



blueberry
BROADCASTING

February 27, 2020

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

ATTN: Lewis C. Pulley
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau

**Re: Response to EEO Audit Letter of February 6, 2020
Station WTOS (AM), Bangor, Maine (Facility ID 3670)**

Dear Mr. Pulley,

This letter is written on behalf of Blueberry Broadcasting, LLC ("Licensee"), licensee of AM Broadcast Station WTOS, Bangor, Maine (Facility ID 3670), in response to the Commission's letter dated February 6, 2020 requesting the Licensee to furnish data as part of an audit of its EEO program.

Station WTOS is part of an employment unit in the Bangor, Maine market (a "smaller market" as defined by section 73.2080 (e) (3) of the rules) which also includes the following seven other radio stations of Licensee: WBAK(FM), Belfast, Maine (Facility ID 25411); WBFB(FM), Bangor, Maine (Facility ID 3671); WKSQ(FM), (Facility ID 341); WBFE(FM), Bar Harbor, Maine (Facility ID 62289); WVOM-FM, Howland, Maine (Facility ID 4092); WTUX(FM), Gouldsboro, Maine (Facility ID 165949); WBKA(FM), Bar Harbor, Maine (Facility ID 40925).

The responses to the Commission's inquiries as set forth in its audit letter are as follows:

3. (a) EEO Public File Reports. Set forth as **Attachment 1** are the Licensee's two most recent EEO Public File Reports for the applicable employment unit covering the periods from December 1, 2017 through November 30, 2018 (the "2018 EEO Public File Report") and December 1, 2018 through November 30, 2019 (the "2019 EEO Public File Report"). These reports were timely placed in the WTOS public inspection file and timely posted on the WTOS

website, www.wtosfm.com, as well as the following websites of its sister stations: www.big104fm.com; www.971thebear.com; www.kissfm.net; www.wvomfm.com.

3. (b) Documentation of Communications Announcing Job Openings. As reported in **Attachment 1**, there were a total of one full-time hire in 2018 (on October 8, 2018) and one full-time hire in 2019 (on July 8, 2019). Set forth in **Attachment 2** is a listing of the recruitment sources used by Licensee for each of these two full-time hires as well as advertising copy for the positions; no organizations requested that the Licensee send it job opening notifications.

3. (c) Interviewee and Referral Source Information. For job hire position 1 (account executive) there were only three interviewees (Two- Blueberry stations) and (One- Linked in) ; and for job hire position 2 (account executive), there were two interviewees (Blueberry stations).

3. (d) EEO Outreach Initiatives. As noted above, the WTOS employment unit is located in a smaller market (the Bangor, Maine radio market) and, pursuant to Section 73.2080 (c) (2) of the rules is required to engage in two recruitment-training outreach initiatives during the period from December 1, 2017 through November 30, 2019 (the "Outreach Period"). Complete details of the licensee's various EEO outreach initiatives during the Outreach Period are set forth in Attachment B to the respective 2018 and 2019 EEO Public File Reports, copies of which are set forth at **Attachment 1**. These outreach activities included in part, (a) participation in four job fairs; (b) hosting three high school students in Licensee's internship/job shadow program; (c) participation in numerous events sponsored by educational institutions involving the broadcast media, including events sponsored by New England School of Communications on the Husson University campus, including a radio/promotions course and a the conversion from paper public inspection file to online public inspection files and its contents. (d) provision of EEO training to management personnel and (e) establishing a training and mentorship program for the advancement of Licensee's employees.

3. (e) Complaints Regarding Discrimination in Employment Practice. During the current license term, there have been no pending or resolved complaints involving WTOS or any of the other stations comprising its employment unit, alleging unlawful discrimination in the employment practices of the employment unit on the basis of race, color, religion, national origin or sex.

3.(f) EEO Enforcement Responsibility and Methods for Informing Employees and Job Applicants of EEO Policies and Program.

(1) EEO Implementation Responsibilities

The administration and enforcement of the licensee's EEO policies and program is conducted by the Director of Programming and Operations (Jack O'Brien) who performs his duties and responsibilities under the supervision and direction of the Licensee's Chief Operating Officer (Bruce Biette). Both the Director of Programming and Operations and the Chief Operating Officer report to Licensee's Chief Executive Officer (Louis Vitali). All hiring for the employment unit is handled by or under the supervision of Licensee's Director of Programming and Operations and/or Chief Operating Officer, both of whom are located at and work from the employment unit. Accordingly, the employment unit's EEO implementation, performance and

evaluation is under the direct administration and oversight of responsible management and corporate officials.

(2) Dissemination of EEO Policies and Program

The Licensee's EEO program and policies are set forth in the form of an EEO Program, a copy of which is set forth at **Attachment 3**. Licensee's employment unit is currently implementing the elements of the EEO Program and will continue to take the steps necessary to ensure that all elements are strictly adhered to at all times. The licensee disseminates its EEO policies to employees and job applicants by the following means:

- The written EEO Program is posted in a area at the employment unit in view of station employees and job applicants. The EEO Program is available to existing employees and new hires.
- The employment unit posts appropriate EEO notices informing employees and job applicants of their equal employment opportunity rights, that Licensee is an equal employment opportunity employer, that discrimination because of race, color, religion, national origin, age or sex is prohibited and that they have the right to notify an appropriate local, State or Federal agency if they believe that they have been discriminated against.
- The Licensee's EEO policies are included in its employment handbook.
- An EEO notice appears on the Licensee's employment application.
- Licensee's Manager, President and Chief Executive Officer (Louis Vitali) receives and reviews memoranda, notices and correspondence from Licensee's Washington, D.C. communications counsel and other sources regarding EEO rules and policies and, in turn, distributes appropriate memoranda and other communications dealing with EEO to Licensee's employment units.
- Meetings are conducted among employment unit personnel and other management level personnel as appropriate.

3. (g) **Analysis of EEO Recruitment Program**. During the two year period from December 1, 2017 through November 30, 2019 covered by the Licensee's 2018 and 2019 EEO Public File Reports, there were only two full-time hires for which referrals were provided by the following sources: radio stations(4); and Linked In (1). Since there have been only two full-time hires over a two year period, Licensee believes that there is an insufficient basis for evaluating its recruitment sources at the time; as additional job openings occur, however, the effectiveness of Licensee's recruitment sources will be evaluated and the list of recruitment sources will be modified and/or expanded as deemed necessary to achieve sufficient numbers of referrals. To date, however, Licensee is satisfied with the overall results of its EEO recruitment program.

3. (h) Analysis of Unit Practices to Ensure Equal Opportunity and Nondiscrimination.

The employment unit is subject to the policies and practices set forth below. In connection with the areas covered below, the employment unit:

Pay/Overtime/Benefits

- Examines rates of pay and fringe benefits for employees with the same duties in order to ensure that there are no inequities based upon race or sex discrimination.
- Provides the opportunity to perform overtime work on a basis that does not discriminate against employees.

Seniority Practices

- Reviews seniority practices to ensure that such practices are nondiscriminatory.

Promotions

- Undertakes to offer promotions in a nondiscriminatory fashion to positions of greater responsibility.
- Instructs those who make decisions on placement and promotion that employees are to be considered without discrimination.
- Disseminates promotion policies to employees by posting or otherwise making such policies known to employees.
- Inquires into interest in skills of lower paid employees with respect to higher paid positions and provides assistance, counseling and/or training to enable employees with interest and potential to qualify for such positions.
- Disseminates information regarding training programs and affords the opportunity for employees to participate.
- Posts jobs at the employment unit so that existing employees will be aware of opportunities of promotion.

Selection Techniques

- Engages in screening and, to the extent used, testing procedures on a basis that is applied fairly, consistently and in a neutral manner.
- Conducts reference checks, if used, on a basis that is fair, consistent and at the same stage of the hiring process.
- Conducts periodic reviews of employee folders.
- Reviews screening procedures and selection process used by persons with hiring responsibilities to ensure that qualified persons are not being excluded during the initial stage.


There are no union agreements at this employment unit.

A copy of this response to the Commission's audit letter, as well as the audit letter itself, will be placed in the WTOS online public inspection file.

The party signing below hereby declares, under penalty of perjury, that the facts and information included in this response and related attachments are true and correct to the best of my knowledge and belief.

