

Beach TV Properties, Inc.  
P. O. Box 9556  
Panama City Beach, FL 32417

April 4, 2016

EEO Staff, Policy Division  
Media Bureau  
Federal Communications Commissions  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**PLEASE STAMP  
AND RETURN  
RECEIVED - FCC**

RE: WPFN-CD, Panama City, FL  
RID #4351  
Beach TV Properties, Inc.  
EEO Audit Response

APR -7 2016

Federal Communications Commission  
Bureau / Office

Ladies and Gentlemen:

Beach TV Properties, licensee of digital Class A television station WPFN-CD, Panama City, Florida (the "Station"), hereby responds to the letter of February 24, 2016, from Mr. Lewis C. Pulley, Assistant Chief, policy Division, Media Bureau, of the Federal Communications Commission, designating the Station for a random EEO audit. The Station is part of a larger employment unit comprised of the following stations: WAWD, WPCT, WPFN-CD and WDES-CD. This response provides information relating to the Unit.

The Unit employs more than four full time employees and thus and thus is required to have an EEO recruitment program. Here are our responses to the questions in part 3 of the audit letter.

(a) Copies of the Unit's two most recent EEO public file reports.

-The report for 2014, attached as Exhibit 1, covers the period from September 21, 2013, through September 20, 2014.

-The report for 2015, attached as Exhibit 2, covers the period from September 21, 2014, through September 21, 2015.

The Unit hosts two corporate websites that link to the stations: [www.destinationnetwork.com](http://www.destinationnetwork.com) and [www.tripsmarter.com](http://www.tripsmarter.com). The two most recent EEO Public File Reports can be accessed through either site. Both sites link directly to the FCC Online Public Files.

From [www.destinationnetwork.com](http://www.destinationnetwork.com), scroll to the bottom of the page, click on the link for FCC Public Files, when that page loads, click on WPFN-CD, then navigate to the EEO Annual Reports by clicking the relevant link in the left frame.

From [www.tripsmarter.com](http://www.tripsmarter.com), in the left frame click on Watch Tourist TV Live! And select a market from the menu. On the next page, there is a link to the FCC public files below the streaming live video. To skip the home pages, go directly to <http://fcc.destinationnetowrk.com>.

As reflected in the attached 2014 and 2015 Annual EEO Public File Reports, the Unit had three full-time hires during the two years under review. The dates of hire for the positions are:

Accounting Assistant	06/30/2014
Accounting Assistant	10/08/2014
Control Assistant	04/20/2015

(b)

Representative dated documentation for recruitment of the full-time positions filled during the period under review is attached as follows:

Exhibit 3 Accounting Assistants 06/30/2014  
*News Herald*, published June 7 & 8, 2014  
 Craigslist Ad published April 29 – June 30, 2014

Exhibit 4 Accounting Assistants 10/08/2014  
*News Herald*, published October 4 & 5, 2014  
 Craigslist Ad published September 14-October 6, 2014

Exhibit 5 Control Assistant 04/20/2015  
*News Herald*, published March 13-20, 2015  
 Craigslist Ad published March 10-31, 2015

The Unit retains copies of all notices sent to all sources used as required by the FCC's rules.

No organization has asked that we send it notices about job openings.

(c) Total number of interviewees for each vacancy and the referral source for each.

<u>Position</u>	<u>Referring Source</u>	<u>No. Interviewed</u>
Accounting Assistant- 6/30/2014	<i>News Herald</i> -2	13
	Craigslist-10	5 (had 2 <sup>nd</sup> interview)
	Friend/Employee Referral-1	
Accounting Assistant- 10/08/2014	<i>News Herald</i> -1	10
	Craigslist-7	
	Walk-in-1	
	Friend/Employee Referral-1	
Control Assistant-04/20/2015	<i>News Herald</i> -1	5
	Craigslist-3	
	Walk-in-1	

(d) The Unit has a total of 19 full-time employees.

The population of the market in which the Unit operates is less than 250,000. WPFN-CD is licensed in communities located in the Panama City-Lynn Haven Metropolitan Statistical Area (MSA), which has a population county wide of 168,852 according to 2010 census via Wikipedia. During the two years under review, the stations were involved in the following initiatives:

Established an internship program designed to assist member of the community acquire skills needed for broadcast employment

The licensee hosted two interns during the period under review. Documentation relating to the internships is provided at Exhibit 6 and Exhibit 7.

The licensee's executive committee meets quarterly to conduct training based on the Counsel's reference memorandum regarding the FCC's EEO requirements and Conduct a self-analysis twice per year. See Exhibit 8 and Exhibit 9.

The licensee's executive committee and all department heads participated in a WebEx Meeting/training session with counsel to provide training on Children's television Requirements and recorded a training video for all new employees to watch. After which The company met to discuss EEO Best Practices in the Broadcast Industry and reviewed The webinar (From January 4, 2012) information with all department heads to ensure all Policies are being followed. See Exhibit 10.

- (e) No complaints have been filed against the station during the current license term and no such complaints are pending.
- (f) The Unit has an Executive Committee which meets quarterly. The Unit conducts a self-assessment twice per year, at that time. In addition, the Department Heads meet quarterly to make sure that we are being pro-active in our approach to hiring for all positions and that the Department Heads remain aware of the EEO rules. At the Executive Committee meetings, we discuss EEO policies, raises, bonus programs, and promotions to ensure each staff member is given fair and equal treatment. These meetings have taken place since 1988.

The Unit started including in all employment ads the statement that it is an Equal Opportunity Employer or "EOE".

The Unit posts employment posters and statements of employee rights in three areas: the Main Building break room, in the Production Building, and in the Human Resources Department. See Exhibit 11.

The Unit has added a notice in the jobs area on its website that it is an Equal Opportunity Employer. That link is available at: [Destinationnetwork.com](http://Destinationnetwork.com) and [tripsmarter.com](http://tripsmarter.com). See Exhibit 12.

This Unit's Personnel Policy Manual includes a statement describing its EEO and Non-Discrimination Policy. See Exhibit 13.

- (g) The company co-founders/owners are aware of recruitment efforts that occur for openings at the Unit. The Director of Accounting/Human Resources Manager also reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives for all Departments. While posting job announcements, the Human Resources Manager updates any contact information that might be out of date and assesses when additional sources beyond the Unit's general recruitment source list should be targeted.
- (h) As discussed in (f) above, the Executive Committee meets every six months to assess various policies and programs of the Unit. The Department Heads meet quarterly. Employment practices are reviewed at those meetings. Department Heads and the Executive Committee examine pay, benefits, promotions, seniority, and selection techniques to be sure they do not have a discriminatory effect. The unit reviews its employment practices to ensure fair and equal treatment during the budgeting process when the owners, working with the Department Heads develop the budget for the next year.

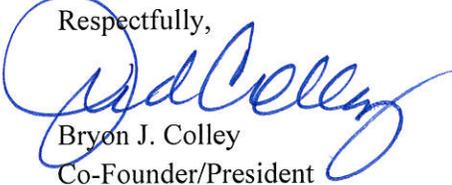
As part of each job opening, the Human Resources Manager researches salaries and benefits available at other media organizations in our region. We encourage promoting from within whenever we have a job opening. Each time we have an open position, the Human Resources Manager and the Department Head meet to discuss whether promotion from within is possible, the ads that need to be placed, and job description flyers to be sent out as part of our outreach to the community.

