

## Response of Reiten Television, Inc. to EEO Audit

KXMC-TV, a television station owned by Reiten Television, Inc. (the Licensee), in accordance with the Federal Communications Commission's (FCC) Equal Employment Opportunity (EEO) regulations, hereby responds to the FCC EEO audit letter it received dated March 29, 2011. KXMC-TV has been randomly selected for an audit. Accordingly, the following responses provide information for the employment unit. Reiten Television, Inc. is the licensee of KXMA-TV, Dickinson, ND; KXMB-TV, Bismarck, ND; KXMC-TV, Minot, ND; and KXMD-TV, Williston, ND, which together form a single employment unit. Collectively, these four stations serve the Minot-Bismarck, North Dakota DMA, with KXMC-TV as the parent station, and KXMA-TV, KXMB-TV, and KXMD-TV operating as full power satellite television stations that rebroadcast the CBS Network programming from KXMC-TV.

In responding to this audit, the Licensee has provided the two most recent EEO Public File Reports and supporting documentation for all hires and activities reflected on those two reports, including information relating to outreach efforts.

### 3(a)

- Included in this response at Exhibit A are the two most recent EEO reports dating from December 1, 2008 to November 30, 2009 (the 2009 Report) and December 1, 2009 to November 30, 2010 (the 2010 Report).
- Copies of the 2010 Report are posted on the station website: [www.kxnet.com](http://www.kxnet.com)
- Listed below are all of the full time positions and their hiring dates for the two most recent EEO reports.

#### 2009

|                              |                 |
|------------------------------|-----------------|
| 1. Account Executive         | 05-January-09   |
| 2. Account Executive         | 05-January-09   |
| 3. TV News Reporter / Anchor | 15-January-09   |
| 4. Account Executive         | 19-January-09   |
| 5. Anchor / Reporter         | 23-April-09     |
| 6. Master Control Operator   | 13-May-09       |
| 7. TV News Reporter          | 19-May-09       |
| 8. Account Executive         | 01-September-09 |
| 9. Account Executive         | 12-October-09   |

#### 2010

|                                     |                 |
|-------------------------------------|-----------------|
| 1. Sales Assistant                  | 01-December-09  |
| 2. Videographer                     | 14-December-09  |
| 3. Meteorologist / Reporter         | 08-February-10  |
| 4. TV News Reporter                 | 19-March-10     |
| 5. Newscast Director                | 12-April-10     |
| 6. Master Control Operator          | 10-June-10      |
| 7. Local Sales Manager              | 28-June-10      |
| 8. Regional Sales Account Executive | 06-July-10      |
| 9. Account Executive                | 15-September-10 |
| 10. TV News Reporter                | 11-October-10   |

### 3(b)

- Files corresponding to each full time position filled by the Unit containing the job announcements posted during the period covered by the EEO reports are included in this response at Exhibit B. Dated copies of advertisements, bulletins, letters, faxes, e-mails, and other

communication sent out announcing the position are included in each file.

- No parties or organizations have requested notification of job openings pursuant to Section 73.2080(c)(1)(ii).

**3(c)**

- The EEO public file Reports attached at Exhibit A to this response provide the total number of interviewees and their referral source for each full time vacancy filled by the Unit during the two year period.

**3(d)**

- The Unit has a total of 68 full time employees as of the date of this response. The stations are located in a metropolitan statistical area that has a population of less than 250,000. Based upon these factors and pursuant to Sections 73.2080(c)(2) and (e)(3), the Unit is required to perform two initiatives within a two-year period. Within the two-year period covered by the 2009 and 2010 reports, the Station engaged in a number of initiatives, as detailed in the Annual EEO Public File Reports attached at Exhibit A, including the following.
- Many unit employees and their managers have attended job fairs in order to inform students and other interested parties of potential openings and opportunities available to them at the station and in the broadcast industry. In the past two years, three job fairs have been attended in hopes of reaching interested applicants.
- In addition, an intern program has been developed to provide hands-on training and college credit for students interested in broadcasting. Three interns have successfully completed the internship program during the two-year period. The internship is designed to expose college interns to the opportunities and career choices available to them in broadcasting.
- The Stations regularly give tours of the station to interested parties as a means of exposing the community, students, and prospective job seekers to the operation of a television station and the broadcast industry. Typically tours of the station and studios introduce visitors to the various aspects of television operations, including news, production, engineering, and sales. During the two-year period, the Stations conducted numerous formal and informal tours of the studios and facilities.
- Documentation included in this response at Exhibit C demonstrates the Unit's performance of its outreach activities during this period and provide additional details about the employees participating in various EEO initiatives.

**3(e)**

- To date, the Unit is not aware of any pending or resolved complaints filed before any body of competent jurisdiction under federal, state, territorial, or local law during the current license term alleging unlawful discrimination in the employment practices of the Unit(s) on the basis of race, color, religion, national origin, or sex.

