



December 11, 2023

VIA PUBLIC INSPECTION FILE
Media Bureau
EEO Staff, Policy Division
Federal Communications Division
445 Twelfth Street, SW
Washington, DC 20554

**Re: EEO Audit Response
Tribune Broadcasting Company
FRN: 0005047105
WTTV(TV), Bloomington, IN, FAC ID 56523
WTTK(TV), Kokomo, IN, FAC ID 56526
WXIN(TV), Indianapolis, IN, FAC ID 146**

Dear Sir or Madam:

Tribune Media Company (“Tribune”), licensee of WTTV(TV), Bloomington, IN, FAC ID 56523, WTTK(TV), Kokomo, IN, FAC ID 56526 and WXIN(TV), Indianapolis, IN, FAC ID 146 (collectively the “Stations”), hereby responds to the October 30, 2023 letter (the “EEO Audit Letter”) from Elizabeth Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau, Federal Communications Commission, which stated that the WTTV(TV) employment unit had been randomly selected for an audit of its EEO program.

3(a). Provide the Station’s two most recent EEO Public File Reports and the Station’s web address.

Response: A copy of the Station’s Annual EEO Public File Reports for the periods April 2021 through March 2022 (Exhibit 1.1) and April 2022 through March 2023 (Exhibit 1.2) are attached. Each report was posted timely to the Station websites <https://cbs4indy.com/> and <https://fox59.com/>. Note that WTTK is designated by the FCC as operating as a satellite station and rebroadcasts WTTV.

3(b). For each Station full-time position filled during the period covered by the above EEO public file reports provide dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position. Include copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Station that it wants to be notified of Station job openings.



Response: There have been no entities that have requested the Stations notify them of all job openings during the reporting period. Copies of the notices for each job opening listed in the public file reports and the list of recruiting sources utilized for each opening are attached as Exhibit 2.1 (2021–2022 Report) and 2.2 (2022-2023 Report). Please note certain commercial recruiting websites, including CareerBuilder, Indeed and LinkedIn, repost Nexstar vacancy notices without any communication or coordination with Nexstar.

3(c). Provide the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Station vacancies filled during the period covered by the above-noted EEO public file reports.

Response: This information is provided in the EEO public file reports included in Exhibit 1.1 and Exhibit 1.2.

3(d). Provide documentation of Station’s recruitment initiatives during the periods covered by the above-noted EEO public file reports. Specify the Station personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Station and state whether the population of the market in which any station included in the Station operates is 250,000 or more. Based upon these two factors, determine and state whether the Station is required to perform two or four initiatives within a two-year period.

Response: There are currently 176 full-time employees of the Stations; and the population of the Indianapolis, Indiana MSA is more than 250,000. Accordingly, the Stations are required to perform four (4) initiatives during each two-year period. Attached as Exhibit 3.1 (2021 - 2022 report) and 3.2 (2022 - 2023 report) is documentation demonstrating performance of the Stations’ recruitment initiatives identified in the EEO public file reports. Station personnel involved in the initiatives are noted in the reports and supporting documentation.

3(e). Disclose any pending or resolved complaints involving the Station filed during the Station’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 Station on the basis of race, color, religion, national origin, or sex.

Response: NONE



(f). In accordance with Section 73.2080(b), from the first day of the Station’s current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

Response: The Stations’ General Manager (“GM”), all Station department heads, each of whom report to the GM, and Station middle managers, each of whom report to the department heads are trained on the Stations’ EEO policies, including EEO hiring obligations. Said training is refreshed on a regular basis. The Stations’ department heads and middle managers are responsible for informing all employees and applicants of the Stations’ EEO policies. A copy of the Station’s EEO/Affirmative Action Policy Statement is displayed in the employee break room and other common areas of the station.

The Stations’ EEO policy is stated on each job application, which indicates that the Station/Nexstar considers applicants for all positions without regard to race, color, religion, creed, gender, national origin, age, disability, marital status or veteran status. That same policy is displayed prominently in the Station’s employee handbook, distributed to each employee and available online through our employee web portal.

The Stations periodically broadcast an announcement containing the Station’s EOE statement and asking local organizations to contact the station if they would like to receive job vacancy notifications. A copy of this script is included in this response material as Exhibit 4.

(g). In accordance with Section 73.2080(c)(3), from the first day of the Station’s current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Unit’s efforts to analyze its EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis.

Response: In addition to the efforts undertaken as part of the preparation of the Annual EEO Public File Report, the Stations also audit the employee personnel files on a regular basis to conduct a review of persons hired to ensure that the Station has an effective EEO recruitment program. The results of the review are internally discussed with the GM and all department heads in an effort to modify the program and implement improvements as necessary.

(h). In accordance with Section 73.2080(c)(4), from the first day of the Station’s current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the Station’s efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect. If the Station has one or more union agreements, describe how the Station cooperates with each union to ensure EEO policies are followed for the Station’s union-member employees and job applicants.



Response: The Station's benefits and seniority practices are established at the parent/corporate level by Nexstar and, therefore, are not subject to discriminatory practices. When positions are open at the Station, job announcements are posted in the Station's break room on the employee bulletin board and posted on Nexstar's internal intranet. This ensures that any employee has the opportunity to apply for a promotion or transfer to another department. Nexstar policy requires that all employees receive an annual performance review and pay increases may be awarded based on performance. Additionally, the GM periodically reviews the Station's processes to ensure that its practices are adequate and nondiscriminatory.

Further, the Nexstar policy regarding equal employment opportunity contains an express provision aimed at nondiscrimination in promotion and advancement opportunities for current employees. Nexstar encourages all employees to realize their full potential and endeavors to promote from within and accommodate requests for transfers; therefore, when there is an opening within the company, internal candidates who have the right qualifications will be considered first. Decisions to promote or transfer are based on an employee's entire employment record, including skills, performance, cooperation with colleagues, efficiency, attendance record, experience, responsiveness to internal and external customers, disciplinary record and safety record. It is the goal of this policy that these special considerations will increase the retention of our experienced employees as an expression of Nexstar's commitment to every employee's personal growth and development and help us to meet the development needs of the company.

3(i). Religious Broadcasters. Not applicable.

4. Time Brokerage. Not applicable.

Should you have any questions regarding the foregoing information, please contact our attorney, Jason Roberts at (214) 765-4229

Sincerely,

A handwritten signature in black ink, appearing to be "J. Roberts", is written over a horizontal line. Below the signature, the text "Vice President & General Manager" is printed.

Vice President & General Manager