

Pittsburgh

Community Broadcasting

May 10, 2019

EEO Staff, Policy Division
Media Bureau
WESA(FM) Online Public File

Re: WESA(FM), Pittsburgh, PA (Fac. ID # 17747)
WYEP-FM, Pittsburgh, PA (Fac. ID # 52745)
EEO Audit Response

Pittsburgh Community Broadcasting Corporation (“PCBC”), licensee of FM stations WESA(FM), Pittsburgh, PA and WYEP-FM, Pittsburgh, PA, hereby responds to the letter dated February 14, 2019, from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau. This response provides information relating to the licensee’s employment unit (the “Unit”) out of which WESA(FM) and WYEP-FM are the stations operated. A contact email for WYEP and WESA is cturko@pittsburghcommunitybroadcasting.org.

The following are PCBC’s responses to the questions in part 3 of the audit letter.

(a) Copies of the Unit’s two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit’s most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit’s most recent EEO public file report must be linked to either the Unit’s site or the general corporate site, pursuant to Section 73.2080(c)(6).

The 2019 Annual EEO Public File Report, attached as Exhibit 1, covers the period from March 31, 2018 – March 28, 2019. The 2018 Annual EEO Public File Report, for the period starting April 1, 2017 – March 30, 2018, is attached as Exhibit 2.¹

The most recent annual EEO Public File Report is linked to the website for both stations at <http://pittsburghcommunitybroadcasting.org/reports>. A direct link to download the most recent report is at: <http://pittsburghcommunitybroadcasting.org/sites/default/files/2019-04/2019%20Annual%20EEO%20Public%20File%20Report.pdf>.

The Unit had 21 full-time hires during the two years under review:

¹ The Annual EEO Report for year 2018 was amended after a review by counsel as part of preparing this response. The staffer who managed recruitment documentation during the period covered by the 2018 report is no longer with PCBC. In preparing for this audit, we only included details we could support with documentation.

<u>Date of Hire</u>	<u>Job Title</u>
3/11/2019	Underwriting Account Executive
12/10/2018	Development Services Coordinator
10/31/2018	Digital Producer – Government
9/5/2018	Operations & Engineering Technician
8/27/2018	Underwriting Account Executive
8/20/2018	IT Manager
4/23/2018	Government Producer/Reporter
3/26/2018	Government Editor
3/26/2018	Bookkeeper & Administrative Coordinator
3/20/2018	Director, Human Resources
3/5/2018	Member Services Manager
3/5/2018	Individual Giving Manager
3/1/2018	Special Events Manager
2/5/2018	Arts & Culture Reporter
1/16/2018	Director, Finance & Administration
1/2/2018	Morning Edition Producer
11/27/2017	Energy Reporter
11/2/2017	Science, Health and Tech Reporter
8/28/2017	Government & Law Reporter
8/1/2017	General Assignment Reporter
7/19/2017	Individual Giving Manager

(b) For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).

PCBC has retained copies of documentation of notices sent to recruitment sources. The unit does not air ads for openings and has no logs of any such ads. No organization requested to be notified of job openings. Documentation of communications about the positions are in the following exhibits:

- Exhibit 3 – Underwriting Account Executive (3/11/2019)
 - PCBC website
 - Corporation for Public Broadcasting
 - Nonprofit Talent
 - Greater Public
 - LinkedIn
 - African American Chamber of Commerce of Western PA

- Exhibit 4 – Development Services Coordinator (12/10/2018)
 - PCBC website
 - Corporation for Public Broadcasting
 - Nonprofit Talent
 - New Pittsburgh Courier
 - LinkedIn

- Exhibit 5 – Digital Producer – Government (10/31/2018)
 - PCBC website
 - Corporation for Public Broadcasting
 - National Association of Black Journalists (NABJ)
 - National Association of Hispanic Journalists (NAHJ)
 - Duquesne University
 - LinkedIn
 - Asian American Journalists Association (AAJA)
 - Point Park University
 - Robert Morris University
 - Carnegie Mellon University
 - University of Pittsburgh

