



April 22, 2021

Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**RE: Station KBIM(FM), Roswell, New Mexico (Facility ID No. 34854)
Response to FCC EEO Audit Letter Dated February 25, 2021**

Dear Sir or Madam:

Noalmark Broadcasting Corporation (“Noalmark” or “Licensee”), licensee of broadcast station KBIM(FM), Roswell, New Mexico (Facility ID No. 34854) (“KBIM” or the “Station”), hereby submits this response to the letter dated February 25, 2021 from the Media Bureau (the “EEO Audit Letter”) requesting information relating to the EEO program maintained by the Station Employment Unit (“SEU”) that includes KBIM.

The SEU consists of KBIM and the following station:

KKBE(AM), Roswell, New Mexico (Facility ID No. 34871).

In compiling the requested information and materials, Noalmark relied upon an examination of its files and records, and due inquiry of current employees who are knowledgeable of employment-related issues at the SEU.

The responses below correspond to the numbered paragraphs as set forth in the EEO Audit Letter.

Question 2 Audit Data Requested:

Question 2(b)(i):

The SEU’s two most recent EEO public file reports are attached hereto as Attachment A. The web site address for the stations in the SEU is www.kbimradio.com. A link is provided on each of these websites to the SEU’s most recent EEO Public File Report.

Question 2(b)(ii):

In accordance with the instructions to Question 2(b)(ii) in the EEO Audit Letter, copies of communications announcing full-time positions filled during the period covered

by the two most recent EEO public file reports are included at Attachment B. As permitted by the instructions, illustrative documentation for one job vacancy in each of the two reporting periods is provided. Notices and log sheets for all vacancies have been retained in the Licensee's files. The Licensee has not been notified by any organization that it wishes to receive notice of the SEU's job openings.

Question 2(b)(iii):

The total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the period covered by the EEO public file reports submitted with this response are included in Attachment C.

Question 2(b)(iv):

In accordance with the instructions to Question 2(b)(iv) in the EEO Audit Letter, documentation of recruitment initiatives listed in the EEO public file reports submitted with this response is attached as Attachment D. The unit personnel involved in these recruitment initiatives are also identified in Attachment D.

As of April 1, 2021, the SEU employed 5 full-time employees. The stations comprising the SEU are located in a metropolitan area as defined by the Office of Management and Budget with fewer than 250,000 persons. Under Section 73.2080(e)(3), the SEU is considered to be located in a "smaller market," and, is required, under Section 73.2080(c)(2), to perform two initiatives within each two-year period.

Question 2(b)(v):

There have been no complaints involving the SEU filed during the current license term before any body having competent jurisdiction under Federal, State, territorial or local law, alleging unlawful discrimination in the employment practices of the Employment Unit on the basis of race, color, religion, national origin or sex.

Question 2(b)(vi):

The Station is part of a small SEU located in a small market. There is no layered management structure within the SEU. The Station Manager ("SM") is "hands on" and involved in all aspects of operations including EEO compliance. During the current license term, the SM has been responsible for ensuring the day-to-day execution and enforcement of EEO policies. The Licensee has adopted its own EEO policy; a copy of this policy is attached as Attachment E. The SM is also responsible for implementing this policy in connection with hiring and Station operations.

The Senior Vice President ("SVP") of the licensee coordinates the EEO program, both federal and corporate, at the SEU level. The SVP interfaces with the SM regarding EEO issues. Employees who are not comfortable for any reason in filing a complaint or voicing a concern with the SM may directly contact the SVP, who will oversee any

ensuing investigation to make sure that it proceeds fairly. Also, the SVP assists the SM in investigating all complaints to ensure any investigations are conducted fairly and in accordance with the Licensee's policies and procedures. The SVP also helps disseminate to the SEU the EEO and other policies of the Licensee, such as those relating to sexual harassment, dress codes, vacation, sick leave, etc.

The President of the Licensee has consistently attempted to create a culture that discourages discrimination in any form and promotes equal opportunity at every station. The President is available for an appeal by an employee who feels that he or she has not received fair consideration.

