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November 4, 2022

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

Attn: Ms. Elizabeth E. Goldin

**RE: NBC Telemundo License LLC
KNBC, Los Angeles, CA (Facility ID No. 47906)
KVEA, Corona, CA (Facility ID No. 19783)
Response to FCC EEO Random Audit Letter**

Dear Ms. Goldin:

NBC Telemundo License LLC, licensee of stations KNBC, Los Angeles, California, and KVEA, Corona, California (the “Stations”), hereby respond to the above-referenced EEO audit letter (the “Audit Request”), which was issued on August 19, 2022. The Stations, which are owned and operated affiliates of the NBC and Telemundo television networks, are the only stations comprising the employment unit (the “Unit”). The Audit Request directs the licensee to provide information pertaining to the Unit’s compliance with the Commission’s EEO rules during the time period covered by the Unit’s two most recent EEO annual public file reports. The Unit’s responses to the specific directives in the Audit Request are set forth below.¹

- a) Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6). For each station in the Unit that maintains a website, provide the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why**

¹ This response is timely submitted pursuant to an extension of time to and including November 7, 2022, granted by the Enforcement Bureau.

the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit's most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).

The Unit is required to file its EEO public file report annually on August 1. Enclosed are copies of the reports for 2021 and 2022.² Collectively, these reports address employment activities of the Unit between August 1, 2020 through July 31, 2022 (the "Reporting Period"). See Exhibit 1 (August 1, 2020 – July 31, 2021); Exhibit 2 (August 1, 2021 – July 31, 2022).

NBCUniversal policy requires its owned and operated stations to comply with all Commission requirements, including the posting of required material on station websites and in online public inspection files. The Unit's EEO public file reports are available in both stations' online public inspection files maintained on the Commission's website. See <https://publicfiles.fcc.gov/tv-profile/knbc/equal-employment-opportunity-records/additional-documents/eoo-public-file-reports/32e93356-5fcc-32c8-c6f4-ed3dc6319201> and <https://publicfiles.fcc.gov/tv-profile/kvea/equal-employment-opportunity-records/additional-documents/eoo-public-file-reports/0c8cf907-6618-b0ad-2c8c-f9f87a64b663>. In lieu of posting EEO public file reports on station websites, both websites include a hyperlink that takes visitors directly to the EEO public file reports uploaded to both of the stations' online public inspection files. See <https://www.nbclosangeles.com/knbc-employment-information/> and <https://www.telemundo52.com/kvea-informacion-de-empleos/>.

- b) For each of the Unit's full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Station (if during that period), provide the date of hire as required by section 73.2080(c)(5)(vi) as well as 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 the burden of responding to this audit, if you have sent a job notice to multiple sources, you may include in your response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). 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 the Unit's job openings, as described in section 73.2080(c)(1)(ii).**

The Unit, which is part of the NBCUniversal Local ("NBCU Local") division of NBCUniversal, is committed to equal opportunity in employment, including broad outreach when full-time job vacancies occur. Pursuant to internal corporate policies, as informed by the

² Both of the Unit's EEO reports were updated in October 2022.

Commission's rules, all NBCU Local employment units are required to list vacancies subject to the rules on the NBC-specific employment website <http://www.nbcunicareers.com> (the "Career Site"). The Career Site, which is available to any interested party without a password and which offers a convenient search feature, identifies full-time opportunities within NBCU Local and other NBCUniversal divisions. All NBCU Local station websites include a hyperlink to the Career Site.

The Unit had 47 vacancies for full-time positions during the Reporting Period. The dates of hire for each vacancy are documented in the enclosed copies of the EEO public file reports. See Exhibits 1 and 2. Notices for each vacancy were posted on the Career Site. Copies of each job announcement as submitted to the Career Site is attached as Exhibit 3.

- c) As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.**

See Exhibits 1 and 2, which documents the total number of interviewees and the referral source for each interviewee for all full-time vacancies filled during the Reporting Period.

