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HORIZON BROADCASTING GROUP

March 31, 2019

Lewis C. Pulley, Assistant Chief
Policy Division
Media Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

RE: KQAK-FM, Facility ID # 31175, Bend, Oregon

Dear Mr. Pulley,

I am in receipt of your letter dated February 14, 2019 regarding the randomly selected audit of KQAK-FM's Equal Employment Opportunity (EEO) program. KQAK-FM's current license was granted on January 24, 2014 and expires on February 1, 2022.

KQAK-FM, and its licensee, Horizon Broadcasting Group, LLC, employs five or more full time employees, and thus, with this correspondence, is responding to your request to provide data as outlined in 47 CFR 73.2080. The business unit includes radio stations KQAK-FM, KWPK-FM, KLTW-FM, KRCO-AM and KBNW-AM (KBNW-AM is operated via LMA with Summit Broadcasting Group, LLC).

Here are our responses to the Audit Data Requested:

3(a). Copies of the business units' two most recent EEO public file reports are attached in Exhibit 1 and business unit website URL's are found in Exhibit 2. The following full-time positions were filled during the reporting periods you have outlined:

October 1, 2016 to September 30, 2017

<i>Position</i>	<i>Hire Date</i>
Air Personality	May 18, 2017
Air Personality/Production Director	June 12, 2017
Account Executive *	August 28, 2017

October 1, 2017 to September 30, 2018

<i>Position</i>	<i>Hire Date</i>
KBNW Program Director/News Director	December 4, 2017
Account Executive	May 19, 2018

* - Two Account Executives were hired from this pool of candidates.

3 (b). Copies of the business units' full time position postings encompassed in the EEO filings provided in 3(a), along with a list of the sources to whom the job notices were sent, are found in Exhibit 3;

3 (c). Copies of the total number of interviewees for each full-time vacancy is found in the Employment Application Flow Charts attached in Exhibit 4;

3 (d). Documentation of the business units' recruitment initiatives is found in Exhibit 5. Horizon Broadcasting Group has 10 full time employees in this business unit. The Bend, OR metro 12+ population is 208,200 according to the Spring 2019 Nielsen market ranking (<https://www.nielsen.com/content/dam/corporate/us/en/docs/nielsen-audio/market-populations-and-rankings.pdf>). The latest total populations estimate for the tri-county service area (Deschutes, Crook and Jefferson counties) according to the Population Research Center at Portland State University is 235,250 (<https://www.pdx.edu/prc/population-reports-estimates>);

3 (e). No complaints have been filed involving the station during its current license term;

3 (f). A description of the business units' management responsibilities for implementation of the Units EEO policies is found in Exhibit 6;

3 (g). A description of the business units' efforts to analyze its EEO recruitment program is found in Exhibit 7;

3 (h). A description of the business units' efforts to analyze its compensation, benefits, seniority practices, promotions and selection techniques is found in Exhibit 8;

3 (i). The business unit is not a religious broadcaster.

4. The licensee is not subject to a time brokerage agreement for KQAK-FM, thus there are no responses for 4 (a), 4 (b), 4 (c) and 4 (d). The licensee does perform a Local Marketing Agreement (LMA) for KBNW-AM (FCC Facility No. 160749), licensed to Bend, Oregon. For purposes of our accuracy, KBNW-AM is included in our business unit report;

5. The accuracy and completeness of this response is being certified by Keith B. Shipman, the President and Chief Operating Officer of Horizon Broadcasting Group, LLC, the licensee of KQAK-FM Bend, Oregon. Mr. Shipman is an officer of the company, as well as a shareholder. His certification is found in Exhibit 9;

6. A copy of this response has been placed in the KQAK-FM public inspection file (as well as all radio stations of the business unit) per Section 73.3526 (e)(10).

Mr. Lewis C. Pulley
Page 3 of 3
March 31, 2019

Should you have any questions regarding our response to your audit request for KQAK-FM please contact Keith Shipman at kshipman@horizonbroadcastinggroup.com or Matt McCormick at Fletcher Heald & Hildreth, PLLC at mccormick@fhhlaw.com.

Thank you.

Kindest Regards,



Keith Shipman
President & CEO

cc: Matthew McCormick, Fletcher Heald & Hildreth, PLC
KQAK-FM Public File
KWPK-FM Public File
KLTW-FM Public File
KRCO-AM Public File
KBNW-AM Public File
Attachments - Exhibits



31175 KQAK-FM
HORIZON BROADCASTING GROUP, LLC
P.O. BOX 5985
BEND, OR 97708-5985

BEND, OR

Federal Communications Commission
Washington, D.C. 20554

February 14, 2019

Dear Licensee:

1. In accordance with 47 CFR § 73.2080(f)(4), the station employment unit (the Unit) that includes your above-referenced station (the Station) has been randomly selected for an audit of its Equal Employment Opportunity (EEO) program. A copy of Section 73.2080 of the Commission's rules is attached at the end of this letter for your reference.

2. If the Unit is not required under our rules to have an EEO recruitment program due to the nature of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you are required to provide only a list of the Unit's full-time employees, identified only by job title (no names should be provided), the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a)-(d) below regarding brokers and brokered stations for instructions for situations in which the applicable employment unit has fewer than five full-time employees.

3. **Audit Data Requested.** If the Unit employs five or more full-time employees (and all units, for Question 3(e)), provide the following information, including an explanation regarding any requested information that you are unable to provide:

(a) Copies of the Unit's two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit's most recent EEO public file report must be linked to either the Unit's site or the general corporate site, pursuant to Section 73.2080(c)(6).

(b) For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of

separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).

(c) In accordance with Section 73.2080(c)(5)(v), 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.

(d) Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. 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, pursuant to Sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody 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. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

(f) In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with Section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until 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.

(h) In accordance with Section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until 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. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be

provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

(j) Among items we do not need in your response to this letter are copies of applicants' resumes, your company training manuals, posters, employee handbooks, or corporate guidebooks. If you believe any of the information in various corporate manuals or posters are relevant to any part of this audit letter, you may summarize what is in them. If you believe this letter requires you to provide an unusually burdensome volume of documentation, you may contact us prior to the response deadline to discuss possible ways of condensing your response.

4. Time Brokerage.

(a) **Licensee of brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to Question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must respond to Question 4(b) below. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 3 above, and also forward the letter to the broker so the broker may respond to Question 4(b) below.