During the license term, the SEU has consistently taken steps to inform employees and job applicants of its EEO policies. The SM, who himself receives comprehensive annual EEO training, conducts a mandatory training and information session with all station employees at least once each year. At this session, a copy of the EEO policies is given to each employee, and the SM reviews in detail the EEO rules of the FCC as well as the Licensee's policy. The SM reaffirms the Licensee's commitment to abide by the EEO rules, and sets out the procedure for the filing of a complaint within the SEU. The SM emphasizes that discrimination of any type will not be tolerated and encourages any employee to contact the SM if he or she thinks he or she has been discriminated against. For the period covered by the 2019 Annual Report, the training session was held on April 15, 2019. For the period of the 2020 Report, the training session was held on January 22, 2020.

Posters outlining the federal and corporate EEO policy and identifying the government agencies to contact if a person believes his or her rights have been violated are posted prominently at the SEU's facilities. In addition, the SEU's employment application states that it is an equal opportunity employer and to contact the FCC or Equal Opportunity Commission if an employee or applicant believes his or her equal employment rights have been violated. A copy of this application is attached as Attachment F. Also, the communications seeking applicants for vacant positions (such as letters to minority and female organizations, newspaper ads, etc.) state that the unit is an equal opportunity employer. Please refer to Attachment B for examples. Finally, all new employees are required to read and acknowledge understanding of the EEO policies before beginning their employment.

Questions 2(b)(vii-viii):

In accordance with Sections 73.2080(c)(3) and (c)(4) of the Commission's rules, the Licensee has adopted a systematic method to analyze its EEO program. EEO training is conducted annually in connection with preparing each year's EEO Public File Report. Each year the SM meets with the President of the licensee to review the SEU's EEO program and conduct a self-assessment. At these meetings, the EEO program is reviewed and recommendations are given as to how to make the policy more effective.

The SEU undertakes thorough and systematic efforts to comply with the FCC's requirement to periodically analyze pay, benefits, seniority practices, promotions, and selection techniques to ensure equal opportunities and nondiscrimination. Each one of these requirements is specifically examined in the annual Self Assessments. For example, in preparation for this annual review the Licensee's accounting office provides a list of all employees and their pay. This list is examined by the SM and the President to ensure any disparities in pay and benefits are not based on sex or race. Additionally, the SEU also reviews each management level personnel to ensure that females and/or minorities, if qualified, are represented and paid commensurately.

The SEU has not entered into an agreement with a union; therefore, the requirement to periodically review cooperation with unions is not applicable.

Question 2(b)(ix):

None of the stations in the SEU is a religious broadcaster; therefore, Question 2(b)(ix) is not applicable.

Question 3: Time Brokerage Agreements

None of the stations is a party to a local marketing agreement.

Should any question arise regarding this information, please contact the Licensee's counsel, Dennis P. Corbett, at (202)789-3115 or email address dcorbett@tpl.law.

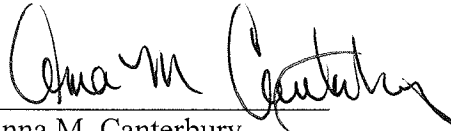
Respectfully submitted,



Anna M. Canterbury
Senior Vice President
Noalmark Broadcasting Corporation

OFFICER'S CERTIFICATION

I certify under the penalty of perjury that, to the best of my knowledge and information, the facts set forth in the response of Noalmark Broadcasting Corporation to the FCC's EEO Audit Letter of February 25, 2021 for Station KBIM(FM), as filed April 22, 2021, are true and correct.

A handwritten signature in black ink, appearing to read "Anna M. Canterbury". The signature is written in a cursive style with a horizontal line underneath the name.

