



1056 Arsenal Street | Watertown, NY | 13601-2200
☎ (315) 782-3142 | 📠 (315) 782-2491 | wpbstv.org



June 8, 2023

To: FCC Online Public Files

Re: EEO Audit Response for St. Lawrence Valley Educational Television Council
WPBS-TV, Watertown, NY
FCC Facility ID No. 62136

St. Lawrence Valley Educational Television Council (“WPBS”), licensee of noncommercial educational (“NCE”) television broadcast station WPBS-TV, Watertown, New York, hereby responds to the letter dated April 24, 2023, from Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau (the “Audit Letter”).

Responses are numbered to correspond with the information requests made in the Audit Letter. As indicated on WPBS’s annual EEO Public File Reports, WPBS-TV is part of the licensee’s employment unit (the “Unit”), which includes the following NCE stations:

- WPBS-TV, Watertown, New York; FCC Facility ID No. 62136
- WNPI-DT, Norwood, New York; FCC Facility ID No. 62137

2. Audit Data Requested.

(b)(i) Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).

The report for 2021-2022, uploaded as Exhibit 1, covers the period from January 23, 2021, to January 22, 2022. The report for 2022-2023, uploaded as Exhibit 2, covers the period from January 23, 2022, to January 22, 2023.

(b)(ii) For each station in the Unit that maintains a website, the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit’s most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).

WPBS has one website for both stations in the Unit, <https://www.wpbstv.org/>. A link to the Unit’s most recent annual EEO Public File Report can be found at <https://www.wpbstv.org/about-us/public-information/>, and the url for the EEO Public File Report itself is <https://www.wpbstv.org/wp-content/uploads/2023/01/01.23.22-01.22.2023-positions-filled-WPBSTV.pdf>.

(b)(iii) For each of the Unit's full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), provide the date of hire as required by section 73.2080(c)(5)(vi) as well as 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 the burden of responding to this audit, if you have sent a job notice to multiple sources, you may include in your response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). 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 the Unit's job openings, as described in section 73.2080(c)(1)(ii).

The Unit hired two (2) full-time employees during the 2021-2022 period under review in Exhibit 1.

Date of Hire	Position
8/2/2021	Manager, Education & Lifelong Learning
1/3/2022	Communications & Digital Coordinator

For documentation announcing each position, see Exhibit 3 corresponding to the 2021-2022 EEO Public File Report.

The Unit hired five (5) full-time employees during the 2022-2023 period under review in Exhibit 2.

Date of Hire	Position
6/20/2022	Curriculum Development Specialist
9/26/2022	Manager, Education & Lifelong Learning
10/17/2022	Broadcast Production Journalist
11/21/2022	Event Coordinator
1/3/2023	Development Initiatives & Auction Manager

For documentation announcing each position, see Exhibit 4 corresponding to the 2022-2023 EEO Public File Report.

There are no organizations that have notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).

(b)(iv) As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.

During the period under review in Exhibit 1, a total of 14 candidates were interviewed for vacancies indicated.

Position	Referring Source	No. Interviewed
Manager, Education & Lifelong Learning	Indeed	5
	LinkedIn	5
Communications & Digital Coordinator	Indeed	4

During the period under review in Exhibit 2, a total of 22 candidates were interviewed for vacancies indicated.

Position	Referring Source	No. Interviewed
Curriculum Development Specialist	Indeed	10
Manager, Education & Lifelong Learning	Indeed	4
Broadcast Production Journalist	Indeed	3
Event Coordinator	Indeed	3
Development Initiatives & Auction Manager	Indeed	2

(b)(v) Dated documentation of the Unit's recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit's total number of full-time employees and state whether the population of the market in which any of the Unit's stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission's rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth, sixth and eighth anniversaries of that date). If the Unit performed more than the required number of initiative activities, it may provide documentation for only the required amount in its response, i.e., two or four points worth. If any documentation that you provide appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask you for additional verification.

WPBS employs 19 full-time individuals in the Unit and operates in the Watertown-Fort Drum, NY MSA, which has a population of less than 250,000. Accordingly, the Unit is required to participate in two recruitment initiatives over a two-year period. For documentation related to the Unit's recruitment initiatives, please see Exhibit 5.

Documentation is provided evidencing participation in the following:

- WPBS's New York State Broadcasters Association Internship program
- Production & Digital/Social Media Internship
- Sexual Harassment Prevention Training
- Diversity and Inclusion Training
- Career Jam participation
- Workforce Connections participation
- GPS Career Workshop participation

(b)(vi) Any pending or resolved complaints involving the Unit filed during the Unit's current license term(s) before any body 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 you must report all complaints, regardless of their status or disposition.

None.

(b)(vii) In accordance with section 73.2080(b), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), 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.

WPBS provides equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin, or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training, and termination.

WPBS's Director of Human Resources, Finance Administration & Compliance is responsible for implementation and administration of EEO policies at the Unit. EEO policy implementation is reviewed annually by WPBS's President & General Manager in coordination with the Director of Human Resources, Finance Administration & Compliance during the budget process and periodically throughout the year.

