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March 19, 2020

Submitted via Online Public Inspection File

EEO Staff
Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

NOTE: No Filing Fee Required

Re: Response to EEO Audit Letter
Station WILL(AM), Urbana, IL (Facility ID 68941)

Dear EEO Staff:

On behalf of The Board of Trustees of the University of Illinois, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational radio station WILL(AM), Urbana, Illinois.

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

Very truly yours,



Barry S. Persh
bpersh@graymillerpersh.com
Counsel for The Board of Trustees
of the University of Illinois

Enclosure

UNIVERSITY OF ILLINOIS
AT URBANA-CHAMPAIGN

Illinois Public Media
WILL Radio TV Online
Campbell Hall for Public Telecommunication
300 North Goodwin Avenue
Urbana, IL 61801-2316



March 18, 2020

EEO Staff, Policy Division
Media Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: **Response to EEO Audit Letter**
Board of Trustees of the University of Illinois
Station WILL(AM), Urbana, IL (Facility ID 68941)

EEO Staff:

The Board of Trustees of the University of Illinois ("University of Illinois" or "Illinois Public Media") hereby responds to an FCC audit letter dated February 6, 2020 requesting information concerning the EEO program of noncommercial educational radio station WILL(AM), Urbana, Illinois. The WILL(AM) employment unit (the "Unit"), which also includes co-owned noncommercial educational stations WILL-FM, Urbana, Illinois (Facility ID 68940) and WILL-TV, Urbana, Illinois (Facility ID 68939), employs more than five full-time employees, and Illinois Public Media therefore provides the following information in response to the audit request.

Item # 3(a). Illinois Public Media encloses copies of the Unit's annual EEO public file reports for the periods covering (i) August 1, 2018 to July 31, 2019, and (ii) August 1, 2017 to July 31, 2018 as Attachment 1.

The WILL station web site is available at: <https://will.illinois.edu/>. The annual EEO public file report is posted at: <https://will.illinois.edu/about/eeoreports>.

The dates of the full-time hires for the periods covered by the 2018-2019 and 2017-2018 EEO reports are as follows:

Job Title	Date of Hire
Creative Specialist/Video Production Manager	9/16/2018
Senior Multimedia Producer	10/1/2018
Senior Web Development	1/16/2019
Director of Broadcast Operations	4/2/2019
Broadcast Engineer	5/8/2019
Business and Finance Coordinator	6/3/2019
Multimedia Producer	6/3/2019

News Reporter	9/27/2017
Assistant Chief Broadcasting Engineer	10/30/2017
Assistant Corporate Support Director	10/30/2017
Business Finance Coordinator	11/27/2017
Education Reporter	12/4/2017
Visiting Senior Engagement Strategist	1/16/2018
Producer Director	1/22/2018
Visiting Digital News Producer	5/23/2018
Art Director	6/16/2018
Senior Producer Director	7/2/2018

Item # 3(b). Illinois Public Media encloses, at Attachment 2, documentation of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions noted above from the 2018-2019 and 2017-2018 annual reporting periods. No organizations notified Illinois Public Media that they want to be notified of openings.

Item # 3(c). The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2018-2019 and 2017-2018 reports are as follows:

Job Title	Referral Source	# of interviewees
Creative Specialist/Video Production Manager	AbilityLinks.org	0
	ACJOB Listserv for University of Illinois	1
	News Gazette	1
	College of Media	0
	HigherEdJobs.com	0
	WILL/Illinois Public Media internal job posting	1
	Word of mouth	0
	TOTAL	3
Senior Multimedia Producer	ACJOB Listserv for University of Illinois	0
	Current Newspaper and current.org	1
	CPB Job Line	1
	NAAJ (National Association of Asian Journalist)	0
	NABJ (National Association of Black Journalists)	0
	NAHJ (National Association of Hispanic Journalists)	0
	HigherEdJobs.com	0
	WILL/Illinois Public Media internal job posting	0
	AbilityLinks.org	0
	College of Media Website	0
	WILL/Illinois Public Media website jobs page	0
	Word of mouth	1
	TOTAL	3

