



April 26, 2021

Via Upload to KRDO Colorado Springs Employment Unit Online Public Files

Elizabeth E. Goldin  
Assistant Chief, Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Ms. Goldin:

This letter, together with attached Exhibits 1 through 55, serves as the response by Pikes Peak Television, Inc. (the “Licensee”), licensee of KRDO-TV, Colorado Springs, Colorado (“KRDO-TV”), to the Enforcement Bureau’s February 25, 2021, request for audit data relating to the station employment unit’s EEO program. KRDO-TV is part of an Employment Unit that includes the following commonly-owned stations (collectively, the “Stations” or the “Employment Unit”):

- KRDO-TV, Colorado Springs, CO (Fac. ID 52579)
- KRDO-FM, Security, CO (Fac. ID 50402)
- KRDO(AM), Colorado Springs, CO (Fac. ID 66250)

KRDO-TV and KRDO-FM are both held by Pikes Peak Television, Inc. KRDO(AM) is held by Pikes Peak Radio, LLC. Both companies are commonly owned by corporate parent News-Press & Gazette Company (“NPG”).

The Stations operate in the Colorado Springs Nielsen Designated Market Area (for television stations) and the Colorado Springs Nielsen Radio Market (for radio stations).

The responses to the relevant audit data requests are set forth below, and the required documentation is provided in the attached Exhibits.

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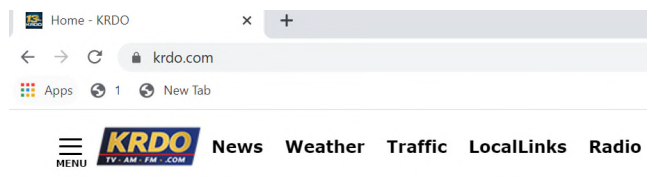
***Audit Data Request 2(b)(i).*** [Provide] copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6). For each station in the Unit that maintains a website, provide the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit’s most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).

**Response:** The Employment Unit’s EEO Public File Reports covering December 1, 2018 to November 30, 2019 and December 1, 2019 to November 30, 2020 are attached as Exhibits 1 and 2, respectively. While preparing the instant response, some minor errors and omissions in the 2019-2020 Report were discovered; the 2019-2020 Report was amended and is submitted with this response and has also been uploaded to the EEO folder of the station online public files. With respect to any inconsistencies between the information provided in the Employment Unit’s EEO Public File Reports and the instant response, the information contained herein shall control and, to the best of the Employment Unit’s knowledge, is true and correct.

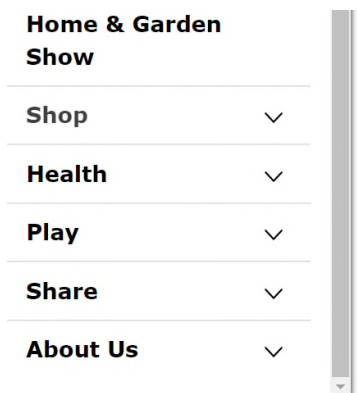
The Employment Unit’s most recent EEO Public File Report is posted to the <http://www.krdo.com> website<sup>1</sup> and is located at the following URL address:

<https://krdo.b-cdn.net/2021/04/KRDO-Amended-2020-EEO-Public-File-Report-Final.pdf>

The Report is accessible to website visitors by clicking the “Menu” icon in the upper left corner of the home page,



scrolling down to “About Us” and clicking the down arrow,



and selecting “EEO Public Filing”:

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<sup>1</sup> The then-current EEO Public File Report has been available on krdo.com at all relevant times. As discussed below, the most recent Report was amended and posted on krdo.com in April 2021.

#### About Us



Advertise with Us

Contact KRDO

Meet the Team

Closed Captioning

Download our Apps

EEO Public Filing

FCC Public File

The Report launches directly from the “EEO Public Filing” link.

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***Audit Data Request 2(b)(ii).*** For each of the Unit’s full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Station (if during that period), provide the date of hire as required by section 73.2080(c)(5)(vi) as well as dated copies of all advertisements, bulletins, letters, faxes, e-mails or other communications announcing the position, as described in section 73.2080(c)(5)(iii). However, to reduce the burden of responding to this audit, if you have sent a job notice to multiple sources, you may include in your response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of the Unit’s job openings, as described in section 73.2080(c)(1)(ii).

**Response:** The Employment Unit filled 72 full-time vacancies during the applicable period. The table below is a list of all full-time positions filled by the Station during the period covered by this audit and the date on which that position was filled. The following list tracks the order the positions appear in the EEO Public File Reports, and the corresponding Exhibit number we have assigned to them for this response is included for convenience.