The Unit does not have a union agreement.

- (i) The licensee is not a religious broadcaster.

These policies have been enforced since 1988, and most recently been proven by our last audit in March 2012. We believe in policing ourselves to ensure that there are no unfair or discriminatory practices and to ensure all employees are aware of this.

Respectfully,



Bryon J. Colley  
Co-Founder/President

# Exhibit 1

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## EEO Public File Report

Station: WAWD, WPCT, WPFN-CA, WDES-CA

Fort Walton, Destin, Panama City, Florida

Period Covered by Report: September 21, 2013 to September 20, 2014

Date of Hire	Position Title	Sources Used to Announce Position	# Interviewed	Source Referring Hire
6/30/2014	Accounting Assistant	1, 8, 10	5	8

#	Recruitment Source	Contact	# Interviewed	Source Req. Notification
1	<b>News Herald</b> 501 W. 11th St. PC, FL 32401	850-747-5020	2	N
2	<b>Gulf Coast Community College</b> 5230 W. Hwy 98, PC, FL 32401	Ms. Kim Hoyt, Co-op Coord. khoyt@gulfcoast.edu, 872-3874	0	N
3	<b>Workforce Center</b> 625 Hwy. 231, PC, FL 32405	Deeyon Kalil kalild@workforcecenter.org	0	N
4	<b>Arnold High School</b> 550 N. Alf Coleman Rd. PC, FL 32407	850-236-3700	0	N
5	<b>Tripsmarter.com website</b>	<a href="http://www.tripsmarter.com/join-the-gang">www.tripsmarter.com/join the gang</a>	0	N
6	<b>MediaRecruiter.com</b>	<a href="http://www.mediarecruiter.com">www.mediarecruiter.com</a>	0	N
7	<b>TVJobs.com</b>	<a href="http://www.tvjobs.com">www.tvjobs.com</a>	0	N
8	<b>Craigslist.com</b>	<a href="http://www.craigslist.org">www.craigslist.org</a>	10	N
9	<b>Walk-ins</b>		0	N
10	<b>Friends/Employees</b>		1	N
<b>TOTAL</b>			13	

Supplemental Outreach Initiatives	Description		Personnel Involved
<b>Internship</b>	Internship for College Graduate with BS in Human Resources	5/21/2014-9/30/2014	Human Resources Dir. of Accounting
<b>Provided Training to Mgmt Personnel on methods of insuring EEO &amp; preventing discrimination</b>	FCC EEO Best Practices Review Quarterly Review	12/13/13, 3/13/14, 6/13/14, 9/12/14	All Members of Executive Committee
<b>Internship</b>	Participated in internship through Gulf Coast State College	2/1/14 - 4/30/2014	Human Resources Dir. Of Accounting

## Exhibit 2

## EEO Public File Report

Station: WAWD, WPCT, WPFN-CA, WDES-CA

Fort Walton, Destin, Panama City, Florida

Period Covered by Report: September 21, 2014 to September 20, 2015

Date of Hire	Position Title	Sources Used to Announce Position	# Interviewed	Source Referring Hire
10/8/2014	Accounting Assistant	1, 8, 10	10	8
4/20/2015	Control Assistant	1, 8, 9,	5	8

#	Recruitment Source	Contact	# Interviewed	Source Req. Notification
1	<b>News Herald</b> 501 W. 11th St. PC, FL 32401	850-747-5020	2	N
2	<b>Gulf Coast Community College</b> 5230 W. Hwy 98, PC, FL 32401	Ms. Kim Hoyt, Co-op Coord. khoyt@gulfcoast.edu , 872-3874	0	N
3	<b>Workforce Center</b> 625 Hwy. 231, PC, FL 32405	Deeyon Kalil kalild@workforcecenter.org	0	N
4	<b>Arnold High School</b> 550 N. Alf Coleman Rd. PC, FL 32407	850-236-3700	0	N
5	<b>Tripsmarter.com website</b>	<a href="http://www.tripsmarter.com/join%20the%20gang">www.tripsmarter.com/join the gang</a>	0	N
6	<b>MediaRecruiter.com</b>	<a href="http://www.mediarecruiter.com">www.mediarecruiter.com</a>	0	N
7	<b>TVJobs.com</b>	<a href="http://www.tvjobs.com">www.tvjobs.com</a>	0	N
8	<b>Craigslist.com</b>	<a href="http://www.craigslist.org">www.craigslist.org</a>	10	N
9	<b>Walk-ins</b>		2	N
10	<b>Friends/Employees</b>		1	N
<b>TOTAL</b>			15	

Supplemental Outreach Initiatives	Description	Personnel Involved
<b>Provided Training to Mgmt Personnel on methods of insuring EEO &amp; preventing discrimination</b>	FCC EEO Best Practices Review Quarterly Review	12/10/14, 3/11/15, 6/10/15, 9/9/15 All Members of Executive Committee
<b>Provided Training to Mgmt Personnel on requirements for Childrens Progra</b>	FCC Compliance Training-Children's Television Requirements Seminar	8/6/2015 All Exec. Comm. & Control & Traffic Mgrs & FCC Attorney

## Exhibit 3

Position: Accounting Assistant

Date: 6/30/14

**Resources:**

News Herald

FSU PC Campus

Gulf Coast Community College

Workforce Center

NWFL Branch of NAACP

A.C.U.R.E.

Craigslist

Goodwill Career Development Center

Filled the position with: Melissa P. on 6/30/14

Source: Craigslist

Interviewed: 13

Received 27 Resumes/applications

## Janet Singletary

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**From:** Janet Singletary <janet.singletary@tripsmarter.com>  
**Sent:** Friday, March 18, 2016 12:10 PM  
**To:** Janet Singletary  
**Subject:** FW: Your ad  
**Attachments:** Beach TV2.pdf

**From:** Branda, Jessica [<mailto:jbranda@pcnh.com>]  
**Sent:** Thursday, March 17, 2016 2:15 PM  
**To:** [janet.singletary@tripsmarter.com](mailto:janet.singletary@tripsmarter.com)  
**Subject:** Your ad

Here you go, copy of your two ads for June 7 & 8, 2014 and October 4 & 5, 2014.

Let me know if you need additional info and thank you for your business.

--



Jessica Branda  
**Classifieds Supervisor**  
Panama City News Herald  
p: 850-747-5019 f: 850-747-5044  
a: 501 West 11th Street, Panama City, FL 32401  
s: newsherald.com e: JBranda@pcnh.com

This message may contain confidential and/or privileged information. If you are not the intended recipient or authorized to receive this for the intended recipient, you must not use, copy, disclose or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by sending a reply e-mail and delete this message. Thank you for your cooperation.

