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88.3TheWind.com kwfc.org



July 26, 2019

Federal Communications Commission
Enforcement Bureau
445 12th Street, SW
Washington, D.C. 20554

Re: EEO Audit Response for Radio Training Network, Inc.; Station Employment Unit
KWFC (Facility ID. No. 3681) and KWND (Facility ID. No. 51636)

Contact Person: Dave Taylor, dave@kwfc.org

By letter dated June 13, 2019, the Commission notified Radio Training Network, Inc. (RTN) that KWFC had been randomly selected for an audit of its EEO program. RTN considers KWFC and KWND to be part of a Station Employment Unit. RTN is a Religious Broadcaster, and all positions at RTN are subject to a religious qualification, including all positions at KWFC and KWND. RTN hereby submits the following responses to the inquiries in the Commission's June 13, 2019 letter.

- (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 included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, 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 47 C.F.R. § 73.2080(c)(6).**

Copies of the Unit's two most recent EEO public file reports are attached.

Station Website List

The websites for stations in the Unit are as follows:

<http://www.kwfc.org>

<https://88.3thewind.com>

Date of Full-Time Hires from Period Covered by EEO Public File Reports

The following hires were made in the two report periods covered by the 10/1/2016-9/30/2018 EEO Public File Reports:

Job Title of Full Time Vacancy	Source	Date Filled
Office Manager	Personal Reference	6/12/17
Director of First Impressions (1 st Hire)	Station Website, Personal Reference	3/19/18
Director of First Impressions (2 nd Hire After 1 st Hire Promoted)	Indeed.com	7/2/18
Account Executive	ZipRecruiter.Com	9/17/18

- (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).

Because all of the positions at KWFC/KWND are subject to a religious qualification, RTN is not required to keep records of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing vacancies for this Unit.

- (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.

Because all of the positions at KWFC/KWND are subject to a religious qualification, RTN is not required to keep records of the total number of interviewees for each vacancy and the referral source for each interviewee. Nevertheless, RTN is providing the following recruitment information for the covered period.

Full Time Positions Filled by Job	Recruitment Source	Total Number of Interviewees from All Sources for this Position
Office Manager	Personal Reference	5
Director of First Impressions (1 st Hire)	Station Website/ Personal Reference	4
Director of First Impressions (2 nd Hire)	Indeed.Com	4
Account Executive	ZipRecruiter.Com	5

*Indicates sources that have requested notification of job openings.

	Recruitment Source (Name, Address, Telephone, Contact Name)	Total Number of Interviewees Provided by Source this Period	Full Time Positions for Which Source Utilized
A	Mid-American All-Indian Center * The Indian Center 650 N Seneca St. Wichita, KS 67203-3204 316-262-5221	0	Office Manager
B	Kathy Christy, Director * OTC Job Placement Office 933 E Central Springfield, MO 65802 417-895-7207	0	Office Manager
C	Evangel University Job Board * 1111 N Glenstone Ave Springfield, MO 65802 417- 865-2815	0	Office Manager
D	Missouri State University * Office of Human Resources 901 S National Ave Springfield, MO 65897 417-836-5000	0	Office Manager
E	Theresa Terry, MO Career Center * MO Div of Workforce Development 1514 S Glenstone Ave Springfield, MO 65804 417-887-4343	0	Office Manager
F	All Access/All Access.com 11 Music Circle South Suite 101 Nashville, TN 37203 615-252-6400	0	Office Manager

G	88.3 The Wind 2550-100 S. Campbell Ave. Springfield, MO 65807 417-889-0883	2	Office Manager
H	HisAir.Net Ted Kelly P.O. Box 307 Duplessis, LA 70728	1	Office Manager
I	Christian Radio Careers Christian Music Broadcasters Post Office Box 241871 Little Rock, AR 72223	1	Office Manager
J	Springfield Business Journal 313 Park Central Square W Springfield, MO 65806 417-831-3238	1	Office Manager
K	89.1 KWFC 2550-100 S. Campbell Ave. Springfield, MO 65807 417-869-0891	0	Office Manager
L	Glassdoor. com	0	Office Manager
M	Indeed.com	0	Office Manager
N	Mid-American All-Indian Center * The Indian Center 650 N Seneca St. Wichita, KS 67203-3204	0	Director of First Impressions (1 st /2 nd Hires)
O	Kathy Christy, Director * OTC Job Placement Office 933 E Central Springfield, MO 65802	0	Director of First Impressions (1 st /2 nd Hires) Account Executive

