

Federal Communications Commission Washington, D.C. 20554  <p style="text-align: center;"><b>FCC 396</b></p>	Approved by OMB 3060-0113 (March 2003)  FOR FCC USE ONLY
<p><b>BROADCAST EQUAL EMPLOYMENT OPPORTUNITY PROGRAM REPORT</b>                  (To be filed with broadcast license renewal application)</p> <p>Read INSTRUCTIONS Before Filling Out Form</p>	FOR COMMISSION USE ONLY FILE NO. B396 - 20130520AEH

**Section I**

Legal Name of the Licensee HERITAGE BROADCASTING COMPANY OF MICHIGAN		
Mailing Address P.O. BOX 627		
City CADILLAC	State or Country (if foreign address) MI	Zip Code 49601 -
Telephone Number (include area code) 2317753478		E-Mail Address (if available)
Facility ID Number 26994		Call Sign WWTV
<b>TYPE OF BROADCAST STATION:</b> (if applicable)	Commercial Broadcast Station <input type="radio"/> Radio <input checked="" type="radio"/> TV <input type="radio"/> Low Power TV <input type="radio"/> International	Noncommercial Broadcast Station <input type="radio"/> Educational Radio <input type="radio"/> Educational TV

**Application Purpose**

New Program Report

Amendment to Program Report

List call sign and location of all stations included on this statement. List commonly owned stations that share one or more employees. Also list stations operated by the licensee pursuant to a time brokerage agreement. Indicate on the table below which stations are operated pursuant to a time brokerage agreement. To the extent that licensees include stations operated pursuant to a time brokerage agreement on this report, responses or information provided in Sections I through II should take into consideration the licensee's EEO compliance efforts at brokered stations, as well as any other stations, included on this form. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

[Stations Locations]

**Station List**

List call sign and location of all stations included on this statement. List commonly owned stations that share one or more employees. Also list stations operated by the licensee pursuant to a time brokerage agreement. Indicate on the table below which stations are operated pursuant to a time brokerage agreement. To the extent that licensees include stations operated pursuant to a time brokerage agreement on this report, responses should take into consideration the licensee's EEO compliance efforts at brokered stations, as well as any other stations, included on this form. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

Call Sign	Facility ID Number	Type (check applicable box)	Location (City/State)	Time Brokerage Agreement (check applicable box)
WWTV	26994	<input type="radio"/> AM <input type="radio"/> FM <input checked="" type="radio"/> TV	CADILLAC, MI	<input type="radio"/> Yes <input checked="" type="radio"/> No

Call Sign	Facility ID Number	Type (check applicable box)	Location (City/State)	Time Brokerage Agreement (check applicable box)
WWUP-TV	26993	<input type="radio"/> AM <input type="radio"/> FM <input checked="" type="radio"/> TV	SAULT STE. MARIE, MI	<input type="radio"/> Yes <input checked="" type="radio"/> No

**CONTACT PERSON IF OTHER THAN LICENSEE**

Name GREGG P. SKALL, ESQ.		Street Address 1200 19TH ST., N.W. SUITE 500		
City WASHINGTON	State DC	Zip Code 20036-2421	Telephone Number 2028574441	

**FILING INSTRUCTIONS**

Broadcast station licensees are required to afford equal employment opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, national origin, religion, and sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, a license renewal applicant whose station employment unit employs five or more full-time station employees must file a report of its activities to ensure equal employment opportunity. If a station employment unit employs fewer than five full-time employees, no equal employment opportunity program information need be filed. If a station employment unit is filing a combined report, a copy of the report must be filed with each station's renewal application.

A copy of this report must be kept in the station's public file. These actions are required to obtain license renewal. Failure to meet these requirements may result in sanctions or license renewal being delayed or denied. These requirements are contained in 47 C.F.R. Section 73.2080 and are authorized by the Communications Act of 1934, as amended.

DISCRIMINATION COMPLAINTS. Have any pending or resolved complaints been filed during  Yes  No this 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(s)?

If so, provide a brief description of the complaint(s), including the persons involved, the date of the filing, the court or agency, the file number (if any), and the disposition or current status of the matter.

[Exhibit 1]

Does your station employment unit employ fewer than five full-time employees?  Yes  No

Consider as "full-time" employees all those permanently working 30 or more hours a week.