(b) **Broker receiving audit letter from brokered station licensee.** If you are the broker of a station, and the station you are brokering receives an audit letter, the licensee of the brokered station must forward the audit letter to you. You should respond to the audit letter concerning EEO information relating only to your own full-time employees at the brokered station. *See* Section 73.2080(f)(3).

(c) **Broker receiving audit letter directly from Commission.** If you are a broker, but the target station in this audit letter is a station licensed to you, you must submit information requested herein for the EEO program at your station (or employment unit). If you maintain EEO data for a station you are brokering with that for your own station that is the target of this audit letter, and lack the ability to separate the information, you must include in your response the information requested herein pertaining to **your** full-time employees at the station(s) you broker. *See* Section 73.2080(f)(3).

(d) **Broker described under 4(b) or 4(c) above.** If your full-time employees at the station you are brokering, combined with your full-time employees at your owned station(s), total fewer than five, however, you need only respond to this letter by the deadline described below by submitting a list of your Unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to Question 3(e) above.

5. Procedures. *You must upload your response to this audit letter to your station's online public inspection file by April 1, 2019, and include in your response your station's Facility ID Number and an e-mail address where a station representative can be contacted about your response.* You should not direct your response to the office of the FCC Secretary. The Secretary does not process responses to EEO audit letters. The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. (*See* 47 CFR § 1.16.)

6. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Extensions of time must be requested by e-mail to lewis.pulley@fcc.gov and will be granted only upon a showing of extraordinary circumstances. Unless and until the EEO Staff grants such a request the original deadline remains in effect. Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with Section 73.2080(g).

7. In accordance with Sections 73.3526(e)(10) (for commercial stations) and 73.3527(e)(11) (for noncommercial educational stations), available through these links:

[https://www.ecfr.gov/cgi-bin/text-](https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13526&rgn=div8)

[idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13526&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13526&rgn=div8)

[https://www.ecfr.gov/cgi-bin/text-](https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13527&rgn=div8)

[idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13527&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?SID=05bcd2d178b35195633871d209cc728e&mc=true&node=se47.4.73_13527&rgn=div8)

you must place a copy of this letter and your response in the public inspection file, including the online public file, of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

8. If our EEO random audits sent in 2017 or 2018 included the Station, you may not have to respond to this letter. If the Station completed an audit in that timeframe, before responding, please tell us the dates of public file reports included in the Station's recent audit response, via e-mail to lewis.pulley@fcc.gov. We will then advise you if a response is necessary. Also, if your most recent license renewal application was granted after February 1, 2017, you may not need to respond to this letter. To find out if you are exempt from responding, send an e-mail to lewis.pulley@fcc.gov. Should you have any questions, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosure

EXHIBIT 2

KQAK-FM Bend, Oregon

Website URL's

KQAK-FM Bend, Oregon
Website URL's

Horizon Broadcasting Group, LLC Corporate Website (www.horizonbroadcasting.com)

Radio Station Website KQAK-FM (www.kqak.com)

Radio Station Website KLTW-FM (www.bend957fm.com)

Radio Station Website KWPK-FM (www.thepeak1041.com)

Radio Station Website KBNW-AM (www.kbnwtalk.com)

Radio Station Website KRCO-AM (www.krcoam.com)

EXHIBIT 1

KQAK-FM Bend, Oregon

3 (a)

EEO Public File Reports

October 1, 2017

October 1, 2018

**EEO ANNUAL PUBLIC FILE REPORT
HORIZON BROADCASTING GROUP – CENTRAL OREGON
dba KQAK-FM, KWPK-FM, KLTW-FM, KBNW-AM, KRCO-AM**

This report covers full-time vacancy recruitment for the period of October 1, 2016 to September 30, 2017

Employment Unit: Horizon Broadcasting Group, LLC (Central Oregon)	Address: Horizon Broadcasting Group, LLC 854 N.E. 4 th Street Bend, OR 97701	Contact Person/Title: Jess Hanson Market Manager
Unit Members/City of License: KQAK-FM, Bend, OR KWPK-FM, Sisters, OR KLTW-FM, Prineville, OR KRCO-AM, Prineville, OR KBNW-AM, Bend, OR (LMA)	Telephone Number: (541) 383-3825	Email Address: jhanson@horizonbroadcastinggroup.com

I. Full-Time Vacancies

#	Job Title	Hire Date	Recruitment Source/Hiree	Recruitment Outreach (Source #)	Interviewee Referral Source	Number Interviewed	New Interviewees	Hired
1	Air Personality	5-18-17	1	1, 2, 3, 4, 5, 7, 8, 10, 11, 13, 14, 19, 25, 27, 29, 30, 31	1	2	2	Kendall Sullivan
2	Air Personality Production Director	6-2-17	1, 19	1, 2, 3, 4, 5, 7, 8, 10, 11, 13, 14, 19, 25, 27, 29, 30, 31	1, 19	3	3	Michael Gamby
3	Account Executive	8-28-17	4, 19, 27	1, 3, 4, 5, 7, 10, 19, 24, 25, 27, 28, 29	3, 19, 28	4	4	Michelle O'Donnell Derek Jacobson

II. Recruitment Sources

Source #	Organization	Number of Applicants/Interviewees Referred
1	Radio Online www.radio-online.com	
2	All Access www.allaccess.com	45
3	Regional Help Wanted www.centraloregonjobs.com	1
4	Oregon Association of Broadcasters 13500 SW Pacific Highway # 58-225, Portland, OR 97723 503-443-2299 www.theoab.org	