- Exhibit 6 – Operations & Engineering Technician (9/5/2018)
 - PCBC website
 - *The position was added to assist with a massive studio upgrade that was in progress and accelerating. The scale of the studio project consisted of complete rebuilds of two master control rooms, three news booths and three studios, equipment upgrades, installing of new wiring and migrating to new traffic and automation systems. The scope of the project wasn't fully realized until after the work had begun. The entire investment in the studio rebuilds and software changes was significant to the organization and required immediate, fulltime help. The position needed to be filled quickly so as to not delay the schedule of work and to limit our exposure to additional, unforeseen costs. The position was opened and resumes were submitted. A contractor that was familiar with the project applied and was hired.*

- Exhibit 7 – Underwriting Account Executive (8/27/2018)
 - PCBC website
 - Corporation for Public Broadcasting
 - Nonprofit Talent
 - New Pittsburgh Courier
 - LinkedIn
 - Indeed

- Exhibit 8 – IT Manager (8/20/2018)
 - PCBC website
 - Nonprofit Talent
 - New Pittsburgh Courier
 - LinkedIn
 - Indeed

- Exhibit 9 - Government Producer/Reporter (4/23/2018)
 - PCBC website
 - Corporation for Public Broadcasting
 - Current
 - NABJ
 - NAHJ

- Exhibit 10 - Government Editor (3/26/2018)
 - PCBC website
 - NAHJ
 - NABJ
 - PRNDI
 - Current

- Exhibit 11 - Bookkeeper & Administrative Coordinator (3/26/2018)
 - PCBC website
 - New Pittsburgh Courier
 - Indeed
 - Nonprofit Talent

- Exhibit 12 - Director, Human Resources (3/20/2018)
 - PCBC website
 - Nextpittsburgh.com
 - New Pittsburgh Courier
 - Current
 - Indeed
 - Nonprofit Talent

- Exhibit 13 - Member Services Manager (3/5/2018)
 - PCBC website
 - Public Radio Association of Development Officers (PRADO)
 - Greater Public
 - Nonprofit Talent
 - Association of Fundraising Professionals

- Exhibit 14 - Individual Giving Manager (3/5/2018)
 - PCBC website
 - PRADO
 - Greater Public
 - Association of Fundraising Professionals
 - Nonprofit Talent
 - CPB

- Exhibit 15 - Special Events Manager (3/1/2018)
 - PCBC website
 - Nonprofit Talent
 - CPB

- Exhibit 16 - Arts & Culture Reporter (2/5/2018)
 - PCBC website
 - PRNDI
 - NAHJ
 - NABJ

- Exhibit 17 - Director, Finance & Administration (1/16/2018)
 - Current
 - PCBC website
 - Indeed
 - New Pittsburgh Courier
 - Nonprofit Talent
 - NextPittsburgh.com

- Exhibit 18 - Morning Edition Producer (1/2/2018)
 - NABJ
 - NAHJ
 - PCBC website
 - PRNDI
 - CPB

- Exhibit 19 - Energy Reporter (11/27/2017)
 - PCBC website
 - CPB
 - NABJ
 - NAHJ

- Exhibit 20 - Science, Health and Tech Reporter (11/2/2017)
 - PCBC website
 - NAHJ
 - NABJ
 - Current
 - CPB

- Exhibit 21 - Government & Law Reporter (8/28/2017)
 - PCBC website
 - NAHJ
 - NABJ
 - CPB

- Exhibit 22 - General Assignment Reporter (8/1/2017)
 - PCBC website
 - pacareerlink.pa.gov
 - PRNDI
 - CPB

- Exhibit 23 - Individual Giving Manager (7/19/2017)
 - PRADO
 - Greater Public
 - NextPittsburgh.com
 - PCBC website
 - Current
 - CPB

(c) In accordance with Section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

- Total number of persons interviewed for Underwriting Account Executive (3/11/2019) - 1
- Sources referring persons interviewed:
 - Word-of-mouth – 1

- Total number of persons interviewed for Development Services Coordinator (12/10/2018)- 6
- Sources referring persons interviewed:
 - Nonprofit Talent - 4
 - CPB – 1
 - Word-of-mouth – 1

- Total number of persons interviewed for Digital Producer – Government (10/31/2018) - 5
- Sources referring persons interviewed:
 - Word-of-mouth – 3
 - Think Public – 1
 - PCBC website – 1

- Total number of persons interviewed for Operations & Engineering Technician (9/5/2018) - 1
- Sources referring persons interviewed:
 - Word-of-mouth – 1