P	Evangel University Job Board * 1111 N Glenstone Ave Springfield, MO 65802 417- 865-2815	0	Director of First Impressions (1 st /2 nd Hires)
Q	Missouri State University * Office of Human Resources 901 S National Ave Springfield, MO 65897	0	Director of First Impressions (1 st /2 nd Hires)
R	Theresa Terry, MO Career Center * MO Div of Workforce Development 1514 S Glenstone Ave Springfield, MO 65804	0	Director of First Impressions (1 st /2 nd Hires)
S	All Access/All Access.com 11 Music Circle South Suite 101 Nashville, TN 37203	0	Director of First Impressions (1 st /2 nd Hires)
T	KWND/KWFC 2550-100 S. Campbell Ave. Springfield, MO 65807 417-889-0883	3	Director of First Impressions (1 st /2 nd Hires) Account Executive
U	HisAir.Net Ted Kelly P.O. Box 307 Duplessis, LA 70728	0	Director of First Impressions (1 st /2 nd Hires)
V	Christian Radio Careers Christian Music Broadcasters Post Office Box 241871 Little Rock, AR 72223	0	Director of First Impressions (1 st /2 nd Hires)
W	Indeed.com	6	Director of First Impressions (1 st /2 nd Hires) Account Executive
X	ZipRecruiter.Com	4	Account Executive

- (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.**

Because all of the positions at KWFC/KWND are subject to a religious qualification, RTN is not required to complete the Outreach Initiatives in section 73.2080(c)(2) for this Station Employment Unit. Nevertheless, RTN regularly engages in outreach activities in the communities surrounding KWFC/KWND. These efforts have included, for example, educating students about employment opportunities in broadcasting. See attached EEO Annual Public File Reports for a description of some of these outreach activities.

- (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.**

There are no pending or resolved complaints involving the stations in this Station Employment Unit filed during the current license term before anyone having competent jurisdiction under federal, state, territorial, or local law, alleging unlawful discrimination in the employment practices of the Station Employment Unit on the basis of race, color, religion, national origin, or sex.

- (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.**

Responsibilities of CEO/President and General Manager:

1. Participate in and actively support Radio Training Network, Inc., EEO policy as it relates to recruitment, selection, evaluation, compensation, training, promotion and termination. Includes being knowledgeable and conversant with the FCC EEO Rules effective March 10, 2003 and understanding the compliance issues that safeguard the station's FCC license
2. Take a proactive role in supporting RTN's policy to prevent harassment of any kind within the workplace, at off-site places of company business and at company-sponsored social venues
3. Develop Equal Employment Opportunity (EEO) policy statements, and internal and external communication procedures

4. Ensure the compliance with state and federal legal requirements
5. Inform employees of the EEO policy and enlist their cooperation/participation and support
6. Create personnel policies to prohibit unlawful discrimination
7. Review job structure, job descriptions and employment practices with management to ensure effective EEO
8. Assist management in arriving at effective solutions to EEO problems
9. Design and implement an internal audit and reporting system
10. Regularly review the company's EEO program with managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities
11. Ensure that Annual EEO report is generated and posted by Office Managers/Compliance Manager
12. Assist and collaborate with legal counsel and Compliance Manager on all station license renewals, mid-term reports, random FCC EEO audits, and public inspection files
13. Audit the contents of the company's bulletin boards and public inspection files to ensure compliance information is posted and up-to-date

Responsibilities of Network Accountant:

1. Participate in and actively support Radio Training Network, Inc., EEO policy as it relates to recruitment, selection, evaluation, compensation, training, promotion and termination. Includes being knowledgeable and conversant with the FCC EEO Rules effective March 10, 2003 and understanding the compliance issues that safeguard the station's FCC license
2. Take a proactive role in supporting Radio Training Network, Inc., policy to prevent harassment of any kind within the workplace, at off-site places of company business and at company-sponsored social venues
3. Develop Equal Employment Opportunity (EEO) policy statements, and internal and external communication procedures
4. Ensure the compliance with state and federal legal requirements
5. Inform employees of the EEO policy and enlist their cooperation/participation and support
6. Create personnel policies to prohibit unlawful discrimination
7. Review job structure, job descriptions and employment practices with management to ensure effective EEO
8. Assist in the identification of EEO problem areas
9. Assist management in arriving at effective solutions to EEO problems
10. Design and implement an internal audit and reporting system
11. Keep President/CEO and General Managers/Office Managers informed of equal opportunity progress and reporting potential problem areas within the company
12. Regularly review the company's EEO program with managers and supervisors at all levels to ensure that the policy is understood and is followed in all personnel activities

Responsibilities of Compliance Manager :

1. Generate and post Annual EEO Report
2. Assist and collaborate with legal counsel on all station license renewals, mid-term reports, random FCC EEO audits, and public inspection files
3. Audit the contents of the company's bulletin boards and public inspection files to ensure compliance information is posted and up-to-date
4. Create and maintain company's EEO Outreach List
5. Disseminate the EEO policy and employment needs to all organizations on company's EEO Outreach List

Responsibilities of All Managers and Supervisors:

1. Participate in and actively support RTN's EEO policy as it relates to recruitment, selection, evaluation, compensation, training, promotion and termination. Includes being knowledgeable and conversant with the FCC EEO Rules effective March 10, 2003 and understanding the compliance issues that safeguard the station's FCC license
2. Take a proactive role in supporting RTN's policy to prevent harassment of any kind within the workplace, at off-site places of company business and at company-sponsored social venues
3. Notify Network Account/Office Manager of any job openings in a timely manner.
4. Complete and distribute Job Postings and Job Descriptions
5. Review all submitted applications and interview qualified applicants for all department job openings
6. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur
7. Ensure that all questions asked during the interview pertain only to the specific job requirements/needs of the open position
8. Notify Network Account of top applicant by completing an RTN Status Authorization Form
9. Complete New Hire 90-Day Performance Appraisals and Annual Performance Appraisals/Reviews for all direct reports
10. Review the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities
11. Notify President/CEO immediately of any performance issues, sexual harassment issues and/or violence in the work place complaints or concerns, and any other issues that may require further investigation or assistance
12. Assist and collaborate with Compliance Manager on all station license renewals, mid-term reports, random FCC EEO audits, and public inspection files (quarterly reports – issues and programs)
 - a. Employees are informed of the Company's EEO policy during their initial New Hire Orientation and during annual staff Sexual Harassment Trainings.
 - b. All applicants are informed of the EEO Policy because Radio Training Network, Inc requires that it be included on all job postings. In addition, in order for an individual to be considered for any job opening, they must submit complete and sign a Radio Training Network, Inc Employment Application. The Radio Training Network, Inc Employment Application contains a notice informing all job applicants that RTN is an Equal Opportunity Employer and that discrimination of any kind is prohibited.

- (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.**

An evaluation of the stations' compliance with the wide dissemination requirement is conducted on an annual basis. Each station's website provides information to individuals and organizations regarding open positions. Staff handling human resource functions attend training periodically on hiring skills and EEO laws. An inclusive culture in the workplace is promoted by fostering an environment of professionalism and respect for personal differences. RTN fosters open communication and early dispute resolution. All staff have quarterly enrichment meetings to help ensure good working relationships. Employees are hired based on objective, job-related qualification standards from an analysis of duties, functions and competencies relevant to the job. Current employees are mentored regarding the criteria needed for promotions and personal growth. Job openings are communicated and posted for all eligible employees. Openings are

posted within KWFC/KWND, as well as on our website and job search websites. In addition, employment agencies are utilized for specialized positions.

(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.**

- Compensation/Benefits- Managers/Supervisors make compensation decisions regarding staff on the basis of established pay procedures.