5	Washington State Association of Broadcasters PO Box 11341, Tacoma, WA 98411, 360-705-0774 www.wsab.org	
6	Oregon Employment Department P.O. Box 6035, Bend, OR 97708 541-388-6070 www.emp.state.or.us	
7	Central Oregon Community College Career Services Center 2600 NW College Way, Bend, OR 97701 541-383-7200	
8	Mt. Hood Community College Career Center 26000 SE Stark Gresham, OR 97030, 503-491-7319	
9	Bellevue Community College 3000 Landerholm Circle SE Bellevue, WA 98007, 425-564-3065	
10	Washington State University Murrow School of Communications Murrow Building Pullman, WA 99164, 509-335-3068	
11	Confederated Tribes of Warm Springs 2122 Wasco Street, P.O. Box C, Warm Springs, OR 97761, 541-553-1634	
12	NAACP P.O. Box 11484 Eugene, OR 97402, 503-485-4767	
13	University of Oregon Career Services P.O. Box 3257, Eugene, OR 97403-0257 Email: jobs@uoregon.edu	
14	Oregon State University Career Services B008 Kerr Administration Building, Corvallis, OR 97331, 541-737-0532 www.career.services.orst.edu	
15	Oregon Council for Hispanic Advancement 108 N.W. Ninth Avenue, Suite 201, Portland, OR 97209 503-228-4131 www.ocha-nw.org	
16	Urban League 10 N. Russell Street, Portland, OR 97227 503-280-2600	
17	Oregon Commission for Women 421 SW Oak Street, Suite 770, Portland, OR 97204 503-725-5889 Email: OACO.mail@oregon.gov	

18	National Association of Broadcasters www.nab.org		
19	Referrals (employee)		5
20	Unsolicited		
21	Refused to Disclose		
22	Central Oregon Career Expo		
23	The Bulletin 1777 SW Chandler Avenue, Bend, OR 97702 541-382-1811		
24	Horizon Broadcasting Group, LLC 854 N.E. 4 th Street. Bend, OR 97701 541-383-3825 KQAK/KWPK/KLTW/KRKO/KBNW (on-air recruitment ads)		1
25	Horizon Broadcasting Group, LLC 854 NE 4 th Street Bend, OR 97701, 541-383-3825 www.horizonbroadcasting.com (website)		
26	Oregon Work Force Job Fair 2321 NE Third Street Prineville, OR 97754, 541-447-8076		
27	Craigslit – Bend, OR www.craiglist/bend.com		3
28	Industry Referral		
29	Radio Business Report		
30	OSU-Cascades Career Center Tykeson Hall 106 1500 SW Chandler Ave. Bend, OR 97702 541-322-3100 www.osucascades.edu/cdc/employers		
31	NASBA Careers Page: www.careerspage.org		

Note: No source requested that it be notified of job openings.

III. Supplemental Recruitment Initiatives

Initiative	Date	Location	Description
Participated in at least 4 events or programs sponsored by educational institutions relating to career opportunities in broadcasting.	Various	Various	<ul style="list-style-type: none"> Keith Shipman, President & CEO, participated in the "Morrow Mentors" program (mentoring senior level communications students) at Washington State University in April of 2017. Keith Shipman, President & CEO, participated in the Murrow College "Meet the Pros" seminar series at Washington State University, and made two classroom visits to discuss radio careers (programming and management) on April 5, 2017. Keith Shipman, President & CEO, participated in the "Morrow Mentors" program (mentoring senior level communications students) at Washington State University in September of 2017. Horizon Broadcasting Group participated in the school to work program at Bend High

<p>Established an Internship Program designed to assist members of the community to acquire skills needed for broadcast employment.</p>	<p>Various</p>	<p>Bend, OR</p>	<p>School, Summit High School and Mountain View High School in the Bend LaPine School District (providing job shadowing to high school students) during 2016-2017 school year. Horizon Broadcasting Group offers internships in programming, news, promotion and marketing for qualified high school juniors and seniors, community college and four-year university students who receive academic credit for a minimum 12-week term. Internships are offered in Fall, Winter, Spring and Summer sessions.</p>
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**EEO ANNUAL PUBLIC FILE REPORT
HORIZON BROADCASTING GROUP – CENTRAL OREGON
dba KQAK-FM, KWPK-FM, KLTW-FM, KBNW-AM, KRCO-AM**

This report covers full-time vacancy recruitment for the period of October 1, 2017 to September 30, 2018

Employment Unit: Horizon Broadcasting Group, LLC (Central Oregon)	Address: Horizon Broadcasting Group, LLC 854 N.E. 4 th Street Bend, OR 97701	Contact Person/Title: Jess Hanson Market Manager
Unit Members/City of License: KQAK-FM, Bend, OR KWPK-FM, Sisters, OR KLTW-FM, Prineville, OR KRCO-AM, Prineville, OR KBNW-AM, Bend, OR (LMA)	Telephone Number: (541) 383-3825	Email Address: jhanson@horizonbroadcastinggroup.com

I. Full-Time Vacancies

#	Job Title	Hire Date	Recruitment Source/Hiree	Recruitment Outreach (Source #)	Interviewee Referral Source	Number Interviewed	New Interviewees	Hired
1	KBNW Program Director – News Director	12-4-17	1, 19	1, 2, 3, 4, 5, 7, 8, 10, 11, 13, 14, 19, 25, 27, 29, 30, 31	1, 19	4	4	Tracy Ellis
2	Account Executive	5-19-18	19, 25	1, 2, 3, 4, 5, 7, 8, 10, 11, 13, 14, 19, 25, 27, 29, 30, 31	19, 25	3	3	Karen Stowe

II. Recruitment Sources

Source #	Organization	Number of Applicants/Interviewees Referred
1	Radio Online www.radio-online.com	
2	All Access www.allaccess.com	41
3	Regional Help Wanted www.centraloregonjobs.com	
4	Oregon Association of Broadcasters 13500 SW Pacific Highway # 58-225, Portland, OR 97723 503-443-2299 www.theoab.org	
5	Washington State Association of Broadcasters PO Box 11341, Tacoma, WA 98411, 360-705-0774 www.wsab.org	

6	Oregon Employment Department P.O. Box 6035, Bend, OR 97708 541-388-6070 www.emp.state.or.us	
7	Central Oregon Community College Career Services Center 2600 NW College Way, Bend, OR 97701 541-383-7200	
8	Mt. Hood Community College Career Center 26000 SE Stark Gresham, OR 97030, 503-491-7319	
9	Bellevue Community College 3000 Landerholm Circle SE Bellevue, WA 98007, 425-564-3065	
10	Washington State University Murrow School of Communications Murrow Building Pullman, WA 99164, 509-335-3068	
11	Confederated Tribes of Warm Springs 2122 Wasco Street, P.O. Box C, Warm Springs, OR 97761, 541-553-1634	
12	NAACP P.O. Box 11484 Eugene, OR 97402, 503-485-4767	
13	University of Oregon Career Services P.O. Box 3257, Eugene, OR 97403-0257 Email: jobs@uoregon.edu	
14	Oregon State University Career Services B008 Kerr Administration Building, Corvallis, OR 97331, 541-737-0532 www.career.services.orst.edu	
15	Oregon Council for Hispanic Advancement 108 N.W. Ninth Avenue, Suite 201, Portland, OR 97209 503-228-4131 www.ocha-nw.org	
16	Urban League 10 N. Russell Street, Portland, OR 97227 503-280-2600	
17	Oregon Commission for Women 421 SW Oak Street, Suite 770, Portland, OR 97204 503-725-5889 Email: OACO.mail@oregon.gov	
18	National Association of Broadcasters www.nab.org	
19	Referrals (employee)	
20	Unsolicited	5