Anna M. Canterbury
Senior Vice President
Noalmark Broadcasting Corporation

Attachment A

EEO PUBLIC FILE REPORT

This report covers full time vacancy recruitment data for the period May 31, 2018 - May 28, 2019

1) Employment Unit: Noalmark Broadcasting Corporation, Roswell, NM

2) Unit Members (Stations and Communities of License): KBIM-FM-Roswell, NM
KKBE-AM-Roswell, NM

3) EEO Contact Information for Unit Member:

Mailing Address: PO Box 1953 Roswell, NM 88202	Telephone Number: 575-623-9100
	Contact Person: Darryl Burkfield
	E-mail Address: darryl.burkfield@noalmark.com

4) Vacancies Filled:

<u>Job Title</u>	<u>Recruitment Source Referring Hiree</u>
------------------	---

- 1) On-Air Morning Show Host
- 2) Account Executive
- 3) On-Air Morning Show Host
- 4) On-Air Morning Show Host

2) Job Title: Sales

Hire Date: 12/3/18

Referral Source(s) of Hire: KBIM/KKBE Radio Interviewees: 6

Name of Organization Notified of Job Vacancy:	Contact Person:	Address:	Phone Number:	# of Interviews Referred	Did Recruitment Source Request notification?
New Mexico Broadcasters Assn.	Paula Maes	Web Site	505-881-4440	1	no
Texas Association of Broadcasters	Ann Arnold	Web Site	512-623-0014	1	no
Radio On-Line	n/a	Web Site	n/a	2	no
KBIM/KKBE Radio	Darryl Burkfield	1301 N Main Roswell NM	575 623 9100	0	no
Walk-In	Darryl Burkfield	1301 North Main Roswell, NM	575-623-9100	2	no

1) Job Title: On-Air Morning Show Host
Referral Source(s) of Hire: All Access

Hire Date: 11/1/18
Interviewees:15

3) Job Title: On-Air Morning Show Host
Referral Source(s) of Hire: All Access

Hire Date: 2/19/19
Interviewees:15

4) Job Title: On-Air Morning Show Host
Referral Source(s) of Hire: All Access

Hire Date: 2/19/19
Interviewees:15

Name of Organization Notified of Job Vacancy:	Contact Person:	Address:	Phone Number:	# of Interviews Referred	Did Recruitment Source Request notification?
New Mexico Broadcasters Assn.	Paula Maes	Web Site	505-881-4440	0	no
Texas Association of Broadcasters	Ann Arnold	Web Site	512-623-0014	0	no
Radio On-Line	n/a	Web Site	n/a	0	no
KBIM/KKBE Radio	Darryl Burkfield	1301 N Main Roswell NM	575 623 9100	0	no
Walk-In	Darryl Burkfield	1301 North Main Roswell, NM	575-623-9100	2	no
All Access	n/a	Web site	n/a	13	no

5) Total # of interviewees referred: For the period from May 31, 2018-May 30, 2019 this Employment Unit interviewed 21 interviewees for 2 full time positions.

6) Supplemental Recruitment Initiatives: List and briefly describe the Supplemental Recruitment Initiatives undertaken during the preceding twelve (12) months.

(A) Initiative: Community Outreach

There were no formal job fairs in Roswell or Chaves County. KBIM and KKBE participated in a virtual job fair made available through The New Mexico Broadcasters Association. 14 resumes were submitted and 0 interviews were conducted.

(B) Participation in general outreach efforts through jobs banks, internet programs & similar programs

All jobs are posted on some or all of the following websites sites: www.nmba.org which is the New Mexico Broadcast Association, www.tab.org, which is the Texas Association of Broadcaster, www.allaccess.com, and www.radio-online.com. Jobs openings are also broadcast on this unit's broadcast stations including KBIM-FM which covers multiple markets and reaches a large pool of potential applicants.

(C) Initiative: Management EEO Training

A training session was held for all upper level management of Noalmark Broadcasting Corporation on September 21, 2018 in Hobbs, New Mexico in conjunction with the Company's strategic planning and professional education annual meeting. The session entailed a comprehensive review of the FCC EEO regulations and the Company's ongoing compliance efforts

(D) Initiative: EEO & Sexual Harassment Staff Meeting

A Staff Seminar meeting was held on April 15, 2019. All employees were required to be at this meeting. During the meeting, FCC Rules and Regulations regarding EEO and the company's Sexual Harassment Policy were reviewed.