POSITION FILLED	DATE OF HIRE	RESPONSE EXHIBIT NO.
Account Executive – TV	3/19/2019	3
Anchor/MMJ (2 positions)	4/22/2019 5/16/2019	4
Anchor – Radio News (2 positions)	3/4/2019 5/19/2019	5
Associate Producer	3/12/2019	6
Board Operator Producer – Radio	3/12/2019	7
Broadcast Engineer	4/22/2019	8
Chief Meteorologist	12/5/2018	9
Digital Content Producer/MMJ	5/21/2019	10
Director of Sales	11/18/2019	11

<b>POSITION FILLED</b>	<b>DATE OF HIRE</b>	<b>RESPONSE EXHIBIT NO.</b>
Executive Producer (2 positions)	8/9/2019 10/21/2019	12
Format Specialist	4/4/2019	13
Local Sales Assistant	1/21/2019	14
Local Sales Manager	2/14/2019	15
Master Control Operator (2 positions)	1/3/2019 10/23/2019	16
Media Coordinator	1/30/2019	17
Meteorologist/MMJ	1/8/2019	18
Multimedia Journalist (2 positions)	4/24/2019 5/23/2019	19
National Sales Assistant	1/18/2019	20
New Business Account Executive – Radio (3 positions)	1/31/2019 3/15/2019 7/2/2019	21
New Business Account Executive – TV (3 positions)	5/22/2019 7/1/2019 10/29/2019	22
News Director	6/19/2019	23
Producer (4 positions)	4/12/2019 5/14/2019 6/13/2019 8/1/2019	24
Technical Director	9/19/2019	25
Videographer (4 positions)	12/28/2018 2/25/2019 6/13/2019 6/16/2019	26
Weekend Anchor/MMJ	6/5/2019	27
Weekend Sports Anchor	4/26/2019	28
Account Executive – TV	12/30/2019	29
Anchor/MMJ (3 positions)	4/6/2020	30
Assignment Manager	10/21/20	31
BOC Supervisor (2 positions)	3/27/2020	32
Business Manager	9/22/2020	33
Digital Content Producer	10/9/2020	34
Graphics/Production Tech	1/28/2020	35
Investigative Journalist	2/13/2020	36
Master Control Operator	9/30/2020	37
Meteorologist	4/2/2020	38
Multimedia Journalist (Bilingual)	10/21/2020	39

<b>POSITION FILLED</b>	<b>DATE OF HIRE</b>	<b>RESPONSE EXHIBIT NO.</b>
New Business Account Executive – Radio (3 positions)	12/10/2019 2/26/2020 10/23/2020	40
New Business Account Executive – TV (2 positions)	11/9/2020 11/9/2020	41
Producer (5 positions)	2/26/2020 4/9/2020 4/9/2020 6/12/2020 10/21/2020	42
Program Director – Radio <sup>2</sup>	10/1/2020	43
Technical Director	6/23/2020	44
Senior Producer	9/22/2020	45
Videographer (3 positions)	2/24/2020 3/18/2020 3/26/2020	46
Weekend Anchor/MMJ	10/9/2020	47

For each full-time job opening, the Licensee has attached (as Exhibits 3 through 47) available copies of records demonstrating that notifications announcing job openings were sent to recruitment sources used by the Employment Unit. Paper copies of records were not generally retained; rather, the Licensee primarily relied on electronic copies available through certain online recruitment sources (e.g., TVJobs.com) and internal job posting records from ADP Recruiting Management. All job postings for the Employment Unit as well as NPG's other locations go through ADP and postings are disseminated throughout NPG's markets. Each Exhibit includes the job posting from ADP along with additional available documentation. Job postings during the applicable period were made available online through KRDO.com as well as other sources including Simply Hired.com, TVJobs.com, and Indeed.com. Documents reflecting use of these latter three specific recruitment sources are provided in Exhibits 53, 54, and 55, respectively. The Employment Unit also occasionally used Spots N Dots and other targeted sources, although records were not maintained and available in every case. The Exhibits attached illustrate that for the period covered by the audit, the Licensee had a regular practice of sending vacancy notifications to a variety of broadcast and non-broadcast recruitment sources, which, in the aggregate, were reasonably calculated to reach the Stations' entire community.

No recruitment source has specifically requested notification of full-time job vacancies from the Employment Unit.

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<sup>2</sup> This was an internal promotion filled by an existing full-time employee.

