



Federal Communications Commission
Washington, D.C. 20554

JUL 27 2010

Steve Carlston, VP/GM
SLC TV Licensee Corporation
299 South Main Street, Suite 150
Salt Lake City, UT 84111

Re: KUSG-TV, Facility ID #35822, St. George, UT

Dear Mr. Carlston:

We have completed our review of the response of SLC TV Licensee Corporation, licensee of the above-noted station, to the April 19, 2010 random audit letter sent to it in accordance with the provisions of Section 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules. As a result of our review, we find that no further action is required. In accordance with Section 73.3526(e)(10) of the Commission's rules for commercial stations or Section 73.3527(e)(11) for non-commercial stations, the licensee must place copies of this letter, our April 19th audit letter, and the audit response in the public inspection file. The licensee must maintain these materials in the file until grant, by final order, of its next renewal application for the station.

Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Lewis C. Pulley".

Lewis C. Pulley
Assistant Chief, Media Bureau
Media Bureau

May 28, 2010

Via Hand Delivery

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: EEO Audit – Employment Unit Comprised of KUSG(TV), St. George, UT (FIN: 35822)

Dear Sir or Madam:

SLC TV Licensee Corp. (“SLCTV”) hereby responds to the EEO Staff’s letter, dated April 19, 2010, informing SLCTV that the employment unit (the “Unit”) associated with the above-referenced station (the “Station”) has been randomly selected for an audit of its EEO program. SLCTV notes that the Unit includes the Station and KUTV(TV), Salt Lake City, UT (FIN: 35823).

3(a). Provide the Unit’s two most recent EEO Public File Reports and the Unit’s web address.

~~Response: Copies of the Unit’s EEO public file reports for the periods June 1, 2008 through May 31, 2009 and June 1, 2009 through May 31, 2010 are attached in Exhibit 1. The Unit’s web address is <http://connect2utah.com/index.php>.~~

The Unit completed sixteen hires during the June 1, 2008-May 31, 2009 period and completed nineteen hires during the June 1, 2009-May 31, 2010 period. The titles, hire dates and total number of interviewees for each vacancy are as follows:

1. Producer:
2. Master Control Operator:
3. Account Executive:
4. Photographer:
5. Producer:
6. News Producer:
7. News Producer:
8. Traffic Operations Manager:
9. Master Control Operator:

10. Web Coordinator:
11. Director of Engineering:
12. Assistant Director of Engineering:
13. National Sales Assistant:
14. Master Control Operator:
15. News Director:
16. Executive Producer:
17. Sales Coordinator-KUSG:
18. Traffic Coordinator:
19. Traffic Coordinator:
20. AR/Collections Clerk:
21. Traffic Coordinator:
22. National Sales Assistant:
23. Accountant:
24. Account Executive:
25. Account Executive:
26. Account Executive:
27. Account Executive:
28. General Manager:
29. Payroll/Accounts Payable:
30. Traffic Coordinator:
31. Marketing Director
32. Account Executive:
33. Traffic Coordinator:
34. Producer:
35. E Media Manager:

3(b). For each Unit full-time position filled during the period covered by the above EEO public file reports provide dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position. Include 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 Unit job openings.

Response: Copies of all available documentation for each job opening listed in the 2009 and 2010 reports are attached as Exhibit 2 and Exhibit 3, respectively.

For a number of positions filled between June 1, 2008 and May 31, 2009, the Unit did not undertake wide recruitment. Four of these positions were filled through internal promotions without recruitment. Another three positions were filled under exigent circumstances due to the resignation of all of the Unit's morning news producers within one week of each other and the Unit's need to fill the positions as expeditiously as possible. (Two positions were filled by employees holding similar positions at other in-market stations who were available for an immediate start date and one position was filled through the permanent hiring of a Unit intern.)

