

New Age Media

March 22, 2012

WGFL-CBS
WMYG-MyTV
Gainesville, FL

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington D.C. 20554

WTLH-FOX
Tallahassee, FL

Re: Equal Employment Opportunity ("EEO") Program WDSI-TV Chattanooga, TN

To Whom It May Concern:

In response to your letter dated February 16, 2012, please find enclosed a response to the request for information as it relates to the EQO program for WDSI-TV Chattanooga, TN 71353.

Please contact me at (570) 970-5629 if you have any questions.

Sincerely,



Susan Troy-Connors
Chief Financial Officer
New Age Media

WDSI-FOX
WCMY-MyTV
Chattanooga, TN

WOLF-FOX
WQMY-MyTV
Wilkes-Barre, PA

WPXT-CW
Portland, ME

Enclosures

March 8, 2012

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554.

Re: Audit response for WDSI-TV (Chattanooga, TN) facility 71353

To Whom It May Concern:

New Age Media of Tennessee License, LLC ("Licensee"), licensee of WDSI-TV, received notice on or about February 17, 2012 that it had been randomly selected for an audit of its EEO program. In accordance with such notice, Licensee submits this response and the enclosed data. For ease of reference, the numbering herein refers to the numbering of the audit letter.

3. Audit Data Requested. If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation for any information that you are unable to provide:

(a) The employment unit's two most recent EEO public file reports, described in 47 C.F.R. § 73.2080(c)(6). For any stations in the Unit that have websites, state the web addresses. If the Unit's most recent public file report is not included or linked to on any of these websites, in violation of 47 C.F.R. § 73.2080(c)(6), provide an explanation for why it is not there. In accordance with Section 73.20090(c)(5)(VI), provide the date of each full-time hire listed in each report provided.

ANSWER:

- Station WDSI's website is www.myfoxchattanooga.com, which links to latest EEO public file report.
- See Exhibit 3(a) for dates of hire for each position filled.

(b) For each 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 § 73.2080(c)(5)(iii). Include copies of job announcements sent to any organizations (identified separately from other sources) that

have notified the Unit that they want to be notified of Unit job openings, as described in § 73.2080(c)(1)(ii).

ANSWER: Since April 1, 2009, Station has filled ten (10) positions. The positions were advertised in the following manners and on the following dates as listed on Exhibit 3(b).

(c) In accordance with § 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.

ANSWER: Forty-six people were interviewed for the open positions during periods covered by the above EEO reports. . See Exhibit 3 (c) for number of interviewees and referral sources for each position.

(d) Documentation demonstrating performance of recruitment initiatives described under § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, training for staff, etc. Specify the Unit personnel involved in the recruitment initiatives. Also, provide the total number of full-time employees of the Unit and whether the population of the market of the Unit is 250,000 or more. Based upon these two factors, as explained in 47 C.F.R. §§ 73.2080(c)(2) and (e)(3), determine and state whether the Unit is required to perform two or four initiatives within a two-year period.

ANSWER:

For the period covering April 1 2009 through March 31 2010 the stations participated in the following initiatives as outlined in Exhibit 3(d)(1)

Total number of full-time employees of the Unit for this period: Thirty -Three (33)

For the period covering April 1 2010 through March 31 2011 the stations participated in the following initiatives as outlined in Exhibit 3(d)(2)

Total number of full-time employees of the Unit for this period: Thirty -Seven (37)

Population of the market is more than 250,000 and thus Unit is required to perform four initiatives within a two-year period.

(e) Disclose any pending or resolved complaints 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; (2) the complainant and other persons involved; (3) the date of its filing; (4) the court or agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. All complaints must be reported, regardless of their status or disposition.

ANSWER: NONE

(f) In accordance with § 73.2080(b), from March 10, 2003 (or from the first day of the Station's current license term if after that date), until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

ANSWER: Each Department Manager is responsible for notifying the Business Manager that there is a job opening, maintain records of job applicants and referral sources for interviewees and forward all records to the business manager for record keeping. The hiring manager is also responsible for working with the Business Manager to create a job posting. The Business Manager is responsible for advertising job openings with as many recruitment sources as appropriate for the specific position and keeping documentation detailing these efforts. This advertising effort may at times include having on air announcements produced and entering appropriate airtime orders to ensure the announcement will be broadcasted. The Business Manager is also responsible for completing the annual EEO Public Report and having it posted on the station's website with a hard copy put in the station's public file. The Business Manager reviews each job announcement to insure the following language is contained in each post WDSI/New Age Media is an EEO Employer and a drug free workplace. The Business Manager is responsible for obtaining a signed copy of employee hand-book. The employee hand-book contains information regarding the entities EEO policies and programs.

(g) In accordance with § 73.2080(c)(3), from March 10, 2003 (or from the first day of the Station's current license term 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 address any problems found as a result of such analysis.

ANSWER: The Business Manager conducted a training session during a Department Head Meeting to educate and remind the managers on EEO topics, including recruitment. We periodically review and update the list of agencies that we provide recruitment information to. The unit sent the Business Manager to the MFM Industry Conference in May 2010 where EEO sessions were attended. Licensee periodically reviews and updates EEO policies

(h) In accordance with § 73.2080(c)(4), from March 10, 2003 (or from the first day of the Station's current license term if after that date), until the date of this letter, describe the Unit's efforts to analyze periodically 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, and 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.

ANSWER: Licensee is continually reviewing and implementing its procedures with respect to analyzing pay, benefits, promotions and other selection techniques in order to avoid any discriminatory effects. Since Licensee's acquisition of Station on April 1, 2007, Licensee has hired an independent third party benefits coordinator to review current policies and to provide suggestions and recommendations, if needed. Licensee also subscribes to certain market reports, including BCFM reports. For the past eighteen months Licensee has interviewed each hiring manager to identify the essential responsibilities of every station position. Licensee has provided performance management training to all hiring managers. Licensee is using new job descriptions and related industry research to develop salary ranges for all current and new positions. All full time station employees are offered an equal health and welfare benefit package.

(i) If you are a religious broadcaster and any of your full-time employees are subject to a religious qualification as described in § 73.2080(a) of our rules, please indicate this in your response to this letter and provide data as applicable to your EEO program. For example, for full-time hires subject to a religious qualification, the Licensee needs to keep 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. No other records would be required for those hires. If five or more full-time positions are not subject to a

religious qualification, the Licensee must keep all records for such hires and complete the initiatives required under § 73.2080(c)(2). Otherwise, a religious broadcaster would not be required to perform these initiatives.

ANSWER: Not applicable.

4. Time Brokerage.

(a) **Brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter to provide us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and answer to question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement.

ANSWER: Station is not a party to a Time Brokerage Agreement.

(b) **Brokers.** If you are the broker of any Unit station referenced above, you are required to supply the Commission with the information requested herein regarding *your* full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. *See* 47 C.F.R. § 73.2080(f)(3). If your employees at your own station(s), combined with your employees at the station(s) you are brokering, total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), **and a response to question 3(e).**

ANSWER: Not applicable.