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Federal Communications Commission
Bureau / Office

May 27, 2010

Federal Communications Commission
Attention: EEO Staff, Policy Division, Media Bureau
445 12th Street, S.W.
Washington, DC 20554

Response to FCC EEO audit: WNEU-TV

ZGS Boston, Inc. (hereinafter ZGS Boston) the broker of WNEU – TV, Merrimack, New Hampshire is in receipt of the Federal Communication Commission's EEO audit letter dated April 19, 2010. It was forwarded to ZGS by NBC Telemundo License Co., the licensee of WNEU. ZGS brokers time on WNEU pursuant to a Time Brokerage Agreement with NBC Telemundo License Co, and hereby responds to the FCC's request with respect to its own employees associated with WNEU.

In addition to brokering time on WNEU, ZGS Boston owns and operates LPTV station WTMU-LP, Boston, Massachusetts, which together form a single employment unit. As the employees for WNEU and WTMU-LP are indistinguishable, the instant response provides information for the entire unit. ZGS Boston currently has 11 full-time employees, and 6 part-time employees.

Audit Data Requested

a) Two most recent EEO public file reports:

1. December 1, 2007 – November 30, 2008 (Attached at Exhibit A)
2. December 1, 2008 – November 30, 2009 (Attached at Exhibit A)

The EEO public file report is available on the **holaciudad! Nueva Inglaterra** website – <http://nuevainglaterra.holaciudad.com/contenidos/telemundo-boston.html> – as well as in the public file at the television station.

The full time positions filled by ZGS Boston during the relevant time period are contained in the attached EEO public file reports and indicate the date each position was filled.

(b) Dated copies of all advertisements, bulletins, faxes, e-mails or other communications announcing available positions.

Attached hereto at Exhibit B.

(c) Total number of interviewees for each vacancy and referral source for each full-time position interviewee.

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Please see Annual Public File Reports attached hereto at Exhibit A.

- (d) Documentation demonstrating performance of recruitment initiatives such as job fairs, mentoring programs and names of personnel involved in each recruitment initiative.**

Attached hereto at Exhibit C. In addition, WNEU has 11 full-time employees and is located in a Metropolitan Statistical Area with a population of greater than 250,000. Accordingly, the Station is required to conduct four non-vacancy recruitment initiatives within a two-year period. The attached documentation, as well as the annual public file reports provided at Exhibit A, provide details of the recruitment initiatives undertaken by the station unit.

- (e) Pending or resolved complaints involving WNEU filed during the Station's current license term alleging unlawful discrimination in employment practices:**

None.

- (f) Responsibilities of station management to ensure enforcement of EEO policies and how station has informed employees and job applicants of its EEO policies:**

The responsibilities of the employment unit's management with regard to EEO matters are as follows: The policy of ZGS Communications is to provide equal opportunity employment as demonstrated by our diverse workforce. Our equal opportunity philosophy applies to all aspects of employment with the company including recruiting, hiring, training, transfer, promotion, job benefits, educational assistance, and social and recreational activities. Our corporate office is very involved in providing training programs with each Station Manager, including for ZGS Boston, to ensure compliance with the Commission's EEO rules. Human Resources on the corporate level is responsible for maintaining all updates and on-going training in hiring, mentoring, and promoting employees, as well as enforcing EEO policies. When the station unit has job openings it is our practice to discuss the job requirements and qualifications in order to decide where to advertise our job opportunities and determine the pay scale for the position with the Station Managers. Human Resources partners with the Station Managers and those with hiring decisions in order to ensure compliance in our recruitment efforts, including the placement of advertising, preparation of documentation demonstrating recruitment efforts and maintaining the files pertaining to EEO matters. It is the responsibility of Human Resources

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to request updates from the stations periodically to assert whether sufficient progress has taken place, if enough applications have been received and if any changes need to be implemented by management to help fill the position.

The company's EEO policies are communicated to employees and job applicants through notices placed in the break room, the employee manual given to each employee immediately following hiring. In addition all employees of the Stations are required to review the policy and sign an acknowledgment form in which they certify that they will comply with our policies and procedures.

(g) Efforts to analyze its EEO recruitment program to ensure effectiveness and address any shortfalls:

Stations keep organized files for each available position in order to document and analyze the recruitment program. The files include, a list of candidates interviewed for the position, and copies of notices for the particular job vacancy. Human Resources and hiring Managers analyzes the different type of recruiting sources and methods in order to determine what attracts applicants. In addition, Station Managers hold monthly meetings with Human Resources and other Executives and discuss job opportunities within the station and employment procedures. These monthly meetings provide the opportunity to analyze and discuss what has worked and what has not and address any problems that may have risen. Human Resources ensures up to date trainings in hiring trends, mentoring, and promoting employees as well as enforcing EEO policies.