***Audit Data Request 2(b)(iii).*** As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.

**Response:** The total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the applicable period are as follows (these positions are listed in the order in which they appear in the Public File Reports):

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Account Executive – TV	1	Indeed.com
Anchor/MMJ (2 positions)	3	Employee Referral Indeed.com Self-Search
Anchor – Radio News (2 positions)	7	Employee Self-Referral (2) Employee Referral (2) Indeed.com (2) KRDO.com
Associate Producer	2	Indeed.com KRDO.com
Board Operator Producer – Radio	2	Colorado State University Employee Referral
Broadcast Engineer	3	Indeed.com (2) KRDO.com
Chief Meteorologist	2	Employee Referral Intelligent Employment Solutions
Digital Content Producer/MMJ	4	Employee Referral KRDO.com Corporate Website (NPGCO.com) Arizona State University
Director of Sales	5	Spots N Dots (2) Friend Indeed.com TV Newscheck
Executive Producer (2 positions)	5	Indeed.com (2) KRDO.com (2) TVJobs.com
Format Specialist	1	Employee Self-Referral
Local Sales Assistant	4	Indeed.com (3) KRDO.com
Local Sales Manager	1	Employee Self-Referral
Master Control Operator (2 positions)	4	Employee Referral Indeed.com KRDO.com (2)
Media Coordinator	1	KRDO.com

<b>POSITION FILLED</b>	<b>NUMBER OF INTERVIEWEES</b>	<b>REFERRAL SOURCE FOR INTERVIEWEES</b>
Meteorologist/MMJ	1	TVJobs.com
Multimedia Journalist (2 positions)	6	Employee Referral Indeed.com (2) JournalismJobs.com Magid Talent Agency TVJobs.com
National Sales Assistant	1	Employee Referral
New Business Account Executive – Radio (3 positions)	10	Broadcast Media Unknown Employee Referral Former Employee Google Indeed.com (2) Networking Mount Carmel Veterans Service Center University of Colorado
New Business Account Executive – TV (3 positions)	4	Employee Referral Indeed.com Internship Program KRDO.com
News Director	4	KRDO.com LinkedIn (2) Rick Gevers
Producer (4 positions)	7	Employee Referral (2) Indeed.com KRDO.com (4)
Technical Director	3	Employee Self-Referral KRDO.com Self-Search
Videographer (4 positions)	8	On-Air Employee Self-Referral Indeed.com (4) KRDO.com TVJobs.com
Weekend Anchor/MMJ	2	KRDO.com Arizona State University
Weekend Sports Anchor	1	Sportscasters Talent Agency of America
Account Executive – TV	2	Indeed.com KRDO.com
Anchor/MMJ (3 positions)	3	Employee Referral Employee Self-Referral Google/Ziprecruiter.com

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Assignment Manager	1	Employee Self-Referral
BOC Supervisor (2 positions)	3	Employee Self-Referral (3)
Business Manager	4	Indeed.com (3) Employee Referral
Digital Content Producer	1	Employee Referral
Graphics/Production Tech	2	Employee Referral (2)
Investigative Journalist	1	Employee Referral
Master Control Operator	1	Employee Referral
Meteorologist	2	Employee Self-Referral TVJobs.com
Multimedia Journalist (Bilingual)	1	Employee Self-Referral
New Business Account Executive – Radio (3 positions)	6	Employee Referral Indeed.com (4) KRDO.com
New Business Account Executive – TV (2 positions)	5	Indeed.com (3) KRDO.com (2)
Producer (5 positions)	7	Employee Referral (3) Indeed.com KRDO.com (2) University of Missouri
Program Director – Radio	1	Employee Self-Referral
Technical Director	1	Indeed.com
Senior Producer	1	Employee Self-Referral
Videographer (3 positions)	5	Employee Referral Indeed.com (4)
Weekend Anchor/MMJ	2	Employee Self-Referral Employee Referral

Please note, Employee Self-Referral as a source means an internal candidate, whereas an Employee Referral means a candidate outside the Employment Unit was referred by an employee of the Stations.

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***Audit Data Request 2(b)(iv).*** Dated documentation of the Unit's recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit's total number of full-time employees and state whether the population of the market in which any of the Unit's stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission's rules, state whether the Unit is required to perform two or four points



*worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth and sixth anniversaries of that date). If the Unit performed more than the required number of initiative activities, it may provide documentation for only the required amount in its response, i.e., two or four points worth. If any documentation that you provide appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask you for additional verification.*

**Response:** The total number of full-time employees of the Employment Unit varies over time. The total number of full-time employees in the Employment Unit as of April 21, 2021, was approximately 86. The Employment Unit's Designated Market Area and Nielsen Radio Market is Colorado Springs, which are located in the Colorado Springs, CO Metropolitan Statistical Area, which has more than 250,000 people. Thus, the Station is required to perform four (4) initiatives in each applicable two-year period. As detailed in the EEO Public File Reports in Exhibits 1 and 2, the Employment Unit has met the requirements of the FCC's EEO rule in this regard for the two-year period ending November 30, 2020, applicable for KRDO-FM and KRDO(AM). The period of time covered by the instant audit request straddles the applicable period for KRDO-TV, whose applicable two-year period runs December 1, 2019, through November 30, 2021.

