



April 1, 2019

VIA ONLINE PUBLIC INSPECTION FILE

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: **KLCW-TV, Wolfforth, TX (Facility ID No. 77719)**
KLBB-FM, Lubbock, TX (Facility ID No. 55062)
EEO Audit Letters

Dear Sir or Madam:

Ramar Communications, Inc. (“Ramar”), licensee of television station KLCW-TV, Wolfforth, TX (Facility ID No. 77719) and radio station KLBB-FM, Lubbock, TX (Facility ID No. 55062), hereby responds collectively to two Media Bureau letters, each dated February 14, 2019, requesting information and materials in connection with audits of the EEO programs of Stations KLCW-TV and KLBB-FM (the “EEO Audit Letters”).

Ramar hereby provides information for its Station Employment Unit (the “Employment Unit”), which in addition to KLCW-TV and KLBB-FM, includes KJTV(AM), Lubbock, TX (Facility ID No. 55061), KLZK(FM), New Deal, TX (Facility ID No. 88795), KTTU-FM, Brownfield, TX (Facility ID No. 4019), KJTV-TV, Lubbock, TX (Facility ID No. 55031), KJTV-CD, Wolfforth, TX (Facility ID No. 168090), KXTQ-CD, Lubbock, TX (Facility ID 55055), KMYL-LD, Lubbock, TX (Facility ID 168087), KLCW-TV, Wolfforth, TX (Facility ID 77719), and KLBB-LD, Lubbock, TX (Facility ID 192484) (collectively, the “Stations”).

In preparing this response, Ramar has relied upon an examination of its files and records and due inquiry of current employees who are knowledgeable of employment-related issues at the Employment Unit. The responses below correspond to paragraphs as set forth in the EEO Audit Letters.



Paragraph 3:

Paragraph 3(a):

Attachment A hereto contains the Employment Unit’s two most recent EEO Public File Reports, covering the period March 23, 2016 to March 22, 2017 (the “2016-17 EEO Report”) and the period March 23, 2017 to March 22, 2018 (the “2017-18 EEO Report,” and together with the 2016-17 EEO Report, the “EEO Public File Reports”). Copies of the EEO Public File Reports are included in the Stations’ online public inspection files. A copy of the most recent EEO public file report is also available on the Stations’ websites. Below are the web addresses for each station’s website and links to the current EEO report on each station’s website:

Station	Station Website	Link to EEO Report on Station’s Website
KLCW-TV	http://www.lubbockcw.com/	http://www.lubbockcw.com/link/753707/eoo-report
KLBB-FM	https://www.937theeagle.com/	https://ramar.images.worldnow.com/library/9a6d9a8b-ba2d-42d0-b436-f411709e1de6.pdf ¹
KJTV(AM)	http://www.1007thescore.com/	http://www.1007thescore.com/link/753707/eoo-report
KLZK(FM)	https://www.1077yesfm.com/	https://ramar.images.worldnow.com/library/9a6d9a8b-ba2d-42d0-b436-f411709e1de6.pdf ¹
KTTU-FM	http://www.doublet973.com	http://www.doublet973.com/link/753707/eoo-report
KXTQ-FM	https://www.magic1065.com	https://ramar.images.worldnow.com/library/9a6d9a8b-ba2d-42d0-b436-f411709e1de6.pdf ¹
KJTV-TV	http://www.fox34.com	http://www.fox34.com/link/753707/eoo-report
KXTQ-CD	http://www.telemundolubbock.com	http://www.telemundolubbock.com/link/753707/eoo-report
KMYL-LD	http://www.mylubbocktv.com	http://www.mylubbocktv.com/link/753707/eoo-report
KLBB-LD	No website	N/A
KJTV-CD	No website	N/A

The date of employment for each full-time hire listed in each report is as follows:

2016-2017 EEO Report Hire Dates

#	Vacancy	Hire Date
1.	Account Executive	04/11/16
2.	Account Executive	09/26/16
3.	Accounting Supervisor	08/22/16
4.	Account Executive	07/11/16
5.	Camera Operator	04/18/16
6.	Multi-Platform Reporter/Photo Journalist	06/16/16

¹ Ramar’s web designer is currently updating this page and therefore the provided link may change. Currently, links to the EEO reports appear on the bottom of the front page of the relevant station website.

7.	Anchor/Reporter	09/01/16
8.	Multi-Platform Reporter/Photo Journalist	07/11/16
9.	Radio Account Executive	07/25/16
10.	Receptionist/Accounting Clerk	07/25/16
11.	Staff Accountant	07/15/16
12.	Master Control Operator	07/06/16
13.	Master Control Operator	07/07/16
14.	Video Editor	01/16/17
15.	Master Control Operator	10/03/16
16.	Radio Account Executive	01/03/17
17.	Master Control Operator	10/14/16
18.	Master Control Operator	10/25/16
19.	Photojournalist	12/01/16
20.	Master Control Operator	12/05/16
21.	Newscast Director	12/12/16
22.	Bilingual Multi Media Journalist	01/10/17
23.	Anchor/Producer Spanish Fluent	03/01/17
24.	Newscast Director	01/26/17

