

05/03/2023

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

Re: Response to Broadcast EEO Audit Letter
Seehafer Broadcasting Corp
Station WLKN-FM Cleveland WI
FIN- 67716

Ms. Goldin,

Seehafer Broadcasting Corp Licensee of WLKN-FM (FIN 67716) Cleveland, Wisconsin hereby submits its response to you EEO Audit letter of April 24, 2023 concerning the stations compliance with the Commissions Equal Employment Opportunity rule. WLKN-FM is part of a 6-station employment unit based in Manitowoc Wisconsin. The other stations included in this SEU are; WQTC-FM Manitowoc (FIN - 59609), WLTU-FM Manitowoc (FIN - 14701), WEMP-FM Two Rivers (FIN - 85300), WCUB-AM Two Rivers (FIN - 14702) and WOMT-AM Manitowoc (FIN - 59610).

This response will include all 6 stations in the Seehafer Broadcasting Corp Stations Employment Group.

Compliance with this audit letter will include the posting of the document into each station's public inspection file.

If there are any questions or concerns regarding this response, please contact me at your earlier convenience.

Respectfully,

Jim Medley
jim@seehafernews.com
920-682-0351

1. This response includes information about the following stations, which comprise the Seehafer Broadcasting Corp Manitowoc/ Cleveland/ Two Rivers employment unit.

WLKN-FM Cleveland	FIN - 67716
WQTC-FM Manitowoc	FIN - 59609
WLTU-FM Manitowoc	FIN - 14701
WEMP-FM Two Rivers	FIN - 85300
WCUB-AM Two Rivers	FIN - 14702
WOMT-AM Manitowoc	FIN - 59610

- 2a. The Seehafer Broadcasting Corp Manitowoc/ Cleveland/ Two Rivers employment unit had employed more than 5 full-time employees during this audit term.

- 2b. **(i) Public File Report.** Copies of the Unit's two most recent EEO Public file reports for the periods covering August 1, 2020, to July 31, 2021 (2020-2021 reporting period) and August 1, 2021, to July 31, 2022 (2021-2022 reporting period) are attached as **Exhibit A**.

The Seehafer Broadcasting Corp Manitowoc Employment Unit's most recent EEO public file report is posted on each of these websites.

- 2b. **(ii) The stations' Web sites are as follows.**

WLKN-FM	www.wlkn.com
WQTC-FM	www.wqtcfm.net
WLTU-FM	www.hotcountry921.com
WEMP-FM	www.wemp989.com
WCUB-AM	www.cubradio.com
WOMT-AM	www.womtradio.com

- 2b. **(iii)** documentation concerning the advertising of any full-time openings and the source the opening was sent to are included as **Exhibit B**.

- 2b. **(iv)** Total number of interviewees for each full-time vacancy and referral for each interviewee are noted in **Exhibit C**

- 2b. (v)** Documents and examples of the SEU's recruitment initiatives for the audit period are included in **Exhibit D**. The number of full-time employees for this SEU is; 15. The Population of Manitowoc County is 81,505 and the population of Sheboygan County is 117,747. This places the Seehafer SEU under the 250,000-population threshold.
- 2b. (vi)** To the best of my knowledge, there are no pending or unresolved complaints for the Seehafer Broadcasting Corp SEU.
- 2b. (vii)** all levels of management with hiring authority should be aware of Seehafer Broadcasting Corp EEO policies, but the ultimate responsibility for compliance with the FCC's outreach requirements rests with the Business Manager and the Operations Manager, under the guidance of the Vice President. The Vice President is active in the business and is knowledgeable of all personal policies and decisions. The Business Manager, who is independent of the Vice President, also informs the Vice President and Operations Manager of all FCC EEO requirements and gives guidance to corrections or shortfalls in meeting the requirements. The Operations Manager is aware of the requirement to make certain that recruitment sources are notified of full-time openings and that the job postings are kept open for enough applicants prior to making a hiring decision unless there is an urgency to fill the position. On a bulletin board in a prominent location are federal employment law posters (including OSHA, Wisconsin unemployment, Equal Employment Opportunity, Employee rights under the national Labor relations act, polygraph protection act, federal minimum wage, family, and medical leave. Seehafer Broadcasting also states it is an equal opportunity employer in employment announcements.
- 2b. (viii)** The Business Manager and Operations Manager work closely together to make sure that the EEO program is effective in creating broad outreach to prospective employees. The Operations Manager is consulted on outreach activities, to determine if they are effective and would meet the FCC's EEO requirements. The Business Manager and staff have also been involved in webinars and have consulted with the Wisconsin Broadcaster Association to ensure that there is a proper understanding of the FCC's EEO Requirements.
- 2b. (ix)** The Owner of Seehafer Broadcasting Corp, at least annually, examines each employee's current salary, last raise, and current duties. He, with the assistance of department Managers, provides pay increases based on cost of living and merit, without regard to age, sex, religion, race, or national origin. Sale persons are on commission and do not receive raises. With respect to promotion, when a position becomes vacant, employees are encouraged to apply and are given special consideration if their experience is well matched to the job requirements. Seehafer Broadcasting Corp employees are not members of a Labor union.
- 2b. (x)** Seehafer Broadcasting Corp is not a Religious Broadcaster.