Accounting/Finance

### Accounting Assistant

Local multi company office looking for an accounting assistant. Full time. Experience in AP/AR, basic book-keeping skills, & Excel in fast paced environment. Email resume [accounting@tripsmarter.com](mailto:accounting@tripsmarter.com) or fax 234-1179. Web ID#: 34174081 Text FL74081 to 56654

Dear Janet  
for 10/4 & 10/5  
2014

Jessica

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in category:

Showing postings for category **accounting/finance**

new posting in:

( [page: 1](#) )

status	manage	posting title	area and category	posted date	exp.	id
Deleted	<a href="#">repost</a>	Accounting Assistant	pfn accounting/finance	06 Oct 2014 09:58	n/a	4701651511
Deleted	<a href="#">repost</a>	Accounting Assistant	pfn accounting/finance	06 Oct 2014 09:57	n/a	4701650199
Deleted	<a href="#">repost</a>	Accounting Assistant	pfn accounting/finance	14 Sep 2014 17:25, renewed 17 Sep 2014 09:25	n/a	4668149343
Deleted	<a href="#">repost</a>	Looking for Accounting Personnel	pfn accounting/finance	29 Apr 2014 13:38	n/a	4446252443
Deleted	<a href="#">repost</a>	Accounting Assistant	pfn accounting/finance	17 Aug 2011 11:40, renewed 22 Aug 2011 11:24	n/a	2551597842

page: 1

Craigslist Post for  
Accounting Assistant

4/29/14

9/14/14

10/06/14



P. O Box 9556, Panama City Beach, FL 32417

850-234-1179

**Accounting Assistant Position Available!**

Local broadcast company is looking for an Accounting Assistant to assist in our multi-office headquarters. This position would work as an assistant to the Director of Accounting. Must have some experience in AP/AR, basic bookkeeping skills & Excel in a fast paced environment. Must be well organized, self-sufficient and use time wisely. This position is full time, year round employment with health, dental and vision insurance, 401k and vacation pay. Submit your resume to:

Beach TV Cable Company  
Human Resource Dept.  
P. O. Box 9556  
Panama City Beach, FL 32417

or

Email resume to [accounting@tripsmarter.com](mailto:accounting@tripsmarter.com)  
fax resume to 850-234-1179



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

July 7, 2014

Gulf Coast Community College  
Attn: Kim Hoyt, Co-op Coordinator  
5230 W. Hwy. 98  
Panama City , FL 32401

RE: Notification of Job Opening

Ms. Hoyt:

We would like to make you aware of a position in which we have open for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

If you should have any questions regarding the above information, please contact me as soon as possible at 850-234-2773 x. 115.

Respectfully,

A handwritten signature in black ink, appearing to read "Janet Singletary", written in a cursive style.

Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

July 7, 2014

Workforce Center  
625 Hwy. 231  
Panama City , FL 32405

RE: Notification of Job Opening

To Whom it May Concern:

We would like to make you aware of a position in which we have open for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

July 7, 2014

Northwest Florida Branch NAACP  
P. O. Box 1004  
Defuniak Springs, FL 32435

RE: Notification of Job Opening

To Whom It May Concern:

We would like to make you aware of a position in which we have open for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

July 7, 2014

Goodwill Career Dev. Center  
Attn: Janet Joyner  
3207 E. 4<sup>th</sup> Street  
Panama City, FL 32401

RE: Notification of Job Opening

Ms. Joyner:

We would like to make you aware of a position in which we have open for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O. Box 9556, Panama City Beach, FL 32417  
850-234-2773

July 7, 2014

Florida State University  
Dept. of Communications  
356 Diffenbaugh  
Tallahassee, FL 32306

RE: Job Opening

Ms. Sexton:

We would like to make you aware of a position in which we have open in our production department for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. I have attached a flyer for the details on this position, if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

If you should have any questions regarding the above information, please contact me as soon as possible at 850-234-2773 x. 115.

Respectfully,

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Janet Singletary  
Accounting Specialist  
Beach TV Cable Company, Inc.

# Exhibit 4

Position: Accounting Assistant

Date: 10/18/14

**Resources:**

News Herald

FSU PC Campus

Gulf Coast Community College

Workforce Center

NWFL Branch of NAACP

A.C.U.R.E.

Craigslist

Goodwill Career Development Center

Filled the position with: Chandra W. on 10/18/14

Source: Craigslist

Interviewed: 10

Received 31 Resumes/applications

## Janet Singletary

---

**From:** Janet Singletary <janet.singletary@tripsmarter.com>  
**Sent:** Friday, March 18, 2016 12:10 PM  
**To:** Janet Singletary  
**Subject:** FW: Your ad  
**Attachments:** Beach TV2.pdf

**From:** Branda, Jessica [mailto:jbranda@pcnh.com]  
**Sent:** Thursday, March 17, 2016 2:15 PM  
**To:** janet.singletary@tripsmarter.com  
**Subject:** Your ad

Here you go, copy of your two ads for June 7 & 8, 2014 and October 4 & 5, 2014.

Let me know if you need additional info and thank you for your business.

--



Jessica Branda  
**Classifieds Supervisor**  
Panama City News Herald  
p: 850-747-5019 f: 850-747-5044  
a: 501 West 11th Street, Panama City, FL 32401  
s: newsherald.com e: JBranda@pcnh.com

This message may contain confidential and/or privileged information. If you are not the intended recipient or authorized to receive this for the intended recipient, you must not use, copy, disclose or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by sending a reply e-mail and delete this message. Thank you for your cooperation.

Accounting/Finance

### Accounting Assistant

Local multi company office looking for an accounting assistant. Full time. Experience in AP/AR, basic book-keeping skills, & Excel in fast paced environment. Email resume accounting@tripsmarter.com or fax 234-1179.  
Web ID#: 34174081  
Text FL74081 to 56654

Year Sheet  
for 6/7-6/8  
2014

Jessica

craigslist >

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postings drafts searches settings billing

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in category: accounting/finance search your postings search

Showing postings for category accounting/finance

new posting in: panama city, fl, fl, us go

( page: 1 )

status	manage	posting title	area and category	posted date	exp.	id
Deleted	<a href="#">repost</a>	Accounting Assistant	pfn accounting/finance	06 Oct 2014 09:58	n/a	4701651511
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Deleted	<a href="#">repost</a>	Accounting Assistant	pfn accounting/finance	17 Aug 2011 11:40, renewed 22 Aug 2011 11:24	n/a	2551597842

page: 1

Craigslist post for  
Accounting Assistant

4/29/14

9/14/14

10/6/14

Looking for full time, year round employee with a strong background in A/P. Applicants must have a minimum of 2 years of computerized accounts payable experience. Must be proficient with a 10 Key and Excel & Word. Must be capable of operating in a fast paced environment and multi-tasking. Hours are Monday - Friday 8-5. Benefits package after 60 days. Starting salary is \$24,000. No smokers please. EEO. Drug free workplace.

Send resume in reply to this email with "ATTN ACCOUNTING" in the subject line or fax 850-234-1179.

