



2233 Wisconsin Ave., NW, Ste. 226  
Washington, DC 20007

**Barry S. Persh**

(202) 776-2458

bpersh@graymillerpersh.com

January 25, 2024

*Submitted via Online Public Inspection File*

EEO Staff  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

NOTE: No Filing Fee Required

Re: Supplement to Response to EEO Audit Letter  
Greater Cincinnati Television Educational Foundation  
Station WCET(TV), Cincinnati, OH (Facility ID 65666)

Dear EEO Staff:

On behalf of Greater Cincinnati Television Educational Foundation, and at the request of FCC staff, we transmit herewith an updated response to an FCC audit letter request for information concerning the EEO program of noncommercial educational television station WCET, Cincinnati, Ohio.

Should any questions arise concerning this response, kindly contact the undersigned individual.

Very truly yours,

*Barry Persh*

Barry S. Persh  
*bpersh@graymillerpersh.com*  
Counsel for Greater Cincinnati Television  
Educational Foundation

Enclosure

January 24, 2024

EEO Staff  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

Re: **Response to EEO Audit Letter**  
Greater Cincinnati Television Educational Foundation  
Station WCET(TV), Cincinnati, OH (Facility ID 65666)

EEO Staff:

Greater Cincinnati Television Educational Foundation (“GCTEF”) hereby responds to an FCC audit letter dated October 30, 2023 requesting information concerning the EEO program of noncommercial educational television station WCET, Cincinnati, Ohio. The WCET employment unit (the “Unit”) employs more than five full-time employees, and GCTEF therefore provides the following information in response to the audit request.

**Item # 2(b)(i).** GCTEF encloses copies of the Unit’s annual EEO public file reports for the periods covering (i) June 1, 2022 to May 31, 2023 and (ii) June 1, 2021 to May 31, 2022 as Attachment 1.

**Item # 2(b)(ii).** The WCET station web site is available at: <https://www.cetconnect.org/>. The annual EEO public file report is posted at: <https://www.cetconnect.org/about/reports/> .

**Item # 2(b)(iii).** The dates of hire for the positions filled during the periods covered by the 2022-2023 and 2021-2022 annual EEO public file reports are as follows:

<b>Job Title</b>	<b>Date of Hire</b>
Broadcast Engineer	7/11/2022
Director of Programming	6/12/2023
School Readiness Coordinator	10/4/2021
Grants Manager	1/10/2022
Engineer (exigent circumstances hire)	1/18/2022
Development Associate	2/21/2022
Producer (internal promotion)	2/28/2022

Production Assistant	3/14/2022
Manager of Education and Engagement	4/25/2022
Project Assistant	5/2/2022
Production Intern (part-time)	5/2/2022
Production Intern (part-time)	5/16/2022

GCTEF encloses, at Attachment 2, documentation of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions filled during the period covered by the two annual EEO public file reports noted above (for the 2022-2023 and 2021-2022 annual reporting periods). No organizations notified GCTEF that they wanted to be notified of job openings.

**Item # 2(b)(iv).** The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2022-2023 and 2021-2022 reports are as follows:

Job Title	Total # of Interviews	# of Interviewees by Referral Source
Broadcast Engineer	3	Indeed.com (2) CET Online Artswave Cincinnati State Technical and Community College CET internal consideration or employee referral (1)
Director of Programming	3	Current (2) Indeed.com CET Online LinkedIn (1) CET internal consideration or employee referral
School Readiness Coordinator	4	The Oniru Group Human Resource Consulting (4) * <i>see note below</i> CET Online
Grants Manager (aka Manager of Grant Writing)	3	Artswave (1) Greater Cincinnati NonProfit News Facebook CET Online (1) Indeed (1) LinkedIn
Engineer ( <i>Exigent Circumstances hire</i> )	1	CET intern consideration or employee referral (1) <b>**Exigent circumstances:</b> WCET needed to immediately replace 3 long-term engineer employees who announced their departures at the same time, and whose duties could not be fulfilled, even briefly, by other station employees. WCET re-hired an engineer that had previously worked for the station.

Development Associate	2	Artswave (1) Greater Cincinnati NonProfit News CET Online Indeed (1)
Producer ( <i>internal promotion</i> )	2	The Oniru Group * <i>see note below</i> Human Resource Consulting (2) ** <i>Internal promotion: a former WCET intern returned to station as a producer following completion of schooling.</i>
Production Assistant	1	CET intern consideration or employee referral (1)
Manager of Education and Engagement	1	The Oniru Group Human Resource Consulting (1) * <i>see note below</i> CET Online
Project Assistant	4	Artswave State of Ohio Job and Family Services CET Online Indeed (4)
Production Intern (2 offers) ( <i>Part-Time</i> )	4	University of Cincinnati Media Production Career Fair (4) **WCET brought on two interns for part-time positions from University career fair recruitment

\* **Please note** that certain positions (including School Readiness Coordinator; Producer; and Manager of Education and Engagement) were recruited by WCET's outside Human Resources consulting firm the Oniru Group. The Oniru Group conducted HR functions for WCET in exchange for a monthly fee, including advertising and recruiting these positions through sources which included local colleges and universities. Documentation of WCET’s working relationship with the Oniru Group and its recruitment efforts for these positions is included in Attachment 2.

**Item # 2(b)(v)**. GCTEF encloses documentation of recruitment initiatives performed during the periods covered by the 2022-2023 and 2021-2022 public file reports as Attachment 3. The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the WCET-TV Unit is 35. The market for the Unit has a population of more than 250,000 persons. Based on these factors, GCTEF is required to perform four (4) initiatives within a two-year period.