- Total number of persons interviewed for Underwriting Account Executive (8/27/2018) - 3
- Sources referring persons interviewed:
 - PCBC website – 1
 - LinkedIn – 1
 - Word-of-mouth – 1

- Total number of persons interviewed for IT Manager (8/20/2018)- 5
- Sources referring persons interviewed:
 - PCBC website – 1
 - LinkedIn – 1
 - Word-of-mouth – 2
 - Indeed - 1

- Total number of persons interviewed for Government Producer/Reporter (4/23/2018)- 5
- Sources referring persons interviewed:
 - Current - 2
 - CPB – 1
 - Word-of-mouth – 2

- Total number of persons interviewed for Government Editor (3/26/2018)- 5
- Sources referring persons interviewed:
 - Unknown – 2
 - Word-of-mouth – 3

- Total number of persons interviewed for Bookkeeper & Administrative Coordinator (3/26/2018)– 5
- Sources referring persons interviewed:
 - PCBC website – 2
 - Nonprofit Talent – 2
 - Indeed – 1

- Total number of persons interviewed for Director, Human Resources (3/20/2018) - 6
- Sources referring persons interviewed:
 - Indeed – 3
 - Word-of-mouth – 2
 - PHRA - 1

- Total number of persons interviewed for Member Services Manager (3/5/2018) - 6
- Sources referring persons interviewed:
 - PCBC website – 2
 - Nonprofit Talent – 4

- Total number of persons interviewed for Individual Giving Manager (3/5/2018) - 4
- Sources referring persons interviewed:
 - Nonprofit Talent – 3
 - Word-of-mouth – 1

- Total number of persons interviewed for Special Events Manager (3/1/2018) - 9
- Sources referring persons interviewed:
 - PCBC website – 3
 - Nonprofit Talent – 3
 - Word-of-mouth – 3

- Total number of persons interviewed for Arts & Culture Reporter (2/5/2018) - 6
- Sources referring persons interviewed:
 - Internal – 2
 - Word-of-mouth – 1
 - Facebook – 1
 - Unknown - 2

- Total number of persons interviewed for Director, Finance & Administration (1/16/2018) - 8
- Sources referring persons interviewed:
 - Nonprofit Talent – 4
 - Indeed – 4

- Total number of persons interviewed for Morning Edition Producer (1/2/2018) - 4
- Sources referring persons interviewed:
 - PCBC website – 1
 - Word-of-mouth – 2
 - CPB – 1

- Total number of persons interviewed for Energy Reporter (11/27/2017) - 2
- Sources referring persons interviewed:
 - Word-of-mouth – 2

- Total number of persons interviewed for Science, Health and Tech Reporter (11/2/2017) - 5
- Sources referring persons interviewed:
 - CPB – 1
 - Internal – 2
 - Word-of-mouth – 1
 - Facebook – 1
 - Unknown - 1

- Total number of persons interviewed for Government & Law Reporter (8/28/2017) - 2
- Sources referring persons interviewed:
 - CPB – 1
 - PCBC website – 1

- Total number of persons interviewed for General Assignment Reporter (8/1/2017) - 7
- Sources referring persons interviewed:
 - Internal – 3
 - PCBC website – 1
 - Unknown – 1
 - Facebook – 1
 - NYC Public Radio Google Group - 1

- Total number of persons interviewed for Individual Giving Manager (7/19/2017) - 7
- Sources referring persons interviewed:
 - Greater Public – 1
 - Indeed – 3
 - AFP – 1
 - PRADO – 1
 - Nonprofit Talent – 1

(d) Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing

documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

Total full-time employees: 57

During the two years under review, the stations were involved in the following initiatives:

Established an internship program designed to assist members of the community to acquire skills needed for broadcast employment.

During the period of March 31, 2018 – March 28, 2019, there were 9 interns from the following universities participating in the internship program with the Unit: American University, Carnegie Mellon University, Northwestern University, Point Park University, and University of Pittsburgh. The Director of HR oversees the program. The program is open to students currently enrolled in secondary education. WESA offers two types of internships; one as a newsroom intern which teaches students to produce broadcast and digital journalism, and another as a production intern which teaches students broadcast production of a live daily show. WYEP offers students a music internship which teaches them programming and preparing music for broadcast. The lengths of the internships follow the school semesters. Supporting documentation is provided in Exhibit 24.