If your station employment unit employs fewer than five full-time employees, complete the certification below, return the form to the FCC, and place a copy in your station(s) public file. You do not have to complete the rest of this form. If your station employment unit employs five or more full-time employees, you must complete all of this form and follow all instructions.

**CERTIFICATION.**

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001).

AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

**I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.**

Signed	Name of Respondent WILLIAM E. KRING
Title VICE PRESIDENT	Telephone No. ( include area code) 2317753478
Date 4/2/2013	

**The purpose of this document is to provide broadcast licensees, the FCC, and the public with information about whether the station is meeting equal employment opportunity requirements.**

**GENERAL POLICY**

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

**RESPONSIBILITY FOR IMPLEMENTATION**

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

Name: WILLIAM E. KRING	Title: VICE PRESIDENT
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It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

<b>I. EEO PUBLIC FILE REPORT</b> Attach as an exhibit one copy of each of the EEO public file reports from the previous two years. Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.	[Exhibit 2]
<b>II. NARRATIVE STATEMENT</b> Provide a statement in an exhibit which demonstrates how the station achieved broad and inclusive outreach during the two-year period prior to filing this application. Stations that have experienced difficulties in their outreach efforts should explain.	[Exhibit 3]

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. We have estimated that each response to this collection of information will average 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0113), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to jboley@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0113.

**THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE**

PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

**Exhibits**

**Exhibit 2**

**Description:** EEO PUBLIC FILES

**Attachment 2**

Description
2011 - 2012 EEO Public File
2012 - 2013 EEO Public File

**Exhibit 3**

**Description:** EEO NARRATIVE STATEMENT

ALL EMPLOYMENT UNIT HIRING GOES THROUGH OUR ASSIGNED EEO OFFICER AND GENERAL MANAGER. HIS RESPONSIBILITY IS TO ENSURE THE STATIONS ARE COMPLIANT WITH EEO POLICIES. EEO MEMOS ARE POSTED WITHIN OUR BUILDING AND A COPY IS GIVEN TO ALL NEW EMPLOYEES. ALL NEW POSITIONS, WITH THE EXCEPTION OF AN OCCASIONAL EXIGENT CIRCUMSTANCE, ARE SUBJECTED TO BROAD OUTREACH BEFORE HIRING DECISIONS ARE MADE.

IN ACCORDANCE WITH 73.2080 (B) EACH MANAGER KNOWS OUR POLICY FROM OUR BIMONTHLY MANAGER MEETINGS TO SEND ALL THE OPENINGS WE WOULD HAVE TO ALL OUR RECRUITMENT SOURCES INCLUDING THE MICHIGAN BROADCASTERS ASSOCIATION. WE POST OPENINGS ON OUR STATIONS AND WEBSITES. ALL ORGANIZATIONS THAT EXPRESS AN INTEREST IN NOTIFICATION OF NEW HIRING OPPORTUNITIES WILL BE PROVIDED WITH NOTICE AS SOON POSSIBLE. PERIODICALLY WE EVALUATE THE EFFECTIVENESS OF OUR OUTREACH CONTACTS. BASED ON LEADS GENERATED FOR NEW EMPLOYMENT OPPORTUNITIES WE WILL DELETE UNRESPONSIVE CONTACTS AND ADD NEW OUTREACH ORGANIZATIONS AND INSTITUTIONS FROM OUR AREA OR NEIGHBORING STATES.

IN ACCORDANCE WITH 73.2080 (C) (4) OUR MANAGEMENT ANALYZES PAY BENEFITS AND SENIORITY PRACTICES, PROMOTIONS AND SELECTION TECHNIQUES EVERY TIME WE HIRE A FULL TIME EMPLOYEE BASED ON OUR BROADCAST ASSOCIATIONS CONTINUAL TRAINING THROUGH WEBINARS AND EMAILS OR OTHER INFORMATION. WE HAVE NO UNION AGREEMENT. THE EEO OFFICER FOR THE COMPANY PERIODICALLY DOES A COMPARISON OF EMPLOYEE SALARIES TO ENSURE THERE IS NO DISCRIMINATION BASED ON SEX, RELIGION OR RACE IN REGARDS TO THE JOB ASSIGNED AND THE PAY RECEIVED. EMPLOYEE PAY IS BASED ON PERFORMANCE AND MERIT. ALL BENEFITS (HEALTH INSURANCE, VACATION, SICK LEAVE ETC) AFFORDED TO OUR EMPLOYEES ARE THE SAME FOR EVERYONE AND BASED ENTIRELY ON LENGTH OF SERVICE(VACATION) AND AT THE SOLE DISCRETION OF EACH FULL TIME EMPLOYEE AS TO WHETHER OR NOT THEY AVAIL THEMSELVES TO THE OFFERED BENEFITS. IT IS THE ONGOING POLICY OF OUR COMPANY TO ENSURE THAT ALL DECISIONS MADE CONCERNING EMPLOYEES ARE MADE BASED ON JOB PERFORMANCE AND NOT DISCRIMINATORY.