- d) Dated documentation of the Unit's recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit's total number of full-time employees and state whether the population of the market in which any of the Unit's stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission's rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth and sixth anniversaries of that date). If the Unit performed more than the required number of initiative activities, it may provide documentation for only the required amount in its response, i.e., two or four points worth. If any documentation that you provide appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask you for additional verification.**

The Unit is committed to diversity and equal employment opportunity and recognizes that employing people with broad experiences enriches our organization and brings significant value to the workplace. To reach these goals, the Unit conducts broad and extensive recruitment outreach and works to attract qualified candidates from diverse backgrounds. During the Reporting Period, the Unit—in a market with a population greater than 250,000—

employed about 250 full-time employees. Accordingly, the Unit has undertaken at least four recruitment initiatives during the Reporting Period as detailed below:

Co-sponsoring a Job Fair: Pursuant to Section 73.2080(c)(2)(iii), the NBC News and NBC Owned Televisions Stations group (rebranded as “NBCU Local”) participated as a co-sponsor of at least one job fair to tap into top talent and inform prospects of various opportunities within the Unit and other NBCU Local stations. Personnel representing the NBCU Local group participated, as a platinum-level sponsor, in the Investigative Reporters & Editors Conference from September 21-25, 2020. Documentation concerning the Unit’s participation is attached as Exhibit 4.

Internship Program: Pursuant to Section 73.2080(c)(2)(v), the Unit hosts a paid internship program designed to assist members of the community to acquire skills needed for employment in the broadcast industry. The goal of the Unit’s internship program is to connect with college students across the country and recruit talented and diverse candidates. The program provides opportunities for a positive learning experience where students can bridge the gap between classroom learning and the real world of the broadcast industry. The Unit’s internship program is offered each year in three cycles (Spring, Summer and Fall) and hosts around 10-14 interns per cycle. Internship opportunities are available with different departments in the Unit including the Investigative, Political, and News and Sports teams. Documentation concerning the internship program is attached as Exhibit 5.

Scholarship Program: Pursuant to Section 73.2080(c)(2)(vii), the Unit participates in the NBC4 Vikki Vargas Broadcast Journalism Scholarship. The scholarship was established nearly 30 years ago by the Unit’s then General Manager Vikki Vargas in collaboration with California State University, Fullerton. It aims to diversify the media industry by attracting Hispanic journalists to the field. The scholarship is an endowment managed by the University and is issued annually based on what the endowment is earning in any particular year (it ranges from \$900-\$1,100 per year). The University’s scholarship selection committee in the Department of Communications selects a recipient each year. Documentation concerning this scholarship is attached as Exhibit 6.

EEO Training: Pursuant to Section 73.2080(c)(2)(xiv), the Unit’s parent company, NBCUniversal, provides its employees with mandatory trainings on anti-discrimination and methods to ensure equal employment opportunities. *Respect in the Workplace* is a mandatory course offered annually that outlines the company’s policies regarding the prevention of harassment and discrimination in the workplace. All station employees, including management, are required to complete this course. In 2021, NBCUniversal added an additional mandatory training, *Diversity, Equity & Inclusion*, which focuses on NBCUniversal’s commitment to diversity and inclusion and its expectations of all employees. Documentation concerning offerings of these trainings is attached hereto as Exhibit 7.

- 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 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 you must report all complaints, regardless of their status or disposition.**

During the preceding license term³, the Unit was the subject of the following pending or resolved discrimination complaint:

- Mark James v. NBCUniversal (KNBC): Complaint of wrongful termination on the basis of age, age discrimination, and retaliation filed with the California Department of Fair Employment and Housing (DFEH) on February 26, 2021 (DFEH Matter No. 202102-12742027). Immediate Right to Sue notice requested and issued the same date/complaint closed with the DFEH. Status: Case settled in private mediation on August 31, 2021.
- f) In accordance with section 73.2080(b), from the first day of the Station's current license term (or the date the licensee acquired the Station, 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.**

The Unit's Human Resources Director is responsible for ensuring proper communication and analysis of the Unit's EEO efforts. The Human Resources Director communicates the program and reviews progress with the department heads and General Manager for the Unit. All job postings contain the Equal Opportunity Employer statement. All employees are required to take harassment and discrimination prevention training upon employment.

The Human Resources Director also oversees equal opportunity and Diversity and Inclusion initiatives locally for employees in addition to parent company initiatives. To ensure effective implementation of Diversity and Inclusion initiatives, the Human Resources Director

³ The preceding license term covers the period since both stations' grant of their last renewal applications on December 31, 2018. See BRC DT-20140801AJG for KNBC and BRC DT-20140801AJD for KVEA.

has the authority, resources, and support of and access to the Unit's senior operational executives.

The responsibility to assure that other managers are aware of all aspects of the implementation of Diversity and Inclusion initiatives is assigned to the Human Resources Director. The Unit's Human Resource Director recognizes their responsibility and accountability for EEO performance results, compliance with the company's Fair Employment Practices Policy and the requirements of Diversity and Inclusion initiatives. Responsibility for the implementation of the policies and practices relating to the compensation, recruitment, screening, upgrading, layoff and rehiring of employees is also assigned to the Human Resources Director in coordination with the legal department.