21	Refused to Disclose			
22	Central Oregon Career Expo			
23	The Bulletin 1777 SW Chandler Avenue, Bend, OR 97702 541-382-1811			
24	Horizon Broadcasting Group, LLC 854 N.E. 4 th Street, Bend, OR 97701 541-383-3825 KQAK/KWPK/KLTW/KRCO/KBNW (on-air recruitment ads)			
25	Horizon Broadcasting Group, LLC 854 NE 4 th Street Bend, OR 97701, 541-383-3825 www.horizonbroadcasting.com (website)		1	
26	Oregon Work Force Job Fair 2321 NE Third Street Prineville, OR 97754, 541-447-8076			
27	Craigslist – Bend, OR www.craigslist/bend.com			
28	Industry Referral			
29	Radio Business Report			
30	OSU-Cascades Career Center Tykeson Hall 106 1500 SW Chandler Ave. Bend, OR 97702 541-322-3100 www.osucascades.edu/cdc/employers			
31	NASBA Careers Page: www.careerspage.org			

Note: No source requested that it be notified of job openings.

III. Supplemental Recruitment Initiatives

Initiative	Date	Location	Description
Participated in at least 4 events or programs sponsored by educational institutions relating to career opportunities in broadcasting.	Various	Various	<ul style="list-style-type: none"> Keith Shipman, President & CEO, participated in the "Morrow Mentors" program (mentoring senior level communications students) at Washington State University in March of 2018. Keith Shipman, President & CEO, participated in the Morrow College "Meet the Pros" seminar series at Washington State University, and made two classroom visits to discuss radio careers (programming and management) on March 27, 2018. Keith Shipman, President & CEO, participated in the "Morrow Mentors" program (mentoring senior level communications students) at Washington State University in September of 2018. Horizon Broadcasting Group participated in the school to work program at Bend High School, Summit High School and Mountain View High School in the Bend LaPine School District (providing job shadowing to high school students) during 2017-2018 school year.

<p>Established an Internship Program designed to assist members of the community to acquire skills needed for broadcast employment.</p>	<p>Various</p>	<p>Bend, OR</p>	<p>Horizon Broadcasting Group offers internships in programming, news, promotion and marketing for qualified high school juniors and seniors, community college and four-year university students who receive academic credit for a minimum 12-week term. Internships are offered in Fall, Winter, Spring and Summer sessions.</p>
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EXHIBIT 3

KQAK-FM Bend, Oregon

3 (b)

Vacancy Postings

Mailing List

All job postings were sent via email and/or US Mail to the "Job Vacancy Postings" list attached. As we send all job postings to multiple sources - and in order to reduce the burden of responding – paragraph 3 (b) we have provided the list of sources to whom all postings were sent and have provided a copy of each job positing.

***KQAK-FM Bend, Oregon
Job Vacancy Postings***

All jobs vacancies are posted to the following websites:

Oregon Association of Broadcasters (www.theoab.org)

Washington Association of Broadcasters (www.wsab.org)

Central Oregon Jobs.com (www.centraloregonjobs.com)

All Access (www.allaccess.com)

Radio Online (www.radioonline.com)

Radio Business Report (www.rbr.com)

Craigslist (www.craigslist.com/bend)

National Alliance of State Broadcasters Association (www.careerpage.org)

Horizon Broadcasting Group, LLC Corporate Website (www.horizonbroadcasting.com)

Radio Station Website KLTW-FM (www.bend957fm.com)

Radio Station Website KWPK-FM (www.thepeak1041.com)

Radio Station Website KQAK-FM (www.kqak.com)

Radio Station Website KBNW-AM (www.kbnwtalk.com)

Radio Station Website KRCO-AM (www.krcoam.com)

All job vacancies are posted on the Horizon Broadcasting Group bulletin board (located at its main studio at 854 NE 4th Street, Bend, OR 97701) for visitor and/or employee notification.

All job vacancies are also mailed to the address list on the next page.

None of our recruitment sources requested that they be notified of any full time openings.

Oregon Association of Broadcasters
13500 SW Pacific Highway # 58-225
Portland, OR 97223

Washington State Association of
Broadcasters
PO Box 11341
Tacoma, WA 98411

Oregon Employment Department
WorkSource Oregon
P.O. Box 6035
Bend, OR 97708

Central Oregon Community College
Career Services Center
2600 NW College Way
Bend, OR 97701

Mt. Hood Community College
Career Center
26000 SE Stark
Gresham, OR 97030

Bellevue Community College
3000 Landerholm Circle
Bellevue, WA 98007

Washington State University
Murrow School of Communications
Murrow Building
Pullman, WA 99164

Confederated Tribes of Warm Springs
2122 Wasco Street, PO Box C
Warm Springs, OR 97761

NAACP
P.O. Box 11484
Eugene, OR 97402

University of Oregon
Career Services
P.O. Box 3257
Eugene, OR 97403-0257

Oregon State University
Career Services
B008 Kerr Administrative Building
Corvallis, OR 97331

Oregon Council on Hispanic
Advancement
108 NW Ninth Avenue, Suite 201
Portland, OR 97209

Oregon Commission for Women
421 SW Oak Street, Suite 770
Portland, OR 97209

Urban League
10 N. Russell Street
Portland, Or 97209
Portland, OR 97212

National Association of Broadcasters
1771 N Street NW
Washington DC 20036

OSU-Cascades Career Center
Tykeson Hall 106
1500 SW Chandler Ave.
Bend, OR 97702

The Bulletin
1777 SW Chandler Avenue
Bend, OR 97701

Oregon Work Force Job Fair
2321 NE Third Street
Prineville, OR 97701

Air Personality

Posting Data

Posting Date: April 16, 2017

Hire Date: May 18, 2017



MyCENTRALOREGON.com

Air Personality

Horizon Broadcasting has an immediate opening for a full-time Air Personality in beautiful Bend, Oregon. Will also be responsible for a full production load and voice tracking as needed. Experience with digital media a plus and community involvement/weekend availability a must. This is smaller market radio, you will be part of a high-energy, cohesive team and wear a number of hats!

