



September 10 , 2021

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: Station KRRN(FM)
Moapa Valley, Nevada
FIN: 27982
RESPONSE TO EEO AUDIT NOTICE

Dear Sir:

Entravision Holdings, LLC ("Entravision"), the licensee of Station KRRN(FM), Moapa Valley, Nevada, is hereby responding to the Commission's EEO Audit Notice, dated August 6, 2021, in connection with the operation of Station KRRN. In response thereto, Entravision is providing the report, attached hereto, responding to the information sought concerning KRRN, to the Commission.

Initially, Entravision wishes to take note that another of its stations in its Las Vegas Employment Unit, Station KQRT(FM), Las Vegas, Nevada (FIN: 51731), was a Station that was subject to the Commission's February 25, 2021 Audit Notice. In a communication, dated August 26, 2021, Assistant Division Chief Elizabeth E. Goldin advised that, since the same Employment Unit was subject to successive Audit Notices, Entravision could rely on the KQRT submission so long as that submission was duly referenced and confirmed as remaining accurate. Entravision is doing so in connection with this submission.

As an initial matter, Entravision wishes to inform the Commission, as it did with its response for KQRT, that during the course of preparing the KQRT Audit Notice submission, Entravision determined that there were deficiencies in the manner in which its EEO records in its Las Vegas Employment Unit were maintained.

The attached Supplemental Statement explains, in greater detail, the problems that Entravision found, the cause for the problems, and the actions that have been undertaken by Entravision in order to remediate the problems. In that regard, Entravision wishes to inform the Commission that it has also undertaken a special review of the Las Vegas Employment Unit's

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EEO efforts and found that they are now up to Entravision's standards and in compliance with the Commission's requirements.

Entravision, through an officer of the licensee's parent, hereby declares under penalty of perjury that the foregoing statements are true and correct, to the best of its information, knowledge and belief. It also confirms that the KQRT submission of May 7, 2021, remains accurate and correct.

Should there be any questions in regard hereto, please communicate with Entravision's communications counsel: Barry A. Friedman, Thompson Hine LLP, Suite 700, 1919 M Street, N.W., Washington, D.C. 20036. His email address is barry.friedman@thompsonhine.com.

Respectfully submitted,



Alexander K. LaBrie
Executive Vice President, Global Human
Resources and Risk Management
Entravision Communications Corporation

Attachment (Supplemental Statement)

SUPPLEMENTAL STATEMENT

On February 25, 2021, the Commission's Media Bureau released its first EEO Audit Notice in calendar year 2021. Entravision Holdings, LLC ("Entravision") was notified in the *Public Notice* that five of its radio stations and one of its television stations were recipients of an Audit Notice.

Following receipt of the Audit Notices, Entravision, reflecting its long history of complying with Commission notices, set to work in preparing the required responses. Senior managers immediately contacted the managers of the affected Employment Units and directed them to collect the requested information for review and submission to the FCC. The managers in five of the Employment Units promptly undertook work on the project. The situation in the sixth Employment Unit, the Las Vegas, Nevada Employment Unit, was entirely different, at odds with the policies of Entravision, and has necessitated the submission of this Supplemental Statement.

Instead of assisting in the preparation of the necessary response, the Las Vegas manager, acting without explanation, immediately resigned from his position. This was not a customary resignation, with advance notice, a period of time in which the manager continued in employment, and the transitioning of work to a replacement. Instead, the manager not only left immediately, he did not participate in Entravision's required exit interview process and failed to leave any information as to how he could be contacted by telephone or electronic means if Entravision had any questions. Entravision was left with no ability to secure any relevant information from the individual.

The former manager's actions left Entravision with some concerns. It began an audit of the manager's performance and sought to secure the information necessary to provide the Audit

Notice response. What Entravision found, much to its displeasure, was that the manager had failed to comply with Entravision's operating guidelines for regulatory compliance.

For example, Entravision requires that managers responsible for Employment Unit compliance document every action, involving recruitment sourcing and initiatives, they take by maintaining files evidencing their work. Entravision has also licensed from Broadcast1Source, a software firm specializing in FCC EEO documentation, a software package that enables its Employment Unit managers to track EEO compliance and maintain records for any FCC review. When Entravision senior management examined the Broadcast1Source files, no information for the Las Vegas Employment Unit could be located. As for paper files, Entravision has been able to locate some, but not all, of the relevant records in support of the last two EEO Program Reports that were prepared for the stations in the Las Vegas Employment Unit.

Entravision has long sought to establish a culture in which its managers and employees understood that, as a regulated entity, there are rules that they have to comply with. In this regard, Entravision wishes to point to the performance of the five other Employment Units in the current audit cycle as well as those in prior audit cycles. The company is disappointed that its manager, a minority group member that Entravision entrusted managerial responsibilities to as part of its effort to hire and promote minority group members, has failed to adhere to its policies.

In recent weeks, Entravision has hired a female minority group member to take over the EEO work for the Las Vegas Employment Unit. Both senior management and the new manager have committed themselves to ensuring full compliance by the Employment Unit going forward. To that end, the new manager will consult with both another manager with EEO compliance experience and Entravision's senior managers at its headquarters.