EEO PUBLIC FILE REPORT

This report covers full time vacancy recruitment data for the period May 28, 2019 - May 27, 2020

1) Employment Unit: Noalmark Broadcasting Corporation, Roswell, NM

2) Unit Members (Stations and Communities of License): KBIM-FM-Roswell, NM
KKBE-AM-Roswell, NM

3) EEO Contact Information for Unit Member:

Mailing Address: PO Box 1953 Roswell, NM 88202	Telephone Number: 575-623-9100
	Contact Person: Darryl Burkfield
	E-mail Address: darryl.burkfield@noalmark.com

4) Vacancies Filled:

<u>Job Title</u>	<u>Recruitment Source Referring Hiree</u>
1) Account Executive	Walk-in
2) Office/Traffic Manager	Walk-in

1) Job Title: Account Executive
Referral Source(s) of Hire: Walk-In

Hire Date: 9/18/19
Interviewees: 6

Name of Organization Notified of Job Vacancy:	Contact Person:	Address:	Phone Number:	# of Interviews Referred	Did Recruitment Source Request notification?
New Mexico Broadcasters Assn.	Paula Maes	Web Site	505-881-4440	3	no
Texas Association of Broadcasters	Ann Arnold	Web Site	512-623-0014	1	no
Radio On-Line	n/a	Web Site	n/a	1	no
KBIM/KKBE Radio	Darryl Burkfield	1301 N Main Roswell NM	575 623 9100	0	no
Walk-In	Darryl Burkfield	1301 North Main Roswell, NM	575-623-9100	1	no

2) Job Title: Office/Traffic Manager
Referral Source(s) of Hire: Walk-In

Hire Date: 5/18/2020
Interviewees: 4

Name of Organization Notified of Job Vacancy:	Contact Person:	Address:	Phone Number:	# of Interviews Referred	Did Recruitment Source Request notification?
New Mexico Broadcasters Assn.	Paula Maes	Web Site	505-881-4440	0	no
Hobbsamerica.com	Heather Canterbury	Web Site	870-862-7777	0	no
All-access	n/a	Web Site	n/a	3	no
KBIM/KKBE Radio	Darryl Burkfield	1301 N Main Roswell NM	575 623 9100	0	no
Walk-In	Darryl Burkfield	1301 North Main Roswell, NM	575-623-9100	1	no

5) Total # of interviewees referred: For the period from May 28, 2019 – May 27, 2020 this Employment Unit interviewed 10 interviewees for 2 full time positions.

6) Supplemental Recruitment Initiatives: List and briefly describe the Supplemental Recruitment Initiatives undertaken during the preceding twelve (12) months.

(A) Initiative: Community Outreach

There were no formal job fairs in Roswell or Chaves County. There were no virtual job fairs offered by the New Mexico Broadcasters Association.

(B) Participation in general outreach efforts through jobs banks, internet programs & similar programs

All jobs are posted on some or all of the following websites sites: www.nmba.org which is the New Mexico Broadcast Association, www.tab.org, which is the Texas Association of Broadcaster, www.allaccess.com, and www.radio-online.com. Jobs openings are also broadcast on this unit's broadcast stations including KBIM-FM which covers multiple markets and reaches a large pool of potential applicants.

(C) Initiative: Management EEO Training

A training session was held for all upper level management of Noalmark Broadcasting Corporation on September 25, 2019 in Dallas, Texas in conjunction with the Company's strategic planning and professional education annual meeting. The session entailed a comprehensive review of the FCC EEO regulations and the Company's ongoing compliance efforts. Management also attended the NAB Radio Show held September 24-27, 2019 in Dallas, Texas.

(D) Initiative: EEO & Sexual Harassment Staff Meeting

A Staff Seminar meeting was held on January 22, 2020. All employees were required to be at this meeting. During the meeting, FCC Rules and Regulations regarding EEO and the company's Sexual Harassment Policy were reviewed.

Attachment B

For the EEO Public File year May 31, 2018 – May 28, 2019

Hire #1 on December 3, 2018, the following were sources were notified and/or jobs were posted:

New Mexico Broadcasters Association
Texas Association of Broadcasters
Radio On-Line
On-Air Announcements Noalmark Broadcasting Corporation KBIM & KKBE

Notices to all additional sources used to announce the vacancy were retained.