(h) Efforts to periodically analyze measures taken to examine pay, benefits, promotions etc. to provide equal opportunity without discrimination:

It is the responsibility of the station unit to adhere to ZGS's strong policy of equal employment opportunity. We take affirmative action to ensure equal employment opportunity for all

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employees and applicant for employment without regard to their race, color, national origin, religion, or gender in all personnel actions, including recruitment, evaluations, promotions, compensation, and training. We ensure that all full-time employees receive the same benefits. Review of pay, benefits, seniority practices and selection techniques is undertaken periodically. In addition, the Executives hold an annual meeting with all Station Managers individually to analyze and address pay, benefits, seniority, and hiring practices. There are no unions represented at the employment unit.

(h) Religious broadcaster and/or religious qualifications:

Not applicable.

Executed this 28 day of May 2010.

Eduardo Zavala

Eduardo A. Zavala
President
ZGS Communications

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EEO Public File Report Form

WNEU - TV

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080(c)(6) of the FCC's Equal Employment Rules. This Annual EEO Report summarizes the relevant hiring and EEO outreach conducted by WNEU. WNEU is operated by ZGS Boston Inc (ZGS). ZGS brokers time on WNEU pursuant to a Time Brokerage Agreement with NBC Telemundo License Co.

The information contained in this Annual EEO Report covers the time period from **December 1, 2008 to and including November 30, 2009** (the "Applicable Period"). Consistent with the FCC's Rules, this Annual EEO Report Contains the following information:

1. A list of all full-time vacancies filled by the Station(s) during the Applicable Period;
2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy, including any such sources that have asked to receive information from the station about any new job openings, which are separately identified;
3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
5. A list and brief description of the community outreach activities, not directly related to the opening of job positions, undertaken by the station during the Applicable Period.

The following sections provide the required information, and summarize the station EEO efforts during the Applicable Period.

This Annual Report was placed in the station's public inspection file on November 30, 2009 and posted on the station's website, in accordance with the FCC's EEO Rules.

SECTION 1: Full-Time Job Openings Filled During This Period

Time Period Covered: **December 1, 2008 to November 30, 2009**

Stations in Employment Unit: **WNEU**

| | Full-time Positions Filled By Job Title and Date Filled | Recruitment Source that Referred the Person Hired | Number of Persons Interviewed |
|----|--|--|--------------------------------------|
| 1. | Marketing Director 4/27/09 | Hispanic American Chamber of Commerce | 4 |

Total Number of Persons Interviewed for All Job Positions: **4**

SECTION 2: Recruitment Sources

Time Period Covered: **December 1, 2008 to November 30, 2009**

Stations in Employment Unit: **WNEU**

| | Recruitment Source (Name, Address, Telephone Number, Contact Person) | Total Number of Interviewees This Source Has Provided During This Period | Full-time Positions for Which This Source Was Utilized |
|----|--|---|---|
| 1. | Hispanic American Chamber of Commerce 406 S. Huntington Ave Boston MA 02130 Nader Acevedo 617-261-4222 | 4 | Marketing Director |

* Indicates sources that have requested notification of job openings.

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WNEU - TV

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3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
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SECTION 1: Full-Time Job Openings Filled During This Period

Time Period Covered: **December 1, 2007 to November 30, 2008**

Stations in Employment Unit: **WNEU**

| Full-time Positions Filled By Job Title and Date Filled | Recruitment Source that Referred the Person Hired | Number of Persons Interviewed |
|--|--|--------------------------------------|
| 1. Marketing Coordinator 4/7/08 | Hispanic American Chamber of Commerce | 10 |
| 2. Account Executive 8/3/08 | Referral from current Account Executive - Maria Rivera | 4 |

Total Number of Persons Interviewed for All Job Positions: **14**

SECTION 2: Recruitment Sources

Time Period Covered: **December 1, 2007 to November 30, 2008**

Stations in Employment Unit: **WNEU**

| | Recruitment Source (Name, Address, Telephone Number, Contact Person) | Total Number of Interviewees This Source Has Provided During This Period | Full-time Positions for Which This Source Was Utilized |
|----|---|---|---|
| 1. | Hispanic American Chamber of Commerce 406 S. Huntington Ave Boston MA 02130 Nader Acevedo 617-261-4222 | 10 | Marketing Coordinator Account Executive - Sales |
| 2. | Association of Latino Professionals in Finance/Accounting 801 S. Grand Ave. Los Angeles, CA Manuel Espinoza 213-243-0004 | 1 | Marketing Coordinator Account Executive - Sales |
| 3. | El Mundo Newspaper Job Fair 408 Huntington Ave. Boston, MA. Alberto Vasallo 617-522-5060 | 1 | Marketing Coordinator Account Executive - Sales |
| 4. | The Ad Club Mixers: 9 Hamilton Place Boston MA, 02108 Anand Chopra 617-262-1100 | 1 | Marketing Coordinator Account Executive - Sales |
| 5. | Boston Chamber of Commerce 75 State St. Boston, MA Sarah McNeely 617-557-7353 | 1 | Marketing Coordinator Account Executive - Sales |
| 6. | Monster.com Job Fair | 0 | Marketing Coordinator Account Executive - Sales |