Send demo and MP3 if available along with resume to:

Human Resources

Horizon Broadcasting Group

854 NE 4th Street

Bend, OR 97701

Or via email at: humanresources@horizonbroadcastinggroup.com

Horizon Broadcasting Group LLC is an equal opportunity employer.



HORIZON BROADCASTING GROUP

854 NE 4th Street

Bend, OR 97701

541-383-3825 (Office)

541-383-3403 (Fax)

www.horizonbroadcasting.com

(April 16, 2017)

Air Personality / Production Director

Posting Data

Posting Date: April 27, 2017

Hire Date: June 12, 2017



MyCENTRALOREGON.com

Air Personality / Production Director

Horizon Broadcasting has an immediate opening for a full-time Air Personality/Production Director in beautiful Bend, Oregon. Will also be responsible for a full production load and voice tracking as needed. Experience with digital media a plus and community involvement/weekend availability a must. This is smaller market radio, you will be part of a high-energy, cohesive team and wear a number of hats!

Send demo and MP3 if available along with resume to:

Human Resources

Horizon Broadcasting Group

854 NE 4th Street

Bend, OR 97701

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Bend, OR 97701

541-383-3825 (Office)

541-383-3403 (Fax)

www.horizonbroadcasting.com

(April 27, 2017)

Account Executive

Posting Data

Posting Date: July 15, 2017

Hire Date: August 28, 2017

Note: Two Account Executives were hired from this pool of candidates.



MyCENTRALOREGON.com

ACCOUNT EXECUTIVE

Horizon Broadcasting is looking for an experienced, aggressive Account Executive to handle a broad range of clients at our multi-media company in beautiful Bend, Oregon. We have recently had some turnover in the sales department and have a number of strong accounts available for the right person. If you understand how to provide customer service to existing accounts, develop new business and can work with multiple platforms including radio, digital and events we are interested in talking to you.

Horizon Broadcasting Group, LLC owns and operates five stations in strong formats including Classic Hits KQAK-FM, Hot AC KWPK-FM, Adults Hits 95.7 FM, News Talk KBNW-AM/FM and Classic Country KRCO-AM/FM as well as a community web portal – www.mycentraloregon.com.

Successful candidates will be part of a competitive team in a fast-paced environment. Horizon Broadcasting offers a comprehensive training program working for highly experienced management as well as a very competitive commissions and compensation package. All inquiries will be kept confidential.

If you think you have what it takes to be part of our team please send your cover letter and resume to:

Human Resources
Horizon Broadcasting Group
854 NE 4th Street
Bend, OR 97701

Or via email at: humanresources@horizonbroadcastinggroup.com

Horizon Broadcasting Group LLC is an equal opportunity employer



HORIZON BROADCASTING GROUP

854 NE 4th Street
Bend, OR 97701

541-383-3825 (Office)

541-383-3403 (Fax)

www.horizonbroadcasting.com

(July 15, 2017)

KBNW-AM Program Director / News Director

Posting Data

Posting Date: August 28, 2017

Hire Date: December 4, 2017

This position was posted during the 2017 filing period, but filled during the 2018 filing period, thus it is reflected on our report dated October 1, 2018.



MyCENTRALOREGON.com

News Director – KBNW-AM Program Director

Horizon Broadcasting has a rare opening for a full-time News Director/PD in beautiful Bend, Oregon. This position handles gathering and reporting news on all five HBG properties as well as our digital platforms and serve as Program Director for our News/Talk station KBNW AM/FM.

Will also be required to do on-air work, handle some production and share in our very active community involvement so weekend availability a must. Will also be asked to help with digital content creation on all station websites so experience in this area is a definite plus.

Send resume along with an on air demo and MP3 if available to:

Human Resources
Horizon Broadcasting Group
854 NE 4th Street
Bend, OR 97701

Or via email at: humanresources@horizonbroadcastinggroup.com

Horizon Broadcasting Group LLC is an equal opportunity employer.

(August 28, 2017)



HORIZON BROADCASTING GROUP

854 NE 4th Street

Bend, OR 97701

541-383-3825 (Office)

541-383-3403 (Fax)

www.horizonbroadcasting.com



MyCENTRALOREGON.com

ACCOUNT EXECUTIVE

Horizon Broadcasting is looking for an aggressive Account Executive to handle a broad range of clients at our multi-media company in beautiful Bend, Oregon. If you understand how to provide customer service to existing accounts, develop new business and can work with multiple platforms including radio, digital and events we are interested in talking to you.

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Successful candidates will be part of a competitive team in a fast-paced environment. Horizon Broadcasting offers a comprehensive training program working for highly experienced management as well as a very competitive compensation plan. All inquiries will be kept confidential.

If you think you have what it takes to be part of our team please send your cover letter and resume to:

Human Resources
Horizon Broadcasting Group
854 NE 4th Street
Bend, OR 97701

Or via email at: humanresources@horizonbroadcastinggroup.com

Horizon Broadcasting Group LLC is an equal opportunity employer

(January 1, 2018)



HORIZON BROADCASTING GROUP

854 NE 4th Street

Bend, OR 97701

541-383-3825 (Office)

541-383-3403 (Fax)

www.horizonbroadcasting.com

Account Executive

Posting Data

Posting Date: January 1, 2018

Hire Date: May 19, 2018

Note: Horizon Broadcasting Group, LLC annually (on January 1) advertises a position for Account Executive which is posted for the entire year. We have adopted this policy to continually recruit qualified sales talent throughout the year.