Respectfully submitted

BLUEBERRY BROADCASTING, LLC

By: 
Louis Vitali, Manager, President and CEO

Telephone: (207) 967-8094

Email: louis@marinertower.com

2018-2019 EEO PUBLIC FILE REPORTS

**WABK-AM, WBAK-FM, WBFB-FM, WKSQ-FM, WBFE-FM, WVOM-FM, WTUX-FM
WBKA-FM**

**184 Target Industrial Circle
Bangor, Maine 04401
207-947-9100**

EEO Public File Report

December 1, 2017 – November 30, 2018

Blueberry Broadcasting LLC is an Equal Opportunity Employer

Full Time Job Vacancies/Interviewee Data

Position	Job Title	Date Filled	Total # of People Interviewed	Source which Referred Interviewee	No. of Interviewees Per Source	Hiree Referral Source
1	Account Executive	10/8/18	3	Number 1 & 26 from Attachment A- All listed in Attachment A were notified of the opening	2 # 1 1 #26	Number 26 from Attachment A- All listed in Attachment A were notified of the opening

Total number of interviewees for all full time positions: 3

There is attached hereto a list of the recruitment sources utilized by the station and total number of number of interviewees referred by each recruitment source. (Attachment A)

There is also attached hereto a narrative description of the station's Supplement EEO Outreach Activities (Attachment B).

Notice: Organizations that regularly distribute information about employment opportunities to job seekers or refer job seekers to employers may request Blueberry Broadcasting LLC to provide them with information about full-time openings at the station. Such requests must include the organization's name, mailing address, e-mail address if applicable, telephone number and contact person, and identify the category or categories of job openings for which it requests notices. Requests should be directed to Jack O'Brien 125 Community Drive, Suite 201, Augusta, ME 04330. Blueberry Broadcasting LLC is an Equal Opportunity Employer.

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

No.	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1	Blueberry Broadcasting Radio Stations	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	2
2	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, ME 04401	207-561-4001	0
3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Ben Haskell haskellb@nescom.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	AWC National Headquarters		3337 Duke Street Alexandria, VA 22314	703.370.7436 Fax 703.370.7437	0
11	Colby College	Shauna Hirshfield sahirshf@colby.edu	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC 20006	202.496.1992	0
13	National Assoc. Of Black College Broadcasters	bcrmail@aol.com or lojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0

16	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300- Portland, ME 04104	207.780.4141	0
17	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
18	University of New England	jnevers@une.edu	11 Hills Beach Road Biddeford, ME 04005-9599	207.602.2503	0
19	Blueberry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
20	Employee Referral	Bruce Biette Race Allen	184 Target Industrial Circle Bangor, ME 04401	207.907.7783 207.907-7747	0
21	Outside Referral	Bruce Biette	184 Target Industrial Circle Bangor, ME 04401	207.907.7783	0
23	Career Center	Michael Shirley	98 North Ave. Suite 20 Skowhegan, ME 04976	207.474.4950	0
25	Tri-County Career Centers	Paul B. Ruggiero	45 Oak Street, Ste. 3 Bangor, ME 04401	207.561.4057	
26	Linkedin	Race Allen	184 Target Industrial Circle Bangor, ME 04401	207.907.7747	1

*** Asterisk denotes recruitment sources which requested job notification announcements**

Attachment B

**WABK-AM, WBAK-FM, WBFB-FM, WKSQ-FM, WBFE-FM, WVOM-FM, WTUX-FM
WBKA-FM**

**184 Target Industrial Circle
Bangor, Maine 04401**

**EEO Public File Report
December 1, 2017 – November 30, 2018**

Statement of Supplemental EEO Outreach Activities:

a) Initiative : Participation in a Job Fair

On May 24, 2018 Blueberry Broadcasting LLC participated in the 21st Annual Spring Career Fair at the Anah Shriners. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by the Director of Programming & Operations and our Bangor Operations Director. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

On October 25, 2018 Blueberry Broadcasting LLC participated in the 21st Annual Fall Career Fair at Anah Shriners. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by a Blueberry Broadcasting Operations Manager and the Director of Programming & Operations. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

b) Initiative: Participation in a Program Sponsored by Educational Institutions:

Hall Dale High School requires all students to participate in a job shadow program before graduation. On April 10, 2018 Blueberry Broadcasting hosted a student that was provided the opportunity to visit our business, to learn first- hand what our employees experience day to day in their careers. He was able to observe activities, ask prepared questions and gain a better understanding of what employees do on a daily basis. He experienced all aspects of our facilities: On-Air, Production and Sales

On July 26, 2018 Blueberry Broadcasting hosted a young man interested in a broadcast career. Hope Association was contacted by the Department of Labor to coordinate a job shadow opportunity with WTOS-FM. He sat in on the morning show, spent time with the Production Director as well as the Director of Programming and Operations for the company. He was given an opportunity to ask questions to all that were involved. He spent four hours on-site. He is considering attending Southern Maine Community College.

On September 26, 2018 the Bangor EU Operations Director and Senior Account Executive joined a "Radio/Promotions" course as guest speakers at the New England School of Communications. The main topic covered how a radio station runs contests and concert promotions, from creation to execution. The two speakers laid out how the radio station(s) and concert promoter(s) work together with ticket giveaways and talked about how a typical budget and proposal would look for standard concert contest. They also spoke about giveaways that would involve cash or a tangible prize other than concert tickets and how a station may go about finding a prize for a promotion. The students asked questions ranging from promotional ideas to copyright issues with concert promotions. They had other questions they had for their class project.

On November 13, 2018 the Blueberry Broadcasting Director of Programming and Operations and the Bangor Operations Director were guest speakers/instructors at the New England School of Communications on the Husson University campus. The request was to discuss public file requirements and maintenance which is part of the course. They spoke about the changes that took place back in March requiring all radio stations to post their public files online. They discussed what is covered by the FCC and what is required to be handled by individual stations. They showed examples of political files, issues and programs and the EEO report. The students were also given time to ask questions about this subject matter and anything related to Blueberry Broadcasting.

- c) Initiative: Provision of training to management level personnel as to methods of ensuring equal employment opportunities and preventing discrimination.**

On October 2, 2018 Blueberry Broadcasting conducted a training session to management level personnel who have substantial responsibility in the making of hiring decisions. This session also included disseminating information regarding all vacancies, recruitment sources, internal record keeping, applications, interviewees and referral sources. This training session was attended by the VP/COO, Director of Sales & the Director of Programming & Operations.

- d) Initiative: Establishment of training programs and mentoring programs designed to enable station personnel to acquire skills that could qualify them for higher level positions.**

Blueberry Broadcasting LLC established training and mentoring programs for the staff. Both programs enable an employee to acquire skills that could qualify them for a higher level position within the organization. The program is individualized and the training and mentoring is designed to fit the needs and desires of the employee and is on-going.

- e) Initiative: Participation in other activities (Menu option # 16)**

Blueberry Broadcasting LLC airs fifteen second public service announcements for community organizations to further the goal of disseminating information as to employment opportunities. These announcements air a minimum of once per day on all Blueberry Broadcasting stations.

**WTOS-AM, WBAK-FM, WBFB-FM, WKSQ-FM, WBFE-FM, WVOM-FM, WTUX-FM
WBKA-FM**

**184 Target Industrial Circle
Bangor, Maine 04401
207-947-9100**

EEO Public File Report

December 1, 2018 – November 30, 2019

Blueberry Broadcasting LLC is an Equal Opportunity Employer

Full Time Job Vacancies/Interviewee Data

Position	Job Title	Date Filled	Total # of People Interviewed	Source which Referred Interviewee	No. of Interviewees Per Source	Hiree Referral Source
1	Account Executive	7/8/19	2	Number 1 from Attachment A- All listed in Attachment A were notified of the opening	2 Number 1	Number 1 from Attachment A- All listed in Attachment A were notified of the opening

Total number of interviewees for all full time positions: 2

There is attached hereto a list of the recruitment sources utilized by the station and total number of number of interviewees referred by each recruitment source. (Attachment A)

There is also attached hereto a narrative description of the station's Supplement EEO Outreach Activities (Attachment B).

Notice: Organizations that regularly distribute information about employment opportunities to job seekers or refer job seekers to employers may request Blueberry Broadcasting LLC to provide them with information about full-time openings at the station. Such requests must include the organization's name, mailing address, e-mail address if applicable, telephone number and contact person, and identify the category or categories of job openings for which it requests notices. Requests should be directed to Jack O'Brien 125 Community Drive, Suite 201, Augusta, ME 04330. Blueberry Broadcasting LLC is an Equal Opportunity Employer.

