

CBS Radio KMVQ-FM Inc.
1800 K Street, NW
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Washington, DC 20006

August 25, 2014

EEO Staff
 Policy Division
 Media Bureau
 Federal Communications Commission
 445 12th Street, SW
 Washington, DC 20554

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AUG 25 2014

Federal Communications Commission
 Bureau / Office

RE: Station KMVQ-FM
San Francisco, California
Fac. ID No. 1084
EEO Audit Letter

Dear Sir or Madam:

CBS Radio KMVQ-FM Inc. (“*CBS Radio*” or the “*Licensee*”), licensee of Station KMVQ-FM (“*KMVQ-FM*,” a “*Station*”), hereby submits the information and materials concerning the Station’s EEO program, as requested by the Federal Communications Commission (the “*Commission*”) in a letter dated June 10, 2014, from the Media Bureau to CBS Radio (the “*EEO Audit Letter*”).¹

As requested in the EEO Audit Letter, CBS Radio hereby provides responsive information for the applicable station employment unit, which in addition to the Station consists of the following stations (together with KMVQ-FM, the “*Stations*” or the “*Employment Unit*”):

KCBS(AM), San Francisco, California (Facility ID No. 9637)²
 KFRC-FM, San Francisco, California (Facility ID No. 20897)³
 KITS(FM), San Francisco, California (Facility ID No. 18510)
 KLLC-FM, San Francisco, California (Facility ID No. 9624)
 KZDG(AM), San Francisco, California (Facility ID No. 25458)⁴

¹ The Media Bureau extended until August 25, 2014 the due date for CBS Radio’s response to the EEO Audit Letter. E-mail of Lewis Pulley to Anne Lucey (June 17, 2014). Therefore this response is timely submitted.

² All are licensed to CBS Radio East Inc. unless otherwise indicated.

³ Licensed to CBS Radio Stations Inc.

⁴ Station KZDG(AM), licensed to CBS Radio East Inc., is subject to a Time Brokerage Agreement with AAA Broadcasting, LLC (“AAA Broadcasting”).

In preparing this response, CBS Radio has relied upon an examination of its files and records and due inquiry of current employees who are knowledgeable of employment-related issues at the Employment Unit. The responses below refer to the numbered paragraphs as they are set forth in the EEO Audit Letter.

Paragraph 3: Audit Data Requested

Paragraph 3(a): EEO Public File Reports and Station Websites

Attachment A contains the Employment Unit’s two most recent EEO public file reports, which cover the 2012-13 reporting period (the “2012-13 EEO Report”⁵) and the 2013-14 reporting period (the “2013-14 EEO Report”⁶).

The current EEO public file report is available on each station’s website. The Employment Unit’s websites are:

<u>Station</u>	<u>Website</u>
KMVQ-FM	http://997now.cbslocal.com/
KCBS(AM) / KFRC-FM	http://sanfrancisco.cbslocal.com/station/kcbs/
KITS(FM)	http://live105.cbslocal.com/
KLLC-FM	http://radioalice.cbslocal.com/
KZDG(AM)	(none)

Attachment A contains screen shots of the stations’ websites showing that each contains the required link to the current EEO public file report.

Attachment A also contains the date of each full-time hire listed in the Employment Unit’s two most recent EEO public file reports.

Paragraph 3(b): Full-time Positions Filled

Attachment B contains copies of advertisements, bulletins, letters, faxes, emails, and other communications announcing the full-time job vacancies filled during the 2012-13 and 2013-14 reporting periods, organized by vacancy and ordered to correspond to the EEO public file reports.⁷ In general, the Employment Unit retains copies of all notices sent to sources, as

⁵ The 2012-2013 EEO Report includes the following inadvertent typographical errors: 1) the chart on page 48 labeled vacancies L, M N, R and V should be labeled vacancies L, M, N, R and W; and 2) the chart on page 60 labeled vacancy W should be labeled vacancy X.

⁶ The 2013-14 EEO Report inadvertently included information for an internal promotion at vacancy K. Information pertaining to 2013-14 vacancy K has been omitted from this EEO Audit Response Letter.

⁷ The Employment Unit inadvertently listed Craigslist, AM FM Jobs, and Bay Area Jobs in the 2012-13 EEO Report as organizations notified about job vacancies, but the Employment Unit did not send these notices. The Employment Unit inadvertently listed Laney College and St. Mary’s College Career Development Center in the 2013-14 EEO Report as organizations notified about job vacancies, but the Employment Unit did not send these notices.

required by Section 73.2080(c)(5)(iii).⁸ Where the same job vacancy notice was sent to multiple sources, only one copy of each such notice is included, along with the list of sources to which the notice was sent. Certain personal data has been redacted.