2c. Seehafer Broadcasting Corp employee manual has been issued to all current and future employees.

3. Time Brokerage; Not applicable

I certify that I am a corporation officer of Seehafer Broadcasting Corporation and that the substantive information and exhibits submitted with this reply are true and true to the best of my knowledge and belief.

Seehafer Broadcasting Corporation

Signed:

A handwritten signature in black ink, appearing to read "M. Seehafer", written over a horizontal line.

Mark Seehafer, President

EXHIBIT A

2 most recent EEO Public File reports

**SEEHAFER BROADCASTING CORP. MANITOWOC
(WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB)**

Annual EEO Public File Report

Prepared by: Jim Medley

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080(c) (6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of the following station(s):

SEEHAFER BROADCASTING, MANITOWOC, WI

And is required to be placed in the public inspection files of these stations, and posted on their websites, if they have websites. The information contained in the Report covers the period beginning **August 1, 2020 and ending July 31, 2021.**

The FCC's 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period.
2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080 (c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number.
3. The recruitment source that referred the hire for each full-time vacancy during the Applicable Period.
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies.
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c) (2) of the FCC rules. Appendices 1, 2, and 3, which follow, have been designed, in the aggregate, to provide the required information. Please note that the letters listed on Appendix 2 under the column entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of the full-time job positions listed on Appendix.

*For purposes of the Report, a vacancy was deemed "filled" not when the offer was extended but when the hire accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person and/or over the telephone.

Appendix 1:
Annual EEO Public File Report Form
Covering the Period from August 1, 2020 to July 31, 2021
Station(s) Comprising Station Employment Unit:

WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB

Vacancy Information

(1) Social & Digital Media Director (filled 8/10/20)

Full-Time Positions Filled 1

Means of Announcing Job Vacancy E, F, H, I

Total Number of Interviewees 5

Source of Hired Person. E (on-air ad)

Vacancy Information

(1) Reception/ Traffic Assistant (filled 8/31/20)

Full-Time Positions Filled 1

Means of Announcing Job Vacancy B, G, E, H, I

Total Number of Interviewees 14

Source of Hired Person. G (Indeed.com)

Vacancy Information

Account Executive (filled 4/15/20)

Full-Time Positions Filled 1

Means of Announcing Job Vacancy F, H, I, E

Total Number of Interviewees 2

Source of Hired Person. H (former employee)

Appendix 2:

Annual EEO Public File Report Form

Covering the Period from August 1, 2020 to July 31, 2021

Station(s) Comprising Station Employment Unit:

WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB

Section 2: Recruitment Source Information

A. Wisconsin Broadcasters Association

44 E Mifflin St

Madison WI 53703

<http://www.wi-broadcasters.org/careers/post-available/>

608-255-2600

B. Wisconsin Job Center - Manitowoc

3733 Dewey St

Manitowoc, WI 54220

<http://www.manitowocjobcenter.org/>

920-683-2888

C. University of Green Bay – Manitowoc

705 Viebahn St

Manitowoc WI 54220

<http://manitowoc.uwc.edu/>

920-683-4600

D. Lakeshore Technical College - Cleveland

1290 North Ave

Cleveland, WI 53015-1412

<http://www.gotoltc.edu/>

920-693-1000

E. On-Air Seehafer Broadcasting

WOMT-AM, WCUB-AM, WEMP-FM, WLKN-FM, WLTU-FM, WQTC-FM

3730 Mangin St

Manitowoc WI 54221

<http://www.seehaferbroadcasting.com/>

920-682-0351

F. Manitowoc Chamber of Commerce

1515 Memorial Dr

Manitowoc, WI 54220

<http://chambermanitowoccounty.org/>

920-684-5575

G. Indeed.com

H. Personal Reference

I. All Seehafer Broadcasting websites.

Appendix 3:
Annual EEO Public File Report Form
Covering the Period from August 1, 2020 to July 31, 2021
Station(s) Comprising Station Employment Unit:

WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB

Section 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken by Seehafer Broadcasting

1. 03/12/21, Assisted a high school student from Manitowoc Lincoln in a class assignment about carriers in broadcasting. The student (M.M.) asked questions about the broadcast industry and different carriers then, submitted a video interview for class credit.
2. Throughout the year, Seehafer Broadcasting will have different groups come through to tour our stations. the Manitowoc Chamber of Commerce. The tours include introductions to the staff and descriptions of their jobs, and the history of the stations, how the radio business works, and the benefits of working at a radio station. During this reporting period, only 1-tour was conducted resulting from the **COVID-19 Pandemic**,
3. 05/06/2021, attended a webinar titled "The FCC rules and how to survive them". This instructional session was conducted by FCC Attorney Gregg P. Skall and Lisa Fields from Broadcast 1 Source.
6. 11/15/20 – 03/15/21; Seehafer radio stations Interned J.L. for UW Wisconsin-Green Bay credit in Sports Broadcasting. During this instruction period, J.L. continued to learn the many facets of Sport Radio Broadcasting.
7. The week of 6/7/21, Seehafer Broadcasting participated in a Virtual Job/Career Fair hosted by the Wisconsin Broadcasters association. This "Virtual Job Fair" was an outreach effort in response to the **Covid-19 Pandemic**.
8. Aired announcements for the Wisconsin Broadcasters Virtual Job Fair. A total is 120, 60-second announcements over 6-stations aired from 7/20 – 7/23 promoting the broadcastersvirtualjobfair.com this was an event set up to help recruit during the COVID19 Pandemic.

**SEEHAFER BROADCASTING CORP. MANITOWOC
(WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB)**

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2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080 (c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number.
3. The recruitment source that referred the hire for each full-time vacancy during the Applicable Period.
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies.
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c) (2) of the FCC rules. Appendices 1, 2, and 3, which follow, have been designed, in the aggregate, to provide the required information. Please note that the letters listed on Appendix 2 under the column entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of the full-time job positions listed on Appendix.

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WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB

Vacancy Information

(1) assignment editor (news) (start date 1/1/22)

Full-Time Positions Filled 1

Means of Announcing Job Vacancy A, H, J

Total Number of Interviewees 2

Source of Hired Person. J (allaccess.com)

Vacancy Information

(1) Assistant Traffic Director (office) (Start date 6/18/22)

Full-Time Positions Filled 1

Means of Announcing Job Vacancy B, H, I, J

Total Number of Interviewees 2

Source of Hired Person. J (allaccess.com)

Vacancy Information

(1) Digital/ Social Director (Start date 3/29/22)

Full-Time Positions Filled 1

Means of Announcing Job Vacancy H, I, J

Total Number of Interviewees 2

Source of Hired Person. H (personal reference)

Appendix 2:

Annual EEO Public File Report Form

Covering the Period from August 1, 2021 to July 31, 2022

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1515 Memorial Dr

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<http://chambermanitowoccounty.org/>

920-684-5575

G. Indeed.com

H. Personal Reference

I. All Seehafer Broadcasting websites.

J. AllAccess.com

Appendix 3:
Annual EEO Public File Report Form
Covering the Period from August 1, 2021 to July 31, 2022
Station(s) Comprising Station Employment Unit:

WOMT/ WQTC/ WEMP/ WLTU/ WLKN/ WCUB

Section 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken by Seehafer Broadcasting