For certain positions filled between June 1, 2009 and May 31, 2010 (the traffic coordinator positions identified as openings 2, 3 and 5 and the account executive positions identified as openings 8-11), the positions were filled from the same recruitment pool. For the sales coordinator position at KUSG, the Unit did not engage in wide recruitment because the employee was handling the duties for the Unit through a vendor and was hired to work directly for the company. The Unit did not engage in wide recruitment for the General Manager due to exigent circumstances (a need to replace the existing manager with a new manager without alerting the existing manager). The Unit did not engage in wide recruitment for its marketing manager position because that position was not "open;" it was created for the individual candidate who was relocating to the market bring a unique skill set to the Unit.

Sources requesting notification of all job announcements were not separately notified of the openings; rather they were notified via the same email as all other recruiting sources, copies of which are attached with the respective job openings.

3(c). Provide the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

Response: The referral source for each interviewee for each Unit vacancy covered by the 2009 and 2010 public file reports is provided within each such report, which are attached as Exhibits 2 and 3, respectively. The total number of interviewees for each vacancy is indicated in the response to Item 3(a) above.

3(d). Provide documentation of Unit recruitment initiatives during the periods covered by the above-noted EEO public file reports. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period.

Response: There are currently 144 full-time employees of the Unit, and the population of the Salt Lake City market is greater than 250,000. Accordingly, the Unit is required to perform four initiatives during each two year period. Attached as Exhibits 4 and 5 is documentation demonstrating performance of the Unit's recruitment initiatives identified in the 2009 and 2010 public file reports.

3(e). Disclose any pending or resolved complaints involving the Station filed during period from January 10, 2008 (the date SLCTV acquired the Unit) through now 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.

Response. None

3(f). For the period from January 10, 2008 until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

Response: The Unit's General Manager is responsible for overseeing EEO compliance. In addition to ensuring that notices regarding full time job openings are widely distributed to diverse groups throughout the area, the General Manager is responsible for providing information regarding the unit's EEO policies to employees and persons applying for new positions with the Unit. The Unit's EEO policy is stated on each job application, indicating that SLCTV considers applicants for all positions without regard to race, color, religion, sex, national origin, age, disability, or any other legally protected status. The Unit's employee handbook also informs its employees of SLCTV's EEO policies and program. Attached as Exhibit ___ is a copy of the relevant page addressing EEO compliance. In addition, advertisements publicizing vacancies inform job applicants that SLCTV is an equal opportunity employer.

3(g). From January 10, 2008 through 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. Unit management meets annually in May to review the Unit's anti-discrimination and anti-harassment policies, conduct a compensation review, review its EEO recruitment program and hiring process. This meeting ensures that all personnel with hiring authority are aware of the Unit's obligations and any problems are addressed. The agenda from the May 25, 2009 meeting is attached in Exhibit 6. When the previous General Manager left the Unit and the new General Manager took over in late 2009, he realized that there were issues with the posting of positions and lack of consistency with the mass dissemination. Since that time, there have been many meetings and training sessions attended and held to ensure that the leadership team as well as any person in a hiring position is aware and following all guidelines set forth by the FCC. Also, a follow up review was held on May 24, 2010 as a recap and analysis to once again review the process and address any questions and/or concerns. These meetings have been scheduled on a quarterly basis going forward. By conducting these types of reviews, the Unit now has over twenty outside recruitment sources that it utilizes for many job openings. The Unit's target for compliance is to undertake at least four recruitment initiatives during each two-year period.

3(h). From January 10, 2008 through 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.

Response. Benefits are set at the corporate level. At the annual meeting described in 3(g) above, Unit management conducts an equal pay and compensation review to ensure Unit policies provide equal opportunity and do not have a discriminatory effect.

There are no unions or union employees at the Unit.

3(i). Religious Broadcasters. Not applicable.

4. Time Brokerage. Not applicable.

Should you have any questions regarding the foregoing information, please contact our attorney, Mark Denbo at 202-230-5180 or mark.denbo@dbr.com.

Sincerely,

Steve Carlston
Vice President and General Manager

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