The Employment Unit has submitted records sufficient to demonstrate four EEO outreach credits for the two-year period applicable to KRDO-FM and KRDO(AM). The Employment Unit's outreach is less robust in the second half of the two-year period than the first half due to COVID-19. As explained in KRDO(AM) and KRDO-FM's Broadcast EEO Program Report,<sup>3</sup> activities in which the Unit participated routinely and consistently over the prior years were cancelled by their organizers due to the ongoing public health emergency. For example, the Employment Unit was unable to attend several scheduled job fairs during 2020 because the job fairs were cancelled by the sponsors. Related to the pandemic and its impact on station operating budgets during Summer 2020, the Employment Unit was not able to offer its regular internship to students. COVID-19 restrictions were outside the Licensee's control. The Employment Unit has been working diligently to identify appropriate and worthwhile EEO outreach activities that can be safely attended during 2021. For example, the Stations have recently hosted station tours via Zoom rather than in person.

The Station has attached, as Exhibits 48 to 52, documentation demonstrating performance of the following recruitment initiatives during the period of time covered by this audit:

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<sup>3</sup> See LMS File No. 0015304884.

<b>Participation in Events Sponsored by Educational Institutions</b> <b>(47 C.F.R. § 73.2080(c)(2)(x))</b> <b>Exhibit 48</b>	
<i>Activity</i>	<i>Personnel Involved</i>
Recruiting Interviews at University of Missouri, Columbia, MO, April 9, 2019	Corporate Director of News & Marketing VP of Human Resources
Classroom Presentation, Rampart High School, Colorado Springs, CO, November 9, 2019	Radio Sales Manager
Station Tour for New Summit Charter Academy, on-site at KRDO, Colorado Springs, CO, March 12, 2019	Promotions Manager
Station Tour for New Summit Charter Academy, on-site at KRDO, Colorado Springs, CO, March 13, 2019	Promotions Manager
Recruiting Interviews at University of Missouri, Columbia, MO, February 12, 2020	Corporate Director of News & Marketing VP of Human Resources
Virtual Recruiting Interviews for Students of Arizona State University, April 1, 2020	Corporate Director of News & Marketing VP of Human Resources
Virtual Station Tour for Students of Family Child Care, July 8, 2020	Promotions Manager

<b>Internship Programs</b> <b>(47 C.F.R. § 73.2080(c)(2)(v))</b> <b>Exhibit 49</b>	
<i>Activity</i>	<i>Personnel Involved</i>
Internship Program, on-site at KRDO, Colorado Springs, CO, Summer 2020. KRDO-TV hosted 2 interns in TV News.	Assistant News Director

<b>Job Fair Attendance</b> <b>(47 C.F.R. § 73.2080(c)(2)(i))</b> <b>Exhibit 50</b>	
<i>Activity</i>	<i>Personnel Involved</i>
Pikes Peak Workforce Center Job Fair, Colorado Springs, CO, April 17, 2019	Human Resources Coordinator
Pikes Peak Workforce Center Military Veterans Employment Expo (MVEE), Colorado Springs, CO, May 29, 2019	Radio News Director Human Resources Coordinator
Colorado Broadcasters Association Career Fair, Colorado Springs, CO, November 13, 2019	Human Resources Coordinator

<b>Participation in Community Group Events</b> <b>(47 C.F.R. § 73.2080(c)(2)(iv))</b> <b>Exhibit 51</b>	
<i>Activity</i>	<i>Personnel Involved</i>
Mount Carmel Veteran Service Center News Launch and Program Support, Mount Carmel Events Center, Colorado Springs, CO, March 19, 2019	Radio Sales Manager

<b>Participation in Training Programs</b> <b>(47 C.F.R. § 73.2080(c)(2)(viii))</b> <b>Exhibit 52</b>	
<i>Activity</i>	<i>Personnel Involved</i>
Training Program, KRDO News Department and Sales Department, Ongoing 2020	News Producers Multimedia Journalists Chief Photographer Account Executives Local Sales Manager