1. 08/25/2021, an employee of Seehafer Broadcasting, Brenda Schultz, attended the EEO Seminar: **“developing signature traits of an inclusive leader”** hosted by the Wisconsin Broadcasters association during the summer conference.
2. 3/08/22 Job Shadow G.M. from Manitowoc Lutheran High School. G.M. is interested in a carrier in broadcasting. She spend the day learning a facets of radio and what goes into the operation to make everything work.
3. 3/05/2022, Terry Stevenson was present for the **Job/ Carrier fair** at the WBA’s 2022 Student Seminar in Middleton Wi. Job seekers and Student attendees were on hand for the 2-hour information and hiring event.
6. 11/15/20 – 07/25/2022; Seehafer radio stations Interned J.L. for College credit at UW Wisconsin Green Bay in Sports Broadcasting. During in-session school period, J.L. continued to learn the many facets of Sport Radio Broadcasting. Co-hosting a weekly Sports Talk program and working local sports broadcasts throughout the year.
7. 6/22/2022, Seehafer Broadcasting Employee, Katie Stevenson, attended the EEO Session: **Practical steps to diversify your station** at the WBA Summer Conference in La Crosse WI.
8. 6/22/2022, Seehafer Broadcasting Employee, Katie Stevenson, participated in the **Job/ Career Fair** which was held at the WBA Summer conference in La Crosse WI

Exhibit B
Advertisements, Bulletins of Job Vacancies

Posted:
Chamber of Commerce
websites
ON AIR All stations

Filled
8/10/20

Director of Social & Digital Media

Summary: The Director of Social & Digital Media position leads the creation, execution and continuous refinement of an effective digital media communication strategy for Seehafer Broadcasting. The position requires consistent creative and effective digital communications and takes a collaborative role with the sales and marketing team, community outreach leaders, and a broad range of partners including clients, community officials and local leaders to support and grow the company. This is a full-time position and operates out of our Manitowoc, Wisconsin office location and will report and work under the direct supervision of Terry Stevenson and our Senior Leadership Team.

Responsibilities:

- Design, maintain, and update SeehaferNews.com, the SN App, all social media platforms, and each individual radio station's website
- Data analysis of digital media, to include submitting weekly reports
- Graphic design work
- Managing on-site talent for various sponsored and/or non sponsored community events, including taking photographs, shooting videos, and (co)-authoring stories
- Other digital and misc projects assigned by senior management

Qualifications:

- Experience with digital and social media
- Understanding of digital marketing and analytics
- Graphic design experience
- Strong organizational skills and proven ability to take initiative and collaborate
- Flexibility and ability to react to a continually changing environment
- Strong written and oral communication skills
- Demonstrates leadership skills with excellent judgment and high standards
- Energy, a sense of humor, resiliency, and flexibility

Goals:

- To create additional revenue streams for Seehafer Broadcasting through the use of our digital platforms
- To enhance the overall listener experience with Seehafer Broadcasting through the use of our digital platforms
- To maintain and grow our overall brand identity within the community by attending various community events



NOW. NEW. NIGHTS.
XYZ WEEKNIGHTS | 5 HOURS
WITH ERIK ZACHARY



ERIK ZACHARY BRINGS A FRESH TAKE TO WHAT'S TRENDING WITH A PASSION FOR MUSIC AND ADVENTURE THAT MATCHES TARGET DEMOS.

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[VO](#)
[Music](#)
[Video](#)
[Podcast](#)
[People](#)
[Columns](#)
[Charts](#)

★ You have 77 unread Net News stories.

[Home](#) > [All Forums](#) > [Job Market](#) > [Job Openings](#)

Forums

[Quick links](#) [FAQ](#)

User Control Panel () • Your posts

[Board index](#) < [Job Market](#) < [Job Openings](#)

Job Openings

Forum rules

You can only post the job opening once in any 24 hour period. Please print your job opening for EOE records. Job openings will remain visible for 14 days. Do not post in this forum if you are looking for work. Please, go to Situations Wanted to post your availability. No voiceover, voicetracking, or other business plugs, please!

