

JOY MEDIA MINISTRIES
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July 19, 2019

Via Upload to Online Public Inspection File ("OPIF")

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: KCAM-FM
Glennallen, AK
Fac. Id. 173007
FRN: 0024906638**

Response to June 18, 2019 EEO Audit Letter

Dear EEO Staff:

In order to satisfy the EEO audit letter dated June 18, 2019 for the above-captioned station, Joy Media Ministries ("JMM") hereby uploads this response to the Online Public Inspection File ("OPIF") for station KCAM-FM, Glennallen, AK, Fac. Id. 173007. The responses in this letter follow the outline in the audit letter which begins with Section 3.

Section 3 – Audit Data Requested

KCAM-FM is within the station employment unit ("SEU") that includes co-owned station KCAM, Glennallen, AK (Fac. Id. 49563). As of the date of this letter, the SEU employs five full-time employees.

- (a) A copy of the SEUs most recent Section 73.2080(c)(6) EEO public file report is attached to this response. There is only one report attached because the SEU had less than five full-time employees the previous year and was not required to file a report with less than five full-time employees. The website for each station in the SEU is as follows:

KCAM-FM - <http://www.kcam.org/>
KCAM - <http://www.kcam.org/>

The specific date of the Full-Time Hire listed in the attached EEO Report (Section 73.2080(c)(5)(vi)) is as follows: (2018) Director of Engineering – 9/26/2018.

- (b) Not applicable (JMM is a religious broadcaster and applies a religious qualification for all hires).
- (c) The recruitment sources used for the 2018 full time vacancy are shown below, as is the source that produced the only interviewee and ultimate hire:

<i>Source</i>	<i>Interviewees</i>	<i>Hire Source</i>
Employee Referral		
Joy Media Board Referral		
KCAM.org http://www.kcam.org/Pages/jobs.html	1	X
Alaska Broadcasters Association		
Glennallen Community Chapel		
Corbin University Broadcasting Department		

- (d) Not applicable.
- (e) There are no pending or resolved complaints involving any station in the SEU during its current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the SEU on the basis of race, color, religion, national origin or sex.
- (f) The first day of the station's current license term is February 1, 2014. The current licensee acquired the station on September 22, 2015. However, the SEU only reached the five full-time employee mark as of September 26, 2018 when the Director of Engineering was hired. Once the SEU began advertising for its fifth full-time vacancy, JMM ensured various levels of employees were involved in the maintenance of the JMM EEO program. For any full-time vacancy, the general manager is involved in all recruiting and hiring practices for that specific position. This allows them to ensure that the EEO policy and requirements are being followed for each vacancy and that job applicants are made aware of JMM's EEO policy.
- (g) The first day of the station's current license term is February 1, 2014. The current licensee acquired the station on September 22, 2015. However, the SEU only reached the five full-time employee mark as of the September 26, 2018 when the Director of Engineering was hired. Since that time, JMM has established and evaluates its recruitment program periodically throughout each year. JMM will monitor the sources used to make certain that they are appropriate for each position and if they are referring qualified candidates using data maintained through the required recordkeeping. Sources that do not generate responses or referring qualified candidates will be removed and replaced with new sources that have the potential to provide better qualified candidates.
- (h) The first day of the station's current license term is February 1, 2014. The current licensee acquired the station on September 22, 2015. However, the SEU only reached the five full-time employee mark as of the September 26, 2018 when the Director of Engineering was hired. Since that time, JMM has undertaken periodic reviews of pay,

benefits, seniority practices, promotions and selection techniques to ensure that each meets appropriate standards and are consistent with the company's financial abilities as a non-profit entity. While the process is informal, it is still effective as it is currently administered. There are no unions.

- (i) JMM is a religious broadcaster as that term is defined in Section 73.2080(a) and has elected to and does apply a religious qualification to all of its employment positions

Section 4 – Time Brokerage Agreements

Not applicable.

The email address where a station representative can be contacted about this response is RGThannum@unwsp.edu.

I, Rod Thannum, President of Joy Media Ministries, licensee of KCAM-FM, hereby certify that the information provided in this letter is accurate and complete.



Rod Thannum, President

cc: Joseph C. Chautin, III, Esq.
Hardy, Carey, Chautin & Balkin, LLP

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