Craigs list Ad

4/29/14

9/24/14

10/6/14



P. O Box 9556, Panama City Beach, FL 32417

**Accounting Assistant Position Available!**

Local broadcast company is looking for an Accounting Assistant to assist in our multi-office headquarters. This position would work as an assistant to the Director of Accounting. Must have some experience in AP/AR, basic bookkeeping skills & Excel in a fast paced environment. Must be well organized, self-sufficient and use time wisely. This position is full time, year round employment with health, dental and vision insurance, 401k and vacation pay. Submit your resume to:

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Human Resource Dept.  
P. O. Box 9556  
Panama City Beach, FL 32417

or

Email resume to [accounting@tripsmarter.com](mailto:accounting@tripsmarter.com)  
fax resume to 850-234-1179



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850-234-2773

Oct 7, 2014

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Panama City , FL 32405

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Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

Oct 7, 2014

Gulf Coast Community College  
Attn: Kim Hoyt, Co-op Coordinator  
5230 W. Hwy. 98  
Panama City , FL 32401

RE: Notification of Job Opening

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Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

Oct. 7, 2014

Arnold High School  
550 N. Alf Coleman Road  
Panama City, FL 32405

RE: Notification of Job Opening

To Whom it May Concern:

We would like to make you aware of a position in which we have open for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

If you should have any questions regarding the above information, please contact me as soon as possible at 850-234-2773 x. 115.

Respectfully,

A handwritten signature in cursive script, appearing to read "Janet Singletary".

Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

Oct 7, 2014

Northwest Florida Branch NAACP  
P. O. Box 1004  
Defuniak Springs, FL 32435

RE: Notification of Job Opening

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Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

Oct 7, 2014

Goodwill Career Dev. Center  
Attn: Janet Joyner  
3207 E. 4<sup>th</sup> Street  
Panama City, FL 32401

RE: Notification of Job Opening

Ms. Joyner:

We would like to make you aware of a position in which we have open for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

Oct. 7, 2014

Florida State University  
Dept. of Communications  
356 Diffenbaugh  
Tallahassee, FL 32306

RE: Job Opening

Ms. Sexton:

We would like to make you aware of a position in which we have open in our production department for an Accounting Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. I have attached a flyer for the details on this position, if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Respectfully,

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Janet Singletary  
Accounting Specialist  
Beach TV Cable Company, Inc.

# Exhibit 5

Position: Control Assistant

Date: 4-20-15

**Resources:**

News Herald

FSU PC Campus

Gulf Coast Community College

Workforce Center

NWFL Branch of NAACP

A.C.U.R.E.

Craigslist

Goodwill Career Development Center

Filled the position with: Harold A. on 4/20/15

Source: Craigslist

Interviewed: 5

Received 15 Resumes/applications

Page : 1 of 1 03/11/2015 16:10:55

Order Number : 34315930  
PO Number :  
Customer : 1003920 BEACH TV  
Contact : richard  
Address1 : PO Box 9556  
Address2 :  
City St Zip : Panama City FL 32407  
Phone : (850) 234-2773  
Fax : (850) 234-1179  
Credit Card :  
Printed By : Jessica Branda  
Entered By : Jessica Branda

Ad Number : 34702472  
Ad Key :  
Salesperson : 06 - Jessica Branda  
Publication : The News Herald  
Section : Classified 2006  
Sub Section : Classified 2006  
Category : 4100 Help Wanted  
Dates Run : 03/13/2015-03/20/2015  
Days : 8  
Size : 1 x 2.99, 28 lines  
Words : 73  
Ad Rate : Recruit2008  
Ad Price : 463.00  
Amount Paid : 0.00  
Amount Due : 463.00

Keywords : Manufacturing/Oper Television Control Room Operat  
Notes :  
Zones :

---

Manufacturing/Oper

**Television Control  
Room Operator**

This is an Entry level position. Duties will include: Monitoring computer systems and maintaining operator logs for multiple television stations. Some general office duties including telephone, filing and shipping. Requires basic office skills, must be familiar with Microsoft Office (Word and Excel). Knowledge of computer networking and Internet protocols a plus (FTP, Telnet, SSH, etc) Email resumes to control@tripsmarter.com or fax to 850-234-1179 Attn: Control  
Web ID#: 34315930

CONTROL ROOM OPERATOR-full time position open at a local tv station, must work weekends and nights. Candidate must be proficient in MS Office, dependable, detail oriented, capable of multi-tasking and work independently. Basic understanding of FTP & web streaming technology a plus. Fax Resumes to: 850-234-1179 EEOE.

Craigslist Ad

3/10 - 3/31/15

## **Control Assistant Position Available!**

Local broadcast company is looking for a Control Assistant to assist in our Traffic/Control Department. This position would work as an assistant to the Control Manager. Manage file maintenance, organize media library. Document work on daily job orders. Must be proficient with Microsoft Office as well as different media files. Experience with MAC products a plus. Must be well organized, self-sufficient and use time wisely. This position is full time, year round employment with health, dental and vision insurance, 401k and vacation pay. Submit your resume to:

Beach TV Cable Company  
Human Resource Dept.  
P. O. Box 9556  
Panama City Beach, FL 32417

or

Email resume to [accounting@tripsmarter.com](mailto:accounting@tripsmarter.com)  
fax resume to 850-234-1179



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

April 2, 2015

Arnold High School  
550 N. Alf Coleman Road  
Panama City Beach, FL 32407

RE: Notification of Job Opening

To Whom it May Concern:

We would like to make you aware of a position in which we have open for a Control Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Janet Singletary  
Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

April 2, 2015

Workforce Center  
625 Hwy 231  
Panama City, FL 32405

RE: Notification of Job Opening

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Director of Accounting  
Beach TV Cable Company, Inc.



P. O Box 9556, Panama City Beach, FL 32417  
850-234-2773

April 2, 2015

Gulf Coast Community College  
Attn: Kim Hoyt  
5230 W. Hwy 98  
Panama City, FL 32405

RE: Notification of Job Opening

Ms. Hoyt:

We would like to make you aware of a position in which we have open for a Control Assistant. The position is full time, year round employment with benefits such as health, vision, dental insurance, 401k and vacation pay. It does require some computer and or technical skills or training. It is the ideal job for a detail oriented multi-tasker! I have attached a flyer for the details on the position; if you would post this job opening we would greatly appreciate it or if you know of a candidate that you could recommend for the position please let us know.

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Northwest Florida Branch NAACP  
P. O. Box 1004  
Defuniak Springs, FL 32435

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P. O Box 9556, Panama City Beach, FL 32417  
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April 2, 2015

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3207 E. 4<sup>th</sup> Street  
Panama City, FL 32401

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Janet Singletary  
Accounting Specialist  
Beach TV Cable Company, Inc.

# Exhibit 6

Internship 2/1/14-  
4/30/2014

### Beach TV Internship Agreement

This Internship agreement (the "Agreement") will confirm the terms and conditions of your Internship with Beach TV Cable Company, located at 8317 Front Beach Road, Suite 23, Panama City Beach, FL 32407 and [REDACTED]

1) I accept the internship, which has been awarded to me by Beach TV Cable Company and understand the following:

- (a) The internship period will be 3-6 months and can be terminated with notice to Janet Singletary.
- (b) Beach TV Cable Company will not pay for services and commitment of 16-24 hours per week. In exchange for said hours per week commitment, payment will be made via knowledge and experience and a letter of recommendation.
- (c) Beach TV Cable Company accepts no responsibility for costs arising from accidents and/or illness incurred during my internship.
- (d) Beach TV Cable Company is not seeking any engagement with you after the completion of this internship and the company is in no way guaranteeing employment. However, during your internship, if a position should arise, consideration for placement could be made.