Preview: Radio Traffic in Manitowoc WI

This full-time position requires some radio traffic experience, knowledge of Visual traffic is a plus. You will be trained to handle up to 6-stations as a primary backup to the Traffic Director. There is room to grow doing podcasts or maybe commercial production and on-air work. This is not a corporate job; we are family-owned and have a fantastic workplace. Work and play on the shore of Lake Michigan. Seehafer Broadcasting Corp is an EEO

Send resume to; jimmedley@womtradio.com

POST A NEW TOPIC

Subject:

Smilies



Posted:
 W: Job center
 Indeed.com
 ON AIR All stations
 All stations websites

 Filtered 9/31/20



ALL ACCESS DOWNLOADS

WE'VE GOT YOUR NEW
HOT AC & AC
MUSIC HERE!



DOWNLOAD



WATCH

Posted:
Chamber of Commerce
All Stations websites
ON Air All Stations

Filed
4/15/20

04/02/2020

Seehafer Broadcasting is looking for out next successful Market Consultant in the Manitowoc, Sheboygan and Two Rivers Area. If you have a sales background, enjoy meeting new people and can talk to business owners about business. We want to talk to you about joining our team. We offer a guaranteed salary, a training program and an awesome income potential. Rush you cover letter and Resume' to;

Terry Stevenson/ Sales Manager
terry@seehafernews.com

Marketing Consultant Wanted

Seehafer Broadcasting in Sheboygan, Manitowoc and Two Rivers is looking for a marketing/sales professional to develop new accounts, service existing accounts, present proposals, generate ideas, and create successful marketing campaigns.

Degree and/or prior experience a plus, outstanding computer and presentation skills, clean drivers record required, and the will to succeed and obtain financial rewards are a must!

Contact:

Terry Stevenson/ Sales Manager
Seehafer Broadcasting
PO Box 1385
Manitowoc WI 54221

Seehafer Broadcasting is an equal opportunity Employer and encourages Female and Minority Applicants.



SoundStack

We make audio

Platform-agnostic tech for creators and advertisers

Book a Demo

Home **Formats** Net News Mediabase Ratings Jobs Forums Directory VO Music Video Podcast People Columns Charts

☆ You have 80 unread Net News stories. search by keyword ... search

Home > All Forums > Job Market > Job Openings

Forums

Quick links **FAQ**

User Control Panel () • Your posts

Board index < Job Market < Job Openings

*Posted:
w: Broadcasters
All Access.com*

Job Openings

Forum rules
You can only post the job opening once in any 24 hr records. Job openings will remain visible for 14 day work. Please, go to Situations Wanted to post your **No voiceover, voicetracking, or other business pl**

Preview: News Professional

Looking for a great News leader, someone that really takes pride in their work. Help us organize an Award-Winning News Department including interviewing local newsmakers, writing local stories & produce local news for a multi-station cluster.

- Must be dependable and organized.
- Be punctual and engaged for the workday.
- Must write local news stories every shift.
- Exercise independent professional judgment in writing, producing, interviewing, taping, or broadcasting on-air material.
- Update website with timely local content.
- Knowledge of Adobe Audition editing software.
- Participates in required station Programming meetings.
- Adheres to all guidelines, policies, and procedures of the station, the FCC, and all other federal, state, and local laws, including policies and procedures regarding indecency and obscenity.

We have the tools to get the job done, AP & State network. Play-by-play is a plus. We need your skills to take our Newsroom to the next level with added local content both on-air and online at www.Seehafernews.com

Say goodbye to the corporate grind and do the job you love while living on the beautiful Wisconsin Lakeshore. Send resume', writing samples, and air-check to; jim@seehafernews.com Seehafer Broadcasting Corp. is an EOE



ALL ACCESS DOWNLOADS

WE'VE GOT YOUR NEW **HOT AC & AC** MUSIC HERE!

PLAY

DOWNLOAD

WATCH



Posted:
Wisconsin Broadcasters
WI Job center
All station websites
AllAccess.com

Radio Traffic

[Back to Jobs Available](#)



By [WOMT](#) 3/18/2022 Radio - Administrative

This full-time position requires some radio Traffic experience, knowledge of Visual traffic is a plus. You will be trained to handle up to 6-stations as a primary backup to the Traffic Director. There is room to grow doing podcasts or maybe commercial production and on-air work. This is not a corporate job; we are family-owned and have a fantastic workplace. Work and play on the shore of Lake Michigan. Seehafer Broadcasting Corp is an EEO

Send resume to; jimmedley@womtradio.com



Views Budget Cost

Posted
Indeed.com
All Access.com
Station Websites

Candidates

Awaiting review
0

Total (excluding rejected)
0

0 Rejected



Discover your top applicants faster by sending a free assessment

Get a more complete picture of each candidate by being able to view and compare their assessment score results when you turn on the assessment of your choice.

