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March 23, 2016

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

RECEIVED - FCC

MAR 23 2016

Federal Communications Commission
Bureau / Office

NOTE: No Filing Fee Required

Re: Response to EEO Audit Letter
Northeastern Educational Television of Ohio, Inc.
Station WEAO(TV), Akron, OH (Facility ID 49421)

Dear EEO Staff:

On behalf of Northeastern Educational Television of Ohio, Inc., we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of WEAO(TV), Akron, Ohio.

Should any questions arise concerning this response, kindly contact this office.

Very truly yours,



Barry S. Persh
Counsel for Northeastern Educational
Television of Ohio, Inc.

Enclosure



**WESTERN
RESERVE**
PUBLIC MEDIA

March 17, 2016

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

Re: **Response to EEO Audit Letter**
Northeastern Educational Television of Ohio, Inc.
Station WEAO(TV), Akron, OH (Facility ID 49421)

EEO Staff:

Northeastern Educational Television of Ohio, Inc. ("NETO" or "Western Reserve Public Media") hereby responds to an FCC audit letter dated February 24, 2016 requesting information concerning the EEO program of noncommercial educational television station WEAO(TV), Akron, Ohio. The WEAO employment unit (the "Unit"), which also includes co-owned noncommercial educational television station WNEO(TV), Alliance, Ohio, includes more than five full-time employees, and NETO therefore provides the following information in response to the audit request.

Item # 3(a). NETO encloses copies of the Unit's annual EEO public file reports for the periods covering (i) June 1, 2014 to May 31, 2015, and (ii) June 1, 2013 to May 31, 2014 as Attachment 1.

The WEAO and WNEO web site is available at: <http://westernreservepublicmedia.org/>. The annual EEO public file report is posted at: <http://westernreservepublicmedia.org/notice.htm> under "EEO Public File Report." The direct link to the report posting is as follows: http://westernreservepublicmedia.org/eo_public_file_report.htm

The dates of the full-time hires for the periods covered by the 2014-2015 and 2013-2014 EEO reports are as follows:

Job Title	Date of Hire
Master Control/Traffic Technician	4-8-2015
Chief Development and Marketing Director	1-1-2015
Account Executive	7-1-2014
Membership Coordinator (2 hires)	8-1-2013 4-1-2014
Membership Manager	10-7-2013



PBS.

Item # 3(b). NETO encloses, at Attachment 2, dated copies of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions noted above from the 2014-2015 and 2013-2014 annual reporting periods. No organizations notified NETO that they want to be notified of openings.

Item # 3(c). The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2014-2015 and 2013-2014 reports are as follows:

Job Title	# of Interviews	Referral Source
Master Control/Traffic Technician	1 0 0 1 0 0 0 0 0 0 1 0 0 3	Akron Beacon Journal Alliance Review Record Courier The Vindicator KSU Career Services Center YSU Career Services Craigslislist.org Indeed, Inc. WesternReservePublic Media.org Ohio Media Watch blog's twitter feed Western Reserve Public Media Facebook and Twitter Ohio Broadcasters Virtual Job Fair Total
Chief Development and Marketing Director	*	*Exigent circumstances hire; see explanation in 2014-15 annual EEO public file report at Attachment 1 for more information
Account Executive	0 0 0 0 0 0 0 0 1 1	Akron Beacon Journal Record Courier Canton Repository The Vindicator Plain Dealer Association of Fundraising Professionals—Greater Cleveland Ohio Broadcasters Virtual Job Fair Word of mouth/prior job applicant Total
Membership Coordinator (2 hires)^	1 1 1	Akron Beacon Journal The Vindicator Canton Repository

	1	Association of Fundraising Professionals
	0	WesternReservePublic Media.org
	0	Western Reserve Public Media Facebook Page
	4	Total
Membership Manager	2	Akron Beacon Journal
	0	The Vindicator
	1	Canton Repository
	0	Association of Fundraising Professionals
	0	WesternReservePublic Media.org
	0	Western Reserve Public Media Facebook Page
	2	Word of mouth from community members
	5	Total

^After the initial Membership Coordinator position was filled, the hire was released within a week and the position was re-filled from the same candidate pool. Another Membership Coordinator vacancy was also filled from the same candidate pool.

Item # 3(d). NETO encloses documentation of Unit recruitment initiatives performed during the periods covered by the 2014-2015 and 2013-2014 public file reports as Attachment 3. The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the WEAO-WNEO Unit is 13. The market for the WEAO-WNEO Unit has a population of more than 250,000. Based on these factors, the Unit is required to perform four initiatives during each two-year period.

During the periods covered by the 2014-2015 and 2013-2014 reports, NETO completed the following initiatives. Documentation at Attachment 3 is provided for the first four activities listed below.

