

## MIDWESTERN BROADCASTING COMPANY

(WTCM Radio, Inc.; WCCW Radio, Inc.;  
WBCM Radio, Inc. and WKJF Radio, Inc.)

### Traverse City-Cadillac-Petoskey Market Station Cluster EEO Narrative Statement

Midwestern Broadcasting Company (MBC) is 100% shareholder in the four subsidiaries listed above which operate a total of seven primary broadcast stations from our studios and offices at 314 East Front Street, Traverse City, Michigan:

- WTCM(AM), Traverse City, Michigan, FIN 70524
- WTCM-FM, Traverse City, Michigan, FIN 70525
- WCCW(AM), Traverse City, Michigan, FIN 20421
- WCCW-FM, Traverse City, Michigan, FIN 20423
- WBCM(FM), Boyne City, Michigan, FIN 71210
- WKLT(FM), Kalkaska, Michigan, FIN 49591
- WJZQ(FM), Cadillac, Michigan, FIN 5207

Grand Traverse County, of which Traverse City is the county seat, has a 2019 U.S. Census estimated population of 93,088. The U.S. Census Bureau reports the following gender and ethnic percentages for Grand Traverse County: Women, 51.1%; Black, 0.7%; American Indian, 1.3%; Asian, 0.8%; and Hispanic, 2.9%.

For full-time job openings for administrative and sales positions at its stations, MBC “casts a wide net” using local print, online and its own airwaves to recruit prospective candidates. For full-time “On-Air” job openings in its Programming Departments, MBC generally seeks experienced “On-Air” personalities through more focused channels (AllAccess.com). The primary source for prospective candidates for “On-Air” positions is Specs Howard School of Broadcasting. Many of MBC’s Program Directors/On-Air Talent/Traffic Directors are alumni of Specs Howard. Broadcasting prospects are also regularly encouraged to visit MBC’s website to learn of job vacancies as they are posted, from time to time.

MBC's President, Ross Biederman, is a founding member of the Michigan Association of Broadcasters (MAB) Foundation. The MAB Foundation is a 501(c)(3) organization which conducts numerous educational and charitable activities, which include, among other things, providing scholarships. Mr. Biederman was a major financial contributor to the formation of the MAB Foundation. In addition, Mr. Biederman established an endowment with the MAB Foundation (the "Leicenger/Biederman Scholarship Endowment"), created in honor of longtime broadcaster Lee Leicenger, and intended to provide annual scholarships to high school students expressing interest in broadcasting.

Besides informing its employees, MBC notifies recruitment sources of the policy and interest in recruiting qualified minorities and females. MBC continues to:

1. Request referrals of other qualified minorities, females and other protected classes from its current workforce, including, minority and female workers;
2. Seek referrals from school counselors; and,
3. Seek referrals from its newly hired minority and female workforce.

MBC has analyzed its recruitment program and finds no adverse impact against females, minorities and/or any other protected class with respect to recruitment.

MBC's analysis of its EEO program does not reveal any inherent, structural or procedural problems or impediments attributable to the MBC to the pay, benefits, seniority practices, promotions, recruiting or retention of minority or female individuals. Indeed, the only potential barrier to minority placement overall is the general lack of minority population in our local recruitment areas within the eleven counties that comprise the Traverse City-Cadillac-Petoskey radio market. Traverse City is approximately 256 miles by highway from Detroit. MBC has also analyzed its employment decisions and finds no adverse impact against females and/or minorities with respect to hires, promotions, transfers, compensation and/or terminations. MBC has no union agreements.