

Gray Miller Persh LLP

Attorneys at Law
2233 Wisconsin Ave., NW, Suite 226
Washington, DC 20007

Barry S. Persh
(202) 776-2458
bpersh@graymillerpersh.com

March 20, 2020

Submitted via Online Public Inspection File

EEO Staff
Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

NOTE: No Filing Fee Required

Re: Response to EEO Audit Letter
Station WCFE-TV, Plattsburgh, NY (Facility ID 46755)

Dear EEO Staff:

On behalf of Mountain Lake Public Telecommunications Council, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational television station WCFE-TV, Plattsburgh, New York.

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 Mountain Lake Public
Telecommunications Council

Enclosure

One Sesame Street
Plattsburgh, NY 12901
Les Amis Canadiens de Mountain Lake PBS
PO Box 876, Lacolle, QC J0J 1J0



March 20, 2020

Lewis C. Pulley
Assistant Chief, Investigations & Hearings Division
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Response to EEO Audit Letter
Station WCFE-TV, Plattsburgh, NY (ID 47655)

Dear Mr. Pulley:

Mountain Lake Public Telecommunications Council ("Mountain Lake"), licensee of noncommercial educational television station WCFE-TV, Plattsburgh, New York, hereby responds to the enclosed FCC audit letter request for information concerning the EEO Program of the station's employment unit.

In response to Item 3(a), Mountain Lake encloses its two most recent EEO public file reports (covering the periods from February 1, 2018 to January 31, 2020 as Exhibit A. Mountain Lake has filed an EEO public file report by February 1, 2020, and that report included 12 months of information and is available on the station's website at <https://mountainlake.org/about/> in the section labeled "Station Reports and Public Info." Full-time positions filled were as follows:

POSITION TITLE	DATE OF HIRE
Account Representative	09/18/2018
Broadcast Operations Technician	02/18/2019

In response to Item 3(b), Mountain Lake encloses dated copies of all advertisements, bulletins, letters, faxes and e-mails for each full-time position filled as Exhibit B. Sources that have requested notification include:

RECRUITMENT SOURCE	WEB ADDRESS
NYS Dept. of Labor / OneWorkSource	ncworksource.com
NYS Broadcasters Association	nysbroadcasters.org
Vermont Dept. of Labor	vermontjoblink.com
Corporation for Public Broadcasting	cpb.org/jobline

Copies of announcements from these organization are included in Exhibit B.

In response to Item 3(c), Mountain Lake lists 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.

POSITION TITLE	NUMBER INTERVIEWED	REFERRAL SOURCE
Account Representative	1	Unknown
Broadcast Operations Technician	1	Mountain Lake PBS Website
Broadcast Operations Technician	2	Unknown

In response to Item 3(d), Mountain Lake enclosed documentation demonstrating performance of recruitment initiatives during this time period, including participation at job fairs, training for staff, and internship programs as Exhibit C. Mountain Lake has 15 full-time employees and operates where the population is 250,000 or more and is therefore required to perform four initiatives within a two-year period.

Job Fairs:

ACTIVITY	DATE	PARTICIPATING EMPLOYEE(S)	HOST/PARTNER
Take the Transition Trek Conf.	3/13/18	Bill McColgan	Clinton & Essex Transition Interagency Councils
CCC Career Exposition	3/26/18	Logan Brody	Clinton Community Coll. Career Svcs
Now to Next Career Fair	3/28/18	Logan Brody	SUNY Plattsburgh
NC Chamber Annual Business Expo	6/7/18	Beth Davis, Thom Hallock, Bill McColgan	North Country Chamber of Commerce
Internship & Career Fair	10/17/18	Beth Davis, Jennifer Kowalczyk	SUNY Plattsburgh
Now to Next Career Fair	3/27/19	Logan Brody	SUNY Plattsburgh
CCC Career Exposition	4/1/19	Logan Brody	Clinton Community Coll. Career Svcs
NC Chamber Annual Business Expo	6/6/19	Beth Davis, Thom Hallock, Bill McColgan	North Country Chamber of Commerce
Internship & Career Fair	10/23/19	Jimmy McCartney	SUNY Plattsburgh

Training for Station Personnel:

EMPLOYEE	TRAINING	DATE(S)
President & CEO	PBS GM Planning Mtg PBS Annual Mtg PBS GM Planning Mtg PBS Annual Mtg APBS-NY Board Retreat PBS GM Strategy Mtg Adirondack Foundation Fundraising Seminar	5/7/18 5/7-9/18 5/29/19 5/29-31-19 6/3-4/19 10/21-22/19 11/2/19
Dir of Programming & On-Air Fundraising	sIX Seminar for Programmers PBS Annual Mtg PBS Brand Refresh Webinar PBS Annual Mtg Local Livestreaming Webinars Quarterly Programming Initiatives (QPIs) Webinar American Portrait Station Webinar	4/30/18 5/7-9/18 5/18/18 5/29-31/19 July&Aug, 2019 10/10/19 11/19/19
Director of Engagement & Marketing	Digital Immersion Project Web Training Digital Immersion Project Workshop Molly of Denali Rural Education Initiative Working Group	2018-19 8/13-14/18 3/4-6/19
Assoc. Producer	PBS Digital Production Workshop	4/24-25/18
Digital Marketing Specialist	PBS Digital Production Workshop	4/24-25/18
Bookkeeper	CPB AFR & Intro to Reports Webinar CPB AFR and Intro to Reports Webinar CPB NFFS Webinar	10/18/18 10/9/19 10/16/19
Director of Development	Introducing Digital Services Webinar Public Media Development and Marketing Conference	7/2/19 7/9-12/19
Education & Office Coordinator	Molly of Denali Rural Education Initiative Working Group Adirondack Foundation Fundraising Seminar Natl Educational Telecommunications Assn Conference	3/4-6/19 11/2/19 1/26-29/20
Promotion Editor	Premiere Pro CC 2019 Essential Training	7/15/19- Present
All Personnel	NAVEX Online Harassment Prevention Training NAVEX Online Harassment Prevention Training	2018-19 2019-20