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No.	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
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2	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, ME 04401	207-561-4001	0
3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Mark Nason nasonm@husson.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	AWC National Headquarters *	* Returned	* Removed from list		0
11	Colby College	Shauna Hirshfield sahirshf@colby.edu	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC 20006	202.496.1992	0
13	National Assoc. Of Black College Broadcasters	bcrmail@aol.com or lojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0

16	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300 Portland, ME 04104	207.780.4141	0
17	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
18	University of New England	jnevers@une.edu	11 Hills Beach Road Biddeford, ME 04005-9599	207.602.2503	0
19	Blueberry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
20	Employee Referral	Bruce Biette Race Allen	184 Target Industrial Circle Bangor, ME 04401	207.907.7783 207.907-7747	0
21	Outside Referral	Bruce Biette	184 Target Industrial Circle Bangor, ME 04401	207.907.7783	0
22	Career Center	Michael Shirley	98 North Ave. Suite 20 Skowhegan, ME 04976	207.474.4950	0
23	Tri-County Career Centers	Paul B. Ruggiero	45 Oak Street, Ste. 3 Bangor, ME 04401	207.561.4057	0
24	Linkedin	Race Allen	184 Target Industrial Circle Bangor, ME 04401	207.907.7747	0
25	Zip Recruiter	Race Allen	184 Target Industrial Circle Bangor, ME 04401	207.907.7747	0

* Asterisk denotes recruitment sources which requested job notification announcements

Attachment B

**WTOS-AM, WBAK-FM, WBFB-FM, WKSQ-FM, WBFE-FM, WVOM-FM, WTUX-FM
WBKA-FM**

**184 Target Industrial Circle
Bangor, Maine 04401**

**EEO Public File Report
December 1, 2018 – November 30, 2019**

Statement of Supplemental EEO Outreach Activities:

a) Initiative : Participation in a Job Fair

On May 23, 2019 Blueberry Broadcasting LLC participated in the 22nd Annual Spring Career Fair at the Anah Shriners. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by the Director of Programming & Operations and our Bangor Operations Director. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

On October 22, 2019 Blueberry Broadcasting LLC participated in the 22nd Annual Fall Career Fair at Anah Shriners. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by a Blueberry Broadcasting Operations Manager and the Director of Programming & Operations. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

b) Initiative: Participation in a Program Sponsored by Educational Institutions:

On March 20, 21 & 22, 2019 Blueberry Broadcasting hosted a high school student that is interested in pursuing a career in radio broadcasting. The student was provided the opportunity to visit our business and learn first-hand what our employees experience on a day-to-day basis. He was able to observe activities, ask questions and gain a better understanding of what is expected daily. he was able to experience all aspects of our facilities. he spent quality time with our Director of Programming & Operations, our Digital Support team, On-Air and production.

On July 31st, 2019 Blueberry Broadcasting News Director and On-Air Personality Ric Tyler was invited to speak to a group of student campers at the New England School of Communications media camp. The summer camp hosts students from Maine and from across New England for several days of informative sessions. Ric began his animated and interactive discussion challenging the students with questions that drew an understanding of the ratings process that is so crucial to television and radio. He touched on such points as diaries, people meters, telephone reminders to participants and the flaws inherent in the system. They then delved into the concept to exploiting the flaws in an effort to accrue the needed ratings to make for a successful career in broadcasting. He then led the future broadcasters in a thesis of how many broadcasters enter the profession with hopes of garnering love/affection/adulation, money and/or power/responsibility. They then studied the early broadcast careers of two former colleagues to explain how attempting to move into larger markets may require them to sacrifice one of the aforementioned attributes and the risk of losing positions in their climb to larger markets. In his final moments, he set a timer on his mobile device for the "lightning Round" to answer any questions as quickly and honestly as possible.

- c) Initiative: Provision of training to management level personnel as to methods of ensuring equal employment opportunities and preventing discrimination.**

On October 8, 2019 Blueberry Broadcasting conducted a training session to management level personnel who have substantial responsibility in the making of hiring decisions. This session also included disseminating information regarding all vacancies, recruitment sources, internal record keeping, applications, interviewees and referral sources. This training session was attended by the VP/COO, Director of Sales & the Director of Programming & Operations.

- d) Initiative: Establishment of training programs and mentoring programs designed to enable station personnel to acquire skills that could qualify them for higher level positions.**

Blueberry Broadcasting LLC established training and mentoring programs for the staff. Both programs enable an employee to acquire skills that could qualify them for a higher level position within the organization. The program is individualized and the training and mentoring is designed to fit the needs and desires of the employee and is on-going.

- e) Initiative: Participation in other activities (Menu option # 16)**

Blueberry Broadcasting LLC airs fifteen second public service announcements for community organizations to further the goal of disseminating information as to employment opportunities. These announcements air a minimum of once per day on all Blueberry Broadcasting stations.

Attachment 2

**DOCUMENTATION REGARDING CONTACTS WITH OR USE OF
RECRUITMENT RESOURCES ON A POSITION BY POSITION BASIS**

2018 EEO

BALDER EMPLOYMENT UNIT

#15 NOT DELIVERABLE -
Came back - Renewed

ATTACHMENT 1.

[SEPARATELY PREPARE THIS FORM FOR EVERY JOB VACANCY - FOR INTERNAL STATION USE ONLY]

JOB VACANCY MASTER RECORD-KEEPING FORM

1. Job Title: Account Executive 4. Hiree Name: Sarah Osborne
2. Vacancy Date: 4/5/18 5. Referral Source(s) of Hiree: #20 + #26
3. Hire Date: 10/23/18 6. Total Number of Interviewees: 3

7. Recruitment Sources Notified of Job Vacancy	Source Contact Person	Source Address	Source Phone Number	Number of Interviews Referred by Source	Did Source Request Notification Pursuant to Prong 2? (Yes/No)
1-2062342546		10055725 #1, one ATR		2	
		10055725 #26 Linkup	Balder Source Person Sarah	1	

NOTE: THIS FORM WILL BE USED IN THE PREPARATION OF YOUR ANNUAL EEO PUBLIC FILE REPORT, HOWEVER IT SHOULD NOT BE PLACED IN THE STATION'S PUBLIC INSPECTION FILE. IT SHOULD BE RETAINED UNTIL AFTER THE GRANT OF THE STATION'S RENEWAL APPLICATION FOR INTERNAL EEO RECORD-KEEPING PURPOSES ONLY.
ATTACH ADDITIONAL RECRUITMENT SOURCES AS NECESSARY

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

No.	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1 ✓	Blueberry Broadcasting Radio Stations <i>BEAR KISSE UOM</i>	Jack O'Brien <i>Dave Allen</i>	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	0 <i>2</i>
2 ✓	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, ME 04401	207-561-4001	0
3 ✓	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4 ✓	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5 ✓	New England School of Communications	Ben Haskell haskellb@nescom.edu <i>MARK HASEN</i>	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6 ✓	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7 ✓	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8 ✓	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9 ✓	Thomas College	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10 ✓	AWC National Headquarters		3337 Duke Street Alexandria, VA 22314	703.370.7436 Fax 703.370.7437	0
11 ✓	Colby College	Shauna Hirshfield sahirshf@colby.edu	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12 ✓	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC 20006	202.496.1992	0
13 ✓	National Assoc. Of Black College Broadcasters	<u>bermail@aol.com</u> or <u>lojelks@aol.com</u>	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14 ✓	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15 ✓	Minority Media & Telecommunications Council <i>Not Deliverable Sent Back</i>	info@mmtconline.org	3636 16 th St. NW, Suite B-366 Washington, DC 20010	202.332.0500	0

✓ 16	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0
✓ 17	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300 Portland, ME 04104	207.780.4141	0
✓ 18	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
✓ 19	University of New England	jnevers@une.edu	11 Hills Beach Road Biddeford, ME 04005-9599	207.602.2503	0
✓ 20	Blueberry Broadcasting Web Sites A115	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
21	Employee Referral	Bruce Biette Race Allen	184 Target Industrial Circle Bangor, ME 04401	207.907.7783 207.907-7747	0
22	Outside Referral	Bruce Biette	184 Target Industrial Circle Bangor, ME 04401	207.907.7783	0
✓ 23	Career Center	Michael Shirley	98 North Ave. Suite 20 Skowhegan, ME 04976	207.474.4950	0
24	Central Maine Help Wanted Online Services	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207-623-9000 ext. 102	0
✓ 25	Tri-County Career Centers	Paul B. Ruggiero	45 Oak St., Ste. 3 Bangor, ME 04401	207-561-4057	0
26	LinkedIn	Race Allen	184 Target Industrial Circle Bangor 04401		(1)

* Asterisk denotes recruitment sources which requested job notification announcements

BBC (AE Recruitment Bangor – Version A)

HAVE YOU EVER THOUGHT ABOUT A CAREER IN RADIO SALES?

WELL WE'RE LOOKING FOR AN ENERGETIC, CREATIVE, CAREER-ORIENTED PERSON TO JOIN OUR TEAM OF SALES PROFESSIONALS IN OUR BANGOR OFFICE.

WE NEED A PERSON WHO IS HIGHLY MOTIVATED TO HELP OTHER BUSINESS PEOPLE SOLVE MARKETING PROBLEMS AND CAPITALIZE ON SALES OPPORTUNITIES.