EXHIBIT 4

KQAK-FM Bend, Oregon

3 (c)

2017 Application Flow Charts

1. Air Personality
2. Air Personality/Production Director
3. Account Executive

2018 Application Flow Charts

1. KBNW Program Director/News Director
2. Account Executive

Horizon Broadcasting Group, LLC
Business Unit: Central Oregon
Employment Application Flow Chart
Position: Air Personality
Posted: April 16, 2017

Referral Source: 1) All Access; 2) Oregon Association of Broadcasters; 3) Indeed.com;
 4) CentralOregonJobs.com; 5) MyCentralOregon.com; 6) Employee Referral; 7) HBG Website;
 8) Craigslist-Bend, OR; 9) HBG Radio Advertisement; 10) Other (please describe)

Ethnicity Code: 1) Caucasian; 2) African-American; 3) Asian-Pacific Islander; 4) Hispanic;
 5) Native-American; 6) Other

Hired: Sullivan, Kendall (May 18, 2017)

Last Name	First Name	M/F/O	Referral Source	Ethnicity Code	Interviewed	Offer
Aber	Scott	M	1	1	No	No
Anderson	Gabe	M	1		No	No
Andresen	Paul	M	1		No	No
August	Kenneth "Gus"	M	1	1	No	No
Brocato	Scott	M	1	1	No	No
Bueno	Freddie	M	1	2	No	No
Campos	Paul	M	1	1	No	No
Cohen	Dave	M	1	1	No	No
Coker	Suzanne	F	1	1	No	No
Cullin	Kip	M	1		No	No
Davis	Leslie	F	1		No	No
Fogt (Wayne)	Brendyn	M	1	1	No	No
Huston	James "Jay"	M	1	1	No	No
Jones	Kenny	M	1	1	No	No
Lowe	James	M	1	1	No	No
Madden	Bill	M	7	1	No	No
Magrann	James	M	1		No	No
Mazzaraco	Vic	M	1	1	No	No
Sanders	Joe	M	1		No	No
Sullivan	Kendall	F	1	1	Yes	Yes
Van Houten	Perry	M	1	1	Yes	Yes
Wayne	Brendyn	M	1	1	No	No
Wilson	John	M	1	1	No	No

Horizon Broadcasting Group, LLC
Business Unit: Central Oregon
Employment Application Flow Chart
Position: Air Personality / Production Director
Posted: April 27, 2017

Referral Source: 1) All Access; 2) Oregon Association of Broadcasters; 3) Indeed.com;
 4) CentralOregonJobs.com; 5) MyCentralOregon.com; 6) Employee Referral; 7) HBG Website;
 8) Craigslist-Bend, OR; 9) HBG Radio Advertisement; 10) Other (please describe)

Ethnicity Code: 1) Caucasian; 2) African-American; 3) Asian-Pacific Islander; 4) Hispanic;
 5) Native-American; 6) Other

Hired: **Gamby, Michael (June 12, 2017)**

Last Name	First Name	M/F/O	Referral Source	Ethnicity Code	Interviewed	Offer
Anderson	Gabriel	M	1		No	No
Anthony	Dave "Scorch"	M	1	1	No	No
August	Kent	M	1	1	No	No
Boldt	Dave	M	1	1	No	No
Bolender	Keith	M	1	1	No	No
Campos	Paul	M	1	1	No	No
Cornell	Mike	M	1	1	No	No
Dustman	Chris	M	1		No	No
Francisco-Smith	Jorge	M	1	4	No	No
Gamby	Michael	M	6	1	Yes	Yes
Gomske	Jeff	M	1	1	No	No
Hardiman	John	M	1		No	No
Heaton	Jackson	M	1		No	No
Jeffrey	JJ	M	1	7	No	No
McClaine	Peter	M	1	1	Yes	No
McClure	Tyler	M	1	1	No	No
Nascimento	Kaz	M	1	1	No	No
Patterson	Lucy	F	1	1	No	No
Pichen	Gail	F	1		No	No
Randall	Ian	M	1		No	No
Reed	Austin	M	1	1	Yes	No
Richards	Gary	M	1	1	No	No
Romero	Daniel	M	1	4	No	No
Salomon	Winnie	F	1	2	No	No
Severance	Dean	M	1		No	No
Wells	Jim	M	1		No	No

Horizon Broadcasting Group, LLC
Business Unit: Central Oregon
Employment Application Flow Chart
Position: Account Executive
Posted: July 15, 2017

Referral Source: 1) All Access; 2) Oregon Association of Broadcasters; 3) Indeed.com;
 4) CentralOregonJobs.com; 5) MyCentralOregon.com; 6) Employee Referral; 7) HBG Website;
 8) Craigslist-Bend, OR; 9) HBG Radio Advertisement; 10) Other (please describe)

Ethnicity Code: 1) Caucasian; 2) African-American; 3) Asian-Pacific Islander; 4) Hispanic;
 5) Native-American; 6) Other

Hired: Michelle O'Donnell (August 28, 2017)
 Derek Jacobson (August 28, 2017)

Last Name	First Name	M/F/O	Referral Source	Ethnicity Code	Interviewed	Offer
Hice	Chris	M	6	1	Yes	No
Jacobson	Derek	M	6, 8	1	Yes	Yes
Kahlie	John	M	8	1	No	No
Lofing	William	M	7, 8	1	Yes	Yes
O'Donnell	Michelle	F	4, 6	1	Yes	Yes
Zerbin	Gina	F	6	1	Yes	No

Horizon Broadcasting Group, LLC

Business Unit: Central Oregon

Employment Application Flow Chart

Position: KBNW-AM Program Director/News Director

Posted: August 28, 2017

Referral Source: 1) All Access; 2) Oregon Association of Broadcasters; 3) Indeed.com;
4) CentralOregonJobs.com; 5) MyCentralOregon.com; 6) Employee Referral; 7) HBG Website;
8) Craigslist-Bend, OR; 9) HBG Radio Advertisement; 10) Other (please describe)

Ethnicity Code: 1) Caucasian; 2) African-American; 3) Asian-Pacific Islander; 4) Hispanic;
5) Native-American; 6) Other

Hired: Ellis, Tracy (December 4, 2017)

