

**FCC EQUAL EMPLOYMENT OPPORTUNITY AUDIT RESPONSE**  
**KPJR-TV, GREELEY, COLORADO**  
**TRINITY CHRISTIAN OF SANTA ANA, INC.**

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KPJR-TV, Greeley, Colorado (FID# 166510) (“KPJR” or “Station”), licensed to Trinity Christian Center of Santa Ana, Inc., d/b/a Trinity Broadcasting Network (“Trinity”), hereby provides the following response to the Commission’s February 14, 2019 random audit notice (“Audit Letter”) requesting information on KPJR’s implementation and compliance of its Equal Employment Opportunity (“EEO”) program in accordance with Commission Rule 73.2080.

**I. Trinity is a Church Organization Requiring Religious Belief as a Job Qualification for All Employees, and KPJR Provides a Religious Program Service**

As the Commission’s files reflect, Trinity is a non-profit, tax-exempt church organization recognized as tax-exempt by the Internal Revenue Service. Over the last few years Trinity has completed random EEO audits for several of its other stations, e.g., WDLI-TV, Canton, Ohio (FID# 67893), WTJP-TV, Gadsden, Alabama (FID# 1002), WMCF-TV, Montgomery, Alabama (FID# 60829), WBUY-TV, Holly Springs, Mississippi (FID# 60830), KTBW-TV, Tacoma, Washington (FID# 67950, licensed to Trinity Broadcasting of Washington), KNAT-TV, Albuquerque, New Mexico (FID# 993), WGTW-TV, Burlington, New Jersey (now Millville, NJ) (FID #7623), WKOI-TV, Richmond, Indiana (FID #67869), and KTBO-TV, Oklahoma City, Oklahoma (FID# 67999). Those filings provide the history, tax-exempt church status, and standing of Trinity as a church organization and qualified religious broadcaster under the Commission’s February 25, 1998 *Streamlining Broadcast EEO Rule Order and Policy Statement*, 13 FCC Rcd 322, and Commission Rule 73.2080(a) [47 CFR § 73.2080(a)]<sup>1</sup>. Accordingly, rather than repeat the information provided in those responses, which remains current, that material is hereby incorporated herein. KPJR is a qualified religious broadcaster. If the Commission desires any further information regarding the Station’s status as a religious broadcaster it will be promptly submitted upon request.

KPJR follows the Commission’s religious broadcaster policy and all employees must share a common faith commitment.

**II. KPJR Has Fewer Than Five Full-Time Employees**

KPJR has fewer than five (5) full-time employees regularly assigned to work thirty (30) hours a week or more. Accordingly, in response to paragraph 2 of the Commission’s Audit Letter (DA 19-78, released February 15, 2019), the Station has only one full-time employee, a Manager / Chief Engineer, who is regularly assigned to work forty (40) hours per week.<sup>2</sup>

The Audit Letter also instructs that KPJR respond to question 3(e), *i.e.*:

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<sup>1</sup>A copy of the Commission’s EEO compliance and no further action letter issued May 2, 2018 for KTBO-TV, the latest such determination among Trinity’s EEO compliance determinations, is attached as Exhibit 1.

<sup>2</sup>The Station is not a brokered station.

*(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 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.*

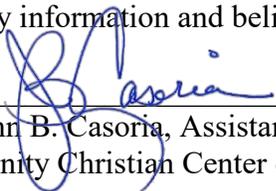
KPJR's last renewal application was granted on March 19, 2014 (BRC DT-20131126BOE). During KPJR's current license term, no complaint involving the Station has been filed alleging unlawful discrimination in its employment practices on the basis of race, color, religion, national origin, or sex.

Pursuant to its operations and activities, the information on file with the Commission, and as provided with this submission, KPJR believes it properly complies with the Commission's EEO regulations. If any additional information is requested, it will be promptly provided upon request.

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CERTIFICATION

I hereby certify that the foregoing response of Trinity Christian Center of Santa Ana, Inc., licensee of KPJR-TV, Greeley, Colorado, to the Commission's February 14, 2019 Random EEO Audit Letter is true and correct, to the best of my information and belief.

  
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John B. Casoria, Assistant-Secretary  
Trinity Christian Center of Santa Ana, Inc.

Date: March 25, 2019



Federal Communications Commission  
Washington, D.C. 20554

May 2, 2018

John B. Casoria, Assistant-Secretary  
Trinity Broadcasting of Oklahoma City, Inc.

Re: KTBO-TV, Oklahoma City, OK (Fac. ID# 67999)

Dear Mr. Casoria:

We have completed our review of the response of Trinity Broadcasting of Oklahoma City, Inc., licensee of the above-noted station, to the February 26, 2018, random audit letter sent to it in accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules. As a result of our review, we find that no further action is required. In accordance with Section 73.3526(e)(10) of the Commission's rules for commercial stations or Section 73.3527(e)(11) for noncommercial stations, the licensee must place copies of this letter, our audit letter, and its audit response in the station's online public inspection file. The licensee must maintain these materials in the file until the next grant of the renewal application, by final order, of the license for the station.

Should you have any questions concerning this matter, you may call the EEO staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley  
Assistant Chief, Policy Division  
Media Bureau  
Federal Communications Commission