Location: Roswell, NM

Contact Name: Darryl Burkfield

Email: darryl.burkfield@noalmark.com

Phone: (575) 623-9100

[Member Login](#)



Job Description

94.9 THE COUNTRY GIANT AND 93.7 THE LIGHT in Roswell, NM has a rare opportunity to take over the #1 sales position on our team. We are looking for a seasoned professional radio seller that can immediately take an existing account list and grow it to its full potential. This is not an entry level position. If you have experience and have a passion for the radio industry than don't let this opportunity pass you by. Want more out your current radio sales job? Send us your resume and desired salary today to darryl.burkfield@noalmark.com. Clean driving record a must. No phone calls please.

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For the EEO Public File year May 31, 2018 – May 28, 2019

Hire #2 on December 3, 2018, November 1, 2018 and final hiring of 2 for one position on February 19, 2019, the following were sources were notified:

New Mexico Broadcasters Association
Texas Association of Broadcasters
Radio On-Line
On-Air Announcements Noalmark Broadcasting Corporation KBIM & KKBE
All Access

**This position was originally filled three times before final applicants (a morning show team of two) were hired, a male and a female.*

Notices to all additional sources used to announce the vacancy were retained.

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Breakfast with the Aliens

Noalmark Broadcasting Corporation

Location: Roswell, NM
 Contact Name: Darryl Burkfield
 Email: darryl.burkfield@noalmark.com
 Web: www.kbimradio.com
 Phone: (575) 623-9100

Job Description

94.9 The Country Giant in Roswell has a monster signal that covers ALL of Southeast New Mexico and West Texas. If you are funny, creative, compelling, know how to interact live with listeners, do killer production and can engage in social media warfare-then we want you! Do you understand contests, promotions and Wideorbit automation? If you think you fit the profile, then what are you waiting for? Send show samples, social media examples, resume, desired salary and anything else that sets you apart from the rest of the pack to Darryl Burkfield, General Manager/KBIM-FM, darryl.burkfield@noalmark.com. Equal Opportunity Employer. Clean driving record a must. No phone calls please.

For the EEO Public File year May 28, 2018 – May 27, 2020

Hire #1 on September 18, 2019, the following sources were notified:

New Mexico Broadcasters Association
Texas Association of Broadcasters
Radio On-Line
On-Air Announcements Noalmark Broadcasting Corporation KBIM & KKBE
All Access

Notices to all additional sources used to announce the vacancy were retained.

Member Login

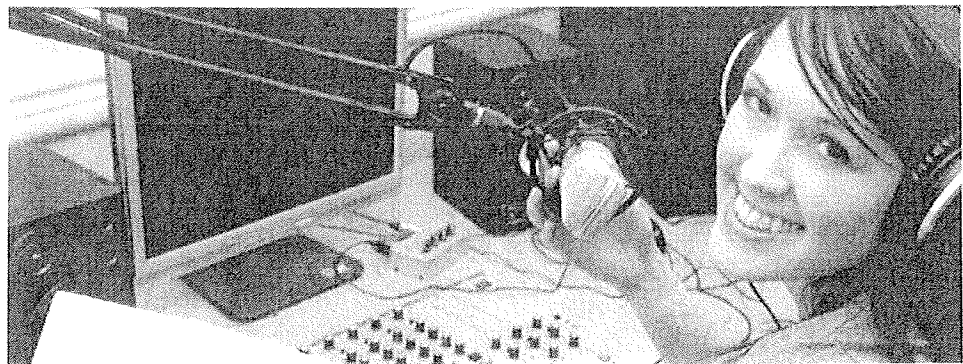


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Sales

Noalmark Broadcasting Corporation

Location: Roswell, NM
 Contact Name: Darryl Burkfield
 Email: darryl.burkfield@noalmark.com

Job Description

94.9 THE COUNTRY GIANT AND 93.7 THE LIGHT in Roswell, NM has a rare opportunity to take over the position on our team. We are looking for a seasoned professional radio seller that can immediately take over an account list and grow it to its full potential. This is not an entry level position. If you have experience and a passion for the radio industry than don't let this opportunity pass you by. Want more out your current radio job? Send us your resume and desired salary today to darryl.burkfield@noalmark.com. Clean driving record: no phone calls please. Equal Opportunity Employer

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For the EEO Public File year May 28, 2018 – May 27, 2020

Hire #2 on May 18, 2020, the following sources were notified:

New Mexico Broadcasters Association

Hobbsamerica.com

All Access

On-Air Announcements Noalmark Broadcasting Corporation KBIM & KKBE

Notices to all additional sources used to announce the vacancy were retained.