Last Name	First Name	M/F/O	Referral Source	Ethnicity Code	Interviewed	Offer
Adams	Lisa	F	1	1	No	No
Agan	Joseph	M	1	1	No	No
Albert	Samantha	F	1	1	No	No
Anderson	John	M	1	1	No	No
Argenio	Sam	M	1	4	No	No
Baes	David	M	1	1	No	No
Barone	John	M	1	1	No	No
Carr	Kendra	F	1	1	No	No
Cato	Peter	M	1		No	No
Chalker	Ben	M	1	1	No	No
Corser	Bobby	M	1	1	No	No
Cullin	Kipp	M	1		No	No
Dempsey	Jennifer	F	1	1	Yes	Yes
Donoho	Doug	M	1	1	Yes	No
Elfman	Robert	M	1	1	No	No
Ellis	Tracy	M	1, 6	1	Yes	Yes
Encarnacion	Rafael	M	1	4	No	No
Hagen	David	M	1		No	No
Hart	TJ	M	1		No	No
Hunt	John	M	1	1	No	No
Ingram	Jon	M	1		No	No
Jeffery	Ian	M	1	1	No	No
Kennedy	Jim	M	1	1	No	No
Krogh	Dan "Thomas"	M	1	1	No	No
Letson	Forrest	M	1	1	No	No
Loftus	Matthew	M	1	1	No	No
Lopez	Luis	M	1	4	No	No
Lynn	Christy	F	1	1	Yes	Yes
Mazzaraco	Vic	M	1		No	No
Michael	Terry	M	1	1	No	No
Murphy	Kyle	M	1	1	No	No
Pierce	Chris	M	1	1	No	No
Rickman	Brian	M	1	1	No	No
Ruben	David	M	1		No	No
Sandoval	Shardan	M	1		No	No
Scharge	Ashley	F	1		No	No
Schnitzlein	Charles	M	1		No	No
Slivensky	Dan "Thomas"	M	1	1	No	No
Sloan	David	M	1	1	No	No
Smith	Kent-Taylor	M		1	No	No
Stahl	Jack	M	1		No	No
Stevens	Picazzo	M	1	2	No	No
Stevens	Robert	M	1	1	No	No

Horizon Broadcasting Group, LLC
Business Unit: Central Oregon
Employment Application Flow Chart
Position: Account Executive
Posted: Continuously

Referral Source: 1) All Access; 2) Oregon Association of Broadcasters; 3) Indeed.com;
4) CentralOregonJobs.com; 5) MyCentralOregon.com; 6) Employee Referral; 7) HBG Website;
8) Craigslist-Bend, OR; 9) HBG Radio Advertisement; 10) Other (please describe)

Ethnicity Code: 1) Caucasian; 2) African-American; 3) Asian-Pacific Islander; 4) Hispanic;
5) Native-American; 6) Other

Hired: Karen Stowe (May 19, 2018)

Last Name	First Name	M/F/O	Referral Source	Ethnicity Code	Interviewed	Offer
Stowe	Karen	F	6, 7	1	Yes	Yes

EXHIBIT 5

KQAK-FM Bend, Oregon

3 (d)

Recruitment Initiatives

INITIATIVES
KQAK-FM Bend, Oregon
October 1, 2016 – September 30, 2017

The business unit engaged in the following broad outreach initiatives in accordance with various elements of FCC Rule 73.2080(c)(2):

<p><i>Participated in at least 4 events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities</i></p>	<ul style="list-style-type: none"> • Keith Shipman, President & CEO, participated in the “Murrow Mentors” program (mentoring senior level communications students) at Washington State University in April of 2017. • Keith Shipman, President & CEO, participated in the Murrow College “Meet the Pros” seminar series at Washington State University, and made two classroom visits to discuss radio careers (programming and management) on April 5, 2017. • Keith Shipman, President & CEO, participated in the “Murrow Mentors” program (mentoring senior level communications students) at Washington State University in September of 2017. • Horizon Broadcasting Group participated in the school to work program at Bend High School, Summit High School and Mountain View High School in the Bend LaPine School District (providing job shadowing to high school students) during 2016-2017 school year.
<p><i>Established an internship program designed to assist members of the community to acquire skills needed for broadcast employment.</i></p>	<p>Horizon Broadcasting Group offers internships in programming, news, promotion and marketing for qualified high school juniors and seniors, community college and four year university students who receive academic credit for a minimum 12 week term. Internships are offered in Fall, Winter, Spring and Summer sessions.</p>
<p><i>Participated in scholarship programs designed to assist students interested in pursuing a career in broadcasting.</i></p>	<p>Horizon Broadcasting Group managers also contribute to scholarship programs at the Edward R. Murrow College of Communications at Washington State University, and the company’s President & CEO, Keith Shipman, serves on the college’s Professional Advisory Board.</p>

INITIATIVES
KQAK-FM Bend, Oregon
October 1, 2017 – September 30, 2018

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<p><i>Participated in at least 4 events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities</i></p>	<ul style="list-style-type: none"> • Keith Shipman, President & CEO, participated in the “Murrow Mentors” program (mentoring senior level communications students) at Washington State University in March of 2018. • Keith Shipman, President & CEO, participated in the Murrow College “Meet the Pros” seminar series at Washington State University, and made two classroom visits to discuss radio careers (programming and management) on March 27, 2018. • Keith Shipman, President & CEO, participated in the “Murrow Mentors” program (mentoring senior level communications students) at Washington State University in September of 2018. • Horizon Broadcasting Group participated in the school to work program at Bend High School, Summit High School and Mountain View High School in the Bend LaPine School District (providing job shadowing to high school students) during 2017-2018 school year.
<p><i>Established an internship program designed to assist members of the community to acquire skills needed for broadcast employment.</i></p>	<p>Horizon Broadcasting Group offers internships in programming, news, promotion and marketing for qualified high school juniors and seniors, community college and four year university students who receive academic credit for a minimum 12 week term. Internships are offered in Fall, Winter, Spring and Summer sessions.</p>
<p><i>Participated in scholarship programs designed to assist students interested in pursuing a career in broadcasting.</i></p>	<p>Horizon Broadcasting Group managers also contribute to scholarship programs at the Edward R. Murrow College of Communications at Washington State University, and the company’s President & CEO, Keith Shipman, serves on the college’s Professional Advisory Board.</p>

EXHIBIT 6

KQAK-FM Bend, Oregon

3 (f)

Implementation of EEO Policies

**KQAK-FM Bend, Oregon
Unit Management Responsibility**

Three positions within Horizon Broadcasting Group, LLC are responsible for implementing and executing its practices to ensure Equal Employment Opportunity.

