broker so the broker may respond to Question 4(b) below.

(b) **Broker receiving audit letter from brokered station licensee.** If you are the broker of a station, and the station you are brokering receives an audit letter, the licensee of the brokered station must forward the audit letter to you. You should respond to the audit letter concerning EEO information relating only to your own full-time employees at the brokered station. *See* Section 73.2080(f)(3).

(c) **Broker receiving audit letter directly from Commission.** If you are a broker, but the target station in this audit letter is a station licensed to you, you must submit information requested herein for the EEO program at your station (or employment unit). If you maintain EEO data for a station you are brokering with that for your own station that is the target of this audit letter, and lack the ability to separate the information, you must include in your response the information requested herein pertaining to **your** full-time employees at the station(s) you

broker. See Section 73.2080(f)(3).

(d) **Broker described under 4(b) or 4(c) above.** If your full-time employees at the station you are brokering, combined with your full-time employees at your owned station(s), total fewer than five, however, you need only respond to this letter by the deadline described below by submitting a list of your Unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to Question 3(e) above.

**5. Procedures. You must upload your response to this audit letter to your station's online public inspection file by July 29, 2019, and include in your response your station's Facility ID Number and an e-mail address where a station representative can be contacted about your response.** The response should be filed in the online file under "EEO Records" which will appear as a briefcase icon on the left side of the screen when you go into the online public file. You should not direct your response to the office of the FCC Secretary. The Secretary does not process responses to EEO audit letters. The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. (See 47 CFR § 1.16.)

6. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Extensions of time must be requested by e-mail to [lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov) and will be granted only upon a showing of extraordinary circumstances. Unless and until the EEO Staff grants such a request the original deadline remains in effect. Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with Section 73.2080(g).

7. In accordance with Sections 73.3526(e)(10) (for commercial stations ) and 73.3527(e)(11) (for noncommercial educational stations), available through these links:

[https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73\\_13526&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13526&rgn=div8)

[https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73\\_13527&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13527&rgn=div8)

you must place a copy of this letter and your response in the online public file, of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

8. If our EEO random audits sent in 2017, 2018, or 2019 included the Station, you may not have to respond to this letter. If the Station completed an audit in that timeframe, before responding, please tell us the dates of public file reports included in the Station's recent audit response, via e-mail to [lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov). We will then advise you if a response is necessary. Also, if your most recent license renewal application was granted after June 1, 2017, you may not need to respond to this letter. To find out if you are exempt from responding, send an e-mail to

[lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov). Should you have any questions, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley  
Assistant Chief, Investigations & Hearings Division  
Enforcement Bureau

Enclosure

Callsign	Facility ID	City	State	Station Type	Licensee
KQSF	76903	DELL RAPIDS	SD	FM	MIDWEST COMMUNICATIONS, INC.
KAFF-FM	25693	FLAGSTAFF	AZ	FM	FLAGSTAFF RADIO, INC
KAFR	81300	WILLIS	TX	FM	AMERICAN FAMILY ASSOCIATION
KAFX-FM	18105	DIBOLL	TX	FM	TOWNSQ. MEDIA LUFKIN LICENSE
KAJO	24822	GRANTS PASS	OR	AM	GRANTS PASS B'CASTING CORP.
KAKN	4079	NAKNEK	AK	FM	BAY BROADCASTING COMPANY
KALW	58830	SAN FRAN.	CA	FM	SAN FRAN. UNIFIED SCHOOL DIST.
KTUI	41171	SULLIVAN	MO	AM	FIDELITY BROADCASTING, INC.
KANO	26449	HILO	HI	FM	HAWAII PUBLIC RADIO, INC.
KAOI	70381	KIHEI	HI	AM	VISIONARY RELATED ENTERTAINM.
KSOX	18653	RAYMONDVIL	TX	AM	VISION HISPANA INC INT'L
KARR	20669	KIRKLAND	WA	AM	JAMES A. DALKE
KASS	43477	CASPER	WY	FM	MT. RUSHMORE BROADCASTING
KATG	86330	ELKHART	TX	FM	AMERICAN FAMILY ASSOCIATION
KAZR	28882	PELLA	IA	FM	SAGA COMM. OF IOWA, LLC
KBAP	175536	BATESVILLE	AR	FM	TONY V. HAMMACK MINISTRIES
KBBU	43335	MODESTO	CA	FM	LAZER LICENSES, LLC
KBBZ	4581	KALISPELL	MT	FM	BEE BROADCASTING, INC.
KRLT	55494	S. LK. TAHOE	CA	FM	D&H BROADCASTING LLC
KBFI	54500	BONNERS FER	ID	AM	RADIO BONNERS FERRY, INC.
KBFL-FM	33654	BUFFALO	MO	FM	MEYER-BALDRIDGE, INC.
KBFS	68739	BLL FOURCHE	SD	AM	ULTIMATE CAPS, INC.
KBKB-FM	64564	FT MADISON	IA	FM	TITAN BROADCASTING, LLC
KBLU	62233	YUMA	AZ	AM	EDB VV LICENSE LLC
KBLW	89078	BILLINGS	MT	FM	HI-LINE RADIO FELLOWSHIP, INC.
KBME	23082	HOUSTON	TX	AM	AMFM TX LIC., DEBTOR IN POSS.
KWFC	3681	SPRINGFIELD	MO	FM	RADIO TRAINING NETWORK, INC
KBRT	34588	COSTA MESA	CA	AM	KIERTRON, INC.
KWJK	86486	BOONVILLE	MO	FM	BILLINGS BROADCASTING, LLC
KBWA	91420	BRUSH	CO	FM	WAY MEDIA, INC.
KBZM	81679	BIG SKY	MT	FM	ORION MEDIA LLC