Choose assessment

Job description

Seehafer Broadcasting in Manitowoc is seeking a "Digital and Social Media Director." The ideal person will know how to update websites, produce video content, creatively promote our radio stations on social media platforms and craft digital graphics. This is a full time job at the Manitowoc Office location and a perfect spot to grow your carrier. If you thrive on creativity and can meet deadlines.

Job Type: Full-time

Schedule:

- 8 hour shift

Experience:

Exhibit C
Interviewees for each vacancy

EEO Interviewees 8/1/20-7/31/21

Social & Digital Media Director

1 full-time position filled 8/10/20.

Position listed: On-air all Seehafer stations, Manitowoc Chamber of Commerce, Personal reference, all Seehafer websites.

5-people interviewed

Source of person hired; On-air ad on Seehafer stations.

Support Team Specialist/ Traffic Assistant

1 full-time position filled on 8/31/20.

Position listed: Wisconsin Job Center, Indeed.com, Personal reference, On-air all Seehafer Stations.

14-people interviewed

Source of person hired; Indeed.com

Account Executive

1 Full-time position filled on 4/15/20.

Position Listed; Manitowoc Chamber, Personal Reference, All Station websites, On-air all Seehafer stations, All Seehafer websites.

2-people interviewed

Source of person hired; Personal Reference (former employee)

EEO Interviewees 8/1/21-7/31/22

News Assignment Editor

1 Full-time position filled on 01/01/22.

Position Listed; Wisconsin Broadcasters Association, All Seehafer websites, All Access.com.

2-people interviewed

Source of person hired; All Access

Assistant Traffic Director

1 Full-time position filled on 6/18/22.

Position Listed; Wisconsin Broadcaster Association, All Access.com, All Seehafer websites.

2-people interviewed.

Source of person hired; All Access

Digital/ Social Director

1 Full-time position filled on 3/29/2022.

Position Listed; All Seehafer websites, All Seehafer stations, personal reference, All Access.com.

2-people interviewed

Source of person hired; Personal reference.

Exhibit D
Recruitment Initiatives



Seehafer Broadcasting
3730 Mangin St
Manitowac, WI 54220

RE: Wisconsin Broadcasters Virtual Job Fair Participation, June 7, 2021

June 14, 2021

Dear Terry Stevenson,

Thank you for participating in the Wisconsin's Broadcasters Virtual Job Fair the week of June 7, 2021. Your hiring agent of record was Terry Stevenson, and the stations that participated were: WOMT, WQTC, WLKN, WCUB, WLTU, WEMP, WDLB, WOSQ.

This job fair also included the following job postings: Account Executive.

Please keep this letter for your records.

Thank you again for participating in the Broadcasters Virtual Job Fair.

Best Regards,

JIM

Kyle Geissler
Director of Operations and Public Affairs
Wisconsin Broadcasters Association
608-255-2600
800-236-1922
@WIBroadcasters



**Wisconsin Broadcasters Association
Virtual Job Fair
June 7-11, 2021**

Day	Number of visits	Pages	Hits	Bandwidth
7-Jun-21	256	3,767	15,197	2.43 GB
8-Jun-21	276	1,587	13,446	1.40 GB
9-Jun-21	170	2,387	9,586	1.44 GB
10-Jun-21	202	2,109	11,237	2.45 GB
11-Jun-21	169	1,501	7,749	1.67 GB
WEEKLY TOTALS	1073	11,351	57,215	

Number of visits - Under this column you will see the number of unique IP addresses that have accessed your website. This number can be associated with the different people that have browsed your website.

Pages - This field shows the number of different pages that were opened on your website from your visitors.

Hits - Under this label you will see the number of accessed files that were recorded for your pages. For example, if your *index.php* file includes four other documents, when the index file is accessed, it will generate a total of 5 hits.

Bandwidth - This statistic provides you with information on how much data each visitor downloads on average.