2) I undertake the following obligations with respect to the Beach TV Cable Company Internship Program:

- (a) To observe all applicable rules, regulations, instructions, procedures and directives of the Organization as laid down in the Employee Handbook.
- (b) To refrain from any conduct that would adversely reflect on the Beach TV Cable Company or on the receiving department/office and will not engage in any activity which is incompatible with the aims and objectives of Beach TV Cable Company and its affiliates;
- (c) To keep confidential any and all unpublished information made known to me by the accepting office or department during the course of my internship that I know or ought to have known has not been made public, and except with the explicit authorization of the Beach TV Cable Company and its affiliates, not to publish any reports or papers on the basis of information obtained during the internship, both during and after the completion of my internship;
- (d) To provide the organization with a copy of all materials prepared during my internship;
- (e) To provide immediate written notice in case of illness or other circumstances which might prevent me from completing the internship.

Internee Signature: \_\_\_\_\_

Date: \_\_\_\_\_

4/1/14

# Exhibit 7

**Beach TV Internship Agreement**

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(e) To provide immediate written notice in case of illness or other circumstances which might prevent me from completing the internship.

Internee Signature: [Signature]

Date: 5-20-14

# Exhibit 8

---

Supplemental Outreach #1

12/13/13

EEO Analysis-Executive Committee

**Pay Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.



GARVEY SCHUBERT BARER  
A PARTNERSHIP OF PROFESSIONAL CORPORATIONS

# Reference Memo

February 2003

## *New EEO Requirements Effective March 10, 2003*

### **Overview**

The FCC has adopted outreach requirements intended to promote equal opportunity in employment in the regulated mass media. The requirements are the product of a multi-year effort to redesign EEO regulation in a manner that satisfies constitutional considerations and the FCC's regulatory mandate.

For now, the requirements apply only to full-time employees. The FCC continues to study whether and to what extent part-time positions should be covered by the rules.

### ***"Option A" Is The Program***

Under its EEO program adopted in 2000, the FCC offered broadcasters and multichannel video programming distributors (MVPDs) a choice between two outreach programs, labeled Option A and Option B. The U.S. Circuit Court of Appeals for the District of Columbia Circuit subsequently ruled Option B unconstitutional. After a further round of comments, the Commission adopted what essentially was Option A as its outreach program. The new rules are effective March 10, 2003.

### ***Small Employment Unit Exemption***

The scope of the small employment unit exemption has been expanded with the adoption of "small market" criteria and recognition of owner-employees.

As before, broadcast station employment units with fewer than five full-time employees are exempt from the outreach and recordkeeping requirements. Every station must, however, file an EEO Program Report (Form 396) with its license renewal application.

Broadcast station employment units with five to ten employees and units comprised of stations in "small markets" – licensed to a community located in a county that is outside of all metropolitan areas, or located in a metropolitan area that has a population of fewer than 250,000 persons – need complete only two, rather than four, recruitment initiatives in a two-year period.

Radio station employment units with ten or fewer employees are exempt from filing a mid-term EEO report.

Owners holding a 20 percent or greater voting interest in a licensee will not be regarded as station "employees" for EEO purposes (unless a single owner has more than 50 percent voting control, in which case he or she will be the only one not regarded as an "employee").

MVPD employment units with fewer than six full-time employees are exempt from outreach and recordkeeping. All MVPDs must, however, file

*Reference Memo* is published by Garvey Schubert Barer. It contains information necessarily of a general nature that cannot be regarded as legal advice. The firm will be pleased to provide additional details and to discuss matters contained in *Reference Memo* as they may apply in specific situations.

Voice 202/965-7880

© garvey schubert barer

Fax 202/965-1729

Fifth Floor, 1000 Potomac Street, NW, Washington, DC 20007

DC\_DOCS:603838.1



**Public File and  
Reporting  
Requirements**

an EEO Program Report (Form 396-C) annually on September 30.

MVPD employment units with six to ten employees and units located in whole or in part in "small markets" – metropolitan areas with a population of fewer than 250,000 persons and areas outside of all metropolitan areas – need complete only one recruitment initiative annually, instead of the two required of larger units.

Employment units must annually document their recruitment efforts, place them in the public file, and post them on their web sites.

Television station employment units with five or more full-time employees, and radio station employment units with more than ten employees, must file the two most recent public file reports with the Commission midway through the license term, using Form 397.

The FCC will investigate every MVPD employment unit with six or more full-time employees once every five years, in connection with which, the most recent public file report must be filed with Form 396-C.

**Outreach  
Requirements**

The fundamental outreach obligation of every employment unit is to widely disseminate information concerning each full-time job vacancy.

Employment units must provide notice of openings to qualifying organizations that request such notice. Employment units must regularly engage in longer-term recruitment initiatives. The Commission provides a menu of sixteen choices from which to select such initiatives.

**Specific  
Requirements**

The FCC's new EEO program for broadcast station employment units contains six elements, which require an employment unit to:

**Outreach**

(1) Recruit for every job vacancy in its operation. A job filled by an internal promotion is not considered a vacancy for which recruitment is necessary. A station employment unit must use recruitment sources for each vacancy sufficient in its reasonable, good faith judgment to widely disseminate information concerning the vacancy. An employment unit must provide notification of each vacancy to any organization that distributes information about employment opportunities to job seekers or refers job seekers to employers, upon request by such organization. To be entitled to notice of vacancies, the requesting organization must provide the employment unit with its name, mailing address, e-mail address (if applicable), telephone number, and contact person, and identify the category or categories of vacancies of which it requests notice. (An organization may request notice of all vacancies).

**Initiatives**

(2) Engage in at least four of the following initiatives in a two-year period coinciding with the license renewal filing date, if the employment unit has more than ten full-time employees; or engage in two initiatives if it has five to ten full-time employees or is in a smaller market:

(i) participation in at least four job fairs by station personnel who have substantial responsibility in the making of hiring decisions;

(ii) hosting of at least one job fair;

(iii) co-sponsoring at least one job fair with organizations in the business and professional community whose membership includes

substantial participation of women and minorities;

(iv) participation in at least four events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities;

(v) establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment;

(vi) participation in job banks, Internet programs, and other programs designed to promote outreach generally (not primarily directed to providing notification of specific job vacancies);

(vii) participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting;

(viii) establishment of training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions;

(ix) establishment of a mentoring program for station personnel;

(x) participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting;

(xi) sponsorship of at least two events in the community designed to inform and educate members of the public as to employment opportunities in broadcasting;

(xii) listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities;

(xiii) provision of assistance to unaffiliated non-profit entities in the maintenance of web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting;

(xiv) provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination;

(xv) provision of training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions;

(xvi) participation in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.

### *Outreach Analysis*

(3) Analyze its recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of its analysis.

### *Employment Analysis*

(4) Periodically analyze measures taken to:

(i) Disseminate the station's equal employment opportunity

program to job applicants and employees;

(ii) Review seniority practices to ensure that such practices are nondiscriminatory;

(iii) Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, national origin, color, religion, or sex discrimination;

(iv) Utilize media for recruitment purposes in a manner that will contain no indication, either explicit or implicit, of a preference for one race, national origin, color, religion or sex over another;

(v) Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;

(vi) Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of race, national origin, color, religion, or sex, and include an effective nondiscrimination clause in new or renegotiated union agreements; and

(vii) Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, religion, or sex.