The Employment Unit airs generic on-air advertisements encouraging individuals interested in jobs at the Employment Unit to visit CBSRadio.com for a list of jobs at all CBS Radio stations. In general, the Employment Unit does not air vacancy-specific on-air advertisements.

The following organizations have requested notice of all full-time job vacancies at the Employment Unit: Alameda County SSA; AMVETS (American Vets); Arriba Junto; Berkeley Adult School Workability II Program; CA Department of Rehabilitation; Ciddio-Morris; Community Housing Partnership; Community Vocational Enterprises; Contra Costa Vocational Service; Department of Veteran Affairs; East Bay Asian Local Development Department Career Link Center; Goodwill Industries; Heald College; Helix Opportunity; Job Corps; Keller Graduate School of Management; KQED; Mission Hiring Hall; Newark One Stop; PEP JOBS/CPMC; Peninsula Works; Rubicon Programs; South of Market Employment Center; The ARC of San Francisco; The Salvation Army (Harbor House); Tri-Cities One Stop Career Center; UCSF; Upwardly Global; United States Department of Veterans Affairs; and Wu Yee Children's Service.⁹ The following organizations have requested notice of all full-time on-air news vacancies at the Employment Unit: Bay Area Black Journalists; Institute of Audio Research; and the California Chicano News Media (also called the Latino Journalist of California). Copies of the job announcements are included in the materials provided in Attachment B.

Paragraph 3(c): Interviewees

Attachment C contains charts listing the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the 2012-13 and 2013-14 reporting periods.

Paragraph 3(d): Recruitment Initiatives

Attachment D contains documentation demonstrating performance of four (4) of the recruitment initiatives listed in the Employment Unit's two most recent EEO public file reports, ordered to correspond to the EEO public file reports. Certain personal data has been redacted.

As of June 10, 2014, the Employment Unit had approximately 144 full-time employees. The Employment Unit is located in a metropolitan area, as defined by the Office of Management and Budget, with more than 250,000 people. Based on these factors, the Employment Unit is

⁸ The CBS Radio recruitment software further distributes notices of vacancies posted to CBSRadio.com to other online sources, as explained in footnote 1 and Attachment A of the 2013-14 EEO Report. The 2012-13 EEO Report inadvertently omitted this footnote.

⁹ AMVETS requested notice from the Employment Unit in December 2013. Thereafter, the Employment Unit sent notice to AMVETS for the 2013-14 EEO Report vacancies L, N, O, P, Q, R, S, T and U, but inadvertently omitted AMVETS from the corresponding 2013-14 EEO Report vacancy charts. The Employment Unit also sent notice to the East Bay Asian Local Development Department Career Center during the 2013-14 reporting period, but inadvertently omitted the East Bay Asian Local Development Career Center from the 2013-14 EEO Report vacancy charts.

required to perform four supplemental recruitment initiatives within each two-year period. The most recent license renewal filing date for the Stations is August 1, 2013. Therefore, the 2012-13 EEO Report and the 2013-14 EEO Report are in two separate two-year periods: the last two-year period ended with the 2012-13 EEO Report, and the current two-year period started with 2013-14 EEO Report.

In accordance with the instructions in the EEO Audit Letter, documentation is only provided for four (4) of the recruitment initiatives, specifically for the Employment Unit’s establishment of an internship program, participation in events or programs sponsored by educational institutions relating to career opportunities in broadcasting, participation in job fairs, and provision of training to the management-level personnel as to methods of ensuring equal employment opportunity and preventing discrimination. The recruitment initiatives are summarized below and are described in more detail in the 2012-13 EEO Report and in the 2013-14 EEO Report. Documentation in support of the remaining recruitment initiatives is available upon request.

Employment Unit personnel involved in these recruitment initiatives, by title, are listed below:

2012-13 EEO Report

<u>Activity</u>	<u>Personnel Involved</u>
South East Community Career Fair – Job Fair	H.R. Administrator
Employment Development Dept Job Fair – Job Fair	H.R. Administrator
Veteran Resource & Career Fair – Job Fair	H.R. Administrator
Dominican University Career Fair – Career Event Sponsored by an Educational Institution	H.R. Administrator
Ohlone College Career Fair - Career Event Sponsored by an Educational Institution	H.R. Administrator
City College of San Francisco Career Fair - Career Event Sponsored by an Educational Institution	H.R. Administrator
Skyline College Career Fair - Career Event Sponsored by an Educational Institution	H.R. Administrator
Academy of Art Career Fair - Career Event Sponsored by an Educational Institution	Sr. VP/GM/Mkt Manager
College Internship Program - Ongoing	H.R. Administrator, Local Sales Manager, Business Development Manager, Producer, Assistant Program Director, Music Director
Contributions to CBS Radio Career Website	Web Administrator
PSA’s - Ongoing	P.S.A Director
CBS Radio Management-Level Training	All Management Level Personnel