* Indicates sources that have requested notification of job openings.

SECTION 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken

Time Period Covered: **December 1, 2007 to November 30, 2008**

Station in Employment Unit: WNEU

1. **Northeastern University Sponsored Events**- outreach efforts to the University Co-op Program to invite graduates to apply at WNEU. We coordinated with Pamela Goodale, Faculty Coordinator, Cooperative Education English and Communication Studies, on May 28, 2009, to post jobs in their standard undergraduate & graduate Co-op PlacePro Record program.



TELEMUNDO

WNEU Telemundo Boston & El Mundo/ Comcast Latino Event

This agreement is made on June 30th 2008 between El Mundo/ Comcast Latino Event, with its principal office located in 408 South Huntington Ave. Boston, MA 02130 and WNEU Telemundo Boston with its principal office located in 529 Main Street, Charlestown, MA 02129.

WNEU Telemundo Boston offers El Mundo / Comcast Latino Event

- Total of twenty (20):30 second commercial spots to run Sunday to Saturday during 8:00am until 11:00pm from 06/17/08 to 7/05/08.

El Mundo / Comcast Latino Event offers WNEU Telemundo Boston the following:

- As media sponsor opportunity to display (1) Banner on stage during the event / *Banner con todos los sponsors*
 - July 05th 2008
 - Space for inflatable at the side of the stage
 - (3) interaction breaks on stage. Telechicas will giving out premiums from the stage. Telemundo will provide a script to announce new programming or upcoming events.
 - Logo in print materials (*promotional flyer*)
 - Opportunity to run Telemundo :30 second promo on the screen during the event.
 - (1) space for booth 10x10/ as a media sponsor ✓
 - *20* tickets admission for the event
 - *NC* ID tags (passes) as a media sponsor/exhibitor
- OK*
- (3) Media Passes
(5) Exhibitors
(4) VIP's*

Production costs are not included under this TRADE AGREEMENT and it is the responsibility for both parties to produce its own piece.

Delivery of an acceptable format of the media piece should meet the death lines and requirements in both ends

These spots will be based on a 100% trade agreement and no cash will be involved in this transaction.

Affidavits of services rendered listing the date and time the TV spots and the commercials were aired will be provided on a monthly basis. Neither party may transfer or broker any part if this agreement; and, it is understood by both parties that unused balances at the end of this agreement are non-refundable

This contract has a total trade value of \$ 8,700.00

Mariel Caballero
Marketing Director
Telemundo New England
Date: June 30th 2008

Wendy Arias
El Mundo
Date: June 30th 2008

DONE



TRADE AGREEMENT

WNEU Telemundo Boston & El Mundo

Telemundo Boston offers El Mundo the following:

- Twenty eight (28) :30 second ROS spots to run from TBD Monday through Friday. *Priority for placement of spots will be based on availability*

| | | |
|------------|--|--|
| Open Date* | | |
|------------|--|--|

*To be used within 90 days

El Mundo offers WNEU Telemundo Boston the following:

- Five (4) Half pages on "El Mundo" newspaper promoting Telemundo's Programming: **Activa Tu Adrenalina Deportes Telemundo** starting the week of July 13th 2008.

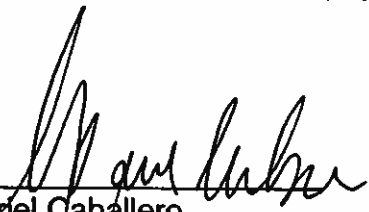
| | |
|--------|---------|
| Period | 4 weeks |
|--------|---------|

Production costs are not included under this TRADE AGREEMENT and it is the responsibility for both parties to produce its own piece.

Delivery of an acceptable format of the media piece should meet the death lines and requirements in both ends These spots will be based on a 100% trade agreement and no cash will be involved in this transaction.