WOMT/WQTC/WEMP/WLKN/WCUB/WLTU
 SEEHAFFER BROADCASTING CORPORATION
 PO BOX 1385
 3730 MANGIN ST
 MANITOWOC, WI 54221-1385

Order #: 174-01791
 Description: JOB FAIR-JUNE 2021
 Date Entered: 5/25/2021
 P.O.#:
 Salesperson: Kanieski, Jenny
 Invoice Frequency: Billed at end of Media Month, Sorted by Date Notary Req'd

WISCONSIN BROADCASTERS ASSOC
 44 E. MIFFLIN
 SUITE 900
 MADISON, WI 53703

On-Air Schedule

Start Date	End Date	Station	Scheduled Time/Event	Repeated	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 6/7/2021	6/11/2021	WOMT-AM	05:00:00 to 20:00:00	Weekly	1:00	30	0.00	0.00	6	6	6	6	6	0	0

Order Start Date: 6/7/2021 Order End Date: 6/11/2021 Spots: 30 Total Charges: \$0.00

Projected Media Month Billing Totals for WISCONSIN BROADCASTERS ASSOC / 174-01791 :

Month	Year	Spot Count	Net Billing
June	2021	30	\$0.00

Confirmed & Accepted for WOMT/WQTC/WEMP/WLKN/WCUB/WLTU By:

Accepted for WISCONSIN BROADCASTERS ASSOC By:

Please Sign and Return One Copy

Wisconsin Broadcasters Association



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Koser Radio Group, Rice Lake

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JIZ BOYD

WCSA/PEP Coordinator

CYLE GEISSLER

Director of Operations and Public Affairs

Sept. 23, 2021

Brenda Schultz
Seehafer Broadcasting Corp.
Manitowoc, Wisconsin

Brenda,

In accordance with the WBA's Assistance Action Plan for EEO Compliance, this letter confirms that you attended the **EEO Seminar: Developing Signature Traits of an Inclusive Leader**, which was held as part of the WBA's 2021 Summer Conference on Aug. 25, 2021.

One of the menu option initiatives under the FCC's Outreach Prong 3 states: "One full 'Menu Option Initiative' credit for participating in a program for station management that will teach them how to ensure Equal Employment Opportunity and prevent unlawful discrimination". The WBA will be offering an EEO training program four times over a two-year period. The seminar will be held in conjunction with the WBA Summer Conferences and at other times during the year. These sessions are offered to meet this FCC menu option and we believe that a station that routinely sends management personnel to all of these courses, and the attendees share the information they receive at the session with other management personnel who are involved in the hiring process at the station, some EEO credit should be available. However, contact your own legal advisors to confirm that they agree with this interpretation and to determine how much credit is available.

Please feel free to contact me if you have any questions! We look forward to helping you, our valued member, with your EEO Compliance.

Sincerely,

Kyle Geissler
WBA Director of Operations and Public Affairs

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Koser Radio Group, Rice Lake

STAFF

LIZ BOYD

NCSA/PEP Coordinator

KYLE GEISSLER

Director of Operations and Public Affairs

March 9, 2022

Terry Stevenson
Seehafer Broadcasting
PO Box 1385
Manitowoc, WI 54221

Terry:

In accordance with the WBA's Assistance Action Plan for EEO Compliance, this letter confirms that your station(s) was represented at the Job/Career Fair which was held as part of the WBA's 2022 Student Seminar on Saturday, March 5 from 11 a.m. to 1 p.m. at the Madison Marriott West in Middleton, Wisconsin.

The following stations were represented:
WOMT, WQTC, WLKN, WCUB, WLTU, WEMP

Job seekers and Student Seminar attendees were on hand. If you'd like a listing of those who attended the Job/Career Fair, along with their contact information, please contact Kyle Geissler at the kgeissler@wi-broadcasters.org.

One of the menu option initiatives under the FCC's Outreach Prong 3 is participation in at least four job fairs or careers fairs by personnel who have substantial responsibility in the making of hiring decisions. **WBA sponsors two job/career fairs each year - one in conjunction with our annual Student Seminar and one in conjunction with our annual Summer Conference.** Full SEU participation in each job/career fair should earn the SEU a 1/4 credit. Accordingly, over a 2-year period of participating in these WBA sponsored job/career fairs, and SEU should earn a full credit.