- [Login \(users/account/login\) or Create Account \(users/account-register.asp\)](#)
- [Contact Us \(misc/contact-us\)](#)

- [User Agreement \(misc/user-agreement\)](#)
- [Privacy Policy \(misc/privacy-policy\)](#)
- [Avoid Scams \(misc/avoid-scams\)](#)

HOBBSAMERICA.COM (1)
 Hobbs, New Mexico Bulletin Board

HOME PAGE (1) > EMPLOYMENT/EMPLOYMENT > HELP WANTED LISTINGS/EMPLOYMENT/HELP WANTED LISTINGS

HELP WANTED LISTINGS

5/4/20

OFFICE MANAGER NEEDED:

~~SEE THE COMPANY WEBSITE FOR THE LIGHT IN~~
 Roswell, NM has an opening for Office Manager. Should be proficient in VT and Marketing traffic systems, EXCEL, Word, and other accounting and administrative software. You will be required to answer phones. You will be greeting guests to the radio station. Experience is a plus, but we would be willing to train the right candidate. Send your resume, audio samples and desired salary today to darryl.burkfield@noalmark.com. Clean driving record a must. No phone calls please. Equal Opportunity Employer

Company: Noalmark Broadcasting Corporation
 Phone: 575-623-9100
 Email: darryl.burkfield@noalmark.com
 Report Listing Issue (misc/contact)

- > [Help Wanted Submission](#)
- [\(employment/help-wanted-listings/help-wanted-submission\)](#)

Attachment C

May 31, 2018 – May 28, 2019

1) Account Executive/Sales

Referral Source: KBIM/KKBE Radio

Referral Sources:	# of Interviewees
New Mexico Broadcasters Assn.	1
Texas Association of Broadcasters	1
Radio On-Line	2
KBIM/KKBE Radio	0
Walk-In	2
Total Number of Interviewees	6

Hire Date:

12/3/18

2) On-Air Morning Show Host

Referral Source: All Access

Referral Sources:	# of Interviewees
Walk-In	2
All Access	13
Total Number of Interviewees	15

*THIS POSITION WAS ORIGINALLY FILLED TWICE AND APPLICANTS DECLINED, THEREFORE A TEAM OF TWO WAS HIRED

May 28, 2019 – May 27, 2020

3) Job Title: Account Executive

Referral Source: Walk-In

Referral Sources:	# of Interviewees
New Mexico Broadcasters Assn.	3
Texas Association of Broadcasters	1
Radio On-Line	1
Walk-In	1
Total Number of Interviewees	6

Hire Date: 9/18/19

4) Office/Traffic Manager

Referral Source(s) of Hire: Walk-In

Interviewees: 4

Referral Sources:	# of Interviewees
New Mexico Broadcasters Assn.	0
Hobbsamerica.com	0
All-access	3
KBIM/KKBE Radio	0
Walk-In	1
Total Number of Interviewees	4

Hire Date: 5/18/2020

Attachment D

Unit Personnel Involved in Recruitment Initiatives

Job Fair (2019 Report)

Personnel: Station Manager

Job Banks (2019 and 2020 reports)

Personnel: Station Manager

Upper Level Training and EEO Training (2019 and 2020 reports)

Personnel: Station Manager and Office Manager



Noalmark Broadcasting
P.O. Box 1953
Roswell, NM

RE: New Mexico Job Fair Participation, Apr 22, 2019

Apr 29, 2019

Dear Darryl Burkfield,

Thank you for participating in the New Mexico's Broadcasters Virtual Job Fair the week of Apr 22, 2019. Your hiring agent of record was Darryl Burkfield and the stations that participated were: KBIM-AM KKBE-FM.

Please keep this letter for your records.