Affidavits of services rendered listing the date and time the radio spots and the commercials were aired will be provided on a monthly basis. Neither party may transfer or broker any part if this agreement; and, it is understood by both parties that unused balances at the end of this agreement are non-refundable

This contract has a total trade value of \$3,500


 Mariel Caballero
 Marketing Director
 Telemundo New England

- CARRIED EXP SPOT \$2,100
credit 1,400

Alberto Vasallo Jr.
 El Mundo Boston

EEO Public File Report Form

[Station Call Signs]

EEO Public File Report

The purpose of this EEO Public File Report (“Report”) is to comply with Section 73.2080(c)(6) of the FCC’s 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of the following station(s): **WNEU and ZGS Boston, Inc.** and is required to be placed in the public inspection files of these stations, and posted on their websites, if they have websites.

The information contained in this Report covers the time period beginning **January 1, 2008 to and including December 31, 2008** (the “Applicable Period”).

The FCC’s 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080(c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c)(2) of the FCC rules.

Appendices 1, 2 and 3 which follow have been designed, in the aggregate, to provide the required information. Please note that the numbers listed on Appendix 2 under the column entitled “Full-time Positions for Which This Source Was Utilized” refer to the number of the full-time job positions listed on Appendix 1.

For purposes of this Report, a vacancy was deemed “filled” not when the offer was extended but when the hiree accepted the job offer. A person was deemed “interviewed” whether he or she was interviewed in person and/or over the telephone.

Appendix 1 to

EEO Public File Report Form

Covering the Period from January 1, 2010 to March 31, 2010

Station(s) Comprising Station Employment Unit: WNEU

Section 1: Vacancy Information

| | Full-time Positions Filled By Job Title | Recruitment Source of Hiree |
|---|--|--|
| 1 | Marketing Coordinator | Chamber Of Commerce Monster.com job fair Graig's List LAPRO Itzel Jordan Ericka Johnson(temp agency) Rudy Rodriguez Maria Rivera |
| 2 | Account Executive | |
| 3 | New England Business Development(Sales) | |
| 4 | Administrative Assistance | |
| 5 | | |

Total Number of Persons Interviewed During Applicable Period: 11

Appendix 2 to

EEO Public File Report Form

Covering the Period from January 1, 2008 to December 31st, 2008

Station(s) Comprising Station Employment Unit: WNEU

Section 2: Recruitment Source Information

| | Recruitment Source (Name, Address, Telephone Number, Contact Person) | Total Number of Interviewees This Source Has Provided During This Period (If Any) | Full-time Positions for Which This Source Was Utilized |
|---|---|--|--|
| A | Hispanic American Chamber Commerce: 406 S. Huntington Ave Boston MA 02130 Nader Acevedo 617-261-4222 | 1 | Marketing Coordinator Sales |
| B | ALFA: Association Latinos Professional in Finance/Accounting | 1 | Marketing Coordinator Sales |
| C | El Mundo Newspaper: Job Fair | 1 | Marketing Coordinator Sales |
| D | The Ad Club Mixers: 9 Hamilton Place Boston MA, 02108 | 1 | Marketing Coordinator Sales |
| E | Boston Chamber of Commerce | 1 | Marketing Coordinator Sales |
| F | Merrimack Valley Chamber of Commerce: Lawrence MA 978-686-0900 | 1 | Marketing Coordinator Sales |
| G | El Planeta Newspaper | | Marketing Coordinator Sales |
| H | Monster.com Job Fair | | Marketing Coordinator Sales |

* Indicates sources that have requested notification of job openings.

Appendix 3 to

EEO Public File Report Form

Covering the Period from January 1, 2008 to December 31, 2008

Station(s) Comprising Station Employment Unit: WNEU

Section 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken by WNEU

[Description of the activities.]

Hispanic American Chamber of Commerce Events
ALFA job fair
El Mundo Newspaper Job Fair
Boston Chamber of Commerce Events
Northeastern University Sponsored Events
The Ad Club Mixers
El Planeta job fair
Monster.com Job Fair
Grag's List Posting
LAPRO
Temp Agency ???

SECTION 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken

Time Period Covered: **December 1, 2008 to November 30, 2009**

Station in Employment Unit: **WNEU**

1. **The Ad Club Mixers** – attended various outreach events in order to encourage applications and discussions about the opportunities in the growing Hispanic Market. On 6.29.08, WNEU Representative participated in The Ad Club "Here's The Pitch" event to encourage interested members to learn more about and participate in the Hispanic Media opportunities in Boston.
2. **El Planeta job fair** – outreach to increase pool of potential job applicants
3. **NBC Universal Internship Program-** Aggressively sought help establishing an Internship Program modeled on the NBCU structure. Coordinated material with Lee Flaster, NBCU NY, regarding procedures, contact info, program structure, etc. Instituted an internship program at WNEU (Sales and Marketing) as a result of the efforts.