**Attachment 3**

## EEO Report June 1, 2011

For the period of 6/1/11-5/31/12

10 Full-time Hired Employees

59 Applications received

36 Interviews performed

Recruitment Sources used:	Interviews
9&10 News Website	8
Cadillac Evening News	7
T.C. Record Eagle	6
Specs Howard	2
Central MI University	6
Media Line	2
Fox 32 Website	1
Talent Dynamics	2
Petoskey News	2
Amvets 110	0

WWTV/WWUP-TV has participated in 2 Job Fairs during the past year. In attendance from WWTV/WWUP-TV was our News Director, Promotion Director, General Manager and General Sales Manager. We advertise the Job Fairs on-air. See Attached

We also host several school tours in our Cadillac studio throughout the school year. WWTV/WWUP-TV has an ongoing Internship program with Ferris State University in Big Rapids and Central Michigan University in Mt. Pleasant. We employ between 8-10 interns per year.

Here is some of the schools that have participated:

2/21/12 Mt. Pleasant High School

2/28/12 Elementary

5/23/12 Wex/Miss Tech Center (high school kids)

WWTV/WWUP-TV sponsors Best of the Class ceremony each spring. It bring together all the top students in their Senior Class from all the high schools in Northern MI.

Media Line <http://www.medialine.com> Mark Shilstone

MediaLine

P.O. Box 51909

Pacific Grove, CA 93950

Phone: 800-237-8073

Magid 319.377.7345 Barbara Frye

Cadillac News

130 N. Mitchell St., P.O. Box 640, Cadillac, Michigan 49601-0640

Phone: 231-775-6565 Fax: 231-775-8790

AMVETS 110

127 W Cass

Cadillac, MI 49601

Jamie Maitland-231-878-4682

Petoskey News

231-347-2544

Dick Kernan

**Specs Howard School  
of Broadcast Arts**

19900 W. Nine Mile Rd.

Southfield, Michigan 48075

Phone 248.358.9000

Ferris State University

Rye, Clayton B Professor (231) 591-2716 Television & Digital Media Production

1201 S. State Street Big Rapids, Michigan USA - 49307

Central MI University Broadcasting Department

Peter Orlick

344 Moore Hall

Mt. Pleasant, MI 48858

989=774=3851



Founders Club

Chairman's Level

Michigan Association of Broadcasters

President's Level

W. Lawrence Patrick

Endowment Level

Jerry P. Colvin

Charles D. Fritz

Carl E. Lee

WBKB/WBKP/WBUP-TV & The Marks Foundation

Charles D. Mefford

Gary A. Reid

James H. Quello

Nancy Waters and Mark Waters

Karole L. White

Membership Level

Elaine Baker

Ross A. Biederman

P. Thomas Bryson

Jock T. Fritz

Bruce I. & Susan E. Goldsen

Iacobelli Foundation

Peter A. Kizer

Robert G. Liggett, Jr.

Partick J. Mullen

Robert F. Ottaway

Tom & Sue Scanlan

Willard Schroeder

Richard Sommerville

Stephen Trivers

William J. Wertz

October 21, 2011

Kevin Dunaway  
WWTV/WWUP-TV  
22320 130th Avenue  
Tustin, MI 49688

RE: MABF Regional Broadcast Media Career & Networking Fairs

Dear Kevin,

This letter is to thank you for your participation in the 2011 MABF Regional Broadcast Media Career & Networking Fair on **Tuesday, October 11** at the **Central Michigan University** in Mt. Pleasant. More than **80** students and business-minded professionals attended this year's event. We hope that you were able to meet and collect information on potential employees and interns.

