



# Vermont Broadcast Associates, Inc.

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Bruce James, President  
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March 19, 2019

EEO Staff, Policy Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: WMOO(FM), Derby Center, Vermont (FIN: 63193)

Ladies and Gentlemen:

I am the President of Vermont Broadcast Associates, Inc. ("VBA"), licensee of radio station WMOO(FM). As such, I am authorized to provide the following information in response to your Public Notice dated February 15, 2019 regarding an EEO audit of the above-referenced facility.

WMOO(FM) is exempt from the EEO recruitment program requirement because it currently employs fewer than five full-time employees.

WMOO(FM) has, in some prior EEO public file reports, been reported as being part of an Employment Unit with other commonly owned stations in the St. Johnsbury, Vermont area. However, as WMOO and WIKE(AM), Newport, Vermont are operated from a separate studio located over 40 road miles from the studio for the St Johnsbury stations, and these station clusters do not serve a common area, they should be considered a separate employment unit.

VBA currently has four employees at the WMOO/WIKE cluster, holding the following positions:

1. Announcer/Operations
  - a. Burton Yerry 40 hours per week
2. Announcer
  - a. John Rice 40 hours per week
3. Sales (2)
  - a. Danielle Paquin 40 hours per week
  - b. Merl Grabowski 40 hours per week

Sincerely,

Bruce James  
President

Pursuant to paragraph 3(e) of your letter, VBA also certifies that there are no pending or resolved complaints alleging unlawful discrimination relative to station WMOO(FM). Also pursuant to paragraph 4(a)-(d) of your letter, VBA certifies it is not party to a time brokerage agreement.

I declare under penalty of perjury that the foregoing information is true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink that reads "Bruce James". The signature is written in a cursive style with a horizontal line underneath it.

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Bruce A. James, President  
Vermont Broadcast Associates, Inc.