Senior Web Development	Women Who Code	0
	Media Bistro	0
	Employ Diversity	0
	Investigate Reports & Editors (IRE) Job Board	0
	AbilityLinks.org	0
	ACJOB Listserv for University of Illinois	2
	College of Media Website	0
	CPB Job line	0
	Current Newspaper and current.org	0
	HigherEdJobs.com	0
	News Gazette	1
	WILL/Illinois Public Media website jobs page	0
	Word of mouth	0
	TOTAL	3
Director of Broadcast Operations	ACJOB Listserv for University of Illinois	0
	WILL/Illinois Public Media internal job listing	1
	Indeed.com	2
	WILL Web Page	0
	Word of mouth	0
	TOTAL	3
Broadcast Engineer	AbilityLinks.org	0
	ACJOB Listserv for University of Illinois	0
	Current Newspaper and current.org	1
	HigherEdJobs.com	1
	Society of Broadcast Engineers	0
	WILL/Illinois Public Media website jobs page	0
	Word of mouth	1
	News Gazette	0
	College of Media Website	0
	TOTAL	3
Business and Finance Coordinator	AbilityLinks.org	0
	ACJOB Listserv for University of Illinois	3
	HigherEdJobs.com	0
	WILL/Illinois Public Media website jobs page	0
	Business Manager Group email	0
	Word of mouth	0
	TOTAL	4
Multimedia Producer	AbilityLinks.org	0
	ACJOB Listserv for University of Illinois	1
	CPB Job line	0
	Current Newspaper and current.org	1
	HigherEdJobs.com	0
	NAAJ (National Association of Asian Journalist)	0
	NABJ (National Association of Black Journalists)	0
	NAHJ (National Association of Hispanic Journalists)	0
	WILL/Illinois Public Media website jobs page	1

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	Word of mouth TOTAL	0 3
News Reporter	AbilityLinks.org ACJOB Listserv for University of Illinois CPB Job line Current Newspaper HigherEdJobs.com University of Illinois HR Job Board WILL/Illinois Public Media internal job posting WILL/Illinois Public Media website jobs page Word of mouth TOTAL	0 0 1 1 0 1 0 0 1 4
Assistant Chief Broadcasting Engineer	News Gazette University of Illinois HR Job Board Current Society of Broadcast Engineers Corporate Public Broadcasting (CPB) WILL/Illinois Public Media internal job posting WILL/IPM Staff Referral WILL/Illinois Public Media website jobs page Word of mouth TOTAL	0 1 0 0 0 1 0 0 1 3
Assistant Corporate Support Director	AbilityLinks.org ACJOB Listserv for University of Illinois Harold and Review Springfield State Journal HigherEdJobs.com News Gazette WILL/Illinois Public Media website jobs page WILL Internal email Word of mouth TOTAL	0 1 0 0 0 1 0 0 0 2
Business Finance Coordinator	AbilityLinks.org ACJOB Listserv for University of Illinois HigherEdJobs.com News Gazette WILL Web page WILL Internal Word of mouth TOTAL	0 2 0 0 0 0 2 2
Education Reporter	AbilityLinks.org ACJOB Listserv for University of Illinois CPB Job line Current Newspaper and current.org	0 0 1 1