Principles applicable to all salary decisions:

- Equal pay without regard to age, color, disability, ethnicity, gender, marital status, national origin, race, sexual orientation, or veteran status
 - Emphasis on internal equity within RTN
 - Determinants of all salary decisions include:
 - The employee's job-related qualifications and performance
 - Pay of other employees performing similar work
 - RTN's fiscal status
 - External market considerations for similar work in the relevant labor market segment based on geographical considerations (local, state, regional, or national)
 - Availability of funds
 - Required President/CEO approval obtained prior to communicating salary offers or changes, including any required fiscal approvals
 - Medical/Dental Benefits are provided to all full-time employees (full-time is anyone working 32 hours or more each week) after their first 30-days of employment
 - Holiday pay – Provided to all full-time employees effective immediately from their full-time start date
 - Vacation pay – All full-time employees are given 2 weeks of vacation pay each year. Fifth year and beyond of employment, employees are given 3 weeks' vacation pay each year.
Only exception would be employees on a contract.
- Selection Process- RTN bases all hiring decisions on the individual's ability to perform the core/essential job functions/requirements of the posted position and without regard to individuals on the basis of their race, sex, color, national or ethnic origin, age, disability, military service, sexual orientation, gender identity, or gender expression. In order to ensure these requirements are met:
 - All job openings/vacancies are posted with all company recruitment sources for a minimum of at least five business days.
 - The hiring manager must review all submitted applications and interview qualified applicants.
 - Decisions to hire individuals must be based on specified job-related criteria. To fulfill this obligation, the hiring manager only solicits information (via submitted applications/resumes and interviews) which directly relates to an applicant's ability to perform the tasks of the job opening.

- Promotions and Transfers- RTN ensures that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid job requirements for promotional opportunities. Decisions to promote an individual are based on specified job-related criteria, the individuals' ability to perform the tasks of sought after position, and the company's needs.
- Discharge/Termination- All decisions are based upon objective criteria. Performance deficiencies and other disciplinary action are administered according to established RTN policies and are administered without regard to individuals on the basis of their race, sex, color, national or ethnic origin, age, disability, military service, sexual orientation, gender identity, or gender expression.

Please direct any questions to the undersigned.

Respectfully submitted,

RADIO TRAINING NETWORK, INC.
KWFC/KWND

I verify the accuracy and completeness of this Report:

By: _____


James Campbell

President/CEO, Radio Training Network, Inc.

Date: July 25, 2019

cc: Radio Training Network, Inc., KWFC/KWND (For Public File)

Declaration Statement by Preparer

RE: FCC EEO Audit of
KWFC, Facility 3681, Springfield, Missouri
SEU KWND, Facility 51636, Springfield, Missouri

I, William Harrier, Compliance Manager for Radio Training Network, Inc.,
declare that:

1. I have prepared the FCC EEO Audit document to the best of my ability.
2. I have not knowingly included false, misleading or incomplete information in the foregoing document.
3. I have not knowingly failed to reveal any relevant information or document to the administering authority.

PREPARER NAME: William Harrier / bill@thejoyfm.com

COMPANY: Radio Training Network, Inc., KWFC/KWND

SIGNED: 

DATE: July 25, 2019



The EEO Public File Report for 10/01/16-09/30/17 was originally placed in the KWND and KWFC Public Files on October 1, 2017. That Report was revised to correct clerical errors and clarify RTN's status as a Religious Broadcaster. The Revised Report was placed in the Public Files of KWND and KWFC on July 26, 2019.

KWND, 88.3 FM – Springfield, MO

KWFC, 89.1 FM – Springfield, MO

ANNUAL EEO PUBLIC FILE REPORT FORM

Oct 1, 2016 - Sept. 30, 2017

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.208 (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 stations: KWND and KWFC. Radio Training Network, Inc. (RTN) is a Religious Broadcaster, and all positions at RTN are subject to a religious qualification, including all positions at KWND and KWFC.

The information contained in this Report covers the time period beginning 10/1/2016 to and including 9/30/2017 (the "Applicable Period"):

1. A list of all full-time vacancies filled by the Station comprising the Station Employment Unit during this Applicable Period.
2. For each vacancy, the recruitment source(s) utilized to fill the vacancy.
3. The recruitment source that referred the hiree 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; and
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 above information. Please note that the numbers 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 positions listed on Appendix 1.