Thank you again for participating in the Broadcasters Virtual Job Fair.

Best Regards,

Suzan Strong
Member Services
New Mexico Broadcasters Association
2333 Wisconsin St., NE
Albuquerque, NM 87110

N.M.B.A. Job Bank

As a member station of the New Mexico Broadcaster's Association, KBIM and KKBE supports and participates in the N.M.B.A. Job Bank which is maintained on the NMBA's website. Member stations, including those listed above submit all job openings as they occur and list an email address to respond.

**EQUAL EMPLOYMENT OPPORTUNITY AND
DISCRIMINATION PREVENTION TRAINING
UPPER LEVEL MANAGEMENT
September 21, 2018**

A training session was held for all upper level management of Noalmark Broadcasting Corporation on September 21, 2018 in Hobbs, New Mexico in conjunction with the Company's strategic planning and professional education annual meeting.

The managers attending the training session for Noalmark were Aaron Forrister, Market Manager of Noalmark's NM stations; and Darryl Burkfield, Station Manager of Noalmark's Roswell, NM stations, Patrick Nolan, Market Manager of Noalmark's Arkansas stations. Company President, William C. Nolan, III along with Senior Vice President, Anna M. Canterbury conducted the session both of whom have extensive experience in EEO training, hiring and management.

The EEO Policy Statement was reviewed. It contains the Company's commitment to ensuring equal opportunity in employment and promotions for minorities and females. A copy of the company's EEO Policy Statement is attached for review.

Mrs. Canterbury then reviewed in detail the FCC's EEO Policy which states that equal opportunity in employment shall be afforded to all persons, and that no one shall be discriminated against, regardless of race, color, religion, national origin or sex. The specific requirements of the self-analysis were discussed, to include a detailed review of the results and proposed enhancements. It was stressed that proper record keeping is very important, and record retention requirements of the FCC were reviewed.

Mr. Nolan and Mrs. Canterbury then reminded them of the Company's sexual harassment policy. After a discussion of several other Company policies, to include the dress code and computer and IT policy, the meeting was adjourned.

**EQUAL EMPLOYMENT OPPORTUNITY AND
DISCRIMINATION PREVENTION TRAINING
UPPER LEVEL MANAGEMENT
September 25, 2019**

A training session was held for all upper level management of Noalmark Broadcasting Corporation on September 25, 2019 in Dallas Texas in conjunction with the Company's strategic planning and professional education annual meeting. Management also attended the NAB Radio Show held September 24-27, 2019 in Dallas, Texas.

The managers attending the training session for Noalmark were Aaron Forrister, Market Manager of Noalmark's NM stations; and Darryl Burkfield, Station Manager of Noalmark's Roswell, NM stations, Patrick Nolan, Market Manager of Noalmark's Arkansas stations. Company President, William C. Nolan, III along with Senior Vice President, Anna M. Canterbury conducted the session both of whom have extensive experience in EEO training, hiring and management.

The EEO Policy Statement was reviewed. It contains the Company's commitment to ensuring equal opportunity in employment and promotions for minorities and females. A copy of the company's EEO Policy Statement is attached for review.

Mrs. Canterbury then reviewed in detail the FCC's EEO Policy which states that equal opportunity in employment shall be afforded to all persons, and that no one shall be discriminated against, regardless of race, color, religion, national origin or sex. The specific requirements of the self-analysis were discussed, to include a detailed review of the results and proposed enhancements. It was stressed that proper record keeping is very important, and record retention requirements of the FCC were reviewed.

Mr. Nolan and Mrs. Canterbury then reminded them of the Company's sexual harassment policy. After a discussion of several other Company policies, to include the dress code and computer and IT policy, the meeting was adjourned.

EEO AND SEXUAL HARRASMENT STAFF SEMINAR

On April 15, 2019 and January 22, 2020 staff seminars were conducted by Noalmark Broadcasting Corporation Station Manager of the Roswell unit, Darryl Burkfield. During this meeting the entire Noalmark Broadcasting Corporation Equal Employment Opportunity policy Statement was read. Then there was a complete discussion of the policy including examples of how it has applied in the past. For instance, we made certain that employees understood that the company wants references from the staff for prospective minority and female employees. Care was taken to make certain employees understood that Noalmark is not just an Equal Employment Opportunity Employer but an Affirmative Action employer as well that wants to seek out and find the best prospective women and minority candidates for positions.