2013-14 EEO Report

<u>Activity</u>	<u>Personnel Involved</u>
Diversity Career Fair – Entertainment Industry College Outreach Tour – Florida A&M University – Job Fair	Regional H.R. Manager, CBS Radio Florida
Hiring Our Heroes Veterans Event – Job Fair	H.R. Administrator
National Assoc. of Television Program Executive Career Day – Job Fair	H.R. Administrator, Business Development Manager
East Bay Works Career Fair – Job Fair	H.R. Administrator

<u>Activity</u>	<u>Personnel Involved</u>
College of San Mateo Career Fair - Career Event Sponsored by an Educational Institution	H.R. Administrator
University of California Berkeley Internship Fair - Career Event Sponsored by an Educational Institution	General Sales Manager, Account Executive
City College of San Francisco Career Fair - Career Event Sponsored by an Educational Institution	H.R. Administrator
Academy of Art Spring Show - Career Event Sponsored by an Educational Institution	SR. VP/GM/MKT Manager
Regional Veterans Employers Conference - Event Sponsored by Groups Interested in Broadcast Employment Issues	H.R. Administrator
College Internship Program - Ongoing	H.R. Administrator, Music Director, Assistant Program Director, Producer, Sales Manager
Contributions to CBS Radio Career Website	Web Administrator
PSA's - Ongoing	P.S.A Director
CBS Corporation Compliance Training Program	All full-time employees, including management-level personnel

Paragraph 3(e): Discrimination Complaints

No complaints involving the Stations were disclosed on the EEO broadcast program reports (FCC Form 396) filed with the license renewal applications for the Stations.¹⁰

To Stations' knowledge, no additional pending or resolved complaints have been filed during the Stations' current license terms before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Employment Unit on the basis of race, color, religion, national origin, or sex.

Paragraph 3(f): Responsibilities of Each Level of Employment Unit Management to Ensure Implementation of Employment Unit EEO Policies; Informing Job Applicants and Employees of Employment Unit EEO Policies

The management of the Employment Unit actively works to facilitate effective implementation and enforcement of its equal opportunity and nondiscrimination practices and policies. The Market Manager holds ultimate responsibility for ensuring enforcement of EEO policies and the Human Resources Administrator oversees the implementation of the EEO process. The Human Resources Administrator works to ensure that the EEO practices and policy are effectively implemented and that the necessary paperwork is completed for each job vacancy. The Regional Human Resources Director also works with the Human Resources Administrator and assists in recruitment for management-level vacancies.

It is the responsibility of each level of management at the Employment Unit to work with the Human Resources Administrator to ensure compliance with the Employment Unit's EEO policies, including compliance with all appropriate recruitment procedures. In connection with each job vacancy, the applicable Employment Unit hiring manager works with the Human Resources Coordinator to comply with the EEO policy and complete the necessary notifications and paperwork.

¹⁰ See FCC File No. B396 - 20130731AOB, AKM and AQL.

The Human Resources Administrator is primarily responsible for widely disseminating information for each full-time vacancy, for ensuring that the Employment Unit fulfills the requisite number of supplemental recruitment initiatives over each two-year period, keeping accurate and detailed recruitment and hiring records, preparing the Employment Unit's annual EEO public file report, and, in conjunction with the Market Manager, assessing the recruitment efforts at the Employment Unit. On an annual basis, in connection with the preparation of the annual EEO public file report, the Market Manager confirms that the Employment Unit's EEO policy has been considered in filling each vacancy.

The Employment Unit informs job applicants that it is an equal opportunity employer on its CBS Radio Application for Employment, on all job vacancy notices, at the CBS Radio Career Center (www.cbsradio.com/careers), on all CBS Radio station websites, and in on-air announcements. On all job vacancy notices, CBS Radio includes the following statement or a substantially similar statement explaining CBS Radio's nondiscrimination policy: "It is the continuing policy of CBS Radio to afford equal opportunity to qualified individuals regardless of their race, color, religion, sex, or sexual orientation, national origin, age or physical or mental disability, veteran or disabled veteran status, and to conform to applicable laws and regulations. We solicit assistance on these openings and future openings. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions of the position." The CBS Radio Career Center (www.cbsradio.com/careers) includes the following statement: "CBS Radio is an Equal Opportunity Employer and welcomes job applications from all qualified candidates." Additionally, each of the CBS Radio Stations' websites states that the station is an equal opportunity employer.

