

May 6, 2024

POSTED TO ONLINE PUBLIC INSPECTION FILE

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

**Re: Response to March 22, 2024, Random EEO Audit Letter
WVEN-TV, Facility ID No. 5802, Melbourne, FL**

Dear Ms. Goldin:

UniMas Orlando, Inc. (“**Licensee**”), licensee of commercial television station WVEN-TV, Facility ID No. 5802, Melbourne, FL (“**WVEN**” or “**Station**”), respectfully submits this response to the EEO Audit Letter, dated March 22, 2024, from the FCC’s Enforcement Bureau stating that the Station has been randomly selected for an EEO audit. The responses set forth below, which are in the order of the requests in Section 2 of the EEO Audit Letter, are provided for the station employment unit consisting of the Station and commonly owned station WRCF-CD, Facility ID No. 10549, Orlando, FL (together with WVEN, the “**Stations**” or the “**Unit**”).¹

2. Audit Data Requested

(a) N/A – The Unit has more than five full-time employees.

(b)(1) Copies of the Unit’s two most recent EEO Public File Reports, described in Section 73.2080(c)(6)

Copies of the Unit’s most recent EEO public file reports for the period covering January 1, 2022 to September 30, 2022 and October 1, 2022 to September 30, 2023 (the “**Audit Period**”) are attached hereto as Exhibit A.² Prior to January 1, 2022, the Unit employed less

¹ WRCF-CD is licensed to Univision Local Media, Inc. (“**Univision Local Media**”). TelevisaUnivision, Inc. is the ultimate parent entity of Licensee and Univision Local Media.

² The Unit’s EEO public file reports covering the Audit Period were timely filed. However, in the course of preparing this audit response, the Unit discovered that some amendments to these reports were necessary and, accordingly, is uploading amended annual public file reports to the online public inspection files of all stations in the Unit substantially concurrently with this response. See note 1 to the EEO public file report covering January 1, 2022 to September 30, 2022 (describing nature of amendments); note 1 to the EEO public file report covering October 1, 2022 to September 30, 2023 (describing nature of amendments).

² See 47 C.F.R. § 73.2080(d).

than five full-time employees. Thus, from September 1, 2020 to December 31, 2021, the Unit was subject to the small station exemption to the requirement to maintain annual EEO public file reports.³

(b)(2) 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).

The website address for the Unit is <https://www.univision.com/local/orlando-wven>. The current EEO public file report (as amended)⁴ for the Unit is posted on the aforementioned website.

(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), 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 a job notice was sent to multiple sources, the Unit may include in its 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 recruitment 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).

As noted above, prior to January 1, 2022, the Unit employed less than five full-time employees, and thus, for the period from September 1, 2020 to December 31, 2021, was subject to the small station exemption set forth in Section 73.2080(d) of the Commission's rules.

During the Audit Period, there were 24 full-time hires for the Unit. For 23 of these full-time hires,⁵ Exhibit B hereto lists: (i) the title of the position; (ii) the date of hire; (iii) the referral

³ See 47 C.F.R. § 73.2080(d).

⁴ See *supra* at note 2.

⁵ As evidenced by the EEO public file reports, the Unit's practice is to disseminate notice of job vacancies to multiple sources. In April 2023, the Unit hired a corporate employee from Univision's STORM program as a Weather Anchor for WVEN-TV. Reporting on weather news and information is an essential function for WVEN-TV, as it is for all local broadcasters. Recruiting for qualified meteorologists to serve as weather anchors is challenging in the ordinary course, as the pool of qualified applicants is relatively small. And, the

source of the hiree; (iv) the total number of interviewees for the position; and (v) the referral sources of interviewees.⁶ Exhibit B also includes a representative example of the notices used to announce the vacancies for the full-time positions for the Unit filled during the Audit Period, together with documentation demonstrating the dissemination of the vacancy information by various recruitment sources (e.g., copies of pages from websites of online recruitment sources). No recruitment sources requested that the Unit provide notice of full-time job openings during the Audit Period.

(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.

The total number of interviewees for each vacancy and the referral sources for the interviewees for the Audit Period are provided in Exhibit B.

(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

pool is even smaller when taking into account WVEN-TV’s need for a qualified meteorologist who speaks Spanish. WVEN-TV’s corporate parent, TelevisaUnivision, Inc., recognized this problem and established the STORM program in collaboration with Florida International University to create a pipeline of qualified Spanish-speaking meteorologists. Prior to being hired for the Weather Anchor position, the individual selected for the vacant Weather Anchor position in Orlando was working as a corporate employee in Univision’s Houston-based weather center. She was selected for this position as part of the STORM program. In order to participate in the STORM program, the individual had to satisfy several criteria, including an interview process and successful completion of Univision’s STEP program. Like STORM, STEP is a collaboration between Univision and Florida International University. STEP is a capstone practicum semester that provides an opportunity for students to train with journalism and media professionals who work in Univision’s Local Media division. It is a highly competitive program for which students must meet all of the basic qualifications and go through an interview and application process before selection. Note that, due to an oversight, the Weather Anchor position was not included on the initially submitted EEO Annual Report for the October 1, 2022 to September 30, 2023 reporting period. The Unit has amended this EEO Report to include the position.

⁶ The Unit’s job vacancies are posted to TU’s external careers site, which is frequently scraped by other popular job search websites such as Indeed.com and LinkedIn. For Position B-1 (Local Sales Manager), the Unit has internal records indicating that there were interviewees referred from two such job search websites, which websites broadly disseminate job information to a large number of jobseekers, as well as three other sources. Thus, while the Unit does not have records showing “scraped” postings on job search websites like Indeed, the Unit believes that the interview records demonstrate that there was recruiting for this position.