Our records show that the following people attended the career fair on behalf of your station(s):

Corey Adkins, Kalin Franks

Representing the following call letters: WWTV/WWUP/WFXQ-TV

The information about the MABF Regional Broadcasting Career Fairs was widely disseminated and marketed, including distribution to resources with a high volume of minority and women candidates. In addition, the information was specifically sent to area MichiganWorks' offices, State of Michigan career websites and to all of the educational institutions in the state of Michigan as well as on the official Career Fair website [www.michiganbroadcastcareers.com](http://www.michiganbroadcastcareers.com).

As you know, participation in the career fair may count as one of the Outreach Prong 3 – Menu Option Initiatives with regards to obtaining EEO credits. As mentioned in previous mailings, your efforts in promoting and planning this event are very important to the FCC in considering possible EEO credit. For MAB members, any questions should be directed to the MAB's Legal Counsel, David Oxenford at 202-973-4256.

The MABF asks that you place this letter, photos, as well as any other fliers, registration materials, and affidavits of PSAs aired, with your EEO records.

Thank you for your participation, we hope the event proved useful in your station recruiting efforts.

Sincerely,

Julie Sochay  
Executive Vice President, MAB Foundation

Enclosures

819 N. Washington Ave.  
Lansing, MI 48906  
Phone: (517) 484-7444  
Fax: (517) 484-5810  
mabf@michmab.com  
www.michmab.com



**Founders Club**

**Chairman's Level**

Michigan Association of Broadcasters

**President's Level**

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Ross A. Biederman

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**Membership Level**

Elaine Baker

P. Thomas Bryson

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Peter A. Kizer

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Partick J. Mullen

Robert F. Ottaway

Tom & Sue Scanlan

Willard Schroeder

Richard Sommerville

Stephen Trivers

William J. Wertz

819 N. Washington Ave.

Lansing, MI 48906

Phone: (517) 454-7444

Fax: (517) 484-5810

mabf@michmab.com

www.mabf.org

*Michigan Association of Broadcasters Foundation*

March 21, 2012

Kevin Dunaway  
Heritage Broadcasting  
PO Box 627  
Cadillac, MI 49601

Dear Kevin:

Thank you for your participation in the 2012 MABF Broadcast Media Career & Networking Fair on Wednesday, March 14 at The Lansing Center in Lansing! More than 325 students and business-minded professionals attended this year's event.

We hope that you were able to meet and collect information on potential employees and interns.

Our records show that the following people attended the career fair on behalf of your company/station(s):

Kevin Dunaway

The following call letters were represented:

WWTV/WWUP/WFQX-TV

The information about the MABF Broadcast Media Career & Networking Fair at GLBC was widely disseminated and marketed, including distribution to resources with a high volume of minority and women candidates. The variety of students present at the awards ceremony, career fair and career sessions was proof that information regarding employment opportunities was made available to many valuable and new sources. In addition, your logo and a link was displayed on our website: [www.michiganbroadcastcareers.com](http://www.michiganbroadcastcareers.com).

**For Stations** - As you know, participation in the career fair may count as one of the Outreach Prong 3 – Menu Option Initiatives with regards to obtaining EEO credits. As mentioned in previous mailings, your efforts in promoting and planning this event are very important to the FCC in considering possible EEO credit. Any questions should be directed to your legal counsel, or, if you are a current MAB member, you can contact MAB's legal counsel, David Oxenford.

The MABF asks that you place this letter, other enclosed items as well as any other promotional materials your station used, and affidavits of PSAs aired, with your EEO records.

Thank you for your participation, we hope the event proved useful in your station recruiting efforts.

Sincerely,

Julie Sochay  
Executive Vice President, MAB Foundation



## EEO Report June 1, 2013

For the period of 6/1/12-5/31/13

16 Full-time Hired Employees

Applications received 126

Interviews preformed 74

Recruitment Sources used:	Interviews
9&10 News Website	21
Cadillac Evening News	14
T.C. Record Eagle	6
Specs Howard	3
Central MI University	0
Media Line	11
Fox 32 Website	6
Talent Dynamics	12
Petoskey News	0
Amvets 110	1

WWTW/WWUP-TV has participated in 3 Job Fairs during the past year. In attendance from WWTW/WWUP-TV was Kevin Dunaway, News Director, Tessia Klix, Promotion Director and William Kring, General Manager. We advertise the job fairs on-air. See attached.

We also host several school tours in our Cadillac studio throughout the school year.