NOW AS YOU MIGHT IMAGINE, STRONG WRITTEN AND VERBAL SKILLS, A SENSE OF ORGANIZATION, AND THE ABILITY TO MANAGE YOUR TIME AND SET AND ACHIEVE GOALS ARE REQUIRED. YOU MUST ALSO HAVE YOUR OWN RELIABLE TRANSPORTATION. THE PERSON THAT WE'RE LOOKING FOR NEEDS TO BE VERY POSITIVE AND HAVE A PERSONAL DRIVE TO SUCCEED.

DOES THAT SOUND LIKE YOU? AND DOES THAT SOUND LIKE THE KIND OF JOB YOU'RE LOOKING FOR?

EMAIL JOBS AT BLUEBERRY BROADCASTING DOT COM. THAT EMAIL AGAIN, IS JOBS AT BLUEBERRY BROADCASTING DOT COM. PLEASE, NO PHONE CALLS. IF YOU LIKE LISTENING TO US, YOU'LL LOVE WORKING WITH US! AND BLUEBERRY BROADCASTING IS AN EQUAL OPPORTUNITY EMPLOYER. THAT EMAIL ADDRESS AGAIN, TO SEND YOUR RESUME IS JOBS AT BLUEBERRY BROADCASTING DOT COM.

BBC (AE Recruitment Bangor – Version B)

ARE YOU HAPPY IN YOUR CURRENT JOB?

HAVE YOU EVER CONSIDERED A CAREER IN RADIO SALES?

WELL, BLUEBERRY BROADCASTING IS SEEKING ENERGETIC, CREATIVE, CAREER-ORIENTED PROFESSIONALS TO ADD TO OUR BANGOR SALES TEAM.

WE'RE SEEKING PEOPLE WHO ARE HIGHLY MOTIVATED, WHO WANT TO HELP LOCAL BUSINESS OWNERS SOLVE MARKETING PROBLEMS, TO CAPITALIZE ON SALES OPPORTUNITIES IN THIS ECONOMY.

THE PEOPLE WE'RE LOOKING FOR SHOULD HAVE CHARISMA AND A POSITIVE ATTITUDE. THEY SHOULD HAVE A PERSONAL DRIVE TO SUCCEED. THEY MUST TAKE DIRECTION WELL, AND HAVE THEIR OWN RELIABLE TRANSPORTATION.

IF THIS SOUNDS LIKE YOU, AND YOU'RE INTERESTED IN PURSUING A SUCCESSFUL SALES CAREER IN BANGOR, THEN JOIN OUR TEAM!

EMAIL YOUR RESUME TO JOBS AT BLUEBERRY BROADCASTING DOT COM TODAY. THAT EMAIL AGAIN, IS JOBS AT BLUEBERRY BROADCASTING DOT COM. PLEASE, NO PHONE CALLS. IF YOU LIKE LISTENING TO US, YOU'LL LOVE WORKING WITH US! BLUEBERRY BROADCASTING IS AN EQUAL OPPORTUNITY EMPLOYER.

Advertiser	Blueberry Bangor Sales						AE								Notes				
Campaign	AE Recruitment						Race								Bumpable, moveable, etc.				
Agency							Industry Code												
Contact	Race						Recruitment/Employment												
Address	do not mail						Revenue Type												
Address							Local Direct												
City, St, Zip							Date												
Phone							4/5/18												
Line	Station	Start Date	End Date	Wks	Alt Wks	Time Frame	Break Type	M	T	W	TH	F	SA	SU	Weekly Spots	Lgth	RATE	Total Spots	Line Cost
1	WBFB	4/7/18	4/13/18	1		0000-0600	Commercial	5	5	5	5	5	5	5	35	60	\$0.00	35	\$0.00
2	WBFB	4/7/18	4/13/18	1		0600-0900	Commercial	2	2	2	2	2	2	2	14	60	\$0.00	14	\$0.00
3	WBFB	4/7/18	4/13/18	1		0900-1500	Commercial	4	4	4	4	4	4	4	28	60	\$0.00	28	\$0.00
4	WBFB	4/7/18	4/13/18	1		1500-1900	Commercial	3	3	3	3	3	3	3	21	60	\$0.00	21	\$0.00
5	WBFB	4/7/18	4/13/18	1		1900-2400	Commercial	5	5	5	5	5	5	5	35	60	\$0.00	35	\$0.00
6															0			0	\$0.00
7	WKSQ	4/7/18	4/13/18	1		0000-0600	Commercial	5	5	5	5	5	5	5	35	60	\$0.00	35	\$0.00
8	WKSQ	4/7/18	4/13/18	1		0600-0900	Commercial	2	2	2	2	2	2	2	14	60	\$0.00	14	\$0.00
9	WKSQ	4/7/18	4/13/18	1		0900-1500	Commercial	4	4	4	4	4	4	4	28	60	\$0.00	28	\$0.00
10	WKSQ	4/7/18	4/13/18	1		1500-1900	Commercial	3	3	3	3	3	3	3	21	60	\$0.00	21	\$0.00
11	WKSQ	4/7/18	4/13/18	1		1900-2400	Commercial	5	5	5	5	5	5	5	35	60	\$0.00	35	\$0.00
12															0			0	\$0.00
13	WVOM	4/7/18	4/13/18	1		0000-0600	Commercial	3	3	3	3	3	3	3	21	60	\$0.00	21	\$0.00
14	WVOM	4/7/18	4/13/18	1		0600-0900	Commercial	2	2	2	2	2			10	60	\$0.00	10	\$0.00
15	WVOM	4/7/18	4/13/18	1		0900-1500	Commercial	2	2	2	2	2	2	2	14	60	\$0.00	14	\$0.00
16	WVOM	4/7/18	4/13/18	1		1500-1900	Commercial	1	2	1	2	1	2	2	11	60	\$0.00	11	\$0.00
17	WVOM	4/7/18	4/13/18	1		1900-2400	Commercial	3	3	3	3	3	3	3	21	60	\$0.00	21	\$0.00
18															0			0	\$0.00
19															0			0	\$0.00
20															0			0	\$0.00
21															0			0	\$0.00
22															0			0	\$0.00
23															0			0	\$0.00
24															0			0	\$0.00
25															0			0	\$0.00
26															0			0	\$0.00
27															0			0	\$0.00
28															0			0	\$0.00
29															0			0	\$0.00
30															0			0	\$0.00
Advertiser							Date		Notes							Total Spots			
																343			
AE				Sales Mgr										Total Amount					
														\$0.00					
<p>This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity.</p> <p>Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.</p>																			

Blueberry Broadcasting
PO Box 3059
Kennebunkport, ME 04046

Order #: 667-00225
Description: AE RECRUITMENT BANGOR
Date Entered: 4/5/2018
P.O.#:
Salesperson: ALLEN, RACE
Invoice Frequency: Billed at end of Media/EOS (Invoice will NOT be printed)

BBC PROMOS

On-Air Schedule

Start Date	End Date	Station	Scheduled Time/Event	Repeated	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 4/7/2018	4/13/2018	WBFB/WMCMA	Midnight to 06:00:00	Weekly	1:00	35	0.00	0.00	5	5	5	5	5	5	5
2 4/7/2018	4/13/2018	WBFB/WMCMA	06:00:00 to 09:00:00	Weekly	1:00	14	0.00	0.00	2	2	2	2	2	2	2
3 4/7/2018	4/13/2018	WBFB/WMCMA	09:00:00 to 15:00:00	Weekly	1:00	28	0.00	0.00	4	4	4	4	4	4	4
4 4/7/2018	4/13/2018	WBFB/WMCMA	15:00:00 to 19:00:00	Weekly	1:00	21	0.00	0.00	3	3	3	3	3	3	3
5 4/7/2018	4/13/2018	WBFB/WMCMA	19:00:00 to Midnight	Weekly	1:00	35	0.00	0.00	5	5	5	5	5	5	5
6 4/7/2018	4/13/2018	WKSQ/WQSSA	Midnight to 06:00:00	Weekly	1:00	35	0.00	0.00	5	5	5	5	5	5	5
7 4/7/2018	4/13/2018	WKSQ/WQSSA	06:00:00 to 09:00:00	Weekly	1:00	14	0.00	0.00	2	2	2	2	2	2	2
8 4/7/2018	4/13/2018	WKSQ/WQSSA	09:00:00 to 15:00:00	Weekly	1:00	28	0.00	0.00	4	4	4	4	4	4	4
9 4/7/2018	4/13/2018	WKSQ/WQSSA	15:00:00 to 19:00:00	Weekly	1:00	21	0.00	0.00	3	3	3	3	3	3	3
10 4/7/2018	4/13/2018	WKSQ/WQSSA	19:00:00 to Midnight	Weekly	1:00	35	0.00	0.00	5	5	5	5	5	5	5
11 4/7/2018	4/13/2018	WVOM/WVQM	Midnight to 06:00:00	Weekly	1:00	21	0.00	0.00	3	3	3	3	3	3	3
12 4/7/2018	4/13/2018	WVOM/WVQM	06:00:00 to 09:00:00	Weekly	1:00	10	0.00	0.00	2	2	2	2	2	0	0
13 4/7/2018	4/13/2018	WVOM/WVQM	09:00:00 to 15:00:00	Weekly	1:00	14	0.00	0.00	2	2	2	2	2	2	2
14 4/7/2018	4/13/2018	WVOM/WVQM	15:00:00 to 19:00:00	Weekly	1:00	11	0.00	0.00	1	2	1	2	1	2	2
15 4/7/2018	4/13/2018	WVOM/WVQM	19:00:00 to Midnight	Weekly	1:00	21	0.00	0.00	3	3	3	3	3	3	3

Order Start Date: 4/7/2018 Order End Date: 4/13/2018 Spots: 343 Total Charges: \$0.00

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.