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 provided appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask for additional verification.

The Unit currently has 41 full-time employees. The Unit operates in a metropolitan area with a population of greater than 250,000 persons. Accordingly, the Unit is required to perform four initiatives within a two-year period.

The EEO Public File Report attached as Exhibit A provides a description of the supplemental outreach initiatives undertaken by the Unit during the Audit Period. These initiatives include *inter alia*, participation in job fairs; the establishment of Liga de Campeones, a scholarship program for high school students interested in pursuing careers in television and journalism; and posting job vacancies including upper-level positions in a job bank media trading group whose membership includes women and minorities. See Exhibit C for documentation to support these initiatives.

(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 all complaints must be reported, 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)), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.

As an initial matter, TelevisaUnivision, the Unit's corporate parent, is committed to fostering a workplace culture of inclusion, respect, and teamwork, and does not tolerate any form of harassment or discrimination based on an individual's race, ethnicity, sex, sexual orientation, gender identity or expression, religion, age, marital status, national origin, ancestry, pregnancy or maternity, medical condition, physical or mental disability, or any trait or status that is protected by law. In furtherance of this policy, the company has established a basic EEO policy – which covers all station employment units – pursuant to which all qualified applicants will receive consideration for employment without regard to sex, gender identity, sexual orientation, race, color, religion, national origin, disability, protected Veteran status, age, or any other characteristic protected by law. This policy

extends to all employment practices, including, for example, recruitment, job application procedures, hiring, training, promotion, compensation, job assignments, and benefits, and requires that employment decisions are made based on legitimate job-related criteria.

Within the Unit, there are two employees tasked specifically with implementation and oversight of the company's EEO policies, as follows:

- President and General Manager of Univision Orlando: Primarily responsible for implementing the company's EEO policies, and for overseeing all employees of the Unit and the Unit's compliance with the requirement to provide equal employment opportunity in all employment decisions.
- EEO Officer of Univision Orlando: Works with President and General Manager to execute the Unit's recruitment and related EEO programs. This includes maintaining and periodically updating and revising a list of recruitment sources; publicizing job openings (upon approval of the job posting by the relevant Department Manager); and maintaining records of information relating to the recruitment, interview, and hiring process.⁷ The Unit's EEO Officer also is responsible for reviewing the effectiveness of the Unit's EEO recruitment policies on an ongoing basis as well as annually.

In addition, managers are expected to ensure that equal employment opportunity is afforded to all applicants for positions with the Unit, and to all employees. Should a concern or complaint regarding EEO arise, managers are expected to address the complaint, notify the Human Resources ("HR") department of such complaint, and be part of the resolution. The Unit's Corporate HR Department also serves as a resource for Unit management and employees on equal employment opportunity matters.

The Unit informs employees and job applicants of its EEO policies and practices in a variety of ways. The basic EEO policy is included on listings and employment applications for all job vacancies within the Unit. The company's EEO policy statement, as well as its policies on non-discrimination, harassment and retaliation, are set forth in the Employee Handbook, which all new hires are required to acknowledge during the onboarding process. These policies are also posted on the parent company intranet site. In addition, EEO notices that explain various rights and responsibilities relating to equal employment opportunity are placed on bulletin boards in the Unit's offices. Labor law posters, including those directed at EEO, are also available for viewing and download from the parent company intranet site. As a further effort to help ensure that effective steps are being taken to build and maintain a

⁷ The Human Resources and Talent Acquisition Departments of Licensee's corporate parent (such departments, the "**Corporate HR Department**") provide human resources and certain other administrative services to its station employment units (including the Unit) such as assistance with posting notifications to TU's corporate career website and certain other recruitment sources.

diverse workforce, during the Audit Period, EEO Officers and hiring managers underwent training focused on EEO compliance and non-discrimination in the workplace.

(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)), a description of 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.

The Unit’s EEO Officer (under the supervision of station management and in collaboration with the Corporate HR Departments) is responsible for reviewing the effectiveness of the Unit’s EEO recruitment policies on an ongoing basis as well as annually. In the course of the Unit’s preparation of the Annual EEO Public File Report, the Unit’s EEO Officer assesses recruitment and outreach efforts, including an evaluation of the Unit’s recruitment sources to help ensure that they reflect a diverse array of sources designed to reach all segments of the community.

(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.

The Unit, in collaboration with the Corporate HR Department, strives to ensure that the Unit’s pay, benefits, seniority practices, promotions, and selection techniques and tests provide equal employment opportunities and do not discriminate against employees or applicants. Policies regarding employee benefits are established on a company-wide basis in accordance with TelevisaUnivision’s corporate EEO and non-discrimination policies. The Unit’s employees are reviewed annually by the management. The Unit’s President and General Manager reviews compensation, promotions, and selection techniques on an annual basis in connection with preparation of a business plan for the upcoming year within the context of basic parameters established by TelevisaUnivision. Such matters are also reviewed on an as-needed basis throughout the year. Promotion and salary increase decisions are reviewed by the Unit’s President and General Manager at the time they are made. The Unit endeavors to ensure that the compensation for each position is comparable to other employees with similar job descriptions and to other similar jobs in the local marketplace.

The Unit does not have any union agreements.

(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.

N/A - The Unit is not a religious broadcaster.

3. Time Brokerage

N/A – The Unit is not subject to a time brokerage agreement.

* * *

I certify that the contents of this audit response are complete and accurate to the best of my knowledge.

Should there be any questions, please do not hesitate to contact Karen Milne, SVP, U.S. Regulatory, TelevisaUnivision, Inc. at regulatory@televisaunivision.com.

Respectfully Submitted,

Eric A. Garcia

Eric A. Garcia (May 6, 2024 15:59 EDT)

Eric Garcia
President & General Manager