

May 12, 2014

VIA HAND DELIVERY

Mr. Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED - FCC

MAY 14 2014

**Federal Communications Commission
Bureau / Office**

Re: **WFXG(TV) (Fac. ID 3228)
Response to 2014 Random EEO Audit**

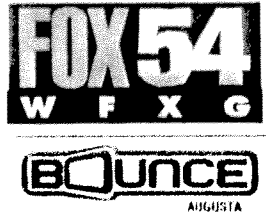
Dear Mr. Pulley,

WFXG License Subsidiary, LLC, licensee of television station WFXG(TV), Augusta, Georgia ("WFXG" or the "Station"), hereby responds to your letter dated February 12, 2014, indicating that the Station was randomly selected for an EEO audit.

The responses, which are provided in the order of the requests in Section 3 of your letter, were prepared under my supervision as Vice-President-General Manager and EEO Officer, with the assistance of the Station's EEO Coordinators Paul Eriksen and Nicole Bussey, Susan Willower, Corporate Director of Human Resources at Raycom Media, Inc. ("Raycom"), and Steven Fecarotta, Corporate Counsel at Raycom. Raycom, the licensee's ultimate parent, provides administrative and legal support to WFXG.

- 3(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 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. § 2080(c)(6).**

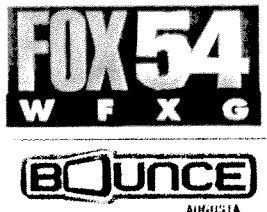
The renewal application filing anniversary date for WFXG is December 1. Exhibit A, therefore, attaches the EEO Public File Reports for the periods December 1, 2011 to November 30, 2012 and December 1, 2012 to November 30, 2013. The cover sheets supplied in Exhibit B identify the dates of each full-time hire covered by the reports. The Station maintains a website at www.wfxg.com, and a link to the most recent EEO Public File Report is on the homepage at www.wfxg.com/link/600112/eo-public-file.



- 3(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 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).

During the 24-month period covered by the attached EEO Public File Reports, WFXG filled 14 full-time positions. Exhibit B includes a cover sheet for each of those vacancies. Each job vacancy cover sheet is followed by copies of advertisements, bulletins, letters, faxes, e-mails, and other communications or records reflecting announcements for the open position. In instances where the same letter and job notice were sent to various sources, only one copy is included in Exhibit B with a list detailing all sources where it was sent. Organizations requesting job opening notification during the period covered by the EEO Public File Reports would be denoted with an asterisk on Attachment A, Master List of Recruitment Sources, of each report. Where applicable, Exhibit B contains the wording and air times of spots for these positions and the Station retains copies of all notices and log sheets used.

Consistent with the Station's standard practice, documentation reflecting broad recruitment (as reflected in the Station's EEO public file report) was maintained in folders that correspond to the full-time job vacancies filled during the reporting period. However, the Station has not been able to locate documentation of the recruitment activity performed in connection with one position filled during the reporting period, the General Manager position. Due to the importance of promptly retaining a qualified candidate for this important position, the Station coordinated recruitment with its corporate headquarters. The Station believes that notification of the job vacancy was disseminated to recruitment sources 1-18 on the Station's EEO public file report, consistent with the Station's standard practice and as reflected on the EEO public file report for the period. In addition, the Station has confirmed that six candidates were interviewed for the position based on its records (consistent with broad recruitment). The Station's EEO Officer during the reporting period has retired and the Station's EEO Coordinator during the reporting period is on leave and is not available to advise in connection with the response to this audit. However, the Station is implementing additional controls to ensure that documentation is retained for positions for which recruitment is coordinated with corporate headquarters and that personnel transitions do not disrupt the ability of the Station to locate its EEO documentation.



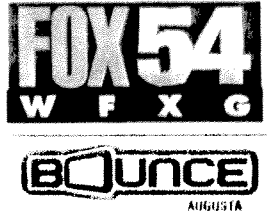
- 3(c) In accordance with Section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.**

The cover sheets in Exhibit B for each full-time position filled during the two-year reporting period indicate the number of interviewees and referral sources for each candidate interviewed for that position.

- 3(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 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 Section 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.**

Exhibit C provides documentation of WFXG's supplemental outreach initiatives for the periods covered by the EEO Public File Reports. The Station's EEO Public File Report for these periods (provided in Exhibit A) reflect the Unit's personnel involved in each initiative. As of April 14, 2014, the Station had 29 filled full-time positions and 4 full-time open positions. WFXG's Community of license is located in Augusta, Georgia, which is located in an OMB metropolitan area with a population of greater than 250,000 persons. Accordingly, WFXG is not located in a "small market," as defined in Section 73.2080 of the FCC's rules, and the Station is therefore scheduled to perform four supplemental initiatives over the course of the two-year period covered by these reports.

- 3(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term 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.**



Since the Station's current owner purchased the Station on August 31, 2011, no EEOC complaints or lawsuits have been filed against the Station.