WPBS's Diversity & Inclusion Policy (the "D&I Policy") is distributed to all employees and is publicly available at <https://www.wpbstv.org/wp-content/uploads/2021/08/WPBS-DIVERSITY-POLICY-FY2022.pdf>. The D&I Policy contains a description of WPBS's employment policies which includes a commitment to diversity and the following Equal Opportunity Statement (which is also contained in WPBS's employee handbook):

WPBS-TV is an Equal Opportunity Employer. We celebrate diversity and are committed to creating an inclusive environment for all employees. All qualified applicants will

receive consideration for employment without regard to race, creed, color, religion, gender, sexual orientation, gender identity/expression, national origin, disability (including the provision of reasonable accommodation), age, genetic information, veteran status, marital status, pregnancy, or related conditions (including breast feeding), or any other basis protected by law. This policy applies to all terms and conditions of employment, including but not limited to hiring, placement, promotions, terminations, layoff, recall, leaves of absence, compensation, and training.

WPBS-TV is committed to assuring equal employment opportunity and equal access to services, programs, and activities for individuals with disabilities. It is the policy of WPBS to provide reasonable accommodation to a qualified individual with a disability to enable such individual to perform the essential functions of the position for which he/she is applying or in which he/she is employed.

The policy applies to all employment practices and actions. It includes, but is not limited to, recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social and recreational programs, layoffs and terminations.

A copy of the D&I Policy is uploaded as Exhibit 6.

All persons involved in employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training, and termination of employees likewise have responsibility for implementation and are required to make their decisions so as to ensure that WPBS's policies and programs are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, or sex. Legally required notices are posted informing applicants and employees that WPBS is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

In Fall of 2021, WPBS contracted with Barclay Damon, LLP, to review and update WPBS's employee handbook. Once the changes were approved, WPBS conducted a company-wide staff meeting in February 2022 to review the changes to the policies and procedures that were made to employee handbook.

Additionally, on an annual basis, WPBS conducts harassment and diversity training for all WPBS staff members, in accordance with the Corporation of Public Broadcasting and New York State guidelines.

(b)(viii) In accordance with section 73.2080(c)(3), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), 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.

During the current license term, as part of its effort to ensure the effectiveness of its EEO program, the Unit conducts an ongoing assessment of the success of its recruitment efforts. The

Unit employs a Director of Human Resources, Finance Administration & Compliance who is responsible for recruitment, retention, employee relations, and benefits administration, and is tasked with enhancing the Unit's EEO processes and strategic initiatives. This position reports directly to the President & General Manager of the Unit.

Recruitment efforts are analyzed against the Commission's EEO rules and regulations on recruitment to ensure compliance. The Unit's recruitment efforts are all done in a manner that contains no indication, either explicit or implicit, of a preference for one race, national origin, color, religion, or sex over another.

(b)(ix) As required by section 73.2080(c)(4), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), 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.

WPBS manages pay levels, compensation, and benefits for positions within the Unit and ensures all employees regardless of race, color, religion, national origin, or sex have equal opportunities for and access to pay increases, promotions, or job openings. On an annual basis, the Director of Human Resources, Finance Administration & Compliance assesses both compensation and benefits offered by the Unit, comparing and benchmarking against national and regional data including other public media licensees. The Unit regularly reviews its practices to ensure that such practices are nondiscriminatory.

During budgeting, the station conducts regular review of rates of pay and fringe benefits for employees having the same duties, and if necessary takes action to eliminate any inequities based upon race, national origin, color, religion, or sex discrimination. Raises are awarded only on the basis of tenure and job performance. And promotions within the Unit are reviewed to ensure that they are made in a nondiscriminatory manner.

In the Fall of 2021, WPBS contracted with Cortel Improvement, LLC, to survey the staff and management to measure their perceptions of the organization. The survey provided an opportunity to track trends, growth, and use data against WPBS's strategic metrics and goals. Using the survey data and narrative comments, WPBS's President & General Manager, senior leadership team, and the Director, Human Resources, Finance, Administration and Compliance will be able to re-establish internal improvement goals. The goal, as a result of receiving this report, is to develop and implement an organization-wide path forward in order to enhance leadership, teamwork, communication, and effectiveness.

In April of 2022, Cortel Improvement, LLC, surveyed and prepared a Gender Equality Survey, which included questions about compensation and parity between genders. The survey is a tool to promote an active and positive voice from the WPBS workforce and leaders. The survey data and narrative comments provided to the President & General Manager, and the Director, Human

Resources, Finance, Administration and Compliance provide an opportunity to enhance both internal improvement goals and organization cultural attitudes.

There are no union contracts or union employees within the Unit.

(b)(x) If your entity is a religious broadcaster and any of the Unit's full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. 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.

WPBS is not a religious broadcaster.

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, based on information provided by WPBS management.

By 
Mark Prasuhn
President & General Manager