

Stamp and Return

1776 K STREET NW
WASHINGTON, DC 20006
PHONE 202.719.7000
FAX 202.719.7049

7925 JONES BRANCH DRIVE
McLEAN, VA 22102
PHONE 703.905.2800
FAX 703.905.2820

www.wileyrein.com

March 24, 2015

Elizabeth E. Goldin
202.719.3199
egoldin@wileyrein.com

VIA HAND DELIVERY

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RECEIVED - FCC

MAR 24 2015

Federal Communications Commission
Bureau / Office

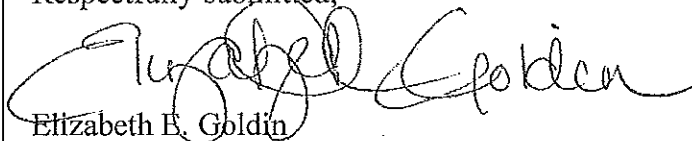
**Re: Response to Broadcast EEO Audit Letter
Clear Channel Broadcasting Licenses, Inc.
Station WKII(AM), Solana, FL
Facility ID No. 35214**

EEO Staff:

On behalf of Clear Channel Broadcasting Licenses, Inc., licensee of the above referenced broadcast station, and the commonly owned stations in the Fort Myers-Naples-Punta Gorda, Florida station employment unit ("SEU"), the undersigned submits the SEU's response to your letter of February 6, 2015 concerning compliance with the Commission's Equal Employment Opportunity rules, 47 C.F.R. § 73.2080. In accordance with your request, this submission consists of a sworn statement by Sherri Griswold, Market Manager, with copies of documentation responsive to your inquiry.

Should any questions arise concerning this submission, kindly contact the undersigned.

Respectfully submitted,



Elizabeth E. Goldin

Counsel to Clear Channel Broadcasting Licenses, Inc.

cc: Sherri Griswold

DECLARATION OF SHERRI GRISWOLD

I, Sherri Griswold, hereby declare as follows:

1. I am a Market President for Clear Channel Broadcasting Licenses, Inc, the licensee of Station WKII(A), Solana, FL (Fac. ID No. 32514), which is part of a station employment unit based in Ft. Myers-Naples-Punta Gorda, FL and which also includes: WIKX(FM), Charlotte Harbor, FL (Fac. ID No. 28899), WCCF(AM), Punta Gorda, FL (Fac. ID No. 28897), WCVU(FM), Solana, FL (Fac. ID No. 71594), WBCG(FM), Murdock, FL (Fac. ID No. 82071), WBTT(FM), Naples Park, FL (Fac. ID No. 55756), WZJZ(FM), Port Charlotte, FL (Fac. ID No. 35213), WOLZ(FM), Ft. Myers, FL (Fac. ID No. 13898), and WCKT(FM), Lehigh Acres, FL (Fac. ID No. 55755). The stations in this SEU are commonly owned through subsidiaries ultimately owned and controlled by iHeartMedia, Inc. (collectively, "iHeartMedia"). This Statement and relevant attachments are being submitted in response to the February 6, 2015 letter of Lewis C. Pulley, Assistant Chief of the Policy Division of the Commission's Media Bureau, concerning a random audit of the SEU's EEO compliance (the "EEO Audit Letter").

2. This SEU employs five or more full-time employees as the term is defined in the broadcast EEO rule of the Federal Communication Commission ("FCC" or the "Commission"), 47 C.F.R. § 73.2080(e)(1).

3. In response to Question 3(a) of the EEO Audit Letter, copies of the SEU's two most recent EEO public file reports, as described in 47 C.F.R. § 73.2080(c)(6), are appended at Attachment A.

The web addresses of the stations in this SEU are as follows: KixClassics.com, WIKX.com, WCCFAM.com, WCVU.com, 989thebeach.com, 1055thebeat.com, Y100Florida.com, 953theriver.com, and catcountry1071.com. A copy of the current report is included on or linked to each of these websites.

The date of each full-time hire listed in the SEU's two most recent EEO public file reports, as required by 47 C.F.R. § 73.2080(c)(5)(vi), is included in the internal business records appended at Attachment B.

4. In response to Question 3(b) of the EEO Audit Letter, the licensee acknowledges that it is required to retain records to document its outreach to the recruitment sources used to fill its full-time positions, including those filled during the period covered by the above EEO public file reports. However, pursuant to the EEO Audit Letter, only one such notice per position is included at Attachment B in addition to all announcements sent to those sources that have notified the SEU that they want to be alerted to job openings at the Unit, as described in § 73.2080(c)(1)(ii).

