

CHRISTIAN TELEVISION NETWORK, INC.
PO Box 6922
Clearwater, FL 33758

Via Upload to WHTN Online Public Inspection File, EEO Audits, Investigations, and Complaints subfolder (found at EEO Records>>Additional Documents>> EEO Audits, Investigations, and Complaints)

Elizabeth E. Goldin, Assistant Chief
Investigations & Hearings Division
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WHTN, Murfreesboro, TN
Fac. Id. 11117
Licensee: CHRISTIAN TELEVISION NETWORK, INC.
FRN: 0005936414

Response to March 22, 2024 - EEO Audit Public Notice

Dear Ms. Goldin:

In satisfaction of the FCC Enforcement Bureau EEO audit public notice released March 22, 2024, Christian Television Network, Inc. (“CTNI”) hereby uploads this response to the Online Public Inspection File (“OPIF”) for station WHTN, Murfreesboro, TN, Fac. Id. 11117. This response will follow the outline in the audit request which begins with the number 2.

2. Audit Data Requested.

2(b)(i). WHTN is the only station in the station employment unit (“SEU”). The SEU employs five or more full-time employees. Therefore, copies of the SEU’s two most recent EEO Public File Reports described in 47 CFR § 73.2080(c)(6) are attached hereto as Exhibit A.¹ WHTN is a religious broadcaster as described in 47 CFR § 73.2080(a) and will limit the remainder of its response accordingly.

2(b)(ii). The licensee maintains a website for the SEU as follows:

Call Sign	Website address	Latest EEO PF Report online
WHTN	https://www.ctntv.org	Yes

2(b)(iii)-(iv). The SEU filled two full-time positions during the during the period covered by the EEO Public File Reports attached pursuant to 2(b)(i) above, as follows:

¹ There were no full-time vacancies for the period covered by the 2022-23 EEO public file report; the incomplete reference thereon to a 2/14/23 vacancy was a formatting error.

<i>Position Filled</i>	<i>Date(s) Filled</i>	<i>Source</i>	<i># of Interviewee(s)</i>	<i>Hiree(s)</i>
Master Control	Feb 2022	Lebanon Democrat Voice of Victory WHTN Website Indeed	3	1
Office Assistant	Feb 2022	Lebanon Democrat Voice of Victory WHTN Website Indeed	1 3	1

The 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) are not required to be attached due to the religious broadcaster exemption applicable to WHTN pursuant to 2(b)(x) of the Audit Public Notice and 47 CFR § 73.2080.

2(b)(v). Pursuant to 2(b)(x) of the Public Notice, recruitment initiatives are not required of WHTN, a religious broadcaster with full time employees subject to a religious qualification.

2(b)(vi). Licensee has had no complaints, pending or resolved, involving the SEU filed during the SEU's current license term(s) before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or gender.

2(b)(vii). In accordance with section 73.2080(b), during WHTN's current license term, the following describes the responsibilities of each level of SEU management responsible for implementing SEU EEO policies and how the SEU has informed employees and job applicants of its EEO policies and program: WHTN management meticulously reviews each job posting to ensure that the knowledge, skills and abilities outlined in the job description are based on merit and ability alone so that all applicants, regardless of race, gender, color, age, disability or national origin can be confident in applying. Once employed, and for current employees, the on-boarding process includes review of the Employee Manual which in Section 1, page 5, has an entire portion dedicated to Equal Employment Opportunity. Included in this section is a reminder to all staff, including managers, that "Violation of this policy may result in disciplinary action, up to and including possible termination."

2(b)(viii). In accordance with section 73.2080(c)(3), during WHTN's current license term, the following is a description of the SEU'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: At least annually, the hiring manager reviews the various outreach sources used to widely disseminate full time vacancies and evaluates whether those sources are producing candidates that meet the SEU's employment needs and position qualifications. As a religious broadcaster whose full-time vacancies include religious belief or affiliation as a requirement, the hiring manager also analyzes current and potentially new outreach sources likely to provide candidates with all qualifications.

Efforts include ongoing evaluation of ways to broaden the reach and scope of SEU recruitment for current and future positions, particularly through local colleges/universities where positions are posted and also boosting the area/scope of online job postings for open positions. These processes are designed to address any problems that may arise.

2(b)(ix). As required by section 73.2080(c)(4), during the SEU's current license term(s) (or since acquisition of the Unit (if during that period)), the following is a description of 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: The SEU is evaluated by the manager annually as well as at any time there is a job opening or transition of employment. The manager also plans several community events throughout the year to stay in touch with the community and ensure that the SEU considers the diversity of the community and how to do a better job of recruiting and hiring when future opportunities become available. The Unit has no union agreements.

2(b)(x). WHTN is a religious broadcaster with five or more full-time employees, all subject to a religious qualification as described in section 73.2080(a) of the rules. Therefore, the SEU is not required to produce records for such hires or complete the initiatives required under section 73.2080(c)(2).

3. Time Brokerage—Licensee of brokered station(s) receives audit letter. Not applicable.

4. Time Brokerage—Broker receives audit letter. Not applicable.

5. Procedures

The station representative contact is Monica Schmelter. She may be reached at the following email address: monicas@ctnonline.com.

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

Christian Television Network, Inc.:



Signed:

Name: Yolanda Morris

Authorized Officer Title: President

cc: Joseph C. Chautin, III, Esq.

Exhibit A
Most Recent Two EEO Annual Reports

EEO PUBLIC FILE REPORT

Dates: 4/1/21 - 3/31/22

Station Employment Unit					
Call Sign	Fac. Id.	Community of License	Call Sign	Fac. Id	Community of License
WHTN	11117	Murfreesboro, TN			

Recruitment Sources			
Source	Contact	Address	Phone
Lebanon Democrat	Melanie	402 N. Cumberland Rd. Lebanon, TN 37087	615 444-3052
Voice of Victory	Chuck Groover	1777 Tate Lane, Mount Juliet, TN 37122	615 773-5200
WHTN Website	Monica Schmelter	9582 Lebanon Road, Mount Juliet, TN 37122	615 754-0030
Indeed	Online Entry	6433 Champion Grandview Way Bldg. 1, Austin, TX 78750	512 459-5300

Vacancies Filled During Period				
Master Control	Date Filled Feb 2022	Source	Interviewee(s)	Hiree
		Lebanon Democrat	0	
		Voice of Victory	0	
		WHTN Website	0	
		Indeed	3	1
		Total	3	
Office Assistant	Date Filled Feb 2022	Source	Interviewee(s)	Hiree
		Lebanon Democrat	0	
		Voice of Victory	1	
		WHTN Website	0	
		Indeed	3	1
		Total	4	

EEO PUBLIC FILE REPORT
Dates: 04/01/22 – 03/31/23

Station Employment Unit					
Call Sign	Fac. Id.	Community of License	Call Sign	Fac. Id	Community of License
WHTN	11117	Murfreesboro	WHTN		

Recruitment Sources			
			Phone
1/15/2023	Indeed	indeed.com	N/A
1/15/2023	WHTN	ctntv.org	615 754 0039
1/15/2023	First Baptist Church	Job Board	615 754 2525
1/20/2023	Lipscomb University	Job Board	615 966 -1000

Vacancies Filled During Period					
Position Filled During the period of 04/01/22 to 03/31/23 no full- time positions were filled.	Date Filled	Source	Interviewee(s)	Hiree	
	2/14/2023				
		Indeed	4	1	
			Total:	1	