

EMG2, LLC
61043 Longview Lane
Cove, Oregon 97824

April 25, 2021

Ms. Elizabeth E. Goldin
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Response to Broadcast EEO Audit Letter
KWVN-FM, PENDLETON, OR (Facility ID No. 57757)

Dear Ms. Goldin:

This letter is provided by EMG2, LLC (“EMG”), licensee of Station KWVN-FM, Pendleton, Oregon, Facility Id. No. 57757, in response to your EEO Audit letter dated February 25, 2021, regarding the random EEO audit of the station employment unit that includes KWVN-FM (the “Unit”).

The Unit, in addition to KWVN-FM, is comprised of Stations (the “Stations”):

KUMA-AM	Pendleton, Oregon	Facility ID No. 57756
KUMA-FM	Pilot Rock, Oregon	Facility ID No. 166045
KTIX-AM	Pendleton, Oregon	Facility ID No. 643
KWHT-FM	Pendleton, Oregon	Facility ID No. 644
KTEL-AM	Walla Walla, Washington	Facility ID No. 12511

- (a) EEO Public File Reports, Website Addresses, and Dates of Hire. Copies of the Unit’s two most recent EEO Public File Reports are attached hereto as Exhibit A. These reports are for the periods October 1, 2018 through September 30, 2019 (the “2019 EEO Public File Report”) and October 1, 2019 through September 30, 2020 (the “2020 EEO Public File Report”). The Stations do not have individual websites, but the website address for Elkhorn Media Group is <https://elkhornmediagroup.com>. Station information, EEO Reports, and links to the Stations’ Online Public Inspection Files are available at that website.
- (b) Full-time Vacancies. The Unit has not had any full-time vacancies during the period covered by the EEO Reports noted above, and thus has not posted, recruited for, interviewed for, or hired any full-time positions.
- (c) Recruitment Initiatives. The Unit has 7 full-time employees. The population of the market in which the Unit operates is less than 250,000. Based on these two factors, the Unit is required to perform two initiatives within a two-year period, pursuant to Sections

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73.2080(c)(2) and (e)(3). Exhibit B contains the recruitment initiatives and supporting documentation covered by the above-noted EEO Public File Reports.

- (d) Complaints. There are no pending or resolved complaints involving the Unit.
- (e) Management's EEO Responsibilities & Recruitment Program Analysis. The majority Owner, Sales Manager, and Program Director all work closely to identify potential job vacancies. When a vacancy is identified, the Unit has several procedures to ensure that full EEO compliance and broad outreach is achieved. First, a robust job description is developed, encompassing all aspects of the job. Second, to ensure full EEO compliance, a review is conducted of all Recruitment Sources. Once all details of the vacancy are prepared, the job opening is distributed to all Recruitment Sources on a planned schedule. In order to make sure that all applicants are aware of the Unit's EEO policies and program, applicants are informed that EMG is an Equal Opportunity Employer and does not discriminate on the basis of race, ethnicity, or any protected class. Additionally, the HR Assistant makes sure all hiring forms are in order and that the company handbook has been reviewed. All employees are provided a copy of the most current and up-to-date employee handbook. In addition to any immediate openings, a quarterly review of all EEO Hiring Procedures and Responsibilities is conducted. This gives ownership and management the opportunity to do a thorough review of all EMG's EEO Procedures and Responsibilities, including a chance to update any new information from the FCC. As policies or procedures may change, the employee handbook is updated and disseminated to current employees.
- (f) Examination of Pay, Benefits, etc. In addition to management's responsibilities described above, management periodically reviews EMG's benefits packages, compensation scales, promotion and seniority guidelines, and its selection techniques in order to ensure it provides equal opportunities to all employees in the company, and to ensure EMG's promotional and seniority guidelines do not have a discriminatory effect. The Unit does not have any union agreements.
- (g) Religious Broadcaster. EMG is not a religious broadcaster and no employees are subject to a religious qualification.

In accordance with Section 73.3526(e)(10) of the Commission's Rules, a copy of the EEO audit letter and this response have been placed in the Public Inspection File for each station in the Unit. To contact a station representative, please email randy@elkhornmediagroup.com.

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Should any question arise in connection with this matter, please contact Elkhorn Media Group's counsel, Matthew H. McCormick of Fletcher, Heald & Hildreth, P.L.C. His telephone number is 703-812-0438 and his email address is McCormick@fhhlaw.com.

I, Randy McKone, do hereby declare under penalty of perjury that the foregoing information is true and correct.