They are:

- President and Chief Executive Officer
- Market Manager (aka General Manager/General Sales Manager)
- Operations Manager

The aforementioned positions have authority to hire and terminate employees for their respective departments, and thus, are trained to adhere to established and acceptable hiring and employment practices in order to ensure a safe and productive work environment.

The ultimate responsibility and authority for the successful implementation of the company's EEO policy rests with the President & Chief Executive Officer. The President & CEO is also charged with reviewing and assessing current EEO legislation, adherence by the company to said legislation and documentation of the companies performance as required by regulatory agencies (if applicable). All managers with hiring and supervisory authority are charged with adhering to current EEO policies of the company.

Over the past decade the company has invested in training for its management team and employees in the areas of professional workplace conduct, anti-harassment, effective communications and conflict resolution.

The company's EEO policy (a copy of which is attached) is published in the Employee Handbook and posted on the employee bulletin board. All job postings include the statement "Horizon Broadcasting Group, LLC is an Equal Opportunity Employer."

This effort is reviewed each October at the outset of budget planning for the coming year.

EQUAL OPPORTUNITY EMPLOYMENT

Horizon Broadcasting Group, LLC is committed to providing equal employment opportunity for all persons regardless of race, color, religion, sex, age, marital status, national origin, citizenship status, disability, or veteran status.

Equal opportunity extends to all aspects of the employment relationship, including hiring, promotions, training, terminations, working conditions, compensation, benefits, and other terms and conditions of employment.

Horizon Broadcasting Group LLC complies with federal and state equal opportunity laws and strives to keep the workplace free from all illegal forms of harassment, including sexual harassment.

Horizon Broadcasting Group, LLC considers illegal harassment in any form to be a serious offense.

Employees who have been subject to prohibited discrimination or harassment should immediately report the incident to the General Manager. Complaints are investigated immediately.

Any reported violations of EEO law or this policy are investigated. An employee found to have engaged in discriminatory conduct or harassment is subject to immediate disciplinary action, including possible termination of employment.

HORIZON BROADCASTING GROUP, LLC
Break Room (EEO Posting)

EQUAL OPPORTUNITY POLICY

Horizon Broadcasting Group LLC is an equal opportunity employer. Equal opportunity in employment is afforded to all qualified persons, and no person shall be discriminated against in employment because of race, color, age, religion, national origin, sex or disability.

The cooperation of each employee and employee organization in effectuating this policy is requested.

Specifically, all persons to whom this notice is addressed are urged to assist the management of the station on a continuing basis, in effectuating this policy and in assisting in recruitment in accordance with this policy.

It is the right of any individual to notify:

FEDERAL COMMUNICATIONS COMMISSION
445 12th STREET, S.W.
WASHINGTON, D.C. 20554

or any other appropriate agency, if he or she feels that the policy of the station has been abrogated in any manner.

Communications regarding this policy as it applies to the station should be addressed to:

Horizon Broadcasting Group LLC
854 NE 4th Street
Bend, OR 97701
541/383-3825

EXHIBIT 7

KQAK-FM Bend, Oregon

3 (g)

EEO Recruitment Analysis

KQAK-FM Bend, Oregon
Analysis of EEO Recruitment Program

Each October, at the outset of strategic planning for the coming year, the senior management team of Horizon Broadcasting Group, LLC analyzes its performance related to hiring practices and adherence to Equal Employment Opportunity guidelines.

The President & Chief Executive Officer and Market Manager review all hires made during the prior 12 months and assess adherence to acceptable hiring practices.

Particular attention is paid to:

- Providing opportunity to all persons regardless of race, color, religion, sex, age, marital status, national origin, citizenship, disability or their status as a veteran of military service;
- Compliance with federal, state and local laws;
- Assuring that the workplace is free from all forms of discriminatory activity and harassment (including sexual harassment);
- Assessment of hiring, promotion, training, workplace environment, compensation, benefits and other terms and conditions of employment.

Adjustments to compensation and benefits are made as necessary to remain competitive in the marketplace.

Our analysis has not revealed any problems related to the company's implementation of its EEO Policy.

EXHIBIT 8

KQAK-FM Bend, Oregon

3 (h)

Compensation, etc. Analysis

**KQAK-FM Bend, Oregon
Analysis of Compensation, etc.**

Each October at the outset of budget planning for the coming year, Horizon Broadcasting Group's senior management team (President & CEO, Market Manager and Operations Manager) assess:

- The rate of pay for all employees commensurate with experience level within the industry and in the Bend, Oregon MSA;
- The level of benefits offered to each full-time employee and their contribution, if any, to the procurement of said benefits;
 - o The company provides earned vacation days, personal days, sick leave, military leave (short term and extended active duty provisions), funeral leave and Family and Medical Leave (Federal and state of Oregon compliant) to all full-time employees;
- Horizon Broadcasting Group, LLC employs a performance based principle when assessing matters of compensation and promotion;
- The *Openings, Promotions and Transfer* provisions of the employee handbook (a copy of the current policy is attached);
- The company's recruitment efforts to reflect the demographic composition of the Central Oregon population;
- Job descriptions, structural reporting and management responsibilities of the entire staff in the business unit.

The business unit that includes KQAK-FM does not have any agreements with labor unions.

OPENINGS, PROMOTIONS and TRANSFERS

It is the objective of Horizon Broadcasting Group to provide employees with opportunity for advancement within the company, and HBG will endeavor to fill openings with existing employees when appropriate. HBG retains the right to hire the most capable and experienced individual within or outside of the company.

The company intends to post current job openings on a bulletin board at all of its locations and at the HBG website (www.horizonbroadcasting.com). Internal postings will occur for 3 days before external recruitment begins. The company reserves the right not to post open positions.

EXHIBIT 9

KQAK-FM Bend, Oregon

5.

Officer Certification

KQAK-FM, Bend, Oregon

FCC EEO Audit

Certification

I, Keith B. Shipman, an officer of Horizon Broadcasting Group, LLC, licensee of KQAK-FM Bend, Oregon (FCC Facility No. 31175), certify that this is an accurate and complete response to the Federal Communications Commission's random audit of the station's Equal Employment Opportunity program.



Keith B. Shipman
President & Chief Executive Officer
Horizon Broadcasting Group, LLC

March 31, 2019