APPENDIX 1 TO

ANNUAL EEO PUBLIC FILE REPORT FORM

COVERING THE PERIOD FROM 10/1/16 -

9/30/17

Full Time Positions Filled by Job	Recruitment Source of Hiree	Total Number of Interviewees from all	Hire Date
Office Manager	Personal Reference	5	6/12/17

Total Number of Persons Interviewed During Applicable Period: 5

APPENDIX 2 TO

ANNUAL EEO PUBLIC FILE REPORT FORM

COVERING THE PERIOD FROM 10/01/16 TO

9/30/17

STATION(S) COMPRISING STATION EMPLOYMENT UNIT: KWND and KWFC

Section 2: Recruitment Source Information

	Recruitment Source (Name, Address, Telephone, Contact	Total Number of Interviewees this source has provided during this	Full Time Positions for which this source was
A.	Mid-American All-Indian Center * The Indian Center 650 N Seneca St. Wichita, KS 67203- 0001	0	Office Manager
B.	Kathy Christy, Director * OTC Job Placement Office 933 E Central Springfield, MO 65802 417-895-7207	0	Office Manager

C.	Evangel University Job Board * 1111 N Glenstone Ave Springfield, MO 65802 417- 865-2815	0	Office Manager
D.	Missouri State University * Office of Human Resources 901 S National Ave Springfield, MO 65897 417 836 5000	0	Office Manager
F.	Theresa Terry, MO Career Center * MO Div of Workforce Development 1514 S Glenstone Ave	0	Office Manager
I.	All Access/All Access.com 11 Music Circle South Suite 101 Nashville, TN 37203 615-252-6400	0	Office Manager
K.	88.3 The Wind 2550-100 S. Campbell Ave. Springfield, MO 65807	2	Office Manager
L	HisAir.Net Ted Kelly P.O. Box 207	1	Office Manager
J	Christian Radio Careers Christian Music Broadcasters Post Office Box 241874	1	Office Manager
L	Springfield Business Journal 313 Park Central Square W Springfield, MO 65806	1	Office Manager
N	89.1 KWFC 2550-100 S. Campbell Ave. Springfield, MO 65807	0	Office Manager

O	Glassdoor. com	0	Office Manager
P	Indeed.com	0	Office Manager

* Indicates sources that have requested notification of job openings

APPENDIX 3 TO

ANNUAL EEO PUBLIC FILE REPORT FORM

COVERING THE PERIOD FROM 10/01/16-09/30/17

STATION(S) COMPRISING STATION EMPLOYMENT UNIT: KWND and KWFC

Supplemental (Non-vacancy specific) recruitment activities undertaken by KWND and KWFC

Because all positions at KWND and KWFC are subject to a religious qualification, RTN is not required to complete the Section 73.2080(c)(2) Outreach Initiatives for this Station Employment Unit. Nevertheless, RTN regularly engages in outreach activities in the communities surrounding KWND and KWFC.

Offering job shadowing and long-term internships to community members, students of local middle schools, high schools and universities including, but not limited to, Evangel University, Drury University, Missouri State University, and Ozarks Technical Community College.

Free Announcements for various churches, non-profits, and organizations – Family Calendar.

Concerts and activities at local universities (i.e. Evangel University, Missouri State University) and not-for-profit buildings (Gillioz Theatre).

Provided tours for local families, persons, elementary/middle/high/home school students (Homeschool,) interested in radio.

Also provided tours for local Cub Scouts, Boy Scouts, and Girl Scouts Troups so that they might earn their communication badges.

KWND(FM)/KWFC(FM)

EEO Narrative

Covering the period from October 1, 2016 – September 30, 2017

Radio Training Network, Inc., the licensee of KWND(FM) and KWFC(FM), is a religious broadcaster as defined by the regulations of the Federal Communications Commission. See 47 C.F.R. 73.2080 (c)(1); Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies, 17 FCC Rcd. 24018 (2002). As a religious broadcaster, Radio Training Network makes reasonable, good faith efforts to recruit applications, without regard to race, color, national origin or gender, among those who are qualified for employment based on their religious belief or affiliation.