Randy McKone
President/Majority Owner
Elkhorn Media Group

Exhibit A

Elkhorn Media Group (EMG)

EEO Public File Report

Location	Pendleton, OR Walla Walla, WA		
Date	Oct 1, 2018-Sept 30, 2019		
KUMA-AM	X	KWHT-FM	X
KUMA-FM	X	KWVN-FM	X
KTIX-AM	X	KTEL-AM	X

I. Vacancy List

Job Title	Recruitment Sources ("RS")	RS that referred hiree
NO JOB OPENINGS FOR THE PERIOD		

II. Master Recruitment Source List (MRSL)

RS #	RS Information	Vacancy Information	Number Referred
1	Eastern Oregon University* One University Blvd* La Grande, OR 97850 1-541-962-3972	N/A	0
2	Blue Mountain CC* 4211 NW Carden* Pendleton, OR 97801 1-541-276-1260	N/A	0
3	Walla Walla CC*500 Tausick Way*Walla Walla, WA 99362 1-509-522-2500	N/A	0
4	Whitman College*345 Boyer*Walla Walla, WA 99362 1-509-527-5111	N/A	0
5	Walla Walla College*204 S College Ave*Walla Walla, WA 99362 1-509-527-2615	N/A	0
6	Union Bulletin*1 st and Popular*Walla Walla, WA 99362 1-509-525-3300	N/A	0
7	East Oregonian* 211 SE Byers Ave*Pendleton, OR 97801 1-541-276-2211	N/A	0
8	Hermiston Herald*193 E Main St*Hermiston, OR 97838 1-541-567-6457	N/A	0
9	Confederated Umatilla Journal*PO Box 638 (CUJ)*Pendleton, OR 97801 1-541-966-2043	N/A	0
10	The Observer*1406 5 th *La Grande, OR 97850 1-541-963-3161	N/A	0
11	Baker City Herald*1915 1 st *Baker City, OR 97814 1-541-523-3673	N/A	0
12	Hells Canyon Journal*PO Box 646*Halfway, OR 97834 1-541-742-7900	N/A	0
13	Wallowa County Chieftan*106 NW 1 st *Enterprise, OR 97828 1-541-426-4567	N/A	0
14	The Blue Mountain Eagle*177 N. Broadway*John Day, OR 97845 1-541-575-0710	N/A	0
15	Certified Personnel Service Agency*10101 N. McAlister Rd.*Island City, OR 97850 1-541-963-6678	N/A	0
16	Express Personnel Services*120 E Hurlburt*Hermiston, OR 97838 1-541-276-4070	N/A	0
17	OAB*7150 SW Hampton St., Ste 240*Portland, OR 97223	N/A	0
18	WSAB*724 Columbia St., NW Suite 310*Olympia, WA 98501 1-360-705-0774	N/A	0
19	Company Radio Stations On Air Advertising	N/A	0
20	Internal Referral	N/A	0
21	Company/Station Website	N/A	0
22	Outside individual Referral	N/A	0

III. Recruitment Initiatives

Type of Recruitment Initiative	Brief Description of Activity
Internship	EMG maintains an ongoing informal internship program to train any interested individual in the various operations of a broadcasting facility
Mentoring young advertising executives and programming people	EMG upper management continually mentors junior advertising executives and on air/programming people for management positions
Business Expos-Jobs Fairs	Northeast Oregon College Fair October 2018, Community Job Fair Eastern Oregon University April 2019, Walla Walla Business Expo March 2019. La Grande High School Career Fair September 2019. Diversity Employment Day Career Fair August 2019 Portland, Oregon. Blue Mtn CC Job Fair May 2019
Training Programs	EMG has its employees regularly attend various training programs to increase their job proficiency and skills and enable employees to obtain the skills necessary for job advancement

Elkhorn Media Group (EMG)

EEO Public File Report

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Date	Oct 1, 2019-Sept 30, 2020		
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KUMA-FM	X	KWVN-FM	X
KTIX-AM	X	KTEL-AM	X

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Mentoring young advertising executives and programming people	EMG upper management continually mentors junior advertising executives and on air/programming people for management positions
Business Expos-Jobs Fairs	Northeast Oregon College Fair October 2019. Community Job Fair Eastern Oregon University April 2020, Walla Walla Business Expo March 2020. La Grande High School Career Fair September 2020. Diversity Employment Day Career Fair August 2020 Portland, Oregon. Blue Mtn CC Job Fair May 2020 <u>ALL CANCELLED BECAUSE OF COVID-19 RESTRICTIONS.</u>
Training Programs	EMG has its employees regularly attend various training programs to increase their job proficiency and skills and enable employees to obtain the skills necessary for job advancement

