



HC2 Broadcasting Holdings Inc.
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February 27, 2023

UPLOADED TO ONLINE PUBLIC FILE

EEO Staff
Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: KEMO-TV, Fremont, California
Facility ID No. 34440
EEO Audit Response

Dear EEO Staff:

This letter responds to an EEO Audit Letter dated March 21, 2022 (the “Letter”) from the FCC’s Enforcement Bureau to the licensee of KEMO-TV, Fremont, California, Facility ID No. 34440 (“KEMO” or the “Unit”). It appears that the Letter inadvertently was delivered to the former licensee of KEMO, Northstar San Francisco License, LLC. The current licensee of KEMO is HC2 Station Group, Inc. (“Licensee”).¹ Please note that the responses set forth below are associated with the specific questions raised in the EEO Audit Letter.

2. *Audit Data Requested.*

2(a) The Unit currently has no full-time employees that are regularly assigned to work 30 hours a week or more.²

2(b)(vi) The Unit has had no pending or resolved complaints involving the Unit filed during the Unit’s 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 Unit on the basis of race, color, religion, national origin, or sex.

3-4. *Time Brokerage.* KEMO is not subject to a time brokerage agreement. Licensee does not broker any broadcast stations.

¹ By email dated February 10, 2023, Enforcement Bureau staff granted an extension, to and including March 13, 2023, for Licensee to submit its response. See Email from Lynn Kalagian-Jones, EEO Specialist, Investigations & Hearings Division, Enforcement Bureau, to David A. O’Connor, Counsel for Licensee (Feb. 10, 2023).

² Licensee notes that the Commission eliminated minimum staffing requirements in 2017. See *Elimination of Main Studio Rule*, Report and Order, MB Docket No. 17-106, 32 FCC Rcd 815 ¶¶ 1, 5, 7 (2017).

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I certify that the contents of this audit response are complete and accurate to the best of my knowledge.

Please contact our counsel, David O'Connor, on 202-383-3429, or doconnor@wbklaw.com if you have any questions.

Respectfully submitted,

Wayne Barr, Jr.
Wayne Barr, Jr.
Chief Executive Officer

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Enforcement Bureau
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DECLARATION OF WAYNE BARR, JR.

I, Wayne Barr, Jr., declare the following:

1. I am Chief Executive Officer of HC2 Station Group, Inc., the licensee of KEMO-TV.
2. I have reviewed the foregoing EEO audit response for KEMO-TV, and I hereby certify that all of the information contained in the response is accurate.
3. I declare under penalty of perjury that the foregoing is true and correct.

Wayne Barr, Jr.

Wayne Barr, Jr.

Executed February 27, 2023