	HigherEdJobs.com NAAJ (National Association of Asian Journalist) NABJ (National Association of Black Journalists) NAHJ (National Association of Hispanic Journalists) WILL/Illinois Public Media website jobs page Word of mouth TOTAL	0 0 0 0 0 1 3
Visiting Senior Engagement Strategist	AbilityLinks.org ACJOB Listserv for University of Illinois CPB Job line Current Newspaper and current.org HigherEdJobs.com NAAJ (National Association of Asian Journalist) NABJ (National Association of Black Journalists) NAHJ (National Association of Hispanic Journalists) PBS University of Illinois HR Job Board WILL/Illinois Public Media website jobs page Word of mouth TOTAL	0 0 1 0 1 0 0 0 0 0 0 1 3
Producer Director	AbilityLinks.org ACJOB Listserv for University of Illinois CPB Job line Current Newspaper and current.org HigherEdJobs.com JournalismNext.com NAAJ (National Association of Asian Journalist) NABJ (National Association of Black Journalists) NAHJ (National Association of Hispanic Journalists) PBS WILL/Illinois Public Media website jobs page Word of mouth TOTAL	0 1 2 1 0 0 0 0 0 1 0 0 5
Visiting Digital News Producer	AbilityLinks.org ACJOB Listserv for University of Illinois CPB Job line Current Newspaper and current.org HigherEdJobs.com NAAJ (National Association of Asian Journalist) NABJ (National Association of Black Journalists) NAHJ (National Association of Hispanic Journalists) News Gazette WILL/Illinois Public Media website jobs page Word of mouth TOTAL	0 0 0 1 0 0 0 0 0 0 2 3
Art Director	AbilityLinks.org	0

	ACJOB Listserv for University of Illinois	0
	College of Media Website	0
	Indeed	0
	HigherEdJobs.com	0
	News Gazette	1
	WILL/Illinois Public Media website jobs page	1
	WILL Internal email	1
	Word of mouth	3
	TOTAL	
Senior Producer Director	AbilityLinks.org	0
	ACJOB Listserv for University of Illinois	1
	College of Media Website	0
	CPB Job line	0
	Current Newspaper and current.org	0
	HigherEdJobs.com	0
	NAAJ (National Association of Asian Journalist)	0
	NABJ (National Association of Black Journalists)	0
	NAHJ (National Association of Hispanic Journalists)	0
	WILL/Illinois Public Media website jobs page	0
	Word of mouth	1
	TOTAL	2

Note: in connection with completing this audit response, Illinois Public Media has corrected some source listings as reflected by the above chart.

Item # 3(d). Illinois Public Media encloses documentation of recruitment initiatives performed during the periods covered by the 2018-2019 and 2017-2018 public file reports as Attachment 3. The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the WILL Unit is 36. The market for the WILL Unit has a population of fewer than 250,000. Based on these factors, Illinois Public Media is required to perform two initiatives during each two-year period.

During the periods covered by the 2018-2019 and 2017-2018 reports, Illinois Public Media completed the following initiatives, involving station personnel as indicated:

Participation in events relating to career opportunities sponsored by educational institutions.

- On Sunday August 26, 2018, WILL participated in the University of Illinois Quad Day. WILL HR Manager Annetta Allison was IPMs representative.
- On Saturday April 6, 2019, WILL participated in the University of Illinois College of Media annual Mediapalooza. Danda Beard, Director of Development, represented the station.
- On Friday March 8-9, 2018, WILL participated in the University of Illinois College of Media annual Mediapalooza. Kristin Walters, Visiting Senior Engagement Strategist and Steve Morck, Digital Media Associate Producer represented the station.

- On Thursday March 22, 2018, WILL participated in the Eastern Illinois University Broadcast Job Fair. EIU alum and WILL Digital Media Associate Producer, Steve Morck represented the station.
- On Sunday August 27, 2017, WILL participated in the University of Illinois Quad Day. WILL HR Manager Annetta Allison represented the station.

Station personnel involved: WILL HR Manager Annetta Allison; Danda Beard, Director of Development; Kristin Walters, Visiting Senior Engagement Strategist; Steve Morck, Digital Media Associate Producer.

Participation in other activities designed by the station to develop employment opportunities in broadcasting.

- On an on-going basis, the WILL Stations work with teachers at University Laboratory High School in Urbana, Illinois to develop an oral history curriculum to train students in the basics of audio production and journalism. Each year, the students produce a documentary that is broadcast on WILL Radio and WILL online.