At the time of hire, employees are given extensive training regarding the Employment Unit's EEO policies and practices during their training orientation. The employees receive the CBS Corporation Business Conduct Statement, which includes sections on equal employment opportunity and a harassment-free workplace environment, and a copy of the CBS Radio Non-Discrimination and Anti-Harassment Policy. Additionally, the CBS Policy Guide (formerly the CBS Radio Human Resources Policy Guide), which describes the CBS Radio non-discrimination and anti-harassment policy, is available to all employees on the "CBS and You" portal. Employees are notified when these policies are revised. The Market Manager and other management-level employees are also available to discuss the Employment Unit's EEO policies at any time with job applicants and employees.

Paragraph 3(g): Analysis of Employment Unit EEO Recruitment Program

The Employment Unit conducts ongoing evaluations of its EEO recruitment program in an effort to ensure that its outreach efforts broadly reach all potential applicants. While the Employment Unit's Market Manager retains ultimate responsibility, the Employment Unit's Human Resources Administrator has primary responsibility for ensuring that the Employment Unit's EEO recruitment program is effective and for taking action to address any problems that may occur. The Employment Unit's Human Resources Administrator and Market Manager periodically review the Employment Unit's list of recruitment sources to confirm that they are effective in wide dissemination of job vacancy announcements across the Employment Unit's community. The Employment Unit has also taken proactive steps to enhance the effectiveness of its recruitment efforts. Among other efforts taken to improve implementation of the Employment Unit's EEO policy and to further broad outreach, the Human Resources

Administrator and the Market Manager specifically reflected on the kinds of job fairs that Employment Unit personnel attended and decided that the Employment Unit would participate in and recruit at the Hiring Our Heroes Veterans Event on October 10, 2013, a career expo primarily targeting candidates who had served in the Armed Forces. The Employment Unit regularly recruits at local colleges and universities including having recruited at College of San Mateo, University of California – Berkeley, City College of San Francisco and the Academy of Art during the reporting period. Additionally, the Employment Unit airs on-air advertisements seeking information from local community-based organizations that are interested in referring job candidates to the Stations. The Employment Unit airs the following on-air announcement on each CBS Radio station in rotating day parts each week:

(Station) is an equal opportunity employer and we encourage local community organizations to refer qualified applicants to us. You can receive (station) and CBS radio job vacancy information by contacting Edith Rivera at 415-765-4000 or by visiting CBSradio.com or (station website).

Paragraph 3(h): Analysis of Employment Unit Efforts to Ensure Equal Opportunity and Nondiscrimination

The Employment Unit regularly analyzes the effectiveness of its EEO practices and policies in an effort to ensure that they provide equal opportunity and do not have a discriminatory effect. Specifically, the Market Manager and Market Controller annually examine employee pay rates, seniority practices, promotions and selection techniques and tests to determine whether all employees were treated equally. The Employment Unit makes all promotion decisions based on the skills, ability and experience of the applicant – race, color, religion, sex, or sexual orientation, national origin, age or physical or mental disability, veteran or disabled veteran status – are not considered. It is the Employment Unit’s policy that the Market Manager and CBS Radio’s Regional Human Resources Director approve all termination decisions.

The Employment Unit has active collective bargaining agreements with the Stage Actors Guild – American Federation of Television and Radio Actors (SAG-AFTRA) and the International Brotherhood of Electrical Workers (IBEW). Local management and CBS Industrial Relations ensure that all union-related job vacancies are provided broad outreach and all EEO practices and policies are effective in both recruitment efforts and during the course of members’ employment. The Employment Unit has established effective relationships with union representation to discuss potential EEO-related concerns, of which there have been no grievances or complaints lodged during the audit period.

Paragraph 3(i): Religious Broadcasters

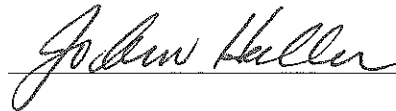
CBS Radio is not a religious broadcaster.

Paragraph 4: Time Brokerages

The Employment Unit includes Station KZDG(AM). Station KZDG(AM) is subject to a Time Brokerage Agreement with AAA Broadcasting, LLC (“AAA Broadcasting”). CBS has provided a copy of this EEO Audit Letter to AAA Broadcasting.

Should any questions arise regarding this information, please contact the undersigned or CBS Radio's counsel Deborah Salons at 202.416.6768.

Respectfully submitted,

A handwritten signature in cursive script, reading "Jo Ann Haller", is written over a horizontal line.

Jo Ann Haller
Senior Vice President, General Counsel and
Assistant Secretary
CBS Radio KMVQ-FM Inc.

Enclosures