

March 1, 2015

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

Dear EEO Staff:

The following is in response to the EEO audit request dated February 6, 2015, for station KCFI-FM (ID#41099) licensed to Cedar Falls, Iowa.

Question 2

KCFI-AM is part of an employment unit that includes at least 5 full-time employees, and is required to maintain an EEO recruitment program. The following is audit data requested in the letter dated February 6, 2015:

Question 3(a)

Copies of the Unit's two most recent EEO public file reports are included with this report.

Stations websites include: www.cruisin1250.com, www.1650thefan.com, www.935themix.com.

For the EEO report covering the Period from October 1, 2012 to September 30, 2013, Rich Mazarella was hired as account executive on 1/31/13.

For the EEO report covering the Period from October 1, 2012 to September 30, 2013, Teresa Johnson was hired as account executive on 7/20/13.

For the EEO report covering the Period from October 1, 2013 to September 30, 2014, Bobbi Kuker was hired as account executive on 10/5/13.

For the EEO report covering the Period from October 1, 2013 to September 30, 2014, John Dixon was hired as morning announcer on 5/2/14.

For the EEO report covering the Period from October 1, 2013 to September 30, 2014, Courtney Frey was hired as account executive on 9/15/14.

Question 3(b)

Copies of job opening announcements for each Unit full-time position filled have been attached.

Licensee retains copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii)

Licensee retains all log sheets for each time ads aired on Unit stations. A summary copy of log sheets has been provided with this response.

The Unit has had no organizations that have notified the Unit that it wants to be notified of Unit job openings.

Question 3(c)

Vacancy: Account Executive.
5 interviewees.
2 interviewees from Radio Commercials
1 interviewee from Referral
2 interviewees from Iowa Workforce

Vacancy: Account Executive.
4 interviewees.
2 interviewees from Radio Commercials
1 interviewee from IBA Website
1 interviewee from Referral

Vacancy: Account Executive.
3 interviewees.
2 interviewee from Radio Commercials
1 interviewee Iowa Workforce

Vacancy: Account Executive.
3 interviewees.
2 interviewee from Radio Commercials
1 interviewee from Iowa Workforce

Vacancy: Morning Announcer.
3 interviewees.
1 interviewee from Referral
1 interviewee from IBA Website
1 interviewee from Station Website

Question 3(d)

The Unit has 13 full-time employees. However, no market in which any station included in the Unit operates is 250,000 or more. The largest market in which any station included in the Unit operates is 130,000 in population; therefore, the Unit is required to perform two initiatives within a two-year period.

Initiative #1 Job Fair Participation:

Station Manager and Program Director have participated in Job Fairs every calendar year at University of Northern Iowa in Cedar Falls and Cedar Falls Schools in Cedar Falls. In each of the past 2 year periods, they have participated in 4 of these Job Fair events each period.

Station Manager has participated in 2 Job Fairs at University of Northern Iowa in past 2 year period.

Station Manager has participated in 2 job Fairs at West High School in the past 2 year period

Program Director has participated in 3 Job Fairs at Hansen Elementary and Junior Achievement in the past 2 year period.

Sales Manager has participated in 1 Job Fairs at Wartburg College in the past 2 year period.

Initiative #2 Internship Program:

The station Unit (KCFI, KCNZ, KCVM) has an ongoing internship program in order to introduce radio broadcasting to high school and college students from the service area.

Generally, interns have come from the University of Northern Iowa and Wartburg College. However, the program is open to any qualified student from any school.

Interns during the past two EEO reporting periods include: Cheyne Reiter, Jordan Knebel, ,

Initiative #3 Employee Training Program:

The station Unit hires an outside training consultant to provide on-going professional development to current employees. During the past 2 reporting periods, Bill Solberg of DDS Marketing, was retained to provide this on-going training, which is designed to provide station personnel additional skills that could qualify them for higher level positions.

The station Unit also sends employees to training sessions provided by the Iowa Broadcasters Association, including training that deals with proper hiring and recruitment techniques, programming, sales and management.

Two times each year during each of the past 2 reporting periods, the station Unit has sent employees to training sessions organized and conducted by DDS Marketing. Sessions include proper hiring and recruiting techniques, personnel, programming, sales, promotions and management.

Question 3(e)

There are no pending or resolved complaints involving the Station.

Question 3(f)

President and General Manager is responsible for implementing Unit EEO policies. This individual is responsible for setting and maintaining the Unit's overall EEO policies, and for educating employees and job applicants of its EEO policies and programs. This individual is also responsible for outreach and identifying organizations to include in all job openings and employment opportunities. This individual is also responsible for assigning staff to implement the performance of recruitment initiatives. This individual is also responsible for the recording and reporting of all EEO initiatives and reports.

Program Director is responsible for informing all potential job applicants of the Unit's EEO policies through marketing practices. This individual is also responsible for posting all EEO policies and reports on station websites.

The Unit maintains an EEO statement on all station websites, which describes the EEO policy of the Unit stations. It also encourages interested organizations to inquire about receiving employment opportunity information from the Unit's stations. The stations in the Unit routinely air a :30 recorded message which encourages organizations to inquire about receiving employment opportunity information. All recruitment announcements distributed by the Unit include the fact that the Unit and all stations are Equal Opportunity Employers. Employees are informed as part of the company handbook, that is required reading by all employees and potential employees prior to they being offered employment. The following is an excerpt of the employee handbook:

EQUAL EMPLOYMENT OPPORTUNITY

It is the Radio station's policy to conduct business activities in a manner that is free from discrimination and to provide equal opportunity and treatment for all employees regardless of race, religion, sex, age, national origin, disability, or military status.

STURGIS FALLS BROADCASTING will ensure that employment decisions and personnel actions including, but not limited to, compensation, benefits, transfer, promotion, discipline, termination, training, and education, and those actions relating to the terms, conditions, and privileges of employment will be administered without regard to race, color, religion, sex, age, national origin, disability, or military status.

STURGIS FALLS BROADCASTING will utilize all reasonable efforts to comply with all requirements of federal, state and local laws and regulations relating to Equal Employment.

Question 3(g)

The President and General Manager annually meet with shareholders and key station personnel to analyze the EEO recruitment program. This meeting is held on or near the due date of the annual EEO report to the Unit's FCC Public File. Any changes or alterations necessary to ensure that the EEO policies are meeting the needs of the station and community are made at this time. Station management also attends an annual EEO presentation at the Iowa Broadcasters Association summer conference, to learn of new or innovative EEO practices. Management also receives distributed legal advice from Washington DC law firms addressing EEO changes and updates on an annual basis, which are made available to members of the Iowa Broadcasters Association.

Question 3(h)

The President and General Manager annually meet with shareholders to review pay, benefits, seniority practices, promotions and selection techniques. These meetings are done prior to employee reviews with all employees. Current practices are tested against national salary rankings available from several organizations, including the National Association of Broadcasters, the Iowa Broadcast News Association and the Greater Cedar Valley Alliance & Chamber of Commerce. The Unit has no union agreements.

Question 3(i)

The Unit is not a religious broadcaster.

Question 4

Time Brokerage

The Unit has no time brokerage agreements.

This report is respectfully submitted by James Coloff, President and General Manager of KCFI-AM, ID #, Cedar Falls, Iowa.

I, James A. Coloff, hereby certify, to my best knowledge and ability, all information submitted in this report is accurate and complete.


James A. Coloff

3/12/15
Date

Witness:


Notary, State of Iowa

3/12/15
Date