11/15/12 Middle School

2/13/13 Manistee High School

2/19/13 Mt. Pleasant High School

2/20/13 Mt. Pleasant High School

3/13/13 TC Eastern Elementary

WWTW/WWUP-TV has an on-air Recruiting spot we are airing 20X per week asking that groups or organizations wanting our job openings to contact Sherri Magiera.

WWTW/WWUP-TV has an ongoing Internship program with Central Michigan University in Mt. Pleasant. We employ between 6-8 interns per year.

WWTW/WWUP-TV sponsors Best of the Class ceremony each spring. It brings together all the top students in their Senior Class from all the high schools in Northern MI.

Media Line <http://www.medialine.com> Mark Shilstone  
MediaLine  
P.O. Box 51909  
Pacific Grove, CA 93950

Phone: 800-237-8073

[www.talentedynamics.com](http://www.talentedynamics.com)  
214-640-3139

Cadillac News  
130 N. Mitchell St., P.O. Box 640, Cadillac, Michigan  
49601-0640  
Phone: 231-775-6565 Fax: 231-775-8790  
Chris Huckle

AMVETS 110  
127 W Cass  
Cadillac, MI 49601  
Jamie Maitland-231-878-4682

Petoskey News  
231-347-2544

Dick Kernan  
**Specs Howard School  
of Broadcast Arts**  
19900 W. Nine Mile Rd.  
Southfield, Michigan 48075  
Phone 248.358.9000

Ferris State University  
Rye, Clayton B Professor (231) 591-2716 Television & Digital Media Production  
1201 S. State Street Big Rapids, Michigan USA - 49307

Central MI University Broadcasting Department  
Rick Sykes  
344 Moore Hall  
Mt. Pleasant, MI 48858  
989-774-3851

EEO Report 6/1/2012-5/31/2013

Job	Recruitment source	# Inter.	Hire Date
Producer	Medialine	1	6/18/2012
	Talent Dynamics *	2	
Traffic	9&10 Website		7/17/2012
	Fox 32 Website	1	
	9&10 Website *	2	
	Cadillac News	2	
Producer	Fox 32 Website	1	7/23/2012
	Amvets 110	1	
	Medialine *	1	
	Talent Dynamics	1	
Reporter	9&10 Website	1	9/17/2012
	Fox 32 Website		
	Talent Dynamics *	1	
	Medialine	1	
Media Consultant	9&10 Website	2	10/24/2012
	Central MI Universtiy		
	Fox 32 Website		
	9&10 News	2	
Photojournalist	Cadillac News	1	10/30/2012
	Traverse City Record *	1	
	Fox 32 Website	1	
Asst Engineer	9 & 10 Website	2	11/5/2012
	Cadillac News *	2	
	9&10 Website	2	
Engineering Dep	Fox 32 Website	1	11/19/2012
	Specs Howard *	1	
	9&10 News	1	
Production Specialist	Specs Howard *	2	11/30/2012
	Fox 32 Website		
	9 & 10 Website	2	
	Cadillac News *	4	
Asst Business Manager	Amvets 110		1/3/2013
	TC Record Eagle	1	
	TC Record Eagle	1	
Sports Reporter	Cadillac News *	2	1/14/2013
	Fox 32 Website		
	9 & 10 Website	1	
News Producer	Talent Dynamics *	3	1/14/2013
	Medialine	1	
	Fox 32 Website		
	9&10 News Website		
Production Specialist	Talent Dynamics	2	1/16/2013
	Medialine *	2	
	9&10 News Website		
Production Specialist	Fox 32 Website		1/16/2013
	9&10 News Website *	2	
	Cadillac News	1	
	Fox 32 Website	1	
	Amvets 110		

EEO Report 6/1/2012-5/31/2013

Media Consultant	TC Record Eagle *	3	2/18/2013
	9&10 News Website	1	
	Fox 32 Website		
Reporter	Cadillac Evening News	1	2/20/2013
	Talent Dynamics *	2	
	MediaLine	2	
	9&10 News Website		
News Editor	Fox 32 Website		3/4/2013
	Talent Dynamics	1	
	MediaLine *	3	
	Fox 32 Website		
Maintenance	9&10 News Website		4/30/2013
	9&10 News Website	2	
	Cadillac Evening News *	1	
	Armvets 110		
	Fox 32 Website	2	

\* Recruiting source that referred the person hired.