

March 24, 2015

EEO Staff  
Policy division  
Media Bureau  
Federal Communications Division  
445 Twelfth Street, SW  
Washington, DC 20554

Re: EEO Audit – WSyr-TV, Syracuse, New York (FIN: 73113)

Dear Sir or Madam:

Nexstar Broadcasting, Inc. (“Nexstar”) hereby responds to the EEO Staff’s letter, dated February 6, 2015, informing Nexstar that the employment unit (the “Unit”) associated with the above-referenced station (the “Station”) has been randomly selected for an audit of its EEO Program.

**3(a). Provide the Unit’s two most recent EEO Public File Reports and the Unit’s web address.**

Response: A copy of the unit’s EEO public file reports for the periods February 1, 2013 through January 31, 2014 (Exhibit 1.1) and February 1, 2014 through January 31, 2015 (Exhibit 1.2) are attached. Each report was posted timely to the Unit’s website [www.localSYR.com](http://www.localSYR.com). The date of each full-time hire is noted on each EEO public file report.

**3(b). For each Unit full-time position filled during the period covered by the above EEO public file reports provide dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position. Include copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings.**

Response: For each position filled, a cover page is provided listing the recruiting sources utilized and the documentation submitted in support thereof, including notices related to entitled sources. Exhibit 2.1 contains the information related to Exhibit 1.1 (2013-14 report) and Exhibit 2.2 contains the information related to Exhibit 1.2 (2014-15 report).

**3(c). Provide 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.**

Response: This information is provided in the EEO public file reports included in Exhibit 1.1 and Exhibit 1.2.

**3(d). Provide documentation of Unit recruitment initiatives during the periods covered by the above-noted EEO public file reports. 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.**

Response: There are currently 122 full-time employees of the Unit, and the population of the Syracuse market is greater than 250,000. Accordingly, the Unit is required to perform four initiatives during each two-year period. Attached as Exhibit 3 is documentation demonstrating performance of some of the Unit's recruitment initiatives identified in the EEO public file reports. Station personnel involved in the initiatives are noted in the reports and supporting documentation.

Included in Exhibit 3 is the Unit's Internship Program overview. The Unit hosted 130 interns over the two-year period covering six academic semesters. Interns included students from more than 15 institutions of higher education. A breakdown of intern sources by semester is provided in Exhibits 1.1 and 1.2.

All initiatives are described in Exhibits 1.1 and 1.2, and supporting documentation is contained in Exhibit 3.

**3(e). Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body 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.**

Response: None.

**3(f). From the first day of the Station's current license term 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.**

Response: Nexstar acquired the station on December 1, 2012; therefore, the information included in this response is as of that date. The Unit's Hiring Managers (listed below), each of whom reports to the General Manager, are trained on the Unit's EEO policies, including EEO hiring obligations. The Hiring Managers also are responsible for informing all employees and applicants of the Unit's EEO policies. Other Unit personnel have responsibilities as described below.

Hiring Managers

General Manager  
News Director  
Chief Engineer  
Director of Sales  
Local Sales Manager  
Digital Media Manager  
Production/Creative Services Manager  
Marketing Manager

Facilitates the Job Posting

Executive Assistant – Processes the Email distribution list, which informs various institutions of Station job openings, in-house posting, letters & faxes  
Digital News Manager – Posts on WSYR Website  
Payroll/H.R. Administrator – Posts on Nexstar Website

Schedules EEO Announcement

Marketing Manager

The Unit informs job applicants of its EEO policies in multiple ways. Exhibit 4 (attached) is documentation of the following efforts:

Statement from Unit website  
On-air EEO Announcement (promo schedule policy, promo text, log schedule)

This information also is disclosed in the Unit's online job application.

**3(g). From the first day of the Station's current license term 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.**

Response: Nexstar acquired the station on December 1, 2012; therefore, the information included in this response is as of that date. The Unit's policies related to EEO practices are evaluated by Unit leadership on an ongoing basis. Although no problems are noted for this license term, processes are in place to address program deficiencies should any arise.

**3(h). From the first day of the Station's current license term 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.**

Response: Nexstar acquired the station on December 1, 2012; therefore, the information included in this response is as of that date. All benefits and seniority practices are set by Nexstar at the corporate level and, therefore, are not subject to discriminatory practices. When positions are open at the Unit, job announcements are posted in the Unit break room on the employee bulletin board. This ensures that any employee has the opportunity to apply for a promotion or transfer to another department. Company policy requires that all employees receive an annual performance review, and pay increases may be awarded based on performance. The General Manager also periodically reviews the Unit's processes to ensure that the Unit's practices are adequate and nondiscriminatory.

Further, the company policy regarding equal employment opportunity contains an express provision aimed at nondiscrimination in promotion and advancement opportunities for current employees. The company encourages all employees to realize their full potential and endeavors to promote from within and accommodate requests for transfers; therefore, when there is an opening within the company, internal candidates who have the right qualifications will be considered first. Decisions to promote or transfer are based on an employee's entire employment record, including skills, performance, cooperation with colleagues, efficiency, attendance record, experience, responsiveness to internal and external customers, disciplinary record and safety record. It is the goal of this policy that these special considerations will increase the retention of our experienced employees as an expression of the company's commitment to every employee's personal growth and development, and help us to meet the development needs of the company.

The Unit does have an agreement with a union (NABET-CWA). The provisions of the collective bargaining agreement provide that the union and the Unit will follow the same EEO practices to ensure that all employees and applicants, whether represented or not, are treated fairly.

**3(i). Religious Broadcasters.** Not applicable.

**4. Time Brokerage.** Not applicable.

Should you have any questions regarding the foregoing information, please contact our attorney, Elizabeth Goldin of Wiley Rein LLP at (202) 719-3199.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Underwood". The signature is fluid and cursive, with a large initial "T" and "U".

Theresa Underwood  
Vice President & General Manager