## CAP III Media, Inc. 220 Market Avenue S., Suite GL—77 Huntington Bank Plaza Bldg. Canton, Ohio 44702

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October 6, 2022

EEO Staff, Enforcement Bureau Federal Communications Commission 45 L Street, NE Washington, D.C. 20554

Re: WINW(AM), Facility ID No. 8549

Canton, Ohio

EEO Audit Response

Dear Sir or Madam:

CAP III Media, LLC ("CAP III"), licensee of Station WINW(AM), Facility ID Number 8549, Canton, Ohio hereby submits this letter in response to the letter dated August 19, 2022, from the Assistant Chief, Investigations and Hearings Division, Enforcement Bureau, in which it is stated that WINW's employment unit has been selected for a random audit of its Equal Employment Opportunity ("EEO") program.

CAP III hereby reports that the WINW employment unit has fewer than five full-time employees, and the same has been true throughout the current license term. Accordingly, CAP III is not required to have an EEO program for this employment unit. Moreover, at the current time, WINW is silent and has no full-time employees.

Neither WINW, nor CAP III has had any pending or resolved discrimination complaints filed in any federal, state or local forum against it during the current license term.

Should any questions arise concerning this matter, please communicate with the undersigned.

Very truly yours,

CAP III MEDIA, INC.

By: /s/ Curtis A. Perry, III
Curtis A. Perry, III, President