

Bicoastal Media Licenses V, LLC
1 Blackfield Drive #333
Tiburon, CA 94920

March 23, 2020

To: FCC Online Public Files

Re: EEO Audit Response for Bicoastal Media Licenses V, LLC
Station KTHH(AM), Albany, OR
Facility Id No. 39485

Bicoastal Media Licenses V, LLC, licensee of radio station KTHH, Albany, Oregon, is responding to the letter dated February 6, 2020, from Mr. Lewis C. Pulley, Assistant Chief Investigations & Hearings Division, Enforcement Bureau, of the Federal Communications Commission (“Audit Letter”).

KTHH is in an employment unit (“Unit”) that consists of the following stations:

CALL SIGN	COMMUNITY	FACILITY ID
KODZ(FM)	Eugene, OR	40845
KPNW(AM)	Eugene, OR	40846
KDUK-FM,	Florence, OR	54010
KFLY(FM)	Corvallis, OR	39574
KEJO(AM)	Corvallis, OR	39573
KLOO(AM)	Corvallis, OR	67594
KLOO-FM	Corvallis, OR	35077
KRKT-FM	Albany, OR	39483
KTHH(AM)	Albany, OR	39485

Our responses to the questions in part 3 of the Audit Letter are as follows:

(a) Copies of the Unit’s two most recent EEO public file reports, described in section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit’s most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by section 73.2080(c)(6). In accordance with section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit’s most recent EEO public file report must be linked to either the Unit’s site or the general corporate site, pursuant to section 73.2080(c)(6).

The report for 2019, attached as Exhibit 1,¹ covers the period from September 21, 2018 to September 20, 2019. The 2018 Annual EEO Public File Report for the period from September 21, 2017 to September 20, 2018, is attached as Exhibit 2.

The most recent annual EEO Public File Report is linked on the following websites:

<u>Call Sign</u>	<u>Domains</u>
KODZ(FM)	https://kool991.com/
KPNW(AM)	http://www.kpnw.com/
KDUK-FM,	http://www.kduk.com/
KFLY(FM)	http://www.us101.country/
KEJO(AM)	https://kejoam.com/
KLOO(AM)	https://klooam.com/
KLOO-FM	https://kloo.com/
KRKT-FM	https://krkcountry.com/
KTHH(AM)	http://comedy990.com/

Full-time hires during the two years under review are:

Engineer – 1/15/18
Promotions Director/Morning Show Host – 4/27/18
Receptionist – 8/23/18
Engineer – 9/10/18
Salesperson – 12/1/18
Promotions Director/Midday DJ – 5/8/19
Web Developer – 5/31/19

(b) For each of the Unit's full-time positions filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in section 73.2080(c)(5)(iii). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide

¹ The 2018 and 2019 annual reports were revised in connection with preparing for the audit. The 2019 report was corrected to remove corporate HQ hires in HR/Accounting and to make conforming edits to the number of interviewees. The 2018 report was amended to reflect that no organization requested notices of openings, to add in interviewees for the web developer position, to breakdown the recruitment sources used chart per opening, and to correct the interviewee chart which inadvertently counted applicants as interviews in some instances.

them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).

Dated copies of documentation relating to recruitment for fulltime openings during the period under review are provided in the following exhibits:

Exhibit 3	Engineer – 1/15/18
Exhibit 4	Promotions Director/Morning Show Host – 4/27/18
Exhibit 5	Receptionist – 8/23/18
Exhibit 6	Engineer – 9/10/18
Exhibit 7	Salesperson – 12/1/18
Exhibit 8	Promotions Director/Midday DJ – 5/8/19
Exhibit 9	Web Developer – 5/31/19

The Unit retained documents evidencing notices sent to sources as provided in Exhibits 3 – 9, but could not locate all documents of contacts with sources listed in the annual reports. Tracking down all documentation was somewhat limited due to the COVID-19 outbreak. In each case, at least one broad source was documented in the attached exhibits.

The Unit did not announce openings on the air and thus does not retain log sheets.

No organization requested notices of job openings.

(c) In accordance with section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Unit's full-time vacancies filled during the period covered by the above-noted EEO public file reports.

Engineer – 1/15/18 – Total Interviewees: 14
 Indeed.com - 7
 Internal referral – 1
 RadioWorld (New Bay Media) – 6

Promotions Director/Morning Show Host – 4/27/18 - Total Interviewees: 5
 Allaccess.com - 5

Receptionist – 8/23/18 - Total Interviewees: 10
 Indeed.com – 8
 Bicoastalmedia.com - 2

Engineer – 9/10/18 – Rehired former employee

Salesperson – 12/1/18 - Total Interviewees: 5

Indeed.com – 4

Referral/Word of Mouth - 1

Promotions Director/Midday DJ – 5/8/19 - Total Interviewees: 6

Allaccess.com – 5

Referral/Word of Mouth – 1

Web Developer – 5/31/19 - Total Interviewees: 4

Bicoastalmedia.com - 2

Indeed.com – 2

(d) Documentation of the Unit's recruitment initiatives described in section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

Total Number of Full-Time Employees: 16

The stations in the unit are located in Eugene-Springfield, Oregon Metropolitan Statistical Area, in Lane County, which has a population of 351,715, and in adjacent smaller counties. Thus, the stations are required to perform four initiatives over a two-year period.

The following illustrative initiatives were undertaken during the period under review with the involvement of the station personnel listed next to the initiative.

Job Fairs – The unit participated in 7 job fairs, itemized below. Documentation is in Exhibit 10.