**Recordkeeping**

(5) Retain records to document that it has satisfied the requirements of paragraphs (1) and (2) above. Such records, which may be maintained in an electronic format, must be retained until after grant of the renewal application for the term during which the vacancy was filled or the initiative occurred. The following records must be maintained:

(i) listings of all full-time job vacancies filled by the station employment unit, identified by job title;

(ii) for each such vacancy, the recruitment sources utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Item (1), which should be separately identified), identified by name, address, contact person and telephone number;

(iii) dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing vacancies;

(iv) documentation necessary to demonstrate performance of the initiatives required by Item (2), if applicable, including sufficient information to fully disclose the nature of the initiative and the scope of the station's participation, including the station personnel involved;

(v) the total number of interviewees for each vacancy and the referral source for each interviewee; and

(vi) the date each vacancy was filled and the recruitment source that referred the hiree.

**Public File Report**

(6) Annually, on the anniversary of the date a station is due to file its renewal application, the station shall place in its public file and on its web site, if it has one, an EEO public file report containing the following information:

(i) a list of all full-time vacancies filled by the station's employment unit during the preceding year, identified by job title;

(ii) for each such vacancy, the recruitment source(s)

utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Item (1), which should be separately identified), identified by name, address, contact person and telephone number;

(iii) the recruitment source that referred the hiree for each full-time vacancy during the preceding year;

(iv) data reflecting the total number of persons interviewed for full-time vacancies during the preceding year and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and

(v) a list and brief description of initiatives undertaken pursuant to Item (2) during the preceding year.

Local recordkeeping is compiled and filed with the FCC in two stages:

(1) Broadcast EEO Program Report (Form 396). Every broadcast station, including those with fewer than five full-time employees, must file a Broadcast Equal Employment Opportunity Program Report (Form 396) with its license renewal application, covering the period of the licensee's ownership during the preceding license term. Form 396 must be placed in the station's local public file.

(2) Broadcast Mid-Term Report. On the fourth anniversary of the filing of the most recent license renewal application, all television stations, and radio stations with ten or more full-time employees, must submit Form 397, and include the public file reports for the two preceding years. The Commission excused the two groups of broadcasters who would have mid-term reports due in 2003—television stations in New Jersey and New York (February 1st) and in Delaware and Pennsylvania (April 1st). The next mid-term reports will be due from radio stations in D.C., Maryland, Virginia, and West Virginia, in June 2007.

The annual employment report form (Form 395-B) is under further study. The Commission said it expects a new form to be adopted in time to meet the September 30 annual filing deadline. The report will gather statistics only to report trends, not to evaluate any reporting entity.

### ***Brokering Situations***

If a station is subject to a time brokerage agreement, the licensee must file Forms 396 and 397 and EEO public file reports concerning only its own recruitment activity.

If a licensee is a broker of another station or stations, the licensee-broker must include its recruitment activity for the brokered station(s) in determining the bases of the Forms 396 and 397 and EEO public file reports for its own station.

If a licensee-broker owns more than one station, it must include its recruitment activity for the brokered station in the Forms 396 and 397 and EEO public file reports for its own station that is most closely affiliated with, and in the same market as, the brokered station.

If a licensee-broker does not own a station in the same market as the brokered station, then it must include its recruitment activity for the brokered station in the Forms 396 and 397 and EEO public file reports for its own station that is geographically closest to the brokered station.

***How To Get Started***

The first step toward compliance with the FCC's program for broad outreach is to identify and compile a permanent record of sources of recruitment and referrals. With respect to whether sources specifically targeted to minorities or women may or must be used, the Commission has said the EEO rule "neither requires nor precludes the use of any specific sources a broadcaster deems appropriate to achieving broad outreach." The Commission elaborated upon the licensee's good faith discretion in achieving broad outreach.

We do not require that broadcasters demonstrate that any particular segment of the community actually was aware of any vacancy. Nor do we require that recruitment be targeted to a specific segment or that broadcasters prove that they obtained a response from a particular segment.

Use of the Internet to post recruitment announcements is permissible, but a licensee may not rely solely on Internet job postings as a basis for achieving broad outreach. Regional and national recruitment sources such as state broadcasters association postings and trade press classifieds are permissible.

Second, identify those sources of recruitment that specifically request to receive information about each job opening. They must be separately "asterisked" in recordkeeping.

Third, review the FCC's menu of recruitment initiatives and select one or two, as appropriate, in which to participate in the coming year. With an eye toward your filing date for the EEO public file report, plan ahead to achieve compliance with the requirement to engage in two or four initiatives, as appropriate, in a two-year period. The filing date is the anniversary of the deadline for filing the station's license renewal application, which is four months prior to the expiration date of the license.

Fourth, mark your calendar for placement of the annual EEO public file report in the local public file (and posting on your web site), on the aforementioned filing date.

Fifth, set up the necessary recordkeeping files:

For the local public file, you will need:

1. Summary of recruitment initiatives.
2. List of positions filled, by date of hire, job title, and recruitment source for hiree.
3. Recruiting sources used for each job search, by name of source, address, contact person, telephone, and indication whether the source requested notification of all openings.
4. Interviewee referral source summary, by recruitment sources used in the preceding year and number of persons interviewed who were referred by each source.

In order to compile the interviewee referral source summary, you will need to maintain an interview list for each opening, identifying the job title for the interviews and the referral source of each interviewee. The interview list, however, is not required to be made publicly available, and should not be placed in the local public file.

***Conclusion***

Finally, implement: be geared up to put recruitment outreach into action when an opening occurs, and follow up with the records of activity necessary to demonstrate broad outreach.

The FCC is committed to an active role in fostering diversity on the airwaves. The new, revised EEO program reflects an aggressive effort to further that objective, while maintaining consistency with limitations on the exercise of governmental power imposed by the federal courts.

Although the Commission acknowledges that the question whether broad outreach is achieved in any case is a subjective one, it is fair to assume that enforcement activity, including substantial fines, will focus on recordkeeping violations.

**Contact Garvey Schubert Barer with any questions or for assistance in implementing your outreach program.**

Supplemental Outreach #2

03/13/2014

EEO Analysis-Executive Committee

**Self-Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

Employee Census

2013

Last Name	Sex
Bizstray	Female
Blalock	Male <i>Mgmt DH</i>
Boettcher	Male
Brown	Male
Capps	Female <i>DH</i>
Cheung	Male
Colley	Male <i>Mgmt PH</i>
Colley	Male
Davis	Male
Davis	Male
Davis	Female <i>Mgmt DH</i>
Ellis	Male
Etheridge	Female
Gallo	Female <i>Mgmt DH</i>
Gurley	Male
Hines	Male <i>Mgmt DH</i>
Holdman	Male
Horton	Male
Mann	Female <i>Mgmt PH</i>
Moseley	Female
Nichols	Male <i>Mgmt DH</i>
Osawa	Male
Pyle	Male
Radziwon	Male
Samac	Male
Schlachter	Male
Shook	Female <i>DH</i>
Singletary	Female <i>Mgmt DH</i>
Solomon	Male
Sosa	Male
Voorhees	Female <i>PH</i>
Walsh	Male <i>DH</i>
Watson	Male
Weber	Male
White	Male
Works	Female <i>DH</i>