Projected Media Month/End-Of-Schedule Billing Totals for BBC PROMOS / 667-00225 :

	<u>Spot Count</u>	<u>Net Billing</u>
April 2018	343	\$0.00

Confirmed & Accepted for Blueberry Broadcasting By:

Accepted for BBC PROMOS By:

Please Sign and Return One Copy



**Blueberry Broadcasting
Sales Recruitment**

Blueberry Broadcasting is adding to our Bangor-based sales team. You will be responsible for prospecting and developing new business as well as maintaining and growing existing accounts. A positive attitude, ability to take direction, and excellent verbal and written communications skills are a must. Sales experience is a plus but we're willing to train the right person. Competitive compensation package includes Medical, Dental, and Paid Vacations. This is a tremendous opportunity for the right candidate! Send your resume and letter of introduction to jobs@blueberrybroadcasting.com. Blueberry Broadcasting is an Equal Opportunity Employer.

Advertiser	Blueberry Broadcasting						AE								Notes				
Campaign	Sales Recruitment						Race								Identical schedule on WBFB and WKSQ - fully bumpable no makegoods				
Agency							Industry Code												
Contact	Race						Recruitment/Employment												
Address	do not mail						Revenue Type												
Address							Local Direct												
City,St,Zip							Date												
Phone							8/29/18												
Line	Station	Start Date	End Date	Wks	Alt Wks	Time Frame	Break Type	M	T	W	TH	F	SA	SU	Weekly Spots	Lgth	RATE	Total Spots	Line Cost
1	B+K	8/30/18	9/12/18	2		0000-0600	Commercial	4	4	4	4	4	4	4	28	30	\$0.00	56	\$0.00
2	B+K	8/30/18	9/12/18	2		0600-0900	Commercial	1	2	1	2	1	2	2	11	30	\$0.00	22	\$0.00
3	B+K	8/30/18	9/12/18	2		0900-1500	Commercial	2	2	3	2	2	2	3	16	30	\$0.00	32	\$0.00
4	B+K	8/30/18	9/12/18	2		1500-1800	Commercial	1	2	1	2	1	1	2	10	30	\$0.00	20	\$0.00
5	B+K	8/30/18	9/12/18	2		1800-2400	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	42	\$0.00
6															0			0	\$0.00
7															0			0	\$0.00
8															0			0	\$0.00
9															0			0	\$0.00
10															0			0	\$0.00
11															0			0	\$0.00
12															0			0	\$0.00
13															0			0	\$0.00
14															0			0	\$0.00
15															0			0	\$0.00
16															0			0	\$0.00
17															0			0	\$0.00
18															0			0	\$0.00
19															0			0	\$0.00
20															0			0	\$0.00
21															0			0	\$0.00
22															0			0	\$0.00
23															0			0	\$0.00
24															0			0	\$0.00
25															0			0	\$0.00
26															0			0	\$0.00
27															0			0	\$0.00
28															0			0	\$0.00
29															0			0	\$0.00
30															0			0	\$0.00
Advertiser							Date		Notes							Total Spots			
																172			
AE				Sales Mgr										Total Amount					
														\$0.00					
<p>This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity.</p> <p>Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.</p>																			

Blueberry Broadcasting
PO Box 3059
Kennebunkport, ME 04046

Order #: 667-00255
Description: SALES RECRUITMENT BANGOR
Date Entered: 8/29/2018
P.O.#:
Salesperson: BIETTE, BRUCE
Invoice Frequency: Billed at end of Media Month (Invoice will NOT be printed)

BBC PROMOS

On-Air Schedule

Start Date	End Date	Station	Scheduled Time/Event	Repeats	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 8/30/2018	9/12/2018	WBFB/WMCMA	Midnight to 06:00:00	Weekly	:30	56	0.00	0.00	4	4	4	4	4	4	4
2 8/30/2018	9/12/2018	WBFB/WMCMA	06:00:00 to 09:00:00	Weekly	:30	22	0.00	0.00	1	2	1	2	1	2	2
3 8/30/2018	9/12/2018	WBFB/WMCMA	09:00:00 to 15:00:00	Weekly	:30	32	0.00	0.00	2	2	3	2	2	2	3
4 8/30/2018	9/12/2018	WBFB/WMCMA	15:00:00 to 18:00:00	Weekly	:30	20	0.00	0.00	1	2	1	2	1	1	2
5 8/30/2018	9/12/2018	WBFB/WMCMA	18:00:00 to Midnight	Weekly	:30	42	0.00	0.00	3	3	3	3	3	3	3
6 8/30/2018	9/12/2018	WKSQ/WQSSA	Midnight to 06:00:00	Weekly	:30	56	0.00	0.00	4	4	4	4	4	4	4
7 8/30/2018	9/12/2018	WKSQ/WQSSA	06:00:00 to 09:00:00	Weekly	:30	22	0.00	0.00	1	2	1	2	1	2	2
8 8/30/2018	9/12/2018	WKSQ/WQSSA	09:00:00 to 15:00:00	Weekly	:30	32	0.00	0.00	2	2	3	2	2	2	3
9 8/30/2018	9/12/2018	WKSQ/WQSSA	15:00:00 to 18:00:00	Weekly	:30	20	0.00	0.00	1	2	1	2	1	1	2
10 8/30/2018	9/12/2018	WKSQ/WQSSA	18:00:00 to Midnight	Weekly	:30	42	0.00	0.00	3	3	3	3	3	3	3
11 8/30/2018	9/12/2018	WVOM/WVQM	Midnight to 06:00:00	Weekly	:30	56	0.00	0.00	4	4	4	4	4	4	4
12 8/30/2018	9/12/2018	WVOM/WVQM	06:00:00 to 09:00:00	Weekly	:30	22	0.00	0.00	1	2	1	2	1	2	2
13 8/30/2018	9/12/2018	WVOM/WVQM	09:00:00 to 15:00:00	Weekly	:30	32	0.00	0.00	2	2	3	2	2	2	3
14 8/30/2018	9/12/2018	WVOM/WVQM	15:00:00 to 18:00:00	Weekly	:30	20	0.00	0.00	1	2	1	2	1	1	2
15 8/30/2018	9/12/2018	WVOM/WVQM	18:00:00 to Midnight	Weekly	:30	42	0.00	0.00	3	3	3	3	3	3	3

Order Start Date: 8/30/2018 Order End Date: 9/12/2018 Spots: 516 Total Charges: \$0.00

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.

Projected Media Month Billing Totals for BBC PROMOS / 667-00255 :

	Spot Count	Net Billing
September 2018	516	\$0.00
Total:	516	\$0.00

Confirmed & Accepted for Blueberry Broadcasting By:

Accepted for BBC PROMOS By:

Please Sign and Return One Copy

Obrien, Jack

From: Race
Sent: Monday, September 17, 2018 2:56 PM
To: Obrien, Jack
Cc: Biette, Bruce
Subject: EEO

Jack,

I posted the Sales opening on Bear and Kiss Facebook pages as well. Do you need a screenshot or anything for your records?

Thanks,

Race

Race Allen
Director of Sales
Blueberry Broadcasting, LLC
184 Target Industrial Circle
Bangor, ME 04401
207-907-7747 Office
207-610-4410 Cell

*See ATTACHED
SAME POST ON BOTH SITES
9/17/18*



blueberry
BROADCASTING

Bangor, Ellsworth/Bar Harbor, Camden/Rockland, Augusta/Waterville

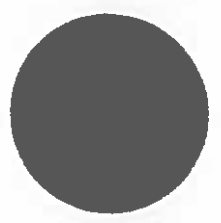
WABK|WBAK|WBKA (BIG 104 FM)
WTOS|WTUX (The Mountain of Pure Rock)
WVOM|WVQM|WVOM-AM (The Voice of Maine)
WBFB|WBFE|WMCM (97.1 The Bear)
WKSQ|WQSK|WQSS (KISS-FM)

 Search

Ernest Home Find Friends

Browse

Sales - Maine's New
Country Leader - The
Bear



blueberry
BROADCASTING



Maine's New Country
Leader - The Bear
8 866 people like this

ABOUT MAINE'S NEW COUNTRY LEADER - THE
BEAR



Target

184 Target Industrial Cir Bangor, Maine
04401

Typically replies within a few hours
Send Message

 <http://971THEBEAR.COM/>

 Broadcasting & Media Production
Company



Sales
Maine's New Country Leader - The Bear
Full-time

Apply Now

 Save

 Share

... More

Description

Come work with us!