2017-2018 EEO Report Hire Dates

#	Vacancy	Hire Date
1.	Web Producer/MMJ	04/03/17
2.	Radio Account Executive	04/17/17
3.	Account Executive	05/31/17
4.	Weather Anchor	05/01/17
5.	Accounting Supervisor	04/19/17
6.	Newscast Director	05/31/17
7.	Master Control Operator	05/01/17
8.	News Operations Manager	05/08/17
9.	Anchor	06/26/17
10.	Master Control Operator	05/01/17
11.	Photojournalist	07/03/17
12.	Photojournalist	06/02/17
13.	Help Desk Technician	06/12/17
14.	TV Sales Manager	10/02/17
15.	Photojournalist	07/25/17
16.	Multi-Platform Reporter/Photojournalist	08/07/17
17.	Newscast Director	08/23/17
18.	Master Control Operator	08/31/17

19.	Anchor/Producer Spanish Fluent	12/26/17
20.	Multi-Platform Reporter/Photojournalist	01/08/18
21.	Producer/Associate Producer Spanish Fluent	11/07/17
22.	Digital Coordinator	12/13/17
23.	Sports Anchor/Reporter	02/05/18
24.	Master Control Operator	12/18/17
25.	Producer/Associate Producer Spanish Fluent	02/26/18
26.	Receptionist/Accounting Clerk	01/29/18
27.	Newscast Director	01/26/18

Paragraph 3(b):

Attachment B hereto and Attachment C hereto contain copies of advertisements, bulletins, letters, faxes, e-mails or other communications announcing the full-time positions filled during the 2016-17 and the 2017-18 reporting periods, respectively. Vacancy notifications were sent to multiple sources as listed in the EEO Public File Reports included at Attachment A hereto. Please note that the Employment Unit uses the recruitment software Broadcast 1 Source and, as a result, almost all of the communications announcing such full-time positions are stored in the Broadcast 1 Source software and detailed information about such announcements is included in various Broadcast 1 Source reports. It is the policy of the Employment Unit to retain copies of all notices sent to all sources used. There were no on-air announcements or advertisements during the 2016-2017 and 2017-2018 EEO reporting periods. In addition, no organization notified the Employment Unit that it wanted to be notified of Employment Unit job openings.

Paragraph 3(c):

During the first reporting period, from March 23, 2016 to March 22, 2017, the Employment Unit filled twenty-four (24) full-time job vacancies. During the second reporting period, from March 23, 2017 to March 22, 2018, the Employment Unit filled twenty-seven (27) full-time job vacancies. The total number of interviewees and the referral source for each interviewee for all full-time Employment Unit vacancies filled during the two reporting periods are detailed in Attachment D hereto.

Paragraph 3(d):

As of the date of the EEO Audit Letters, February 14, 2019, the total number of full-time employees of the Employment Unit was 85, and the population of the market(s) in which the Employment Unit operates was greater than 250,000. Based on these two factors, 47 C.F.R. §§ 73.2080(c)(2) and (e)(3) calls for the Employment Unit to perform four outreach initiatives within a two-year period.

Attachment E hereto lists the Employment Unit personnel (by title) involved in the recruitment initiatives performed by the Employment Unit during each of the 2016-2017 and 2017-2018 EEO reporting periods. A full description of these recruitment initiatives is included in each of the EEO Public File Reports, as provided in Attachment A hereto. Attachment F hereto contains documentation demonstrating the Employment Unit's performance of its supplemental recruitment initiatives during the period encompassed by the EEO Public File Reports.²

Paragraph 3(e):

To Ramar's knowledge, there have been no pending or resolved complaints involving the Stations filed during the Stations' current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices in the Employment Unit on the basis of race, color, religion, national origin, or sex.

Paragraph 3(f):

The management of the Employment Unit works to take positive steps to eliminate any systematic discrimination from personnel practices, to ensure that the Employment Unit employs and develops a workforce representative of the local labor force, and to create an environment that encourages further opportunities for growth and promotion for all Employment Unit employees. The President of Ramar (who is also the television station General Manager, and who is hereinafter referred to as the "President of Ramar") holds ultimate responsibility for ensuring enforcement of the Employment Unit's EEO policies, and the Program Director oversees the implementation of the Employment Unit's EEO policies and procedures. The radio station General Manager also works directly with the Program Director to ensure compliance with the Employment Unit's EEO policies and procedures.

The President of Ramar is responsible for ensuring compliance with all federal and state laws and Employment Unit EEO policies and procedures and for providing overall support to department heads and managers. The Program Director works with departmental heads and managers to ensure that the Employment Unit's EEO policies and procedures are followed, that

² Pursuant to paragraph 3(d) of the EEO Audit Letters, since the Employment Unit has performed more than four initiatives, it provides documentation for four initiatives in Attachment F, and summarizes the rest of the initiatives in the EEO Public File Reports in Attachment A.

all job vacancy notices are distributed through the recruitment software and service Broadcast 1 Source, and that all interviews and hires are also logged through Broadcast 1 Source. The Program Director is primarily responsible for widely disseminating information for each full-time vacancy, keeping accurate and detailed recruitment and hiring records, working to help ensure that Employment Unit personnel participate in supplemental recruitment initiatives, and preparing the Employment Unit's annual EEO public file report. It is the responsibility of each department head and manager to work with the Program Director to ensure compliance with federal and state laws and compliance with the Employment Unit's EEO policies and procedures, including the use of appropriate recruitment procedures and the Broadcast 1 Source software and system.