During the periods covered by the 2022-2023 and 2021-2022 reports, GCTEF completed the following initiatives, involving station personnel as indicated:

***Scholarship Program***

- WCET supports the scholarship program sponsored by the Ohio Association of Broadcasters by posting the availability of such a program, offering assistance to individuals in completing the application process and by discussing the scholarship opportunities.
- *Station personnel involved:* Chief Executive Officer, Chief Content Officer, Human Resources Manager.

***Events with Educational Institutions Relating to Broadcasting***

- Education Staff have held more than 60 Ohio - Approved trainings for early childhood teachers and stay at home care providers, helping them grow in their profession and increase the viability of their centers. The great majority of these educators are from disadvantaged neighborhoods. For most of the home-based care providers, PMC's training is the only professional development they receive. All providers who complete the training receive credit from the state of Ohio which is essential to keeping their license.
- *Station personnel involved:* Chief Education Officer, Manager of Education and Engagement, Director of Learning Services, School Readiness Coordinator.
- Education staff surveyed middle school students in Dayton to better understand how they think about their future career as well as the pathways to those careers. Based on those surveys and national research, The Organization is now in production for a video series called "Engineering Your Future 2.0" which will be widely distributed to middle school students through their schools and on social media
- *Station personnel involved:* Chief Education Officer, Director of Learning Services, Producer
- Tours for groups of homeschool children
- *Station personnel involved:* Education and Technology Coordinator
- Several meetings of General Managers with the Superintendent of the Ohio Department of Education, discussing the power of public media in addressing the pandemic and helping to mitigate the learning loss for K -12 students
- *Station personnel involved:* Chief Executive Officer, Chief Education Officer

***Training program designed to enable station personnel to acquire skills that could qualify them for higher-level positions***

- Ongoing internal training efforts designed to enable station personnel to acquire skills that could lead them to qualify for higher level positions within the station. Mostly occurred in the Production and Education Services departments. This type of activity has evolved from in person to online and group training which allowed more employees to take advantage of the training opportunities. Recent national conferences for PBS, the International Society for Technology and Education (ISTE) and the National Education Telecommunications Associate (NETA) were online, allowing more employees to take advantage of training opportunities.
- *Station personnel involved:* Chief Executive Officer, Chief Operating Officer

***Events in the community designed to inform and educate members of the public as to employment opportunities in broadcasting***

- Held "About CET" presentation at the Kenwood Retirement Community
- *Station personnel involved:* Development staff
- Held "About CET" presentation at the Deupree House
- *Station personnel involved:* Development staff

- CET is Me special event (latter two days free to the public)
- *Station personnel involved:* Development staff
- CET offered a presentation to the Edgewood (KY) Seniors Group
- *Station personnel involved:* Development staff
- CET hosted 2 in person events with Chef Lidia Bastianich
- *Station personnel involved:* Development staff
- Discussion about CET and the Cincinnati Woman's Club
- *Station personnel involved:* Development staff
- Hosted and recorded four Urban Consulate Presents events and discussion
- *Station personnel involved:* CEO, COO, CCO

### ***Mentorship Program***

- Senior management identified employees for advancement in the organization and allowed them additional growth opportunities to make sure they can have a career in broadcasting.
- *Station personnel involved:* CEO, COO, CDO, CCO, CPO

**Item # 2(b)(vi).** There were no complaints alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex filed during the current license term before any body having competent jurisdiction under applicable law.

**Item # 2(b)(vii).** Responsibilities of each level of Unit management responsible for implementing the Unit's EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

The CEO and COO meet periodically to discuss employment needs for the organization. These conversations are helped along by manager requests, retirements, and operational additions or deletions. The recruiting for open positions is done by the HR manger, and during this time period an independent outside consultant was also utilized. The HR manager, who reports to the COO, is responsible for administering EEO policy.

Employees are informed of the station's EEO policies and programs through signing off on receipt of the employee handbook, the posting of EEO and Labor posters in prominent areas such as the employee break room, and periodic Anti-Discrimination trainings. The fact that WCET is an equal opportunity employer is contained on the job application as well as the station's web site when jobs are posted. For ongoing reference the Organization's policies are maintained on the Intranet site maintained by our digital team. The HR manager regularly reviews the Intranet and keeps these policies current and accurate.

**Item # 2(b)(viii).** Efforts to analyze the Unit's EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

On an annual basis, when possible, WCET reviews and revises its EEO program. An employee census is prepared by the HR manager and reviewed by the CEO and COO prior to the end of the Organization's fiscal year end. The HR manager is able to determine the effectiveness of recruiting sources and constantly strives to find new sources to help in our outreach efforts.

**Item # 2(b)(ix).** Efforts to periodically analyze 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:

WCET provides annual employee reviews to determine salary and bonus decisions. Salary decisions are made annually with any applicable raises going into effect at the beginning of the calendar year. Pay equity has been maintained to ensure that employees in like positions are being compensated in like manner. Turnover has traditionally been very low from year to year so promotions are granted as possible. Internal promotions to replace retiring or resigning employees are preferable. We have put much effort into ensuring all employees are being compensated fairly and therefore have the ability to make a career as our employee. New hire interviews are typically done by the HR manager, the hiring manager, and any additional related staff for the open position. The new hire is ultimately selected by the interviewing group with final compensation being assigned at the budgeted amount.

**Items # 2(b)(x), 3 and 4** are not applicable.

Greater Cincinnati Television Educational Foundation, through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,  
GREATER CINCINNATI TELEVISION  
EDUCATIONAL FOUNDATION

By: Lee Weinel

Print Name: Lee Weinel

Title: CFO/COO

Date: January 24, 2024