Blueberry Broadcasting is adding to our Bangor-based sales team. You will be responsible for prospecting and developing new business as well as maintaining and growing existing accounts. A positive attitude, ability to take direction, and excellent verbal and written communications skills are a must. Sales experience is a plus but we're willing to train the right person. Blueberry Broadcasting operates 16 radio stations with 5 distinct brands covering Eastern and Central Maine. Competitive compensation package includes Medical, Dental, and Paid Vacations.

This is a tremendous opportunity for the right candidate! Send your resume and letter of introduction to race@blueberrybroadcasting.com.

Blueberry Broadcasting is an Equal Opportunity Employer.



8 8K people like this
Broadcasting & Media Production Company

Maine's New Country Leader - The Bear

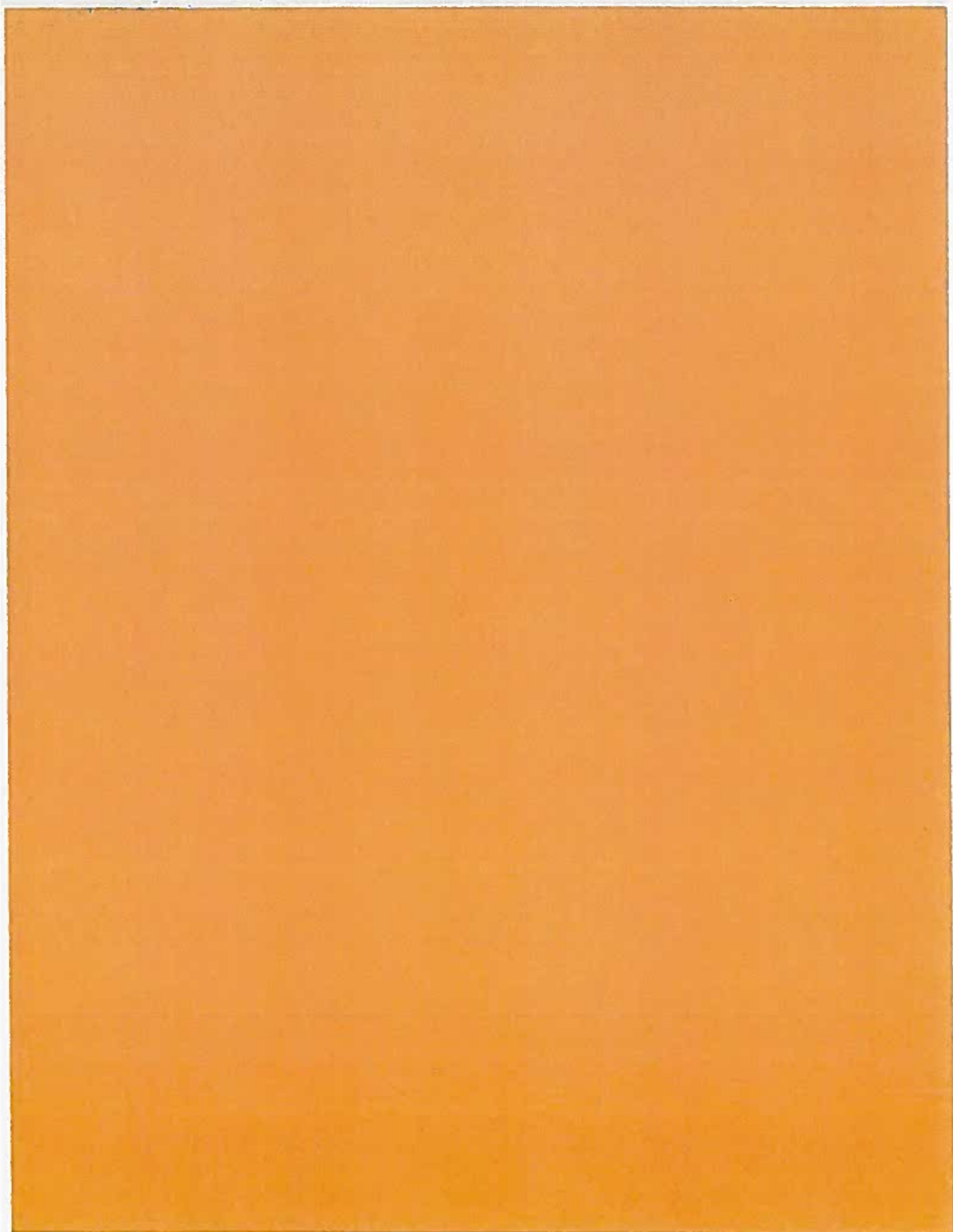
X

Typically replies within a few hours
8 8 K people like this

Type a message



Chat



2019 EEO

ATTACHMENT I.

[SEPARATELY PREPARE THIS FORM FOR EVERY JOB VACANCY - FOR INTERNAL STATION USE ONLY]

JOB VACANCY MASTER RECORD-KEEPING FORM

1. Job Title: Account Executive
2. Vacancy Date: 2/15/19
3. Hire Date: 7/28/19
4. Hire Name: Spady Monroe
5. Referral Source(s) of Hire: #1 Radio
6. Total Number of Interviews: 2

7. Recruitment Sources Notified of Job Vacancy	Source Contact Person	Source Address	Source Phone Number	Number of Interviews Referred by Source	Did Source Request Notification Pursuant to Prong 2? (Yes/No)
1-19 & 22					
See Attachment A					
#1 on Air Recruitment	Rachel Allen	See schedule 5/19			
LINKEDIN	Rene Allen	184 Target Woods Road Circleville, Ohio 43001	203-907- 2717		
INTERVIEW #1	Rene	"	"	1	#1 on Air
INTERVIEW #2	Rene	"	"	1	#1 on Air

NOTE: THIS FORM WILL BE USED IN THE PREPARATION OF YOUR ANNUAL EEO PUBLIC FILE REPORT. HOWEVER IT SHOULD NOT BE PLACED IN THE STATION'S PUBLIC INSPECTION FILE. IT SHOULD BE RETAINED UNTIL AFTER THE GRANT OF THE STATION'S RENEWAL APPLICATION FOR INTERNAL EEO RECORD-KEEPING PURPOSES ONLY.

ATTACH ADDITIONAL RECRUITMENT SOURCES AS NECESSARY

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1	Blueberry Broadcasting Radio Stations	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	0
2	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, Maine 04401	207-561-4001	0
3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Ben Haskell haskellb@nescom.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College Career Services	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	All Access Online	Joel Denver	24955 Pacific Coast Highway- Malibu, CA	90265 (zip)	0
11	Colby College	Shauna Hirshfield	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC	202.496.1992	0

			20006		
3	National Assoc. Of Black College Broadcasters	bcrmail@aol.com or lojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
4	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0
16	University of Southern Maine	Stephanie Towns stowns@usm.maine.e du	PO Box 9300 Portland, ME 04104	207.780.4141	0
17	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
18	University of New England	jnevers@une.edu	11 Hills Beach Road Biddeford, ME 04005- 9599	207.602.2503	0
19	Blueberry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
20	Employee Referral	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 103	0
21	Outside Referral	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207-623-9000 Ext 112	0
22	Tri-County Career Centers	Paul B. Ruggiero	45 Oak St., Ste.3 Bangor, MEE 04401	207-561-4057	0

* Asterisk denotes recruitment sources which requested job notification announcements
Attachment B



blueberry
BROADCASTING

mailed postcard

Post 2/14/19

Blueberry Broadcasting is looking for an energetic, creative, career-oriented person to join our team of sales professionals in our Bangor, Maine office. We need a person who is highly motivated to help local businesses solve their marketing challenges. Responsibilities include prospecting and developing new business as well as growing and maintaining existing accounts.

Strong written and verbal skills, a sense of organization, and the ability to manage your time and set and achieve goals are required. Prior sales experience is a plus but not necessary; we will train the right person.