**3(f)**

- Primary responsibility for compliance with the FCC's EEO rules resides with Reiten Television Inc.'s Chairman and its President, aided by the KXMB-TV Office Manager, as well as the department heads within the stations. The management of the station employment unit sets EEO and hiring policy for all the commonly owned stations. In addition, the KXMB-

TV station unit's Office Manager is charged with enforcing the EEO and hiring policies, and maintaining necessary records of EEO compliance efforts. Finally, the department heads at the stations within the Unit are aware of the EEO and hiring policies and are trained so that they can conduct interviews properly and ensure compliance with the FCC's applicable EEO rules.

- The KXMB-TV Office Manager is in charge of ensuring that the stations follow EEO regulations and makes sure the stations perform a sufficient number of EEO activities. The KXMB-TV Office Manager also manages all necessary documentation and records keeping to ensure EEO compliance of all stations.
- Periodically, members of the station employment unit attend EEO education seminars for continuing EEO education, as well continually monitoring the trades, notifications from legal counsel, and other sources in an effort to keep up on EEO regulations. With this, the station employment unit in turn periodically ensures that every station unit department manager is brought up to date on the latest EEO regulations. In this way, corporate management ensures that employees involved in hiring and promotion decisions are aware of the FCC's applicable EEO rules.
- Job postings, announcements and notices circulated by the Unit to advertise the opening of jobs at the stations regularly include a statement that Reiten Television Inc. is an equal opportunity employer and that it welcomes all qualified candidates.
- The Unit also includes an equal opportunity statement at the top of the Unit's application for employment to again remind applicants that the Unit does not discriminate in its employment and personnel policies, giving fair and equal treatment to all applicants.
- An Employee Handbook, which provides information about employee rights in the event they feel they may have been discriminated against or harassed in any way is provided to all employees.
- Please see the response to question (3g) below for more information.

**3(g)**

- Corporate management, with the assistance of KXMB-TV's Office Manager, reviews its EEO compliance on an ongoing basis. In particular, at the conclusion of the preparation of the annual EEO Public File Report, the Office Manager analyzes the report and the stations' efforts in the preceding year in an effort to identify the recruitment sources that attained the most applicants and those sources that did not produce any applicants. Future job announcement notification adjustments are made on the basis of this review. Similarly, the stations review and analyze their other outreach activities on an annual basis.
- The station employment unit is currently evaluating the use of specific recruitment sources for specific jobs. At one time, the local newspaper was the de facto standard method used for every job announcement. However it is apparent now that the newspaper does not always provide qualified applicants, depending on the specific job; as well it being very expensive. Numerous job opening announcements during the recent two-year period yielded no qualified applicants from ads placed in the local newspaper. This we believe is due in part to North Dakota's current and unique employment position when compared to the nation as a whole; North Dakota having relatively low unemployment. Further we believe because of the competitiveness in the local job market for new hires, qualified applicants for these same positions were better received

from the Internet; from the likes of TVJobs.com, JournalismJobs.com, and MediaLine.com.

- The station employment unit has determined through its continual self evaluation of its EEO policies that seeking qualified applicants for specialized positions such as in the news and technical departments for example; that it is essential that local Internet sources such as bismanonline.com and national/regional Internet sources like those mentioned above, be used in conjunction with traditional local recruitment sources in order to reach a broader scope of applicants. To ensure compliance and continue to post the job announcement locally, many positions are also advertised through television ads aired on the stations, posted on the licensee's own website www.kxnet.com, and sent to local educational institutions and other local sources, thus ensuring the wide dissemination of job openings to the stations' community.

**3(h)**

- The station employment unit continually evaluates the EEO program to determine compliance and look for ways in which to improve.
- Under the direction of upper level management, the station employment unit, as part of the annual or otherwise periodic review of employee performance, salaries, and consideration for promotion; ensures no person is unlawfully discriminated against with respect to any of these employment actions, and to ensure that the unit's employment practices and polices are not having an unintended discriminatory impact. Upper level management also assesses pay and performance of all employees as necessary, including an annual review of whether or not to grant salary increases at the stations.
- Reiten Television Inc. offers all of its benefits to all full time employees regardless of race, color, religion, national origin, or sex. Department heads, under the direction of corporate management, periodically review benefits and salaries of employees to ensure that promotions are predicated on a qualification basis.
- Reiten Television Inc. does not have any union members or agreements.

**3(i)**

- This Unit is not a religious broadcaster and is not subject to religious qualifications.

I certify that the statements provided in this audit report are complete and accurate to the best of my knowledge, information and belief.



David M. Reiten  
Chairman of the Board

Date: 5/06/2011