

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0120 (February 2003)	FOR FCC USE ONLY
FCC 396-A		
BROADCAST EQUAL EMPLOYMENT OPPORTUNITY MODEL PROGRAM REPORT Read INSTRUCTIONS Before Filling Out Form		FOR COMMISSION USE ONLY FILE NO. -

Section 1

MISSOULA BROADCASTING COMPANY, LLC		
Mailing Address 2425 W. CENTRAL AVENUE SUITE 203		
City MISSOULA	State or Country (if foreign address) MT	ZIP Code 59801 -
Telephone Number (include area code) 4063291882	E-Mail Address (if available) BLEIFSON@SIMMONSMEDIA.COM	
FCC Registration Number:	Facility ID Number 162324	Call Sign KDTR
<input type="radio"/> Application for Construction Permit for New Station <input type="radio"/> Application for Assignment of License <input checked="" type="radio"/> Application for Transfer of Control <input type="radio"/> Amendment to pending application		
a. Service Type:	FM	
b. Community of License:	City: FLORENCE State: MT	

INSTRUCTIONS

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to ensure equal employment opportunity. This is submitted to the Commission as the Model EEO Program. 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.

Guidelines for a Model EEO Program and a Model EEO Program are attached.

NOTE: Check appropriate box, sign the certification below and return to FCC:

- ☐ Station employment unit will employ fewer than 5 full-time employees; therefore no written program is being submitted.
- ☒ Station employment unit will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed	Name of Respondent DAVID E. SIMMONS
Title MANAGER	Date

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).

MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I. GENERAL POLICY

It will be our policy to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

II. RESPONSIBILITY FOR IMPLEMENTATION

Name: DAVID E. SIMMONS	Title: MANAGER
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will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. POLICY DISSEMINATION

To ensure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

- ☒ The station's employment application forms will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☒ Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.
- ☒ We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.
- ☐ Other (specify)

[Exhibit 1]

IV. RECRUITMENT

To ensure that information concerning each full-time vacancy is widely disseminated, we propose to use the following list of recruitment sources consistent with the requirements of 47 C.F.R. Section 73.2080:

[Exhibit 2]

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-PERF, Paperwork Reduction Project (3060-0120), 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 3060-0120.

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 1

Description: OTHER - STATIONS IN EMPLOYMENT UNIT

THIS REPORT IS BEING FILED IN CONJUNCTION WITH THE FCC 315 APPLICATION SEEKING THE FCC'S CONSENT TO THE TRANSFER OF CONTROL OF MISSOULA BROADCASTING COMPANY, LLC. THE RELEVANT STATIONS, WHICH ALL ARE IN THE SAME EMPLOYMENT UNIT INCLUDE:

KDTR FM, FLORENCE MT, #162324
KKVU FM, STEVENSVILLE, MT #162327
KYJK FM, MISSOULA, MT #162326
K275BS, MISSOULA, MT #149672
K287AQ, HAMILTON, MT #146254

Attachment 1

Exhibit 2

Description: RECRUITMENT

THE EMPLOYMENT UNIT WILL USE A VARIETY OF RECRUITMENT SOURCES DESIGNED TO INFORM QUALIFIED JOB APPLICANTS IN THE COMMUNITY OF THE AVAILABILITY OF FULL-TIME VACANCIES AT THE STATIONS. THE SPECIFIC RECRUITMENT SOURCES USED WILL VARY DEPENDING ON THE POSITION TO BE FILLED. THE EMPLOYMENT UNIT WILL USE LOCAL NEWSPAPERS, AREA COLLEGES AND UNIVERSITIES, MINORITY ORGANIZATIONS, AND STATE AND LOCAL EMPLOYMENT AGENCIES WHERE APPROPRIATE. JOBS REQUIRING SPECIALIZED SKILL MAY BE ADVERTISED IN PROFESSIONAL AND TRADE JOURNALS. THE EMPLOYMENT UNIT MAY ALSO USE THE STATIONS AND THEIR WEBSITES AS WELL AS THIRD PARTY WEBSITES.

THE APPLICANT'S MOST RECENT ANNUAL EEO REPORT, WHICH INCLUDES THE RECRUITMENT SOURCES UTILIZED BY THE APPLICANT, IS ATTACHED HERETO.