The Human Resources Director is responsible for integrating the efforts of officers, other managers, and staff to achieve the following activities and processes:

1. Conduct or participate in in-depth analyses of the total employment process to determine whether and where impediments to equal employment opportunity exist.
2. Implement and audit a quarterly reporting system, including the annual internal review process, to evaluate the ongoing effectiveness of Diversity and Inclusion initiatives:
 - a. Monitor records of applicants, placements, transfers, promotions, and separations at all levels to ensure conformance with non-discrimination policy.
 - b. Facilitate a review of results by management.
 - c. Advise management of program effectiveness and submit recommendations for improvement, when warranted.
3. Ensure that operating units make every good faith effort to understand and to achieve Diversity and Inclusion goals and objectives.
4. Advise and encourage employees to participate in company-sponsored educational, training, recreational and social activities, or related programs.
5. Assure that counseling is made available to all employees. As appropriate, encourage employees to take part in company training activities and external educational programs. Encourage the use of the company's Tuition Reimbursement Program.
6. Work with Human Resource representatives and hiring managers to assure that minorities and women are given equal opportunities for promotional consideration and career advancement.

The Human Resources Director also has the following specific responsibilities:

1. Help management solve EEO problems as they may occur.
2. Serve as liaison between the business unit and enforcement agencies.

3. Keep management continuously informed of latest developments in the equal employment area.
4. Ensure by means of continuing efforts that:
 - a. Satisfactory progress is being made toward Diversity, Equity and Inclusion goals and objectives.
 - b. The technical requirements of federal EEO notices are complied with through the proper display of federal posters.
 - c. All other technical phases of compliance are adhered to.
5. Ensure management involvement with local minority organizations and community action groups as appropriate.

In addition, the Human Resources Director meets formally with Unit management to review human resource matters. These matters include problem areas like compensation, and hiring, promotion and separation practices.

- 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 acquired the Station, 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.**

As noted above, the Unit reviews its EEO practices periodically. The Unit reviews the source data to ensure utilization of a variety of mechanisms to reach a significant number of diverse potential candidates. All candidates are given consideration regardless of the source. In addition, the Unit will send notifications of vacancies to community organizations, including, but not limited to, those who may submit completed Community Organization Request Forms. These forms are located on KNBC and KVEA's websites.

- h) As required by section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee acquired the Station, 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.**

In-depth analyses of the total employment process are performed periodically to determine whether and where impediments to equal employment opportunity exist. These analyses include an evaluation of the following:

- a) The work force by organizational unit and job group is analyzed to determine whether there are any problems of minority or female utilization or of minority or female distribution. Organizational units where minorities and/or females are underrepresented or concentrated, if any, are reported, and goals are established for each job group in which the rates of minority and/or female employment are less than would reasonably be expected. Appropriate action-oriented programs are identified and established to work toward goal attainment.
- b) Personnel activity, including applicant flow, hires, terminations, and promotions, is analyzed to determine whether there are gender, race, or ethnicity-based disparities and whether selection practices for hiring, promotions and terminations had a disparate impact on women or minorities.
- c) Selection, recruitment, referral, and other personnel procedures are reviewed to determine whether they result in disparities in the employment or advancement of minorities or women. The selection process is analyzed to ensure that there are no barriers to equal employment. The Human Resources staff is constantly on watch for possible non-supportive attitudes on the part of hiring managers. Examination of applicant flow data is conducted for each open position. Human Resources representatives monitor hiring, promotion, and other placement decisions to assure that the selections have been based on job-related criteria and also that no barriers to placement of minorities and females exist. Transfer and promotion practices are continuously monitored to identify any barriers to movement for minority and female employees.

i) Religious Broadcasting

These questions are not applicable to the Unit.

j) Items Not Requested

This question is not applicable.

k) Time Brokerage

These questions are not applicable to the Unit.

Please contact the undersigned if you have any questions regarding the foregoing or need additional information.

Respectfully submitted,

NBC Telemundo License LLC

By: /s/

Angela Y. Ball
Assistant Secretary

DECLARATION OF ANGELA Y. BALL

I hereby declare, under penalty of perjury, that, to the best of my knowledge, information and belief, the foregoing is accurate and complete. Executed November 4, 2022.

/s/

Angela Ball
Assistant Secretary
NBC Telemundo License LLC