Also senior management met with the staff to discuss Noalmark's Sexual Harassment Policy. The complete policy was read to employees and that was followed by a discussion on what forms sexual harassment can take and the potential consequences, internal and legal, that can follow from such action. Also there was a discussion of how to report sexual harassment to management both in Roswell and to the corporate headquarters in El Dorado, AR.

Attachment E

EQUAL EMPLOYMENT OPPORTUNITY POLICY

Noalmark Broadcasting Corporation maintains an Equal Employment Opportunity policy in accordance with Section 73.2080 of FCC regulations. Our policy is that all persons shall be afforded equal opportunity in employment, and that no person shall be discriminated against due to race, color, religion, ethnicity, marital status, gender or age. All decisions on employment will be made based on nondiscriminatory considerations.

Our corporate officers and General Managers have been instructed to rigorously enforce this policy and require strict cooperation of all employees in its implementation. Employees observing actions in violation of this policy are required to contact our executive officers at 202 West 19th Street, El Dorado, Arkansas 71730, or by telephone at (870) 862-7777. All such communications will be held in the upmost confidence and thoroughly investigated.

Attachment F

APPLICATION FOR EMPLOYMENT - NOALMARK BROADCASTING CORPORATION

This station is an equal opportunity employer. This station seeks and employs qualified persons in all job classifications and positions without discrimination on the basis of race, religion, sex, national origin, age or disability. Such discriminatory practices are specifically prohibited by law. If you believe your equal employment rights have been violated, you may contact the Federal Communication Commission, the Equal Opportunity Commission or the appropriate state or local EEO agency.

LAST NAME		FIRST NAME		M.I.	SOCIAL SECURITY NO.	
STREET ADDRESS			CITY	STATE	ZIP CODE	TELEPHONE NO.
ARE YOU 18 YEARS OF AGE OR OLDER?		POSITION DESIRED		SALARY DESIRED		DATE AVAILABLE
YES NO						
DO YOU HAVE A FCC RESTRICTED RADIO TELEPHONE OPERATOR PERMIT?		WORD/DATA PROCESSING EQUIPMENT YOU CAN OPERATE:				
YES NO						
DO YOU HAVE THE ABILITY TO PERFORM THE SPECIFIC JOB FUNCTIONS OF THE POSITION FOR WHICH YOU ARE APPLYING?						YES NO
IF YES, ARE YOU ABLE TO PERFORM THESE TASKS WITH OR WITHOUT AN ACCOMMODATION? WITH WITHOUT						
IF YOU CAN PERFORM THESE TASKS WITH AN ACCOMMODATION, HOW WOULD YOU PERFORM THESE TASKS, AND WITH WHAT ACCOMMODATION?						
ARE YOU LEGALLY ELIGIBLE FOR EMPLOYMENT IN THE U.S.? YES NO						
HAVE YOU EVER BEEN CONVICTED OF A FELONY RELATED TO YOUR ABILITY TO PERFORM IN THE JOB FOR WHICH YOU ARE APPLYING?						YES NO
IF YES, PLEASE EXPLAIN: (CONVICTION RECORD IS NOT NECESSARILY A BARRIER TO EMPLOYMENT. RELEVANT FACTORS WILL BE EVALUATED.)						
EMPLOYMENT HISTORY: LIST ALL EMPLOYMENT SINCE HIGH SCHOOL. LAST POSITION FIRST.						
NAME OF EMPLOYER	FROM	TO	POSITION	SUPERVISOR	REASON FOR LEAVING	
	MO/YR	MO/YR				
LIST EDUCATION, TRAINING, AND EXPERIENCE RELEVANT TO THE POSITION APPLIED FOR:						
1. _____						
2. _____						
3. _____						
4. _____						
5. _____						

I certify that the statements I have made are true to the best of my knowledge and I authorize the licensee to investigate the accuracy and completeness of the information provided.

SIGNATURE OF APPLICANT

DATE