If you're positive and have a personal drive to succeed, send your resume and letter of introduction to jobs@blueberrybroadcasting.com. Please, no phone calls. Blueberry Broadcasting is an equal opportunity employer.

continuous soft rock
KISS-FM
94.5 • 97.5 • 102.5

WVOM
101.3 • 103.9 • 1450
THE VOICE OF MAINE

PURE ROCK
101.1 105.1

The Biggest
Hits!
Big
104.1

New Country
Bear
97.1 • 99.1 • 103.3

Blueberry Broadcasting, LLC, 184 Target Industrial Circle, Bangor, ME 04401
(p)207.947.9100 (f)207.942.8039



blueberry
BROADCASTING

*RADIO-IT
SCRIPT
MAY 2019
AND September 2019*

Blueberry Broadcasting
Sales Recruitment
051419

Blueberry Broadcasting is adding to our Bangor-based sales team. You will be responsible for prospecting and developing new business as well as maintaining and growing existing accounts. A positive attitude, ability to take direction, and excellent verbal and written communications skills are a must. Sales experience is a plus but we're willing to train the right person. Competitive compensation package includes Medical, Dental, and Paid Vacations. This is a tremendous opportunity for the right candidate! Send your resume and letter of introduction to jobs@blueberrybroadcasting.com. Blueberry Broadcasting is an Equal Opportunity Employer.

Advertiser	BBC\Blueberry Bangor Sales							AE							Notes				
Campaign	AE Recruitment							Race							Bumpable, moveable, etc.				
Agency								Industry Code											
Contact	Race							Recruitment/Employment											
Address	do not mail							Revenue Type											
Address								Local Direct											
City, St, Zip								Date											
Phone								5/14/19											
Line	Station	Start Date	End Date	Wks	Alt Wks	Time Frame	Break Type	M	T	W	TH	F	SA	SU	Weekly Spots	Lgth	RATE	Total Spots	Line Cost
1	WBFB	5/15/19	5/28/19	2		0000-0600	Commercial	5	5	5	5	5	5	5	35	30	\$0.00	70	\$0.00
2	WBFB	5/15/19	5/28/19	2		0600-0900	Commercial	2	2	2	2	2	2	2	14	30	\$0.00	28	\$0.00
3	WBFB	5/15/19	5/28/19	2		0900-1500	Commercial	4	4	4	4	4	4	4	28	30	\$0.00	56	\$0.00
4	WBFB	5/15/19	5/28/19	2		1500-1900	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	42	\$0.00
5	WBFB	5/15/19	5/28/19	2		1900-2400	Commercial	5	5	5	5	5	5	5	35	30	\$0.00	70	\$0.00
6															0			0	\$0.00
7	WKSQ	5/15/19	5/28/19	2		0000-0600	Commercial	5	5	5	5	5	5	5	35	30	\$0.00	70	\$0.00
8	WKSQ	5/15/19	5/28/19	2		0600-0900	Commercial	3	2	3	2	2	2	2	16	30	\$0.00	32	\$0.00
9	WKSQ	5/15/19	5/28/19	2		0900-1500	Commercial	4	4	4	4	4	4	4	28	30	\$0.00	56	\$0.00
10	WKSQ	5/15/19	5/28/19	2		1500-1900	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	42	\$0.00
11	WKSQ	5/15/19	5/28/19	2		1900-2400	Commercial	5	5	5	5	5	5	5	35	30	\$0.00	70	\$0.00
12															0			0	\$0.00
13															0	30	\$0.00	0	\$0.00
14															0	30	\$0.00	0	\$0.00
15															0	30	\$0.00	0	\$0.00
16															0	30	\$0.00	0	\$0.00
17															0	30	\$0.00	0	\$0.00
18															0			0	\$0.00
19															0			0	\$0.00
20															0			0	\$0.00
21															0			0	\$0.00
22															0			0	\$0.00
23															0			0	\$0.00
24															0			0	\$0.00
25															0			0	\$0.00
26															0			0	\$0.00
27															0			0	\$0.00
28															0			0	\$0.00
29															0			0	\$0.00
30															0			0	\$0.00
Advertiser							Date		Notes							Total Spots			
																536			
AE							Sales Mgr									Total Amount			
																\$0.00			
<p>This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity.</p> <p>Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.</p>																			

Blueberry Broadcasting
PO Box 3059
Kennebunkport, ME 04046

Order #: 667-00295
Description: AE RECRUITMENT
Date Entered: 5/14/2019
P.O.#:
Salesperson: ALLEN, RACE
Invoice Frequency: Billed at end of Media Month (Invoice will NOT be printed)

BLUEBERRY

Statement Group: Blueberry Broadcasting
Receivables Group: Non-Billable
Sales Commission: No Commission
A/R Account: Blueberry NON-BILLABLE
Order Discount: <None>
Agency Discount: <None>
Default Primary Product Code: Promo
Secondary Product Code: <unassigned>
Last Modified: 5/14/2019
Modified 2 times
OrderType: Per Spot

On-Air Schedule

Start Date	End Date	Station	Scheduled Time/Event	Repeated	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 5/15/2019	5/28/2019	WBFB/WMCA	Midnight to 06:00:00	Weekly	:30	70	0.00	0.00	5	5	5	5	5	5	5
2 5/15/2019	5/28/2019	WBFB/WMCA	06:00:00 to 09:00:00	Weekly	:30	28	0.00	0.00	2	2	2	2	2	2	2
3 5/15/2019	5/28/2019	WBFB/WMCA	09:00:00 to 15:00:00	Weekly	:30	56	0.00	0.00	4	4	4	4	4	4	4
4 5/15/2019	5/28/2019	WBFB/WMCA	15:00:00 to 19:00:00	Weekly	:30	42	0.00	0.00	3	3	3	3	3	3	3
5 5/15/2019	5/28/2019	WBFB/WMCA	19:00:00 to Midnight	Weekly	:30	70	0.00	0.00	5	5	5	5	5	5	5
6 5/15/2019	5/28/2019	WKSQ/WQSSA	Midnight to 06:00:00	Weekly	:30	70	0.00	0.00	5	5	5	5	5	5	5
7 5/15/2019	5/28/2019	WKSQ/WQSSA	06:00:00 to 09:00:00	Weekly	:30	32	0.00	0.00	3	2	3	2	2	2	2
8 5/15/2019	5/28/2019	WKSQ/WQSSA	09:00:00 to 15:00:00	Weekly	:30	56	0.00	0.00	4	4	4	4	4	4	4
9 5/15/2019	5/28/2019	WKSQ/WQSSA	15:00:00 to 19:00:00	Weekly	:30	42	0.00	0.00	3	3	3	3	3	3	3
10 5/15/2019	5/28/2019	WKSQ/WQSSA	19:00:00 to Midnight	Weekly	:30	70	0.00	0.00	5	5	5	5	5	5	5

Order Start Date: 5/15/2019 Order End Date: 5/28/2019 Spots: 536 Total Charges: \$0.00

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.

Projected Media Month Billing Totals for BLUEBERRY / 667-00295 :

		<u>Spot Count</u>	<u>Net Billing</u>
May	2019	459	\$0.00
June	2019	77	\$0.00

Confirmed & Accepted for Blueberry Broadcasting By:

Accepted for BLUEBERRY By:

Please Sign and Return One Copy

Advertiser	BBC Promo - Sales Recruitment							AE							Notes				
Campaign								Race											
Agency								Industry Code											
Contact								Recruitment/Employment											
Address	do not mail							Revenue Type											
Address								Local Direct											
City,St,Zip								Date											
Phone								2/10/20											
Ln	Station	Start Date	End Date	Wks	Alt Wks	Time Frame	Break Type	M	T	W	TH	F	SA	SU	Weekly Spots	Lgth	RATE	Total Spots	Line Cost
1	ALL 5	9/14/19	9/20/19	1		0000-0600	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	21	\$0.00
2	ALL 5	9/14/19	9/20/19	1		0600-1200	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	21	\$0.00
3	ALL 5	9/14/19	9/20/19	1		1200-1800	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	21	\$0.00
4	ALL 5	9/14/19	9/20/19	1		1800-2400	Commercial	3	3	3	3	3	3	3	21	30	\$0.00	21	\$0.00
5															0			0	\$0.00
6	ALL 5	9/21/19	9/22/19	1		0000-0600	Commercial						3	3	6			6	\$0.00
7	ALL 5	9/21/19	9/22/19	1		0600-2400	Commercial						9	9	18	30	\$0.00	18	\$0.00
8															0			0	\$0.00
9															0			0	\$0.00
10															0			0	\$0.00
11															0			0	\$0.00
12															0			0	\$0.00
13															0			0	\$0.00
14															0			0	\$0.00
15															0			0	\$0.00
16															0			0	\$0.00
17															0			0	\$0.00
18															0			0	\$0.00
19															0			0	\$0.00
20															0			0	\$0.00
21															0			0	\$0.00
22															0			0	\$0.00
23															0			0	\$0.00
24															0			0	\$0.00
25															0			0	\$0.00
26															0			0	\$0.00
27															0			0	\$0.00
28															0			0	\$0.00
29															0			0	\$0.00
30															0			0	\$0.00
Advertiser							Date		Notes							Total Spots			
																108			
AE				Sales Mgr										Total Amount					
														\$0.00					
<p>This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity.</p> <p>Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.</p>																			

