

## December 14, 2023

## Via Upload to WVRI(FM) Clifton Forge Employment Unit Online Public File

Elizabeth E. Goldin Assistant Chief, Investigations and Hearings Division Enforcement Bureau Federal Communications Commission 445 12<sup>th</sup> Street S.W. Washington, D.C. 20554

Dear Ms. Goldin:

This letter serves as the response by Liberty University, Inc. (the "Licensee"), licensee of WVRI(FM), Clifton Forge, Virginia ("WVRI" or the "Station"), to the Enforcement Bureau's October 30, 2023, request for audit data relating to the station employment unit's EEO program. WVRI is the only station in the employment unit¹ and has zero full-time employees; as a result, audit data requests 2(a) and 2(b)(vi) are the only questions applicable to WVRI.

\* \* \* \* \*

Audit Data Request 2(a). If the Unit has fewer than five full-time employees (defined by section 73.2080(e)(1) as employees regularly assigned to work 30 hours a week or more), submit a response listing the Unit's full-time employees identified by job title (no personal names should be provided), the number of hours each is regularly assigned to work per week, and a response to Question 2(b)(vi) below. Please also see Questions 3 and 4 below for guidance regarding brokers and brokered stations.

The employment unit has zero full-time employees, and thus the Licensee has nothing to report regarding job titles and number of hours regularly assigned to work per week. Further, WVRI is not subject to any time brokerage agreement, and therefore the Licensee has no information to report in response to Questions 3 and 4.

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<sup>&</sup>lt;sup>1</sup> The Station is part of Liberty's "The Journey" radio network. *See* The Journey, *Where Can I Listen?* (2023), https://www.myjourneyfm.com/. Another of Liberty's Journey stations, WRVL, was randomly selected for an FCC EEO audit in August 2022. As explained in WRVL's timely response to that 2022 audit, WRVL is the only full-power Journey station with technical coverage serving the Roanoke-Lynchburg Nielsen Audio Market (*see, e.g.*, Radio Online, *Nielsen Audio Ratings: #121 Roanoke-Lynchburg*, (Aug. 1, 2023), https://ratings.radio-online.com/content/arb277), and Lynchburg is where all Journey employees' jobs are based. In any event, WRVL is the only Journey station with any full-time employees.

Audit Data Request 2(b)(vi). Any pending or resolved complaints involving the Unit filed during the Unit's current license term(s) 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. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that the Unit must report all complaints, regardless of their status or disposition.

**Response**: The employment unit has had zero complaints involving the employment unit during the Station's current license term.

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As the only Station in the employment unit, WVRI(FM) is uploading a copy of this response to its online public inspection file.

If you have any questions regarding this response or need any further information, please call or email our FCC attorney Patrick Cross at (919) 573-6256 or pcross@brookspierce.com.

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Respectfully submitted,

Dr. Robert Ritz

Chief Financial Officer

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