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***Audit Data Request 2(b)(v).*** *Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that you must report all complaints, regardless of their status or disposition.*

**Response:** The Employment Unit has had the following four complaints during the license term:

1. Cynthia Weller v. Pikes Peak Television, Inc., EEOC charge 541-2014-01458, filed May 28, 2014. Ms. Weller was a Promotions Producer and claimed sex and age discrimination, which Pike Peak Television, Inc. denied. To resolve the matter, the claim was settled through mediation with no admission of liability on September 17, 2014, and thereafter the claimant withdrew the EEOC charge.
2. Jene Nelson v. KRDO, EEOC charge 541-2013-00343, filed December 20, 2016. Ms. Nelson was News Director and made a number of claims, including sex and age discrimination and retaliation, all of which Pikes Peak Television, Inc. and KRDO-TV denied. While the EEOC charge was still in process, on March 17, 2017, the claimant filed complaint 01-17-0001-6651, Jene E. Nelson v. Pike's Peak Television, Inc. and News-Press & Gazette Company, and a demand for arbitration with the American Arbitration Association. The EEOC charge was dismissed on February 26, 2018, at the claimant's request so the matter could be handled solely with arbitration. To resolve the matter, it was settled through mediation on January 16, 2019, with no admission of liability.
3. Timothy E. McSpadden v. KRDO-TV, EEOC charge 541-2018-01766, filed July 31, 2018. Mr. McSpadden was a Promotions Manager and claimed race and age discrimination, which was denied by Pikes Peak Television, Inc. and KRDO-TV. The EEOC charge was dismissed on August 3, 2018, with the right to sue. No civil action followed.
4. Victoria Martinez v. KRDO Newschannel 13, EEOC charge 541-2019-00157, filed October 19, 2018. Ms. Martinez was a newscast Director and claimed sex and national origin discrimination, which Pikes Peak Television, Inc. and KRDO-TV denied. The EEOC charge was dismissed on March 27, 2019, with the right to sue. No civil action followed.

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***Audit Data Request 2(b)(vi).*** *In accordance with section 73.2080(b), from the first day of the Station's current license term (or the date the licensee acquired the Station, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.*

**Response:** *Implementation of EEO Policies.* The Employment Unit has three levels of management to ensure enforcement of Employment Unit EEO policies: a General Manager, Department Heads, and supervising managers. Each level of management has input into the hiring, training, disciplining, terminating, and daily supervision of station employees. The General Manager has primary responsibility for implementing EEO policies.

For most of the license term, a Human Resources (HR) Coordinator, who reports to the General Manager, had significant responsibility for EEO compliance. The HR Coordinator, with oversight and supervision by the General Manager, was responsible for posting job vacancies to the Employment Unit's list of recruitment sources; working with Department Heads and supervising managers to ensure tracking of interviewees and collection of referral data; and scheduling, attending, and keeping records of EEO outreach activities. The HR Coordinator had frequent dialogue with NPG's Corporate Recruiting Manager on EEO and related matters.

In connection with an administrative reorganization, as of January 1, 2021, EEO functions previously performed by the HR Coordinator were assigned to and performed by the Business Manager of the Employment Unit. The Business Manager position was recently vacated (April 2021). As of the date of this response, the Employment Unit is actively and broadly recruiting for a Business Analyst/HR Coordinator position, who will have EEO compliance as a significant job responsibility.<sup>4</sup>

Throughout the course of the current license term, the Employment Unit has used a hiring protocol that is designed to ensure the Station widely disseminates vacancy notifications and maintains records consistent with the Commission's EEO rule. When a position opens, Department Heads or supervising managers (depending on the vacancy) notify the HR Coordinator of the opening and discuss the job responsibilities, the qualifications required, and the recruiting sources to be used to fill the position. After being notified of the opening and discussing qualifications with the relevant hiring manager, the HR Coordinator prepares a job description (in some cases the hiring manager will write the job description), obtains the approval of the relevant hiring manager for the job description, and then emails to job posting

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<sup>4</sup> Throughout this response, when responsibilities or job functions of the HR Coordinator are discussed, those responsibilities and job functions were performed by the Business Manager for the period January 2021 to April 2021. They are currently being performed by an HR Coordinator located at a different NPG station (this person was previously HR Coordinator at KRDO). Upon hire of the Business Analyst/HR Coordinator, this person will perform such responsibilities and job functions.

websites or directly posts to websites the job description.<sup>5</sup> For sales or other key positions, the HR Coordinator reports the status of the recruitment to the Corporate Recruiting Manager at least weekly by email and during a monthly call with all Human Resources personnel within the NPG corporate family. Each Department Head and/or supervising manager, the General Manager, and the HR Coordinator discuss the status of recruitment for all posted positions as well as potential hires during weekly Department Head meetings. For sales positions, the total number of vacancies at each NPG property is reviewed weekly by the Director of Sales for NPG's Broadcast Division and discussed with the respective local Directors of Sales during weekly calls. For all positions, the relevant hiring manager informs the HR Coordinator of the interviewees, and the HR Coordinator records the interviewees and their sources of referral.