Total Employees  
 11 F  
 25 M  
 36

8 Exec, Comm.  
 4 F  
 4 M

Dpt. Head  
 13 total  
 8 F  
 7 M

Supplemental Outreach #3

06/13/14

EEO Analysis-Executive Committee

**Pay Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

Supplemental Outreach #4

09/12/14

EEO Analysis-Executive Committee

**Self-Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

**Beach TV Cable Company, Inc.**  
**Employee Census**  
**2014**

Last Name                      Sex

Blalock	Male	Exec Comm, DH
Boettcher	Male	
Brown	Male	
Capps	Female	DH
Colley	Male	Exec. Comm
Colley	Male	
Davis	Male	
Davis	Male	
Davis	Female	Exec. Comm
Ellis	Male	
Hines	Male	Exec Comm
Holdman	Male	
Horton	Male	
Mann	Female	Exec Comm DH
Moseley	Female	
Nichols	Male	Exec
Osawa	Male	
Radziwon	Male	
Samac	Male	
Shook	Female	DH
Singletonary	Female	Exec. DH
Solomon	Male	
Sosa	Male	
Walsh	Male	
Watson	Male	DH
White	Male	
Williams	Female	
Works	Female	DH

Total  
8 F  
20 M

28 total

13 minority  
15 non-minority

47%  
minority

Exec. Comm  
7 total  
4 M  
3 F

DH  
11 total  
6 F  
5 M

# Exhibit 9

Supplemental Outreach #1

12/10/14

EEO Analysis-Executive Committee

**Pay Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

---

Supplemental Outreach #2

03/11/15

EEO Analysis-Executive Committee

**Self-Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

**Beach TV Cable Company, Inc.**  
**Employee Census**  
**2014**

Last Name	Sex
Blalock	Male EXEC
Boettcher	Male
Brown	Male
✓ Capps	Female DH
Colley	Male EXEC
Colley	Male DH
Davis	Male DH
Davis	Male
✓ Davis	Female EXEC
Ellis	Male
✓ Hines	Male EXEC
Holdman	Male
Horton	Male
✓ Mann	Female EXEC
✓ Moseley	Female
Nichols	Male EXEC
✓ Osawa	Male
Radziwon	Male DH
Samac	Male
✓ Shook	Female DH
✓ Singletary	Female EXEC
Solomon	Male
✓ Sosa	Male
Walsh	Male
✓ Watson	Male DH
White	Male
✓ Williams	Female
✓ Works	Female DH

14 EXEC & DH  
 6 are F  
 8 are M

12 are considered minority  
 28 total  
 43% minority

Supplemental Outreach #3

09/09/15

EEO Analysis-Executive Committee

**Pay Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

Supplemental Outreach #4

09/9/15

EEO Analysis-Executive Committee

**Self-Analysis**

Founder/CEO

President

Vice-President

VP of IT

General Sales Manager

Dir. of New Media

Dir. of Accounting/HR Dir.

**Beach TV Cable Company, Inc.**  
**Employee Census**  
**2015**

<u>Last Name</u>	<u>Sex</u>
Andrews	Male
Blalock	Male EXEC
Boettcher	Male
Brown	Male
- Capps	Female DH
Colley	Male DH
Colley	Male EXEC
- Cranney	Female DH
Davis	Male DH
Davis	Male
- Davis	Female EXEC
Ellis	Male
- Hines	Male EXEC
Horton	Male
Moseley	Female
Nichols	Male EXEC
- Osawa	Male DH
Radziwon	Male DH
Samac	Male
- Shook	Female DH
- Singletary	Female EXEC
Solomon	Male
- Sosa	Male DH
Walsh	Male DH
- Watson	Male DH
White	Male
Williams	Female

6 EXEC Comm  
 2 Female  
 1/3

27 total

16 dept head/Exec comm.

9 minority

57% minority dept heads/Exec.

10 minority / 27 total = 37% minority

57% managers

# Exhibit 10

**Janet Singletary**

---

**From:** Destination Network <messenger@webex.com>  
**Sent:** Thursday, August 06, 2015 11:05 AM  
**To:** janet.singletary@tripsmarter.com  
**Subject:** WebEx meeting changed: FCC Compliance Meeting  
**Attachments:** WebEx\_Meeting.ics

*W/Melodie Virtue  
Garry Schubert*

Hi, Janet Singletary,

Destination Network changed the WebEx meeting information.

**FCC Compliance Meeting**

Thursday, August 6, 2015

3:00 pm | Eastern Daylight Time (New York, GMT-04:00) | 2 hrs

**Join WebEx meeting**

Meeting number: 735 269 073

**Join by phone**

**1-650-479-3208** Call-in toll number (US/Canada)

Access code: 735 269 073

Add this meeting to your calendar.

Can't join the meeting? Contact support.

IMPORTANT NOTICE: Please note that this WebEx service allows audio and other information sent during the session to be recorded, which may be discoverable in a legal matter. By joining

*web ex meeting  
w/ Melodie Virtue  
8/6/15  
All exec comm.  
All mgmt team  
on web meeting  
training session*

# Exhibit 11

1-800-4-OSHA  
WWW.OSHA-DC.GOV

### OSHA

Occupational Safety and Health  
U.S. Department of Labor

### NOTICE

EMPLOYEE POLYGRAPH PROTECTION ACT

### FLORIDA

NO SMOKING

To Smoker Please Contact  
Labor Law Compliance Center  
1775 Red Oak St. Suite 113  
Maitland, FL 32751  
www.laborlaw.com  
800-801-4397

## Job Safety and Health It's the law!

**OSHA**  
Occupational Safety and Health  
U.S. Department of Labor

- You have the right to a safe and healthy work environment.
- You have the right to receive information and training about workplace safety and health hazards.
- You have the right to file a complaint with OSHA without fear of retaliation.
- You have the right to participate in OSHA activities, such as safety and health committees.
- You have the right to file a complaint with OSHA if you believe your employer is not following OSHA rules.
- You have the right to file a complaint with OSHA if you believe your employer is not following OSHA rules.
- You have the right to file a complaint with OSHA if you believe your employer is not following OSHA rules.

## THE LAW

OSHA

## THE LAW

OSHA

## FLORIDA

NO SMOKING

To Smoker Please Contact  
Labor Law Compliance Center  
1775 Red Oak St. Suite 113  
Maitland, FL 32751  
www.laborlaw.com  
800-801-4397

FLORIDA LAW  
DISCRIMINATION

## Workers' Comp Works For You

If you are injured on the job:

1. Notify your employer immediately to get the name of an approved physician. Workers' comp insurance may not pay the medical bills if you don't report your injury promptly to your employer.
2. Notify the doctor and medical staff that you were injured on the job so that bills may be properly filed.
3. If you have any problems with your claim or suffer excessive delays in treatment, contact the State of Florida's Division of Workers Compensation at 1-800-342-1741.