- 10/17-18/17/18 – Oregon State University Career Fair. Market Manager participated.
- 5/17/18 – Lane Community College Career Fair. Market Manager and Sales Manager participated.
- 3/7/18– Linn Benton Community College Career Fair. Market Manager, Sales Manager and Office Manager participated.
- 10/17/18 – Oregon State University Career Fair. Market Manager participated.

- 2/13/19 – University of Oregon Career Fair. Market Manager participated.
- 5/16/19 – Lane Community College Career Fair. Market Manager participated.
- 4/17/19 – Linn Benton Community College Career Fair. Market Manager and Promotions and Marketing Director participated.

Co-Sponsored 2 Job Fairs – On **11/9/2017** and **8/19/2019**, the unit co-sponsored University of Oregon Career Fairs in conjunction with the Eugene Area Radio Stations organization. In addition to sponsorship, Market Manager and Sales Manager represented Bicoastal Media with a booth at both events. Documentation is in Exhibit 11.

Scholarship Program – Bicoastal Media Market Manager and Sales Manager both serve on the Board of Directors for the Eugene Area Radio Stations (EARS) organization, which grants annual broadcast scholarships. Each year listeners from all area radio stations are invited to submit an application along with an essay describing why they want the scholarship. Applications are also distributed through Lane Community College, Linn Benton Community College, Oregon State University and the University of Oregon and all area high schools through their respective career counseling departments. All applicants are reviewed and winners are selected by the EARS board of directors. Three (3) \$3000 scholarships were awarded in both reporting periods under review. Documents relating to the EARS scholarship program are in Exhibit 12.

Training for staff –

Nielsen Sales and Programmers Training

In-Market for 90-minute sessions. The sales staff participated in regular and on-going sessions during the reporting period. There were four sessions inside of the reporting periods under review. The training sessions focus on the Nielsen/Tapscan tools and are designed to improve skills. Sessions address various topics and are inclusive of all skill and experience levels. (5/15/18, 9/6/18, 3/12/19 & 8/27/19). Training sessions presented information that will assist in helping attendees become better candidates for promotion.

Radio Advertising Bureau

We sent two Account Executives through the Radio Advertising Bureau “Radio Marketing Professional” sales training program during the reporting periods under review (3/13/18 & 4/1/19).

Mentorship Program

The Market Managers implement the mentoring program. They work directly with all employees on a regular and ongoing basis making a special point to select employees who express and demonstrate a desire to elevate to higher level positions in the company. Coaching and counseling on management skills that include conflict resolution, personnel and project management and interpersonal relationship skills allowing each person on the team to grow to his or her fullest potential.

Provided assistance to unaffiliated non-profit entity in maintaining its web site that provides counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting

The Market Manager works directly with the webmaster for the Eugene Area Radio Stations organization. The web site includes employment opportunities and resources for broadcast employment and scholarships. See <https://eugeneradio.org> .

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody 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 all complaints must be reported, regardless of their status or disposition.

No complaints filed.

(f) In accordance with section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

The Market Manager is responsible for implementation and administration of the stations' EEO policies at the local level. EEO training is on-going in the Market Manager's meetings with staff throughout the year. EEO policy implementation is reviewed annually by the licensee's President and Chief Operating Officer during the budget process and periodically throughout the year during his station visits with market management.

Advertisements for full-time employment include "Equal Opportunity Employer" or "EOE." The licensee's employment application states that it is an "Equal Opportunity Employer" and that it "considers applicants for all positions without regard to race, color, religion, sex, national origin, marital status, the presence of non-job related medical condition or handicap, or any other legally protected status." The Unit's Equal Employment Opportunity policy is posted internally on the Staff Bulletin Board for all employees to view.

The Unit's EEO policy is included in the Employee Handbook. All employees are required to acknowledge that they have read the Handbook and to sign a form that they have read and understood it.

(g) In accordance with section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter,

describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.

The Market Manager is aware of all recruitment efforts that occur for openings he oversees. He reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives. When recruitment is necessary, a general review is given to: A) are current recruitment sources in keeping with the generally accepted sources for the position and the industry; B) are new recruitment sources possible or necessary in generating a desired interest; C) are some previously used traditional sources no longer viable, for sake of repetition, functionality or engagement; and D) cost. A general analysis of the readily available recruitment sources has determined that when recruitment is necessary, the greatest response is from the immediate local area. The Market Manager also reviews the effectiveness of the program during his preparation of the Annual EEO Public File Reports for the stations.

In addition, the Unit has its communications counsel review its Annual EEO Public File Report each year. Counsel provides suggestions for improvement to the recruitment program to the extent needed.

(h) In accordance with section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its 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. If the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Senior management meets each year at budget time to analyze pay levels for each position within each department. During that time, senior management evaluates compensation and benefits to ensure all employees regardless of race, color, religion, national origin or sex have equal opportunities for and access to any pay increase, promotions or job openings at any business unit within the Company. Employee evaluations are gauged by the following general criteria: A) overall job performance; B) quality of work; C) attendance; and D) attitude. Subcategories include, but are not limited to, performance in cross trained areas, proactive abilities and positive awareness, and participation.

It is Bicoastal Media's policy to make available to all Company employees any job opening within the Company. In addition to our outreach efforts, employees that are looking to advance and may be willing to relocate are made aware of job openings within the Company. Each year we compare employment statistics of the radio industry with our own to see how we measure up.

There are no union contracts or union employees within the Unit.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example,

for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

Not applicable.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based on information provided by the Market Manager of the Unit.


Kevin P. Mostyn
Vice President & Chief Technology Officer