Attachment 2

Description
2018 EEO Report

Annual EEO Public File Report
Missoula Office for KDTR, KKVU, KYJK, KKVU-HD4

The purpose of this EEO Public File Report (“Report”) is to comply with Section 73.2080(c)(6) of the FCC’s 2002 EEO Rule. This Report has been prepared on behalf of the Stations Employment Unit that is comprised of the following stations: KDTR, KKVU, KYJK, KKVU-HD4 and is required to be placed in the public inspection files of these stations, and posted on their websites, if they have websites.

The information contained in this Report covers the time period beginning December 1, 2017 to and including November 30, 2018.

The FCC’s 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station (s) comprising the Station Employment Unit during the Applicable Period;
2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 7302080 (c) (1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
5. A list and brief description of the initiatives undertaken pursuant to Section 7302080(c)(2) of the FCC rules.

Appendices 1, 2 and 3 which follow have been designed, in the aggregate, to provide the required information. Please note that the numbers listed on Appendix 2 under the column entitled “Full-time Positions for Which This Source Was Utilized” refer to the number of the full-time job positions listed on Appendix 1.

For the purpose of this Report, a vacancy was deemed “filled” not when the offer was extended but when the hiree accepted the job offer. A person was deemed “interviewed” whether he or she was interviewed in person, over the telephone or by e-mail.

Appendix 1 to

Annual EEO Public File Report Form

Covering the Period from December 1, 2017 to November 30, 2018

Stations Comprising Stations Employment Unit: KDTR, KKVU, KYJK, KKVU-HD4

Section 1: Vacancy Information

	Full-time Positions Filled By Job Title	Recruitment Source of Hiree	Total Number of Interviewees From All Sources for This Position
1	NONE		

Total Number of Persons Interviewed During Applicable Period: **0**

Appendix 2 to

Annual EEO Public File Report Form

Covering the Period from December 1, 2017 to November 30, 2018

Stations Comprising Station Employment Unit: KDTR, KKVU, KYJK, KKVU-HD4

Section 2: Recruitment Source Information

	Recruitment Source (Name, Address, Telephone Number, Contact Person)	Total Number of Interviewees This Source Has Provided During This Period (If Any)	Full-time Positions for which This Source was Utilized
A	University of Montana 32 Campus Drive Missoula, MT 59812 Contact: Heather Niemeyer hireumgrads@mso.umt.edu	0	0
B	Montana Broadcasters Association Job Bank HC 70 Box90 Bonner, MT 59823 Contact: Greg McDonald	0	0
C	Craigslist Online Classifieds Craigslist.com	0	0
D	All Access Online Classifieds Allaccess.com	0	0
E	Word of mouth, referral	0	0
F	Unsolicited resumes on file	0	0
G	On Air Radio Ads	0	0
H	In-House Posting	0	0
I	Resource Management Inc.	0	0
J	Indeed.com	0	0

*Indicates sources that have requested notification of job openings. N/A

Appendix 3 to

Annual EEO Public File Report Form

Covering the Period from December 1, 2017 to November 30, 2018

Stations Comprising Station Employment Unit: KDTR, KKVU, KYJK, KKVU-HD4

Section 3: Supplemental (Non-Vacancy Specific) recruitment Activities

Undertaken by KDTR, KKVU, KYJK, KKVU-HD4

	<u>Type of Recruitment Initiative</u>	<u>Brief Description of Activity</u>
1	EEO Training for Management (x2)	Management meets bi-annually to discuss methods and tactics to ensure equal employment opportunity and prevention of discrimination as well as brushing up on EEO rules and requirements. 12/14/17 & 5/23/18
2	High School Student Job Shadow	We had 2 high school students come to the stations in the Spring and job shadow various positions throughout the day. This program was setup through the Missoula Job Service.
3	Radio Station Tours (x1)	A tour and introduction to careers in radio was presented to a youth summer camp group on 07/25/18
4	Speaking Engagements (x3)	Our Promotions Director spoke to the UofM Journalism School about Women in Media, Podcasting and media careers on 10/17/18. She also sat on a 2-day panel before the public as well as the UofM Business School about community building, diversity and outreach. (10/12-10/13/18)
5	Career Fair	We had a table at the University of MT Welcome Feast on 8/31/18. This gave us an opportunity to introduce ourselves to students and answer any questions they had in regards to our stations and careers available in radio.