For outreach initiatives, the HR Coordinator collects documentation of the Employment Unit's outreach activities from various participating personnel and maintains the documentation in the private file. The HR Coordinator and Department Heads and/or supervising managers engage in the Employment Unit's outreach activities and routinely discuss in an informal manner the effectiveness of current outreach activities and additional future outreach efforts.

The HR Coordinator, in consultation with the General Manager, prepares the annual EEO Public File Report.

*Unit's Efforts to Inform Employees and Applicants of EEO Policies and Program.* The Employment Unit maintains a handbook containing NPG's Harassment Policy, which includes a description of harassment and a procedure for employees to follow to report incidents involving harassment, discrimination or retaliation. The handbook also includes a specific statement relating to EEO, which states as follows:

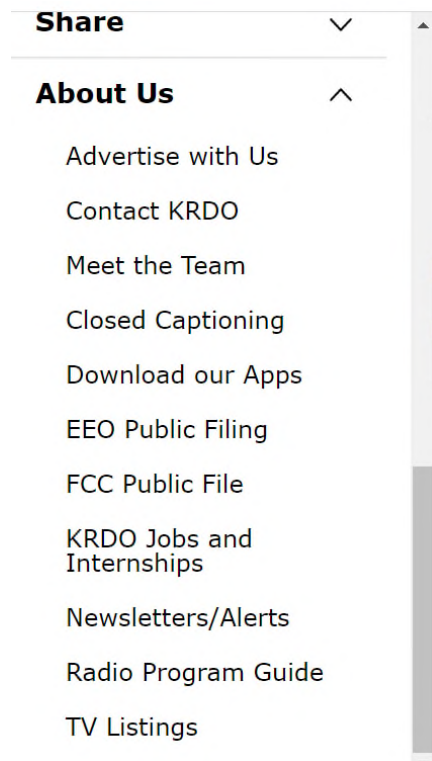
NPG is committed to providing a work environment that is free from all forms of discrimination and conduct that can be considered harassing, coercive, or disruptive.... NPG will not tolerate any actions, words, jokes, or comments based on a person's sex, race, color, national origin, age, religion, disability, sexual orientation, or any other legally protected characteristic.

Additionally, NPG has implemented mandatory harassment training for all employees using a web-based training tool called Management Learning Systems. Following initial rollout of the tool through a webinar presentation made by NPG's outside employment counsel, employees at the Stations began taking this training in April 2018. All new hires are also required to complete the training.

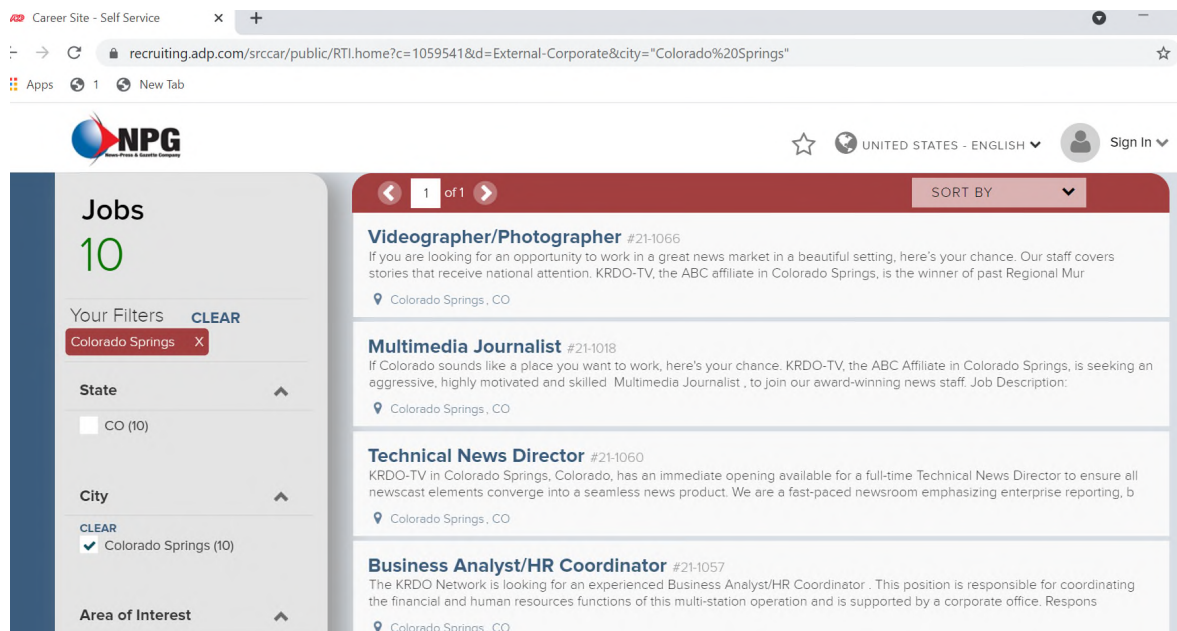
The Employment Unit's website, [www.krdo.com](http://www.krdo.com), contains a link to "KRDO Jobs and Internships" from the "About Us" drop down menu, as shown below:

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<sup>5</sup> In 2016, NPG implemented the ADP Recruiting Management system. All job postings go through this system and postings are disseminated to all NPG locations (corporate and other stations) via this tool. ADP does not send the postings to third parties. Third-party postings are handled by the HR Coordinator.



When potential applicants click on “KRDO Jobs and Internships,” they are taken to NPG’s Jobs website where they can view Employment Unit job opportunities via an ADP plug-in, as shown below:



The NPG Jobs website features a statement at the bottom of the page concerning the company's status as an equal opportunity employer. The statement reads:

EEO is The Law - click here for more information  
Equal Opportunity Employer Minorities/Women/Protected  
Veterans/Disabled.  
We endeavor to make this site accessible to any and all users. If  
you would like to contact us regarding the accessibility of our  
website or need assistance completing the application process,  
please email careers@npgco.com. Thank You

For job applicants, the Employment Unit generally includes on vacancy recruitment notices the following statement (or a close variation thereof):

“KRDO is an Equal Opportunity Employer” or “EOE”

Additionally, the standard job application used by the Employment Unit contains a statement as follows:

I understand that this employer does not unlawfully discriminate in  
employment and no question on this application is used for the  
purpose of limiting or eliminating any applicant from consideration  
for employment on any basis prohibited by applicable local, state  
or federal law.

Thus, in the aggregate, the Employment Unit educates, at numerous points and through various means, its employees and applicants about its non-discrimination and equal opportunity policies.

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***Audit Data Request 2(b)(vii).*** *In accordance with section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee acquired the Station, if after that date) until the date of this letter, describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.*

**Response:** The Employment Unit regularly monitors and analyzes its EEO recruitment program. The HR Coordinator tracks the Unit's EEO activities and recruitment and maintains and updates the recruitment source list, adding new sources and contact information as warranted and in consultation with the General Manager, Department Heads, and supervising managers. The recruitment source list is regularly evaluated—when qualified applicants are scarce, the HR Coordinator, in consultation with the applicable Department Head or supervising manager, works to identify new recruitment sources. In the case of particularly specialized hires, such as National Sales Manager, NPG management is also consulted on recruitment sources and candidate selection. The goal of the Employment Unit's recruitment process is to provide notification to recruitment sources such that the outreach is reasonably calculated to reach the



entire community, and to provide notification to recruitment sources that are reasonably expected to result in reaching qualified applicants, particularly when a position requires a specialized skill-set (i.e., weather, on-air talent, etc.). For such specialized positions, the Employment Unit evaluates the recruitment source list and attempts to identify and add “targeted” sources to the list as appropriate (for example, the Rick Gevers or Spots N Dots). Thus, recruitment is discussed at the time of every vacancy and is periodically reviewed and updated.

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***Audit Data Request 2(b)(viii).*** *As required by section 73.2080(c)(4), from the first day of the Station’s current license term (or the date the licensee acquired the Station, if after that date) until the date of this letter, describe the Unit’s efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit’s union-member employees and job applicants.*

**Response:** *Compensation and Benefit Levels.* The Licensee’s compensation levels for all employees are reviewed on at least an annual basis during budget preparation by the General Manager, Human Resources Coordinator, and the Department Heads to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. Compensation and benefits are also reviewed during annual employee evaluations. Compensation may be increased for myriad reasons, including length of service, merit, fairness, and to ensure that rates of pay are non-discriminatory.

*Seniority Practices and Promotions.* Department Heads and supervising managers, as applicable, conduct annual performance appraisals for appropriate categories of employees. Internal promotions are based on these appraisals and discussions among the General Manager, relevant Department Head, and/or supervising manager, all of whom have responsibility for enforcing aspects of Employment Unit EEO policies.