KCAM-FM	173007	GLENNALLEN	AK	FM	JOY MEDIA MINISTRIES
KSEC	34795	BENTONVILLE	AR	FM	LA ZETA 95.7 INC.
KCHK-FM	34906	NEW PRAGUE	MN	FM	INGSTAD BROS BROADCASTING, LLC
KCHU	65232	VALDEZ	AK	AM	TERMINAL RADIO, INC.
KCJA	172622	CONWAY	IA	FM	CALVARY CHAPEL CLARINDA, INC.
KSDW	52141	TEMECULA	CA	FM	CALVARY CHAPEL OF COSTA MESA
KCLN	33055	CLINTON	IA	AM	GENDREAU BROADCAST LLC
KRMC	73757	DOUGLAS	AZ	FM	WORLD RADIO NETWORK, INC.
WANT	4103	LEBANON	TN	FM	BAY-POINTE BROADCASTING, INC.
WAOK	63775	ATLANTA	GA	AM	ENTERCOM LICENSE, LLC
WATQ	36357	CHETEK	WI	FM	CAPSTAR TX, LLC, DEBT IN POSS.
WAYB-FM	71148	GRAYSVILLE	TN	FM	FAMILY WORSHIP CENTER CHURCH
WAIK	49515	GALESBURG	IL	AM	WPW BROADCASTING, INC.
WFSR	18284	HARLAN	KY	AM	EASTERN BROADCASTING CO.
WGAR-FM	47740	CLEVELAND	OH	FM	CITICASTERS LIC., DEBTOR IN POSS.
WHCU	18048	ITHACA	NY	AM	SAGA COMM. OF NEW ENGLAND, LLC
WCLU	57895	GLASGOW	KY	AM	ROYSE RADIO, INC.
WHMQ	25834	GREENFIELD	MA	AM	SAGA COMM. OF NEW ENGLAND, LLC
WCMT-FM	67053	MARTIN	TN	FM	THUNDERBOLT BROADCASTING CO.
WCNL	35406	NEWPORT	NH	AM	SUGAR RIVER MEDIA, LLC
WCOM-FM	174382	SILVER CREEK	NY	FM	FAMILY LIFE MINISTRIES, INC.
WCSK	34914	KINGSPORT	TN	FM	KINGSPORT CITY SCHOOLS B. OF ED
WCSO	90785	COLUMBUS	MS	FM	AMERICAN FAMILY ASSOCIATION
WCXZ	52626	HARROGATE	TN	AM	LINCOLN MEMORIAL UNIVERSITY
WCZY-FM	9920	MT PLEASANT	MI	FM	LATITUDE MEDIA, LLC
WDDJ	54719	PADUCAH	KY	FM	BRISTOL BROADCASTING COMPANY
WDLJ	78414	BREESE	IL	FM	KM RADIO OF BREESE, L.L.C.
WDMP-FM	17056	DODGEVILLE	WI	FM	DODGE POINT BROADCASTING CO.
WDSL	71354	MOCKSVILLE	NC	AM	FARREN K. SHOAF
WDUV	1178	N PT RICHEY	FL	FM	COX RADIO, INC.
WJNV	78986	JONESVILLE	VA	FM	REGINA KAY MOORE
WJNZ	50377	ROBERTSDALE	AL	AM	TRI CITY RADIO, LLC
WJOL	62235	JOLIET	IL	AM	ALPHA MEDIA LICENSEE LLC
WJRC	58716	LEWISTOWN	PA	FM	SALT AND LIGHT MEDIA MINISTRIES
WJSH	19616	FOLSOM	LA	FM	CHARLES W. DOWDY, DEBT-IN-POSS.
WJWJ-FM	61006	BEAUFORT	SC	FM	S. CAROLINA EDUC TV COMMISSION
WJZ	28636	BALTIMORE	MD	AM	ENTERCOM LICENSE, LLC
WGLD	55352	MCHSTR TNSP	PA	AM	RADIO LICENSE HOLDING SRC
WGTZ	25043	EATON	OH	FM	ALPHA MEDIA LICENSEE LLC
WGYL	58946	VERO BEACH	FL	FM	VERO BEACH BROADCASTERS, LLC
WHAA	91555	ADAMS	WI	FM	WISC. EDUCATIONAL COMM BD
WHCU	18048	ITHACA	NY	AM	SAGA COMM OF NEW ENGLAND, LLC
WHET	53978	W FRANKFORT	IL	FM	WITHERS BCASTING OF S ILLINOIS

WHHN	91685	HOLLIDAYSBG PA	FM	RADIO MARIA, INC.
WHMQ	25834	GREENFIELD MA	AM	SAGA COMM OF NEW ENGLAND, LLC
WHMX	49690	LINCOLN ME	FM	LIGHTHOUSE RADIO NETWORK, INC.
WHTG	72323	EATONTOWN NJ	AM	PRESS COMMUNICATIONS, LLC
WIBG	19617	OCEAN CITY/SOMERS PO	NJ	AM ENRICO S. BRANCADORA
WIGH	25543	JACKSON TN	FM	AMERICAN FAMILY ASSOCIATION