- 3(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 programs.**

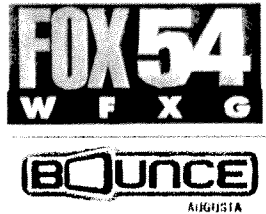
On December 17, 2012, Andrew Wyatt assumed the role of EEO Officer for WFXG. Andrew Wyatt and EEO Coordinator Brenda Taylor are primarily responsible for ensuring that the Station implements its responsibilities as an equal opportunity employer. These Station personnel work closely in these efforts with Clyde Baucom, Raycom's Vice President of Corporate Human Resources and Susan Willower, Raycom's Corporate Director of Human Resources since December 17, 2012.

From September 30, 2003 until December 17, 2012, Barry Barth served as WFXG's EEO Officer. From August 31, 2011 until March 1, 2013, Michael DiLaura worked with the Station and Clyde Baucom as Raycom's Corporate Director of Human Resources.

Employees in Department Head and Supervisor level positions are responsible for understanding, communicating, observing and implementing the Station's EEO policy in all employment-related matters so as to prevent discrimination and to provide equal employment opportunities to both current employees and applicants under consideration for positions at the Station. Raycom's Human Resources Department is responsible for providing assistance to the Station's EEO Officer and EEO Coordinator in overseeing the recordkeeping requirements utilized to provide broad outreach in the Station's recruitment efforts and proper maintenance of the files relating to job applicants, and the Station's outreach initiatives.

All employment-related actions that will affect an employee are reviewed by the EEO Officer in conjunction with the EEO Coordinator and/or Raycom's Human Resources Department. This coordination is undertaken to ensure that employment actions are made in accord with the Station's and Raycom's EEO policies.

Raycom conducts ongoing training on an individual and group basis (both formally and informally) to reinforce the Station's EEO Policy, recordkeeping requirements, and to help ensure EEO compliance. The Station's EEO Officer, the EEO Coordinator, as well as personnel from the Corporate Human Resources Department conduct this training. In addition, the Station EEO Officer and the EEO Coordinator provide periodic updates outlining the Station's EEO policy and its commitment. Department Heads and Supervisors receive periodic memos from the EEO Coordinator outlining and reinforcing the Station's EEO and Harassment policies. This information is also discussed at Department Head meetings with other key personnel.



Through Raycom's Corporate Human Resources Department, the Station has access to web-based training for Department Heads and Supervisors to review the EEO policies and sexual harassment policies. In addition, these policies are included in the employee handbook and new hire orientation. The Station's commitment to principles of equal employment opportunity is reflected in the application forms and on the Station's job postings website, and is communicated annually to all employees by the EEO Officer and EEO Coordinator.

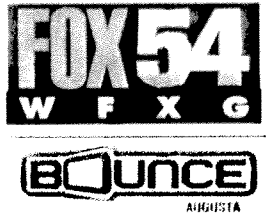
- 3(g) In accordance with Section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.**

The Corporate Director of Human Resources at Raycom, working with the Employment Unit's EEO Officer, EEO Coordinator and Department Heads, makes an assessment of the Station's recruitment efforts on an annual basis. This review covers the Station's recruitment activities, referral sources used, record keeping activities, and the Station's outreach initiatives. This annual review provides the opportunity to determine if there are areas in the recruitment and outreach process that may need modification to produce broader results. The Employment Unit's EEO Officer and EEO Coordinator have also started conducting a Quarterly Self Audit of recruitment practices.

The reviews of the past two years have not uncovered any deficiencies. Consistent with its standard practice, the Station has maintained a broad-based list of sources and continues to review its list of recruitment sources. Also, in a further effort to attract a broad cross-section of its community, the Station solicits recruitment sources via on-air advertising on a regular basis (see the wording of the Station's spot and logs in Exhibit C).

- 3(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.**

The Station's compensation plans are reviewed on a yearly basis by the Station's General Manager (who serves as the Station's EEO Officer), including with reference to salary trends in the industry, and by Raycom's HQ in connection with preparation of the Station's budget business plan. The plans are also reviewed on an as-needed basis throughout the year. Any changes or adjustments to the compensation plans are approved by the Station's General Manager, the EEO Coordinator, and the relevant department head. In addition, Raycom HQ establishes and handles pension and health plans on a company-wide basis.



- 3(i) **If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hire must be provided. 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.**

This request is not applicable.

If you have any questions about the materials provided, please do not hesitate to contact me. On behalf of Raycom and WFXG, I certify that the statements in this Response Letter are true, correct, and complete to the best of my knowledge and belief, and are made in good faith.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Wyatt', with a long horizontal line extending to the right.

Andrew Wyatt
General Manager of WFXG

Attachments (Exhibits A-C)

cc: Susan Willower, Corporate Director of Human Resources (via e-mail)
Steven Fecarotta, Corporate Counsel (via e-mail)