During the designated period KWND(FM) and KWFC(FM) engaged in the following outreach recruitment activities:

Internship Program: Long-term internship opportunities are available to local community members and students of area high schools and universities, including, but not limited to, Evangel University, Missouri State University and Ozarks Technical Community College.

Job Shadowing: KWND(FM)/KWFC(FM) offers shadowing programs to local community members and students at the middle school, high school and university levels, including, but not limited to, Evangel University, Missouri State University and Ozarks Technical Community College.

Community Service Hours: KWND(FM)/KWFC(FM) provides the opportunity for students from Missouri State, Ozarks Technical Community College, New Covenant Academy (K-12), and Evangel University, and Community Service Organization Members to meet their required community service hours.

Educational Tours: KWND(FM)/KWFC(FM) gives facility tours for local families, elementary school, middle school, high school, and home school students interested in broadcasting. KWND(FM)/KWFC(FM) also offers tours to local Cub Scout, Boy Scout and Girl Scout Troops so that they might earn their communication badges.

The EEO Public File Report for 10/01/17 – 09/30/18 was originally placed in the KWND and KWFC Public Files on 10/01/18. That Report was revised to correct clerical errors, clarify RTN's status as a Religious Broadcaster, and clarify that the Director of First Impressions position was filled twice during this period due to an internal promotion. The Revised Report was placed in the Public Files of KWND and KWFC on July 26, 2019.

KWND, 88.3 FM – Springfield, MO
KWFC, 89.1 FM – Springfield, MO

ANNUAL EEO PUBLIC FILE REPORT FORM
Oct 1, 2017 - Sept. 30, 2018

The purpose of this EEO Public File Report (“Report”) is to comply with Section 73.208 (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 stations: KWND and KWFC. Radio Training Network, Inc. (RTN) is a Religious Broadcaster, and all positions at RTN are subject to a religious qualification, including all positions at KWND and KWFC.

The information contained in this Report covers the time period beginning 10/1/2017 to and including 9/30/2018 (the “Applicable Period”):

1. A list of all full-time vacancies filled by the Station comprising the Station Employment Unit during this Applicable Period.
2. For each vacancy, the recruitment source(s) utilized to fill the vacancy.
3. The recruitment source that referred the hiree 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; and
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 above information. Please note that the numbers 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 positions listed on Appendix 1.

APPENDIX 1 TO

ANNUAL EEO PUBLIC FILE REPORT FORM

COVERING THE PERIOD FROM 10/1/17 - 9/30/18

Station Comprising Station Employment Unit: KWND/KWFC

Section 1: Vacancy Information

	Full Time Positions Filled by Job Title	Recruitment Source of Hiree	Total Number of Interviewees from all sources for this position
1.	Director of First Impressions (1 st Hire)	Station Website/Personal Reference	4
2.	Director of First Impressions (2 nd Hire after 1 st Hire Promoted to Promotions Director)	Indeed.com	4
3.	Account Executive	ZipRecruiter.com	5
4.			
5.			

Total Number of Persons Interviewed During Applicable Period: 13

APPENDIX 2 TO

ANNUAL EEO PUBLIC FILE REPORT FORM

COVERING THE PERIOD FROM 10/01/17 TO 9/30/18

STATION(S) COMPRISING STATION EMPLOYMENT UNIT: KWND/KWFC

Section 2: Recruitment Source Information

	Recruitment Source (Name, Address, Telephone, Contact Name)	Total Number of Interviewees this source has provided during this period	Full Time Positions for which this source was utilized
A.	Mid-American All-Indian Center* The Indian Center 650 N Seneca St. Wichita, KS 67203-3204 316-262-5221	0	Director of First Impressions (1 st /2 nd Hires)
B.	Kathy Christy, Director* OTC Job Placement Office 933 E Central Springfield, MO 65802 417-895-7207	0	Director of First Impressions (1 st /2 nd Hires); Account Executive
C.	Evangel University Job Board* 1111 N Glenstone Ave Springfield, MO 65802 417- 865-2815	0	Director of First Impressions (1 st /2 nd Hires)
D.	Missouri State University* Office of Human Resources 901 S National Ave Springfield, MO 65897	0	Director of First Impressions (1 st /2 nd Hires)