Established training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions.

PCBC provides opportunities for employee development through attendance at national conferences designed to enable station personnel to acquire skills that could qualify them for higher level positions. In 2019, PCBC sent several members of the staff to the following training programs: Education Writers Association Training, Poynter Institute Reporters & Editors in MultiPlatform Newsrooms, PRNDI Editor Training, PRNDI Conference, and Public Media Women in Leadership Advance Program. Supporting documentation is provided in Exhibit 25.

Participated in at least 4 events or programs sponsored by educational institutions relating to career opportunities in broadcasting

On September 6, 2018, the Unit's Newsroom Director attended Carnegie Mellon University's Pittsburgh Summer Internship Program Breakfast. On February 21, 2019, the Director of HR attended the Chatham University Internship and Job Mixer. On November 12, 2018, the Newsroom Director participated on a panel at Carnegie Mellon University titled *Pathways Career Exploration* that exposes students to different job possibilities. On February 4, 2019, the Director of HR attended the Jumpstart 2019 Career Fair at Carnegie Mellon University. On February 7, 2019, the Director of HR attended the Spring Internship and Job Fair at Point Park University. Supporting documentation is provided in Exhibit 26.

Provided training to management level personnel on methods of ensuring equal employment opportunity and prevent discrimination.

In September of 2018, the Unit fulfilled the CPB required Harassment Prevention Training Program. Training was provided individually to all members of the staff through Navex online portal. Supporting documentation is provided in Exhibit 27.

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody 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. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the names of the complainant and other persons involved; (3) the date the complaint was filed; (4) the court or agency before which it is pending or by which it was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

No complaints have been filed against the station during their current license term. No such complaints are pending.

(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.

PCBC's EEO statement is printed on all job postings, posted on the employment page of PCBC's website, independent of job postings and is a part of the employee manual. All employees sign a policy manual acknowledgement stating that they have read and understood all policies of PCBC. The EEO policies are reviewed annually by the Vice President, Human Resources & Organizational Development and the CEO.

PCBC provides ongoing training to management level personnel, with hiring authority, on methods of ensuring equal employment opportunity to prevent discrimination in the workplace. The group reviews all procedures and documentation and recommendations on improving the licensee's EEO compliance are not only welcomed but encouraged.

Upon notification of an opening from the General Manager, PCBC's Vice President, Human Resources will create a Candidate Opening File. The recruitment sources are then notified and announcements are placed. Interviews are then set from the available applicants with the appropriate manager. A selection is then made. Documentation is then retained by PCBC's Vice President, Human Resources.

PCBC's Personnel Policy Manual also includes a statement describing EEO and Non-Discrimination Policies. In addition, PCBC has posters and statements of employee rights and non-discrimination policies.

(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.

The CEO is aware of all recruitment efforts that occur for openings in the Unit. The CEO then reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives. Under the supervision of the CEO, the Vice President, Human Resources also reviews the effectiveness of the program during her preparation of the Annual EEO Public File Reports for the stations.

PCBC evaluates the effectiveness of the organization's efforts by several means. EEO goals and objectives incorporated as appropriate in employees' annual performance reviews are evaluated in connection with salary adjustments. Effectiveness of measures to assure the diversity of PCBC's workforce are reviewed in connection with preparation of annual reports required by the Corporation for Public Broadcasting. Responses received from each recruitment sources are evaluated for diversity through follow-up contact with each potential candidate.

(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 Unit'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 Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

Compensation is reviewed annually during the budgeting process to ensure that staff are paid appropriately according to the job performed without regard to race, color, religion, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age, or veteran status. Each year, compensation is benchmarked against other radio stations in public media of similar market size and cost of living. Promotions within PCBC are posted internally as well as through external recruitment channels.

Senior management at PCBC meets each year at budget time to analyze pay levels for each position within each department. During that time, senior management evaluates compensation and benefits to ensure all employees regardless of race, color, religion, national origin or sex have equal opportunities for and access to any pay increase, promotions or job openings internally. Each year PCBC compares employment statistics of the radio industry with the Unit to check for competitiveness in the market.

There are no union contracts or union employees within the Unit.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

The licensee is not a religious broadcaster.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,

Pittsburgh Community Broadcasting



Terence J. O'Reilly
President and Chief Executive Officer

GSB:10207297.4