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December 12, 2023

Ms. Elizabeth E. Goldin
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: **Response to Broadcast EEO Audit Letter**
Cumulus Licensing LLC
Station KOMS(FM), Poteau, Oklahoma
Facility ID 37086

Dear Ms. Goldin:

Cumulus Licensing LLC (“Cumulus”), licensee of radio station KOMS(FM), Poteau, Oklahoma, hereby submits its Response to your letter of October 30, 2023 (“EEO Audit Letter”) concerning the Station’s compliance with the Commission’s Equal Employment Opportunity Rule, 47 C.F.R. § 73.2080. Station KOMS is part of a station employment unit based in Fort Smith, Arkansas, that includes stations KBBQ-FM, Van Buren, Arkansas (Facility ID 37827), and KNSH(FM), Fort Smith, Arkansas (Facility ID 23869). For this reason, Cumulus’s Response to the EEO Audit Letter involves the entire Fort Smith SEU. In accordance with your request, this submission consists of a sworn statement by Richard S. Denning, Executive Vice President and General Counsel of the licensee, indicating that fewer than five full-time employees are assigned to this SEU.

To comply with the procedures presented in Item 5(a) of the aforementioned EEO Audit Letter, Cumulus is uploading its Response into the online public inspection file of each station in this SEU.

If there are any questions about this submission, please contact undersigned counsel to Cumulus Licensing LLC.

Sincerely,

A handwritten signature in black ink that reads "Mark N. Lipp".

Mark Lipp

Enclosure

Declaration of Richard S. Denning
Executive Vice President and General Counsel of Cumulus Licensing LLC

I, Richard S. Denning, hereby declare as follows:

1. I am the Executive Vice President and General Counsel of Cumulus Licensing LLC, the licensee of Station KOMS(FM), Poteau, Oklahoma (Facility ID No. 37086), which is part of a station employment unit ("SEU") that includes Stations KBBQ-FM Van Buren, Arkansas (Facility ID No. 37827), and KNSH(FM), Fort Smith, Arkansas (Facility ID No. 23869). This statement is submitted in response to the October 30, 2023, letter of Elizabeth E. Goldin, Assistant Chief of the Investigations & Hearings Division of the Commission's Enforcement Bureau, concerning a random audit of this SEU's EEO program (the "EEO Audit Letter").

2. In response to Question 2(a) of the EEO Audit letter, this Station employs fewer than five full-time employees as the term is defined in the Commission's broadcast EEO rule, 47 C.F.R. § 73.2080(e)(1). The full-time employees assigned to the stations in this SEU by job title and the number of hours each are regularly scheduled to work per week are identified below:
 - Sales Manager – 40 hours per week;
 - Account Executive – 40 hours per week.

3. In response to Question 2(b)(vi) of the EEO Audit Letter, the licensee affirms that it is not aware of any discrimination complaints filed against the licensee during the current license term.

Richard Denning

Richard S. Denning

Executed on this 12th day of December 2023

Signature Certificate

Reference number: RG5G5-E8CX3-EQVKJ-WNGNQ

Signer

Timestamp

Signature

Richard Denning

Email: richard.denning@cumulus.com

Sent:

12 Dec 2023 17:10:35 UTC

Viewed:

12 Dec 2023 17:14:51 UTC

Signed:

12 Dec 2023 17:15:06 UTC



Recipient Verification:

✓ Email verified

12 Dec 2023 17:14:51 UTC

IP address: 104.247.35.106

Location: New York, United States

Document completed by all parties on:

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