Please feel free to contact me if you have any questions! The WBA looks forward to helping you, our valued members, with your EEO Compliance.

Sincerely,

A handwritten signature in black ink that reads 'Kyle Geissler'.

Kyle Geissler
WBA Director of Operations and Public Affairs

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TERRY STEVENSON
Seehafer Broadcasting, Manitowoc

JEFF WRIGHT
Midwest Communications, Green Bay

STAFF

LIZ BOYD
NCSA/PEP Coordinator

KYLE GEISSLER
Director of Operations and Public Affairs

July 11, 2022

Katie Stevenson
Seehafer Broadcasting
PO Box 1385
Manitowoc, WI 54221

Katie:

In accordance with the WBA's Assistance Action Plan for EEO Compliance, this letter confirms that your station(s) was represented at the Job/Career Fair which was held as part of the WBA's 2022 Summer Conference on Wednesday, June 22 from 1:30 p.m. to 2:45 p.m. at the La Crosse Radisson.

The following stations were represented:
WOMT, WQTC, WLKN, WCUB, WLTU, WEMP

Job seekers and Student Seminar attendees were on hand. If you'd like a listing of those who attended the Job/Career Fair, along with their contact information, please contact Kyle Geissler at the kgeissler@wi-broadcasters.org.

One of the menu option initiatives under the FCC's Outreach Prong 3 is participation in at least four job fairs or careers fairs by personnel who have substantial responsibility in the making of hiring decisions. **WBA sponsors two job/career fairs each year - one in conjunction with our annual Student Seminar and one in conjunction with our annual Summer Conference.** Full SEU participation in each job/career fair should earn the SEU a 1/4 credit. Accordingly, over a 2-year period of participating in these WBA sponsored job/career fairs, and SEU should earn a full credit.

Please feel free to contact me if you have any questions! The WBA looks forward to helping you, our valued members, with your EEO Compliance.

Sincerely,

Kyle Geissler
WBA Director of Operations and Public Affairs

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TERRY STEVENSON
Seehafer Broadcasting, Manitowoc

JEFF WRIGHT
Midwest Communications, Green Bay

STAFF

LIZ BOYD
NCSA/PEP Coordinator

KYLE GEISSLER
Director of Operations and Public Affairs

July 11, 2022

Katie Stevenson
Seehafer Broadcasting
PO Box 1385
Manitowoc, WI 54421

Dear Katie:

In accordance with the WBA's Assistance Action Plan for EEO Compliance, this letter confirms that the following stations were represented at the **EEO Session: Practical Steps to Diversify Your Station** which was held June 22 at the WBA Summer Conference in La Crosse, Wisconsin: WQTC, WEMP, WLKN, WCUB, WLTU, WOMT

The following employees were in attendance:
Katie Stevenson

One of the menu option initiatives under the FCC's Outreach Prong 3 states: "One full 'Menu Option Initiative' credit for participating in a program for station management that will teach them how to ensure Equal Employment Opportunity and prevent unlawful discrimination". The WBA will be offering this training program four times over a two year period. If a station routinely sends management to these courses, by the end of the segment, (two year period), the SEU would claim one full menu option credit for that two year period. Please note - these four seminars will each be on different discrimination topics, so an SEU will need to have someone from management in attendance at all four sessions to get the full menu option credit.

Please feel free to contact me if you have any questions! We look forward to helping you, our valued member, with your EEO Compliance.

Sincerely,

Kyle Geissler
WBA Director of Operations and Public Affairs

Jim Medley

From: Lisa Fields, Broadcast1Source <lfields@bc1source.com>
Sent: Friday, May 7, 2021 11:10 AM
To:
Subject: ADV: IBA Webinar Follow Up

[View this email in your browser](#)



On behalf of all of us at Broadcast1Source, TLP Law, and the Independent Broadcaster's Association, thank you for participating in our FCC EEO Training meeting on May 6, 2021. We appreciate your interest in additional training on this subject matter and the great questions posed to us.

This email serves as your certificate of participation. Please print and retain a copy to include in your EEO Public File.

We are happy to continue to be a resource to you and your colleagues. Please don't hesitate to reach out if we can be of further service.

Sincerely,

A handwritten signature in cursive script that reads "Lisa".

Lisa A. Fields
SVP/General Manager, Broadcast1Source