Entravision is disappointing in having to report that someone it entrusted responsibility to has failed to perform as expected. It has responded to this event by developing a protocol to ensure that this will not happen again. Entravision is committed to ensuring such a result.

EMPLOYMENT UNIT'S TWO MOST RECENT EEO PUBLIC FILE REPORTS

In connection with its responses to this Item 2(b), the Employment Unit wishes to advise the FCC of the following:

1. The Employment Unit maintains a website for Station KRRN. The URL for that website is: <https://www.radiolasuavecita.com/las-vegas/>
2. The Employment Unit's two most recent EEO public file reports are omitted pursuant to the discussion in the covering statement.

Item 2(b)(ii)

EMPLOYMENT UNIT'S HIRING ACTIONS

In connection with its responses to this Item 2(b)(ii), the Employment Unit is relying on previously submitted information as discussed in the covering statement.

Item 2(b)(iii)

EMPLOYMENT UNIT'S 2019-2021 INTERVIEWING INFORMATION

In connection with its responses to this Item 2(b)(iii), the Employment Unit is relying on previously provided information as discussed in the covering statement.

EMPLOYMENT UNIT'S 2019-2021 RECRUITMENT INITIATIVES

In connection with its responses to this Item 2(b)(iv), the Employment Unit wishes to advise the FCC of the following:

1. The Employment Unit is relying on previously provided information, as discussed in the covering statement, in connection with its recruitment initiatives.
2. The Employment Unit's annual EEO Report provides details as to the Employment Unit personnel responsible for its Initiatives.
3. As of the date of this submission, the Employment Unit has 14 full-time employees.
4. The Employment Unit is located in the Las Vegas Metropolitan Statistical Area, where the population is greater than 250,000.

UNIT'S EEO COMPLAINT STATUS

To the best of Entravision Holdings, LLC's knowledge, its Las Vegas Employment Unit is not the subject of any EEO complaints that are currently pending or were resolved during the Employment Unit's current license term.

MANAGEMENT RESPONSIBILITIES

The responsibilities of each level of management, applicable to the Las Vegas Employment Unit, to ensure enforcement of EEO policies are as follows:

President/Chief Operating Officer Jeffery A. Liberman

Oversees the operations and policies of the broadcast operations of the Company.

Executive Vice President/Global Human Resources and Global Risk Management
Alexander LaBrie

Annually reviews the EEO policy of the Company. Notifies all local Business Operations Managers of any new changes and requirements for EEO compliance. Annually, distributes Company handbooks to be reviewed and acknowledged by all current employees, which include the Company EEO policy. Reviews compliance efforts by individual Stations and Employment Units.

Local Business Operations Manager Denise Sanseverino

Informs Employment Unit members as to the existence of the electronic EEO handbook and their obligations to review and understand. The BOM is also responsible for the Station's direct EEO compliance and management of hiring decisions.

Administers EEO policy by providing EEO information to the Unit's personnel and ensures that personnel electronically verify their receipt of the Company's policies. Prepares the annual EEO Report for the Public File. Arranges for job postings for open positions, both internally and externally, ensuring that potential applicants are equally considered.

How EEO information is disseminated:

As indicated above, the Company has an electronic employee handbook that contains its EEO policies and is provided to each employee of the Unit. In the case of any advertising or other external employment communications, the Unit indicates that they comply with EEO requirements.

EEO RECRUITMENT POLICY ANALYSIS

Where Entravision is engaging in recruitment efforts during a calendar quarter, Entravision, through its Business Operations Managers and Executive Vice President for Global Human Resources and Risk Management, undertake a regular review of each Employment Unit's efforts in order to be certain that recruitment process is carried out in a manner that assures equal opportunity outreach. The analysis involves a review of the Employment Unit's open positions, the recruitment efforts to fill them, and the selection procedures for the hire, if a hire has occurred. Entravision management has determined, based on its reviews and analysis of its employee and management population, that its outreach to the general population is an effective one which is confirmed by the wide range of applicants for various positions and the diverse population of Entravision's employees and managers.

STATEMENT CONCERNING EMPLOYMENT UNIT PRACTICES AND PROCEDURES

The Business Operations Manager of the Employment Unit, supervised by Entravision's Executive Vice President/ Global Human Resources and Risk Management and the Company's Chief Operating Officer, are responsible for analyzing the EEO, hiring, compensation, and retention activities of the Employment Unit.

In addition to regular Employment Unit and corporate reviews of hiring, staffing and compensation, the Entravision provides the Employment Unit with data from such sources as state labor departments, private compensation consultants, and publicly available compensation database that allow it to ensure that there are no inequities in compensation or benefits among the Employment Unit's personnel.

All promotions are initially proposed by the Unit Business Operations Manager and then are considered by the Executive Vice President/ Global Human Resources and Risk Management and, finally, the Chief Operating Officer of Entravision.

The Employment Unit and Entravision are sensitive to EEO issues. Entravision submits that the significant minority and female component of its workforce reflects well on its concern for ensuring EEO compliance and its efforts to recruit and retain both women and minorities on the Unit's staff.

The Employment Unit is not represented by a labor union.