Training programs to enable station personnel to acquire skills that could qualify them for higher level positions

WNEO/WEAO encourages and finances training programs (college class work, seminars) designed to enable station personnel to acquire skills that would qualify them for higher positions. Among others, engineering staff members attended a conference on the spectrum auction, membership received database management training, and engineering attended traffic software training. *Station personnel involved:* Brandon Wyoma, Marybeth Gibbons, Tony Dennis, Ricky Patterson

Participation in Job Fairs

2014-15 reporting period: The Regional Career Expo was held at Youngstown State University; and a Job Fair at Kent State University-Trumbull. *Personnel involved:* Director of Education Jeff Good for Western Reserve Public Media (WNEO/WEAO)

2013-14 reporting period: The Regional Career Expo was held October, 2013 at Youngstown State University; and an event with the Northeast Ohio Council on Higher Education. *Personnel involved:* Director of Education Jeff Good for Western Reserve Public Media (WNEO/WEAO)

Participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting

As a member of the Ohio Association of Broadcasters ("OAB"), Western Reserve Public Media qualifies for three scholarship opportunities through Ohio Broadcasters Foundation each year. The OAB Kids Scholarship is for children of full-time employees of an OAB member station. The Ohio Broadcasters Scholarship is for students already enrolled at a four-year college or university in Ohio. Lastly, the OAB Executive Development Scholarship is for OAB station employees working full-time in a managerial role. *Personnel involved:* President/CEO and station staff.

Participation in at least four programs sponsored by educational institutions relating to careers in broadcasting

WNEO/WEAO has participated with various educational institutions in events, programs, stations tours, and symposiums which provided information about broadcasting careers students at local schools, colleges/universities. *Personnel involved:* Duilio Mariola and Jeff Good

Sponsorship of at least two events in the community designed to inform and educate members of the public as to opportunities in broadcasting

Duilio Mariola presented information about broadcasting as part of the course he teaches at the University of Akron. College students also crew tapings/live-air of local WNEO/WEAO programming. Western Reserve Public Media offers a video production class called You Be the Producer covering video and television fundamentals and careers. *Personnel involved:* Duilio Mariola

Internship Program

Internship opportunities are available to provide students with the skills needed for broadcast employment. *Personnel involved:* Duilio Mariola

Item # 3(e). There have been no complaints alleging unlawful discrimination in the employment practices of the WEAO-WNEO employment unit on the basis of race, color, religion, national origin, or sex filed during the current license term before any body having competent jurisdiction under applicable law.

Item # 3(f). Responsibilities of each level of Unit management responsible for implementing Unit EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

Under the oversight of NETO's President/CEO and EEO Officer, each department head is responsible for defining the job descriptions, requirements, and desirable skills for vacant positions. The EEO Officer ensures that the Unit's job vacancy advertisements and the "Jobs" section of the station website indicate that Western Reserve Public Media is an equal opportunity employer. The EEO Officer also directs department heads to advertise each open position in a specific list of newspapers and websites designed to reach a diverse pool of potential applicants. Each application received is measured against the applicable "matrix" of job requirements and desirable traits as part of a management review. The candidate list is then prioritized and the most qualified candidates are interviewed either in-person or by phone by a team consisting of the department head and at least one other employee. The EEO Officer is also routinely present to ensure that interviews are handled in a consistent manner. The next steps in the Unit's EEO recruitment process typically involve the interview team agreeing on a final candidate and the department head informing the President/CEO and discussing the team's rationale for selecting the preferred candidate for employment.

Station employees are informed of the organization's EEO/anti-discrimination policies through the employee handbook and the posting of the policy in connection with vacant positions. Applicants are informed of the station's EEO/anti-discrimination policies through the job postings, on NETO's website and on the job application.

Item # 3(g). Efforts to analyze the Unit's EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

During the hiring process, NETO gauges the effectiveness of its employment outreach efforts by the quality and quantity of applications received. If it is determined that either the quality or quantity of applicants is insufficient, it may add other sources, such as a popular online job source or an industry "job seekers" website. NETO also chooses to attend the job fairs that it believes have the greatest potential for reaching a diverse pool of potential job candidates. NETO is confident that its EEO program itself is effective, in that, "candidates for employment or promotion will be considered on the basis of job-related criteria, without regard to race, color, national origin, age, gender, disability, ancestry, religion, sexual orientation or gender identity in accordance with federal and state regulations."

Item # 3(h). Efforts 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:

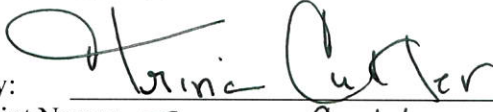
At times that NETO is in a financial position to offer raises, it implements consistent "across-the-board" salary increases for station personnel. When NETO increases an employee's job responsibilities, it also offers an increase in salary based on salary reports from various sources including The Corporation for Public Broadcasting (CPB), the National Educational Television Stations (NETA) Salary Compensation Report, Robert Half Salary Guide and the U.S. Department of Labor National Occupational Information Network (O*NET). With regard to employee retirement benefits, NETO is an "instrumentality of the state of Ohio" and as such, offers its employees the Ohio Public Employee Retirement System (OPERS) benefit. Regarding employee health benefits, each year NETO engages a broker to solicit proposals for health care providers. Once there are a few providers to compare (or different proposals from the same provider), NETO engages its entire staff in the selection process.

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

WEAO(TV)
EEO Audit Response

Northeastern Educational Television of Ohio, Inc., through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,
NORTHEASTERN EDUCATIONAL TELEVISION
OF OHIO, INC.

By: 
Print Name: Trina Cutter
Title: President and CEO
Date: March 17, 2014