Training on EEO & Anti-Discrimination

EMPLOYEE	TRAINING	DATE(S)
All Personnel	Employee Assistance Services Diversity & Inclusivity Training Employee Assistance Services	2018-19 9/3/19 2019-20

Internship Programs

PROGRAM	MOUNTAIN LAKE DEPARTMENT(S)	YEARS
SUNY Plattsburgh Internship Program	Production & Content	2018-19
		2019-20
	Development	2018-19
		2019-20
	Marketing & Engagement	2018-19
		2019-20
NYS Broadcaster's Assn Internship	All Departments	2018-19
		2019-20
Colgate University Internship	Production & Content	2018-19
		2019-20
Vista Program Internship	Marketing & Engagement	2018-19
		2019-20
Gordon College Internship	Marketing & Engagement	2019-20

In response to Item 3 (e), Mountain Lake reports that there have been no pending or resolved complaints filed during the current license term alleging discrimination in the station's employment practices.

In response to Item 3(f), Mountain Lake reports the following with respect to the responsibilities of each level of management to ensure enforcement of 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 Education & Office Coordinator posts job openings in the station's lunchroom and on our website.
- The Education & Office Coordinator includes EOE in all full-time job opening postings, including those with newspapers, placement agencies, labor departments, on-line advertisement sites, and Mountain Lake's website job listing.
- All employees receive and sign for a copy of our Equal Employment Opportunity and Affirmative Action Policy (see attached).
- The President & CEO manages all interview committees and coordinates the development of the questions to be asked of each candidate for a job opening.
- The Education & Office Coordinator receives all resumes and applications and forwards to Hiring Manager for review, scheduling of interviews, recording of applicants and interviews, and checking of references. Hiring Manager works with Education & Office Coordinator to document the scheduling of interviews.

- The Education & Office Coordinator handles the advertisement of each job opening and posting of employment opportunity information to be sure to include a large and varied audience under the advice of the President & CEO.
- Interviewees are asked to indicate how they learned of the employment opportunity with the station.
- The Education & Office Coordinator and at least one member of the Executive Leadership Team assigned by the President & CEO are responsible for attending at least one job fair each year.
- The President & CEO and the Education & Office Coordinator are responsible for reading and implementing all the recommendations regarding EEO rules for broadcasters as provided by legal counsel.

In response to Item 3(g), Mountain Lake reports the following with respect to employment unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result.

- The President & CEO and the Education & Office Coordinator reviewed and implemented the FCC's guidelines and regulations, including: EEO rules, public file requirements, FCC form completion, outreach recruitment requirements, recordkeeping and reporting, and the annual public file report.
- The Education & Office Coordinator periodically calls employers, labor departments, and placement services to make sure they receive our advertisements.
- The President & CEO and Executive Leadership Team members look for additional recruitment services and communicate them to the Education & Office Coordinator for future openings.
- Education & Office Coordinator saves digital copies of all applicant resumes and files hard copies in EEO binder available in our Front Office.
- The President & CEO and the Education & Office Coordinator review the standard operating procedures for all full-time openings and make adjustments where necessary to improve the process and ensure compliance with applicable regulations.
- Hiring Managers are instructed by the President & CEO on how to follow the EEO guidelines.

In response to Item 3(g)(h), Mountain Lake reports the following with respect to the employment unit's efforts over the year 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:

- The President & CEO, at least annually, compares pay and benefits offered by other PBS television stations and non-profit organizations in our area to those offered by Mountain Lake.
- There are no seniority practices employed by Mountain Lake.
- All qualified employees are given the first opportunity to apply for full-time openings. Open positions and their requirements/qualifications are posted in the station's lunchroom. Employees are notified of all full-time openings.
- After each full-time opening is filled the President & CEO examines the material turned in by the Hiring Manager, and issues are reviewed, discussed and further training is provided if necessary.
- All offer letters are reviewed and approved by the President & CEO after thorough review of the hiring process for the full-time opening with the Hiring Manager.
- The same reference-checking procedure is used for review of all job candidates, for similar positions.

Items 3(i), 4(a) and 4(b) are not applicable.

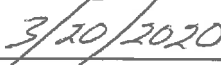
Mountain Lake, through its undersigned authorized officer, hereby declares and certifies that the foregoing statements set forth in this response are true and correct to the best of its knowledge and belief.

Respectfully submitted,
MOUNTAIN LAKE PUBLIC
TELECOMMUNICATIONS COUNCIL

By: _____


William N. McColgan
President and CEO

Date: _____


3/20/2020