Exhibit B

Elkhorn Media Group

EEO Outreach Program & Recruitment Initiatives

EEO Outreach Program: The Elkhorn Media Group maintains an ongoing informal Outreach program. During March of 2018 and March of 2019, the Elkhorn Media Group hosted and participated in the Walla Walla Home and Outdoor Show and the Walla Walla, Washington Fairgrounds and Hermiston Home and Outdoor Show at the Community Center in Hermiston, Oregon. These events for 2020 were canceled due to Covid-19. In addition to multiple days of broadcasting live from these events, listeners and attendants were encouraged to come to stop by the Elkhorn Media Group booth. While visiting attendants had the opportunity to learn about and discuss the many different positions involved in the broadcast industry. Specifically, station personnel had the opportunity to discuss with attendants the different departments within the Elkhorn Media Group. Attendants asked questions about qualifications and other career opportunities. The attached flyer was made available to all interested individuals with a personal invitation to contact the Elkhorn Media Group to explore future opportunities.

Station Personnel involved: Nicole Naughton, Butch Thurman, Julie Thompson, Randy McKone, Stacie Cummings, Debbie McKone

Recruitment Initiatives & Outreach Efforts conducted during the October 1 2018 – September 30, 2019 and October 1 2019 – September 30, 2020 terms:

1. Internships. EMG conducted 2 internships during the term listed above. One from 11/1/18 to 12/31/18 with a student from Pendleton High School, and a second internship from 11/1/19 to 12/31/19 with another student from Pendleton High School.
2. Mentorship Program. EMG upper management continually mentors junior advertising executives and on air/programming personnel for future management positions. The upper management personnel who are involved in mentoring include Sales Manager, Program Director and Office Manager.
3. Business Expos/Job Fairs. EMG attended and participated in the following business expos and job fairs:
 - a. Northeast Oregon College Fair, October 2018
 - b. Community Job Fair, Eastern Oregon University, April 2019
 - c. Walla Walla Business Expo, March 2019
 - d. La Grande High School Career Fair, September 2019
 - e. Diversity Employment Day Career Fair, August 2019
 - f. Portland, Oregon Blue Mountain Community College Job Fair, May 2019
 - g. Northeast Oregon College Fair, October 2019
4. Training Programs. EMG provides training programs and encourages its employees to regularly attend various training programs in order to increase their job proficiency and skills, and enable employees to obtain the skills necessary for career advancement.



~INTERNSHIP OPPORTUNITIES~

Are you Looking to Learn More About Media and Radio Broadcasting! An Internship with ELKHORN MEDIA GROUP maybe just what you are looking for.

If you have an interest in an Internship, we want to talk to you. The Elkhorn Media Group occasionally has openings for Internship positions. This is your opportunity to learn about the many aspects and avenues available to you in the field of Media and Radio Broadcasting. You will get firsthand knowledge of on-air broadcasting, creative production, advertising sales, clerical, even a first look at engineering. The Elkhorn Media Group is a locally owned full-service media company serving Eastern Oregon and SE Washington. We operate 15 Radio stations, 2 major websites, 4 Social media platforms, 2 mobile Apps and an Award-Winning Video Department. To find out more contact one of our offices below or speak with your guidance counselor.

Contact Information

Pendleton, Oregon 541-276-1511

La Grande, Oregon 541-963-3405

John Day, Oregon 541-575-1400

Burns, Oregon 541-573-5942

Radio ~ Digital ~ Social ~ Video

Elkhorn Media Group does not discriminate on the basis of race, gender, or ethnicity.

Our goals are to inform and entertain our audiences and get results for our advertising partners.



Interested in Media and Broadcast Opportunities!

Radio ~ Digital ~ Social ~ Video

Fulltime ~ Parttime ~ Internships

Elkhorn Media Group does not discriminate on the basis of race, gender, or ethnicity.

Elkhorn Media Group is a locally owned and operated full-service media company serving Eastern Oregon and SE Washington. We operate 15 Radio Stations, 2 Major Websites, 4 Major Social Media accounts, 2 Mobile Apps and an Award-Winning Video Department. If you have interest in the media business, we are always anxious to talk about your goals and area of interest.

Major Communities We Serve

*Pendleton ~ Hermiston ~ Walla Walla ~ Milton-Freewater
La Grande ~ Baker City ~ John Day ~ Burns ~ Prairie City*

Contact Information

Pendleton, Oregon 541-276-1511

La Grande, Oregon 541-963-3405

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Walla Walla Business Expo, March 2019

ELKHORN
MEDIA GROUP



Hermiston Home & Outdoor Show



Hermiston Home & Outdoor Show



Hermiston Home & Outdoor Show