**\$25,000 Reward**

1-800-342-1741

## Workers' Comp Works

If you are injured on the job:

1. Notify your employer immediately to get the name of an approved physician. Workers' comp insurance may not pay the medical bills if you don't report your injury promptly to your employer.
2. Notify the doctor and medical staff that you were injured on the job so that bills may be properly filed.
3. If you have any problems with your claim or suffer excessive delays in treatment, contact the State of Florida's Division of Workers Compensation at 1-800-342-1741.

**\$25,000 Reward**

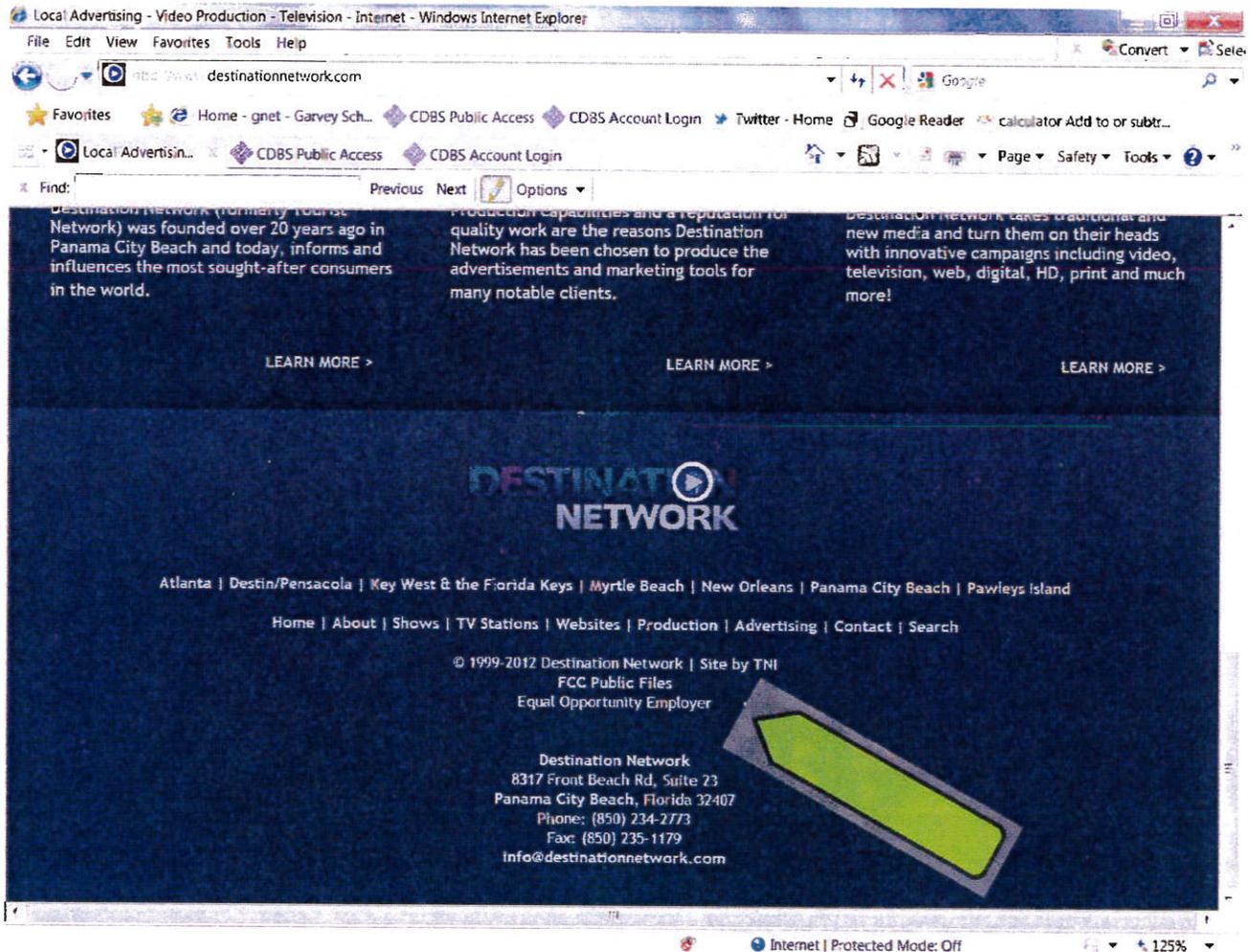
1-800-342-1741

The bulletin board is a large rectangular display mounted on a wall, containing several informational posters and notices. The posters are arranged in a grid-like fashion. Key elements include:

- Top Left:** A poster titled "EMPLOYEE RIGHTS" with a logo that includes the letters "EEO".
- Top Center:** A poster with the heading "Job Safety and Health It's the law!" and the OSHA logo.
- Top Right:** A poster titled "Workers' Compensation Act".
- Middle Left:** A large poster with the heading "Job Safety and Health It's the law!" and the OSHA logo, featuring several small images of workers in safety gear.
- Middle Center:** A poster titled "NOTICE" with the heading "THE LAW" below it.
- Middle Right:** A poster with a "NO SMOKING" sign, which consists of a circle with a diagonal slash over a cigarette.
- Bottom Center:** A poster titled "To Employees".
- Bottom Right:** A poster with a heading that is partially obscured but appears to be "OSHA".

The posters contain various text, including legal notices, safety instructions, and company policies. The overall theme is workplace safety and legal compliance.

# Exhibit 12



# Exhibit 13

## **I. OPERATING**

### **I. 1. EQUAL EMPLOYMENT OPPORTUNITY**

The Company is an equal opportunity employer and is committed to equal opportunity without regard to race, religion, color, sex, age, national origin, citizenship, disability or any other basis of discrimination prohibited by applicable local, state or federal law.

In addition to compliance with federal EEO statutes, the Company complies with applicable state and local laws governing nondiscrimination. This policy applies to all terms and conditions of employment, including but not limited to the following:

- Recruitment, hiring, placement, transfer, promotion, and demotion;
- Training, development, and educational assistance;
- Compensation and benefits;
- Educational, social, and recreational programs;
- Discipline;
- Termination of employment.

Employment decisions, subject to the legitimate business requirements of the Company, are based solely on the individual's qualifications, merit, behavior and performance.

### **I. 2. NONDISCRIMINATION/ANTI-HARASSMENT**

The Company is committed to maintaining a work environment free of intimidation and discriminatory practices or procedures. Accordingly, The Company considers it improper and against policy for any employee, regardless of employment status, to harass another employee. Harassment is conduct focused on a person or group of persons including, but not limited to, physical or verbal abuse, unwelcome activity of a sexual nature, retaliation, as well as any behavior or action which interferes with an individual's ability to perform assignments or which creates a hostile or intimidating work environment.

The following, though not all-inclusive, is a list of various types of harassment.

1. Verbal Abuse - any language that degrades or berates others, including, but not limited to, racial, religious, or sexual comments, jokes, sexual innuendoes, or threats of any kind.
2. Physical Abuse - includes touching, hitting, slamming, throwing, kicking or threatening another person, including restraining by force or blocking the path of another.
3. Interference or Hostile Environment - any behavior or action which interferes with an employee's ability to perform work assignments or which results in or creates a hostile or intimidating work environment.
4. Sexual Harassment Policy. Harassment on the basis of sex is a form of discrimination and is a violation of Section 703 of Title VII of the 1964 Civil Rights Act. The Equal Employment