Blueberry Broadcasting
PO Box 3059
Kennebunkport, ME 04046

Order #: 667-00311
Description: SALES RECRUITMENT
Date Entered: 9/10/2019
P.O.#:
Salesperson: ALLEN, RACE
Invoice Frequency: Billed at end of Media Month (Invoice will NOT be printed)

BLUEBERRY

Statement Group: Blueberry Broadcasting
Receivables Group: Non-Billable
Sales Commission: No Commission
A/R Account: Blueberry NON-BILLABLE
Order Discount: <None>
Agency Discount: <None>
Default Primary Product Code: Promo
Secondary Product Code: <unassigned>
Last Modified: 9/18/2019
Modified 2 times
OrderType: Per Spot

On-Air Schedule

Start Date	End Date	Station	Scheduled Time/Event	Repeated	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 9/14/2019	9/22/2019	WABK/WBAK/V	Midnight to 06:00:00	Weekly	:30	27	0.00	0.00	3	3	3	3	3	3	3
2 9/14/2019	9/20/2019	WABK/WBAK/V	06:00:00 to 12:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
3 9/14/2019	9/20/2019	WABK/WBAK/V	12:00:00 to 18:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
4 9/14/2019	9/20/2019	WABK/WBAK/V	18:00:00 to Midnight	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
5 9/21/2019	9/22/2019	WABK/WBAK/V	06:00:00 to Midnight	Weekly	:30	18	0.00	0.00	0	0	0	0	0	9	9
6 9/14/2019	9/22/2019	WBFB/WMCMA	Midnight to 06:00:00	Weekly	:30	27	0.00	0.00	3	3	3	3	3	3	3
7 9/14/2019	9/20/2019	WBFB/WMCMA	06:00:00 to 12:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
8 9/14/2019	9/20/2019	WBFB/WMCMA	12:00:00 to 18:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
9 9/14/2019	9/20/2019	WBFB/WMCMA	18:00:00 to Midnight	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
10 9/21/2019	9/22/2019	WBFB/WMCMA	06:00:00 to Midnight	Weekly	:30	18	0.00	0.00	0	0	0	0	0	9	9
11 9/14/2019	9/22/2019	WKSQ/WQSSA	Midnight to 06:00:00	Weekly	:30	27	0.00	0.00	3	3	3	3	3	3	3
12 9/14/2019	9/20/2019	WKSQ/WQSSA	06:00:00 to 12:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
13 9/14/2019	9/20/2019	WKSQ/WQSSA	12:00:00 to 18:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
14 9/14/2019	9/20/2019	WKSQ/WQSSA	18:00:00 to Midnight	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
15 9/21/2019	9/22/2019	WKSQ/WQSSA	06:00:00 to Midnight	Weekly	:30	18	0.00	0.00	0	0	0	0	0	9	9
16 9/14/2019	9/22/2019	WTOS/WTUX/V	Midnight to 06:00:00	Weekly	:30	27	0.00	0.00	3	3	3	3	3	3	3
17 9/14/2019	9/20/2019	WTOS/WTUX/V	06:00:00 to 12:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
18 9/14/2019	9/20/2019	WTOS/WTUX/V	12:00:00 to 18:00:00	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
19 9/14/2019	9/20/2019	WTOS/WTUX/V	18:00:00 to Midnight	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
20 9/21/2019	9/22/2019	WTOS/WTUX/V	06:00:00 to Midnight	Weekly	:30	18	0.00	0.00	0	0	0	0	0	9	9
21 9/14/2019	9/22/2019	WVOM/WVQM/	Midnight to 06:00:00	Weekly	:30	27	0.00	0.00	3	3	3	3	3	3	3
22 9/14/2019	9/20/2019	WVOM/WVQM/	06:00:00 to 12:00:00	Weekly	:30	11	0.00	0.00	1	1	1	1	1	3	3
23 9/14/2019	9/20/2019	WVOM/WVQM/	12:00:00 to 18:00:00	Weekly	:30	11	0.00	0.00	1	1	1	1	1	3	3
24 9/14/2019	9/20/2019	WVOM/WVQM/	18:00:00 to Midnight	Weekly	:30	21	0.00	0.00	3	3	3	3	3	3	3
25 9/21/2019	9/22/2019	WVOM/WVQM/	06:00:00 to Midnight	Weekly	:30	18	0.00	0.00	0	0	0	0	0	9	9

Order Start Date: 9/14/2019 Order End Date: 9/22/2019 Spots: 520 Total Charges: \$0.00

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.

Attachment 3

EEO PROGRAM

EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM OF BLUEBERRY BROADCASTING, LLC

I. General Policy

It is our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin, age or gender in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is our policy to promote equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin, age or gender.

It is our policy to communicate our equal employment policy and employment needs to sources of qualified applicants, without regard to race, color, religion, national origin, age or gender, and to solicit their recruitment assistance on a continuing basis.

It is our policy to continually review our job structure and employment practices and maintain positive recruitment training, job design and other measures needed to ensure genuine equality of opportunity at all levels.

It is our policy to conduct a continuing program to exclude all unlawful forms of prejudice or discrimination based upon race, color, religion, national origin, age or gender from our personnel policies and practices and working conditions.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

II. Responsibility for Implementation

Bruce Biette, Chief Operating Officer, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, age or gender. It is our policy to ensure a positive application and vigorous enforcement of our policies and to review and control managerial and supervisory performance in the administration of our equal employment opportunity policies.

III. Policy Dissemination

It is our policy to disseminate our equal employment opportunity policies to job applicants, employees, and those with whom we regularly do business. To assure compliance with this requirement, we:

- 1) Post notices in our offices informing employees, and applicants for employment, of their equal employment opportunity rights, that we are an equal employment opportunity employer, that discrimination because of race, color, religion, national origin, age or gender is prohibited and that they have the right to notify an appropriate local, State or Federal agency, including the Equal Employment Opportunity Commission and Federal Communications Commission, if they believe they have been discriminated against;
- 2) Place a notice in bold type on our employment application informing prospective employees that discrimination because of race, color, religion, national origin, age or gender is prohibited and that they may notify an appropriate local, State or Federal agency, if they believe they have been discriminated against.

IV. Recruitment

It is our policy to conduct a meaningful program of recruitment involving broad outreach in recruitment to all qualified job candidates. To assure compliance with this requirement, we:

- 1) Widely disseminate information about each full-time job opening in our operation to recruitment sources for the purpose of obtaining referrals for the available position and otherwise comply with Federal Communications Commission requirements applicable to the recruitment/outreach process;
- 2) Communicate to recruitment sources that we are an equal employment opportunity employer;
- 3) Analyze our recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of our analysis.

V. Promotion and Advancement

It is our policy to offer promotions of employees in a nondiscriminatory fashion without regard to race, color, religion, national origin, age or gender to positions of greater responsibility. To assure compliance with this requirement, we:

- 1) Instruct those who make decisions on placement and promotion that all employees are to be considered without discrimination, and that there should be ongoing review to ensure compliance with this requirement;
- 2) Give all employees equal opportunity for positions which lead to higher positions. Inquire as to the interests and skills of lower paid employees with respect to any of the higher paid positions, followed by assistance, counseling and effective measures to enable employees with interest and potential to qualify themselves for such positions;

- 3) Provide opportunity to perform overtime work on a nondiscriminatory basis.

VI. Analysis of Equal Employment Opportunity Efforts

It is our policy to analyze the results of the measures undertaken by us to recruit, hire and promote individuals and to identify and evaluate any difficulties encountered in implementing our equal employment opportunity program with the goal of improving our program to the extent necessary. To assure compliance with this requirement, we periodically analyze measures taken to:

- 1) Disseminate the station's equal employment opportunity program to job applicants and employees;
- 2) Review seniority practices to ensure that such practices are nondiscriminatory;
- 3) Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, national origin, color, religion, age or gender discrimination;
- 4) Utilize media for recruitment purposes in a manner that will contain no indication, either explicit or implicit, of a preference for one race, national origin, color, religion, age or gender discrimination;
- 5) Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;
- 6) Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of race, national origin, color, religion, age or gender, and include an effective nondiscrimination clause in new or renegotiated union agreements; and
- 7) Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, religion, age or gender.
- 8) Encourage minority and female entrepreneurs/vendors to conduct business with all parts of our operation, including recruitment of a wide pool of qualified entrepreneurs/vendors from different sources.