Station personnel involved: WILL HR Manager Annetta Allison; Danda Beard, Director of Development; Kristin Walters, Visiting Senior Engagement Strategist; Steve Morck, Digital Media Associate Producer.

Training opportunities for station personnel

- Station WILL-TV hires minority trainees, with little or no experience in television production, and teaches them the rudiments of camera operation and studio production. The young people involved in this program have the opportunity to develop skills that can qualify them for higher level, full-time positions in broadcasting.
- Illinois Public Media hires work-study students from the University of Illinois annually and train to handle customer service and provide staff support for various departments at the stations. Through this work, students learn a great deal about different aspects of the broadcasting operation, including radio and television programming, development/fundraising activities, marketing, production, and an overview of the technical areas covered by broadcast engineering and operations. Students are encouraged to participate in station activities and to learn about careers through direct interaction with various broadcast professionals.

Station personnel involved: Kimberlie Kranich, Director of Engagement & Education Outreach, Elisabeth Bralts, Director of Content & Strategic Communications, Scott Cameron, Director for News and Public Affairs

Internship opportunities designed to develop skills needed for broadcast employment.

- WILL/IPM have several ongoing internships, including: The Bob Endres Internship in News and Public Affairs in collaboration with the College of Media, IPM hired one undergraduate student hired for Fall 2018 semester; The Dave Benton Internship in News and Public Affairs, IPM hired two summer 2019 student interns, one undergraduate of UIUC and another undergraduate from Pomona College, Claremont, CA; The Donald P. Mullally Internship, and the Media Research Internship, IPM hired two students, one undergraduate student from UIUC for fall semester 2018 and one undergraduate from UIUC for spring semester 2019. WILL/IPM Community Content and Engagement hired

one U of I undergraduate intern as Educational Outreach Assistants to learn and assist with educational outreach programs, for both fall 2018 and spring 2019 semesters.

Station personnel involved: Duane Roach, Creative Specialist/Video Production Manager, Niala Boodhoo, Executive Producer, Kimberlie Kranich, Director of Engagement & Education Outreach, Elizabeth Weathers, Administrative Aide

Item # 3(e). There have been no complaints alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex filed during the current license term before any body having competent jurisdiction under applicable law.

Item # 3(f). Responsibilities of each level of management to implement the Unit's EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

Illinois Public Media management level personnel with responsibility for implementing the Unit's EEO policies include Maurice Bresnahan, CEO, and Annetta Allison, HR Coordinator. They implement EEO recruitment practices by following the guidelines set forth by the licensee University of Illinois Office of Access and Equity Search Guidelines and Procedures (<https://oae.illinois.edu/academicsearch.html>) with respect to vacancy recruitments.

Illinois Public Media's CEO and HR Coordinator also lead the Unit's efforts to abide by the organization's Statement of Commitment to Diversity, whereby Illinois Public Media states its commitment to fostering a culture of diversity and inclusion to maintain a fair, unbiased work environment, and to enhance our ability to effectively serve the public as a media organization. Illinois Public Media's Diversity Goals include efforts to:

- recruit and retain a diverse workforce that is representative of our service area.
- provide equal opportunity in employment.
- educate our management and staff annually in best practices for maintaining an inclusive and diverse environment for all persons.
- seek candidates for IPM's Community Advisory Committee that represent the geographically and demographically diverse composition of the many communities we serve.
- assist in developing a more diverse future workforce with professional skills in the broadcasting/media industry by recruiting diverse candidates for Illinois Public Media internship and work-study student opportunities and/or by participating in minority or other diversity job fairs.

In addition, the Illinois Public Media Diversity Policy Practices and Initiatives include:

- Illinois Public Media will review with the University licensee official those practices that are designed to fulfill our commitment to diversity and to meet the applicable FCC guidelines.