*Selection Techniques.* After providing notices of job vacancies to a number of recruitment resources, the selection process is based upon the experience, qualifications, and talents of the candidates. The General Manager, Department Head, and/or supervising manager consult on each selection, and, as discussed above, management of NPG has input on certain hires for key positions. As described above, the Employment Units’ policy and practice is to perform and document EEO recruitment prior to making an employment offer.

*Union Agreements.* There are no unions present at the Employment Unit, but, if there were, the Licensee would cooperate with any union to ensure EEO policies are followed for the Employment Unit’s union-member employees and job applicants.

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The remaining audit data requested is not applicable because the Licensee is not a religious broadcaster, and no station in the Employment Unit is brokered by another company.

Each Station in the Employment is uploading a copy of this letter and the attached Exhibits to each Station's online public inspection file.

If you have any questions regarding this response or need any further information, please call or email our attorney Elizabeth Spainhour at (919) 573-6229 or [espainhour@brookspierce.com](mailto:espainhour@brookspierce.com).

THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK;  
SIGNATURE IS ON FOLLOWING PAGE

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. Timothy Hannan", with a long horizontal flourish extending to the right.

J. Timothy Hannan  
Executive Vice President and Chief Financial Officer  
News-Press & Gazette Company, Parent Company of  
Pikes Peak Television, Inc. and Pikes Peak Radio, LLC

**KRDO Colorado Springs Employment Unit  
Response to February 25, 2021, EEO Audit Letter**

**EXHIBIT LIST**

Exhibit 1	EEO Public File Report (December 1, 2018-November 30, 2019)
Exhibit 2	Amended EEO Public File Report (December 1, 2019-November 30, 2020)
Exhibit 3	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive- TV
Exhibit 4	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Anchor/MMJ
Exhibit 5	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Anchor/Radio News
Exhibit 6	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Associate Producer
Exhibit 7	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Board Operator Producer – Radio
Exhibit 8	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Broadcast Engineer
Exhibit 9	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Chief Meteorologist
Exhibit 10	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Digital Content Producer/MMJ
Exhibit 11	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Director of Sales
Exhibit 12	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Executive Producer (2)
Exhibit 13	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Format Specialist
Exhibit 14	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Local Sales Assistant
Exhibit 15	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Local Sales Manager
Exhibit 16	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Master Control Operator (2)
Exhibit 17	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Media Coordinator
Exhibit 18	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Meteorologist/MMJ
Exhibit 19	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist (2)
Exhibit 20	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of National Sale Assistant
Exhibit 21	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of New Business Account Executive – Radio (3)

Exhibit 22	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of New Business Account Executive – TV (3)
Exhibit 23	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of News Director
Exhibit 24	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Producer (4)
Exhibit 25	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Technical Director
Exhibit 26	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Videographer (4)
Exhibit 27	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Weekend Anchor/MMJ
Exhibit 28	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Weekend Sports Anchor
Exhibit 29	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive – TV
Exhibit 30	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Anchor/MMJ (3)
Exhibit 31	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Assignment Manager
Exhibit 32	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Broadcast Operations Center Supervisor (2)
Exhibit 33	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Business Manager
Exhibit 34	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Digital Content Producer
Exhibit 35	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Graphics/Production Tech
Exhibit 36	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Investigative Journalist
Exhibit 37	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Master Control Operator
Exhibit 38	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Meteorologist
Exhibit 39	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist (Bilingual)
Exhibit 40	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of New Business Account Executive – Radio (3)
Exhibit 41	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of New Business Account Executive – TV (2)
Exhibit 42	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Producer (5)
Exhibit 43	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Program Director – Radio
Exhibit 44	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Technical Director
Exhibit 45	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Senior Producer

Exhibit 46	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Videographer (3)
Exhibit 47	Copies of documentation, advertisements, or other communications announcing job vacancy for the position of Weekend Anchor/MMJ
Exhibit 48	Copies of documentation demonstrating participation in educational institution activities
Exhibit 49	Copies of documentation demonstrating establishment of an internship program
Exhibit 50	Copies of documentation demonstrating attendance at job fairs
Exhibit 51	Copies of documentation demonstrating participation in community group events
Exhibit 52	Copies of documentation demonstrating participation in training programs
Exhibit 53	Copies of records demonstrating recruitment through Simply Hired
Exhibit 54	Copies of records demonstrating recruitment through TVJobs.com
Exhibit 55	Copies of records demonstrating recruitment through Indeed.com