	417-836-5000		
F.	Theresa Terry, MO Career Center* MO Div of Workforce Development 1514 S Glenstone Ave Springfield, MO 65804 417-887-4343	0	Director of First Impressions (1 st /2 nd Hires)
I.	All Access/All Access.com 11 Music Circle South Suite 101 Nashville, TN 37203 615-252-6400	0	Director of First Impressions (1 st /2 nd Hires)
K.	88.3 The Wind 2550-100 S. Campbell Ave. Springfield, MO 65807 417-889-0883	2	Director of First Impressions (1 st /2 nd Hires); Account Executive
L	HisAir.Net Ted Kelly P.O. Box 307 Duplessis, LA 70728	0	Director of First Impression (1 st /2 nd Hires)
M	Christian Radio Careers Christian Music Broadcasters Post Office Box 241871 Little Rock, AR 72223	0	Director of First Impressions (1 st /2 nd Hires)
N	89.1 KWFC 2550-100 S. Campbell Ave. Springfield, MO 65807 417-869-0891	1	Director of First Impressions (1 st /2 nd Hires); Account Executive

O	Indeed.com	6	Director of First Impressions (1 st /2 nd Hires); Account Executive
P	ZipRecruiter.com	4	Account Executive

* Indicates sources that have requested notification of job openings

APPENDIX 3 TO

ANNUAL EEO PUBLIC FILE REPORT FORM

COVERING THE PERIOD FROM 10/01/17-09/30/18

STATION(S) COMPRISING STATION EMPLOYMENT UNIT: KWND/KWFC

Section 3: Supplemental (Non-vacancy specific) recruitment activities undertaken by KWND and KWFC

Because all positions at KWND and KWFC are subject to a religious qualification, RTN is not required to complete the Section 73.2080(c)(2) Outreach Initiatives for this Station Employment Unit. Nevertheless, RTN regularly engages in outreach activities in the communities surrounding KWND and KWFC.

ACTIVITIES:

Offering job shadowing and long-term internships to community members, students of local middle schools, high schools and universities including, but not limited to, Springfield Little Theatre Education Students, Evangel University, Drury University, Missouri State University, and Ozarks Technical Community College.

Free Announcements for various churches, non-profits, and organizations – Family Calendar.

Concerts and activities at local universities (i.e. Evangel University, Missouri State University) and not-for-profit buildings (Gillioz Theatre).

Provided tours for local families, persons, elementary/middle/high/home school students (Homeschool) interested in radio.

Also provided tours for local Cub Scouts, Boy Scouts, and Girl Scouts Troops so that they might earn their communication badges.

Exhibit 3

KWND(FM)/KWFC(FM)

EEO Narrative

Covering the period from October 1, 2017 – September 30, 2018

Radio Training Network, Inc., the licensee of KWND(FM) and KWFC(FM), is a religious broadcaster as defined by the regulations of the Federal Communications Commission. See 47 C.F.R. 73.2080 (c)(1); Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies, 17 FCC Rcd. 24018 (2002). As a religious broadcaster, Radio Training Network makes reasonable, good faith efforts to recruit applications, without regard to race, color, national origin or gender, among those who are qualified for employment based on their religious belief or affiliation.

During the designated period, KWND(FM) and KWFC(FM) engaged in the following outreach recruitment activities:

Internship Program: Long-term internship opportunities are available to local community members and students of area high schools and universities, including, but not limited to, Evangel University, Missouri State University and Ozarks Technical Community College.

Job Shadowing: KWND(FM)/KWFC(FM) offers shadowing programs to local community members and students at the middle school, high school and university levels, including, but not limited to, Evangel University, Missouri State University and Ozarks Technical Community College.

Community Service Hours: KWND(FM)/KWFC(FM) provides opportunities for students from Missouri State University, Ozarks Technical Community College, New Covenant Academy (K-12), Springfield Little Theatre, and Evangel University, as well as Community Members to accrue community service hours.

Educational Tours: KWND(FM)/KWFC(FM) gives facility tours for local families, elementary school, middle school, high school, and home school students interested in broadcasting. KWND(FM)/KWFC(FM) also offers tours to local Cub Scout, Boy Scout and Girl Scout Troops so that they might earn their communication badges.