- Illinois Public Media is committed to diversity and equal employment opportunity in every aspect of personnel policy and practice including: recruitment, selection, placement, training and advancement of employees.
- Recruitment for all full-time and permanent part-time employment opportunities at Illinois Public Media takes place through an open and fair process following the guidelines of the University of Illinois Office of Equal Opportunity and Access and University Staff Human Resources.
- Job postings are submitted to professional minority organizations and special efforts are made by management and search committee members to recruit minority candidates by email and the internet.
- Seminars or workshops will be provided annually to Illinois Public Media managers and other appropriate staff on ways to create a more diverse workforce and to maintain a culture of respect and non-discrimination.
- A Diversity Report will be completed annually, and the Community Advisory Committee shall review its policies annually.

The Illinois Public Media stations are licensed to the University of Illinois, and the University's nondiscrimination statement, ethics policies, and equal opportunity information reflect state and federal law as well as the University's and Board's commitments to equal opportunity, affirmative action and diversity.

Illinois Public Media also includes the following language in its job postings:

Illinois is an equal opportunity employer and all qualified applicants will receive consideration for employment without regard to race, religion, color, national origin, sex, sexual orientation, gender identity, age, status as a protected veteran, status as a qualified individual with a disability, or criminal conviction history. Illinois welcomes individuals with diverse backgrounds, experiences, and ideas who embrace and value diversity and inclusivity. (www.inclusiveillinois.illinois.edu).

Item # 3(g). Efforts to analyze the Unit's EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

After each position search closes, the HR Coordinator, Annetta Allison, meets with each hiring manager to discuss which sources generated applicants based on a report received by our Office of Equity and Access and to determine the percentage of minority candidates who applied. We also have a trained Diversity Advocate that serves on each committee to help identify ways to reach a broader base of diverse candidates. We extend searches regularly when we do not believe we have successfully reached a broadly diverse pool of candidates, therefore committing to our efforts to widely disseminate vacancy information to potential candidates. We also analyze sources and add or remove those that are not working for a particular search, as all are different depending on the position. After the HR Coordinator meets with the hiring manager, she discusses these changes with the CEO, Maurice Bresnahan, and they together decide whether to implement additional changes.

Item # 3(h). Efforts to periodically analyze 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 WILL stations are licensed to the University of Illinois, a public educational institution, and its employment practices are therefore governed by the State University Civil Service System guidelines and follow the Provost Communications guidelines and procedures, as outlined at: <https://humanresources.illinois.edu/hr-professionals/current-employees/position-classification-changes/index.html>. These guidelines set forth procedures for performance reviews of civil service employees as a continuing, ongoing activity between employees and their supervisors to encourage communication about job expectations and to provide the opportunity for supervisors to give important feedback relative to meeting performance standards. They may also provide a basis for determining job training or development needs for employees and for supporting the process of determining merit salary increases.

Illinois Public Media's own EEO Policy Statement is available at <http://will.illinois.edu/jobs/eoo/>. Pursuant to that statement, Illinois Public Media follows the guidelines, policies and procedures of the University's Office of Diversity, Equity and Access for hiring, recruiting, and maintaining a nondiscriminatory work environment. Moreover, in its employment context, Illinois Public Media adheres to University policy not to engage in discrimination or harassment against any person because of race, color, religion, sex, national origin, ancestry, age, marital status, disability, sexual orientation, unfavorable discharge from the military, or status as a disabled veteran or veteran of the Vietnam era and to comply with all federal and state nondiscrimination, equal opportunity and affirmative action laws, orders, and regulations. See also the University of Illinois Diversity Initiative at www.inclusiveillinois.illinois.edu.

Items # 3(i), 4(a), 4(b), 4(c), and 4(d) are not applicable.

The Board of Trustees of the University of Illinois, through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,
THE BOARD OF TRUSTEES OF THE
UNIVERSITY OF ILLINOIS

By:  _____

Print Name: Avijit Ghosh

Title: Comptroller

Date: 20 March 2020