5. In response to Question 3(c) of the EEO Audit Letter, the internal business records appended at Attachment B provide data concerning (a) the total number of interviewees for each vacancy and (b) the referral source for each interviewee for each particular full-time vacancy filled during the period covered by the above EEO public file reports.

6. In response to Question 3(d) of the EEO Audit Letter, documentation concerning the Unit's performance of four recruitment initiatives described in § 73.2080(c)(2) during this time period is appended at Attachment C. Station personnel involved in the recruitment initiatives are noted in the documentation. This SEU employs a total of 42 full-time employees and at least one of our stations is located in a market with a population of more than 250,000. Accordingly, the SEU is required to perform at least four recruitment initiatives during a two-year period

7. In response to Question 3(e) of the EEO Audit Letter, the licensee is aware of the following discrimination complaints filed against one or more stations in this SEU:

A complaint alleging sex discrimination, among other claims, was filed against the licensee by Jack Degnan, a Program Director, Music Director and on-air host, on or about March 8, 2013 at the U.S. Equal Employment Opportunity Commission and the Florida Commission on Human Rights. *See* EEOC Charge No. 510-2013-02246. The matter was settled between the parties on April 17, 2014. The EEOC issued an Acknowledgement of Settlement and closed its case on June 12, 2014.

8. In response to Question 3(f) of the EEO Audit Letter, the licensee affirms that iHeartMedia has created and deployed an EEO compliance plan, with the assistance of outside communications counsel, known as the iHeartMedia Broadcast Diversity Recruitment Plan (the "Recruitment Plan" or "Plan"). The Recruitment Plan was distributed to all regional managers and, through them, disseminated to each SEU in conjunction with the effective date of the current EEO regulations. The Plan contains directives as to how iHeartMedia SEUs are to engage in broad recruitment for job vacancies and undertake recruitment initiatives, includes sample forms for collecting and maintaining the necessary recruitment data, and provides a quarterly self-assessment program designed to ensure that the SEU follows the Plan's directions and regularly updates corporate headquarters as to the employment unit's progress in the area.

At the corporate level, iHeartMedia assists SEUs in understanding and following the Recruitment Plan, responding to SEU requests for assistance and/or calling upon outside counsel for additional guidance when warranted. Furthermore, iHeartMedia has a team of internal public inspection file auditors that routinely assesses each SEU's FCC EEO compliance, based on the most recent EEO Public File Report, as part of a review of overall public file compliance. Finally, with the recent deployment of applicant tracking system software called OpenHire throughout the company, iHeartMedia has been conducting training sessions with its SEUs on its hiring policies and procedures, including compliance with the FCC's EEO broad outreach rules.

At the local level, I am responsible for overseeing EEO Compliance, and Rhonda Richey, my Executive Assistant, directs the day-to-day EEO efforts, including posting openings and collecting the applications. Further, we contract the services of an outside Compliance Specialist to review, on a quarterly basis, all recruiting and hiring records as well as recruitment initiatives accomplished, and to report all findings to me along with recommendations. This includes suggesting new referral sources, updating source contact information, reviewing hiring efforts and results as well as recruitment initiatives. This SEU's compliance efforts include identifying iHeartMedia's efforts to afford equal employment opportunities to employees through statements disseminated in job applications and posted in conspicuous areas within the workplace.

9. In response to Question 3(g) of the EEO Audit Letter, the licensee affirms that the SEU understands that it must periodically analyze the effectiveness of its EEO recruitment program by reviewing the productivity of sources on its recruitment list and the outcome of its recruitment initiatives. The company's Recruitment Plan, through the quarterly self-assessment mechanism, provides SEUs with a regular opportunity to consult the corporate headquarters about these issues. The stations broadcast announcements seeking out new sources and post the same announcement on the stations' web sites. New sources have been added to improve recruiting. This SEU verifies the contact information of all of its sources following every job posting. For any failed contacts, an email is sent and a follow up phone call is made, if necessary, to update our records with the source's current contact information.

Further, our SEU encourages its staff to advise our EEO coordinator of any potential recruiting sources with which they become familiar in the course of doing business on behalf of the iHeartMedia stations. Our SEU monitors news and public affairs programming including public service announcements for new sources.


10. In response to Question 3(h) of the EEO Audit Letter, this SEU strives to comply with all federal, state and/or local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that the unit provides equal opportunity and does not discriminate against employees or applicants. This SEU's employment practices are my ultimate responsibility, working in conjunction with in-house counsel at iHeartMedia corporate headquarters and, when applicable, outside employment and labor counsel.

Dated: March 24, 2015

[SIGNATURE PAGE FOLLOWS]

**SIGNATURE PAGE TO
DECLARATION OF [Sherri Griswold, Market Manager]**

As of the date set forth above, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



Sherri Griswold, Market Manager