The Employment Unit informs job applicants of the Employment Unit's EEO policies and program on the Ramar Communications Employment Application and on all job vacancy notices. The Ramar Communications Employment Application states that,

RAMAR provides equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination... If you believe your equal rights have been violated, you may contact the President of RAMAR at P.O. Box 3757, Lubbock, TX 79452, the Federal Communications Commission in Washington, DC 20554 or any other appropriate state or local agency.

On all job vacancy notices, the Employment Unit states that Ramar and the Stations "are equal opportunity employers and all qualified applicants are encouraged to apply." Copies of job postings noting that Ramar is an equal opportunity employer are included at Attachments B and C hereto.

The Employment Unit informs employees of the Employment Unit's EEO policies and program at the time of hire when employees are provided with a copy of the Ramar Communications, Inc. Employee Handbook. Additional copies of the Employee Handbook are available in the Employment Unit's Human Resources office. Section 102 in the Employee Handbook states that Ramar is an equal opportunity employer and informs employees of the Employment Unit's EEO policies and program, Ramar's affirmative action program, and employee rights if they believe they have been subject to discrimination. Employees are encouraged to bring any questions or concerns about any type of discrimination to the attention of an immediate supervisor, the General Manager, and/or the President of Ramar.

Paragraph 3(g):

The Employment Unit evaluates its EEO recruitment program on a regular basis, pursuant to 47 C.F.R. § 73.2080(c)(3), to ensure that its outreach efforts are effective in reaching all segments of the communities served by the Employment Unit. The Employment Unit conducts these evaluations annually at the time its EEO public file report is prepared and placed in the public file.

The President of Ramar retains ultimate responsibility for ensuring that the Employment Unit's EEO recruitment program is effective and for making sure that any problems with the recruitment program are resolved appropriately. This includes systematized implementation of the Employment Unit EEO practices and procedures through an agreement with the recruitment software and notice distribution system Broadcast 1 Source. Broadcast 1 Source gives the Employment Unit tools to manage open job vacancies, to track the distribution of notices of vacancies to recruitment sources, to update and track the recruitment sources used by the Employment Unit, and to track the referral sources of interviewees and hires.

The Employment Unit's Program Director has primary responsibility for ensuring that the Employment Unit's EEO recruitment program is effective on a day-to-day basis and for taking action to address any problems with recruitment. Since Ramar began using Broadcast 1 Source, the Employment Unit has centralized the distribution of all job vacancy notices in the Program Director's office. The Program Director sends notice of every vacancy to both the local and larger statewide/national lists of recruitment sources in an effort to more widely disseminate notice of vacancies at the Employment Unit. Furthermore, the Program Director, when appropriate based on the type of position, also sends notice of certain vacancies to industry-specific organizations including TVJobs.com and MediaLine.com.

Paragraph 3(h):

The Employment Unit regularly analyzes the effectiveness of its EEO practices and policies in an effort to ensure that they provide equal opportunity and do not have a discriminatory effect, pursuant to 47 C.F.R. § 73.2080(c)(4). Ramar is committed to employing a workforce that is representative of the composite labor force. The President of Ramar and the Program Director annually examine employee pay, benefits, and promotions to ensure that they provide equal opportunity and do not have a discriminatory effect.³ The Employment Unit makes all pay and promotion decisions based on the skills, ability, experience, and performance of the applicant, and the Employment Unit does not consider race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law. The Employee Handbook states that:

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at RAMAR will be based on merit, qualifications and abilities. RAMAR provides equal employment opportunity to all qualified individuals without regard to their race, color, religion, sex, national origin, age, disability, or any other characteristic provided by law.

Additionally, it is Ramar policy that all hiring, promotion, and termination decisions are reviewed and/or approved by the President of Ramar and the Program Director.² The hiring salary for each full-time vacancy must be approved by the President of Ramar.

³ Note that the radio station General Manager also participates in this review on the radio side of the Employment Unit.

The Employment Unit has not entered into an agreement with a union, and therefore the requirement to periodically review cooperation with the union is not applicable.

Paragraph 3(i):

Ramar is not a religious broadcaster; therefore this paragraph is not applicable.

Paragraph 4:

The Employment Unit Stations are not party to any time brokerage agreement.

[Signature on following page]

Should any questions arise regarding this information, please contact the undersigned or Ramar's counsel, Dennis P. Corbett at 202.789.3115 or dcorbett@telecomlawpros.com.

I certify under penalty of perjury that the foregoing is true, correct and complete.
Executed on April 1, 2019.

Respectfully submitted,

/s/ Brad Moran

Brad Moran
President
Ramar Communications, Inc.