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May 5, 2022

UPLOADED TO WWGA, WBTR-FM, WCKS, WKNG AND WLBB
ONLINE PUBLIC INSPECTION FILES

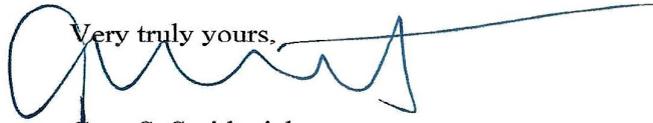
Elizabeth E. Goldin, Esquire
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: WWGA(FM), Tallapoosa, GA
Facility I.D. No. 183308
Response to EEO Audit Data Request

Dear Ms Goldin:

Uploaded to the Online Public Inspection Files of WWGA(FM) and WKNG(AM), Tallapoosa, GA; WBTR-FM and WLBB(AM), Carrollton, GA; and WCKS(FM), Fruithurst, AL; on behalf of WKNG, LLC, licensee of WWGA, is the licensee's response to your letter dated March 21, 2022, in connection with WWGA's random selection for an audit of its Equal Employment Opportunity program.

If there are any questions, please communicate with the undersigned.

Very truly yours,

Gary S. Smithwick
Counsel for
WKNG, LLC

GSS/sls
Attachments

**Station WWGA(FM)
Tallapoosa, GA
Facility ID No. 183308**

**Response to FCC's
Random EEO Audit**

Steven L. Gradick, under penalty of perjury, declares as follows:

I am the sole member of WKNG, LLC, the licensee of WWGA(FM), Tallapoosa, Georgia (Facility ID No. 183308) ("Station"). I am also the General Manager of the Station.

Based on my understanding of the FCC's rules, I believe that WKNG, LLC is exempt from having to undertake recruitment for full-time positions and also is not required to satisfy recruitment initiatives or complete annual EEO Public File Reports. However, I am providing a complete picture of the structure of our offices, out of an abundance of caution.

The Station operates from offices and studios at 102 Parkwood Circle, Carrollton, Georgia ("Carrollton Office"). Also operating from the Carrollton Office are WBTR-FM, Carrollton, (licensed to WYAI, Inc.) and WCKS(FM), Fruithurst, Alabama (licensed to WCKS, LLC). WYAI, Inc. and WCKS, LLC are affiliates of WWGA. I am the sole shareholder of WYAI, Inc. and the sole member of WCKS, LLC.

At the Carrollton offices are the following full-time employees: (1) Production Director; (2) Traffic and Billing Director; (3) Engineer; and (4) Sports Director. For several years, the Sports Director had worked for WCKS and WBTR-FM on a part-time basis. In 2017, when he graduated from college, we increased his hours to full-time. It is important to note that the Sports Director does not regularly perform work for WWGA. (He helps out with pre- and post-game shows on about 10 Friday nights per year during high school football season).

WYAI, Inc. also is the licensee of WLBB(AM), Carrollton, Georgia. WLBB is operated from offices and studios at 808 Newnan Road, Carrollton, Georgia ("Newnan Road Office"). At the Newnan Road Office, there is one full-time employee: a News Director. The Engineer also performs services for WLBB from time-to-time, but does not maintain an office at the Newnan Road Office. The News Director does not perform work for any station other than WLBB, although his three-minute newscasts do air on the other stations.

WKNG, LLC also is the licensee of WKNG(AM), Tallapoosa, Georgia (Facility ID No. 73183). WKNG operates from offices and studios at 1546 Golf Course Road,

Tallapoosa, Georgia ("Golf Course Road Office"). Noncommercial Educational Station WKNG-FM, Heflin, Alabama, is licensed to Covenant Communications, Inc. ("Covenant"), and also operates from the Golf Course Road Office. I am a Director of Covenant.

At the Golf Course Road Office, there are two full-time employees: a Station Manager (who primarily works for Covenant, although he also performs some "back office" functions for the other stations) and an Office Manager (who primarily works for WKNG(AM)).

All of our other employees at these three locations are either part-time or work on commission.

I understand that, under the FCC's rules, a "Station Employment Unit" consists of one or more stations in the same market that share at least one employee. In our case, there are just four full-time employees who perform work for the Station: (1) Production Director; (2) Traffic and Billing Director; (3) Engineer (each located at the Carrollton Office); and (4) the Office Manager (located at the Golf Course Road Office).

In the unlikely event that the FCC determines that WKNG, LLC was subject to the EEO rules requiring recruitment for open positions and satisfaction of recruitment initiatives over the past two years. I can report that, between November 30, 2019, and December 1, 2020, there were no full-time hires at the Unit; and between November 30, 2020, and December 1, 2021, we had one hire who replaced an employee who was terminated. Over the past two years, we did not perform any outreach activities because there were no openings and COVID-19 created problems in conducting outreach.

If WKNG, LLC ultimately ends up with five or more full-time employees, then in such case, we will prepare and file in our online public inspection files by December 1, 2022 (and/or any subsequent year when WKNG, LLC may have five or more full-time employees) the required EEO public file report.

There are no pending or resolved complaints filed during the 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 Station as set forth in Question 2(b)(vi) of the Commission's audit letter dated March 21, 2022.

My email address, as a Station representative, is: steve1027@aol.com.

Dated this 5th day of May, 2022.

WKNG, LLC



Steven L. Gradick
Member