



April 1, 2019

Via Upload to WVVA Online Public File

Mr. Lewis Pulley
Assistant Chief, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Mr. Pulley:

This letter, together with attached Exhibits 1 through 27, serves as the response by WVVA License, LLC (the "Licensee"), licensee of WVVA(TV), Bluefield, West Virginia ("WVVA" or the "Station"), Facility ID 74176, to the Media Bureau's February 14, 2019, request for audit data relating to the station employment unit's EEO program. WVVA is the only station in the Employment Unit (the "Employment Unit" or "Unit"). The Station operates in the Bluefield-Beckley-Oak Hill Nielsen Designated Market Area. The Licensee is a subsidiary of WVVA Television, Inc., which is itself a subsidiary of corporate parent Quincy Media, Inc. ("QMI" or the "corporate parent").

At all times during the period covered by this audit, the Employment Unit has used the commercially available Broadcast1Source software and tools to organize and track the data required by the Commission's EEO rule. The responses to the relevant audit data requests are set forth below, and the required documentation is provided in the attached exhibits.

***Audit Data Request 3(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).*

Response: The Employment Unit's EEO Public File Reports covering June 1, 2016-May 31, 2017 and June 1, 2017-May 31, 2018 are attached as Exhibits 1 and 2, respectively. With

respect to any inconsistencies between the information provided in the Employment Unit’s EEO Public File Reports and the instant response, the information contained herein shall control and, to the best of the Licensee’s knowledge, is true and correct.

WVVA’s most recent EEO Public File Report is posted to the Station’s website at <https://wvva.com/>. The report is accessible to website visitors at the bottom of the WVVA.com homepage, as circled in red below:



The EEO Report link points directly to the Unit’s report in the FCC Online Public Inspection File. The direct link URL is: <https://publicfiles.fcc.gov/api/manager/download/cb3487fe-fdd9-a21a-6167-a38c389a599d/104ddc5c-417e-4721-818a-9cb8ed2cbe1c.pdf>

The following is a list of all positions filled by the Station during the period covered by this audit and the date on which that position was filled. The following list tracks the order the positions appear in the Station’s Public File Reports, and the corresponding exhibit number we have assigned to them for this response is included for convenience.

POSITION FILLED	DATE OF HIRE	RESPONSE EXHIBIT NO.
Multimedia Journalist	6/6/2016	3
Multimedia Journalist/Greenbrier Bureau	6/6/2016	4
Promotion Assistant	6/21/2016	5
Morning Anchor/Multimedia Journalist	10/3/2016	6
Chief Meteorologist	8/1/2016	7
Weekend Meteorologist/Multimedia Journalist	9/20/2016	8
Master Control Operator	1/30/2017	9
Multimedia Journalist	2/6/2017	10
Content Manager	3/6/2017	11
Promotion Manager	4/3/2017	12
Promotion Assistant	4/3/2017	13
Multimedia Journalist	6/5/2017	14
News Anchor	11/6/2017	15

POSITION FILLED	DATE OF HIRE	RESPONSE EXHIBIT NO.
Meteorologist/Multimedia Journalist	8/7/2017	16
Morning Anchor/Multimedia Journalist	1/15/2018	17
Content Manager	10/30/2017	18
News Director	12/4/2017	19
Producer	2/1/2018	20
Multimedia Journalist (2 positions)	2/14/2018 3/12/2018	21
Meteorologist/Multimedia Journalist	3/21/2018	22
Multimedia Journalist/Greenbrier County	4/9/2018	23
Multimedia Journalist	4/9/2018	24
Multimedia Journalist	5/31/2018	25

Audit Data Request 3(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).*

Response: WVVA filled 24 full-time vacancies during the applicable period. For each job opening filled, the Station has attached (as Exhibits 3 through 25) copies of records demonstrating that notifications announcing job openings were sent to recruitment sources used by the Station. For each of the job openings listed in response to Audit Data Request 3(a), the attached documentation begins with a report produced by Broadcast1Source¹ showing job

¹ Several years ago, the Station transitioned its system of tracking and managing the documentation of EEO compliance to a software platform developed by Broadcast1Source. This transition was made company-wide by the Station's corporate parent, in an effort to enhance the ability of each of QMI's station employment units to ensure compliance with the Commission's EEO policies and regulations. Broadcast1Source (www.broadcast1source.com) is a well-known software platform that allows hiring managers to disseminate job postings to recruitment sources with one "click" and to automatically collect documentation of that notification. Most of the

notification details, including a detailed job description, the list of recruitment sources notified of the vacancy, and the date the notification was sent. The documentation also includes a report showing the date and time that email or fax notification (as opposed to mail or other non-automated means) of the job opening was sent to recruitment sources notified by fax or email. The exhibits attached illustrate that for the period covered by the audit, the Employment Unit had a regular practice of sending vacancy notifications to a wide variety of sources, which, in the aggregate, were reasonably calculated to reach the Station’s entire community.

WVVA does generally retain electronic copies of its manual postings, *i.e.*, those that are not automatically emailed or faxed by Broadcast1Source (for example, letters that are sent by mail or postings to industry websites). WVVA is advised that Broadcast1Source does not retain “copies” of automatic emails or faxes distributed to recruitment sources that may be printed, but the system instead produces reports (the reports included in the exhibits) that provide the date and time of emails or faxes to recruitment sources. Records of notification sent through Broadcast1Source and manual postings have been consistently maintained by the Unit for the relevant period.

The Employment Unit’s had 11 recruitment sources for the 2017-2018 reporting period and 10 recruitment sources for the 2016-2017 that requested full-time job vacancy notifications. A table of these recruitment sources appears below:

Recruitment Source	Reporting Period(s)
Huntington University	2016-2017 2017-2018
Illinois Institute of Art	2016-2017 2017-2018
Illinois Media School	2016-2017 2017-2018 ²
Mt. Ebenezer Baptist Church	2016-2017 2017-2018
Ohio/Illinois Center for Broadcasting	2016-2017 2017-2018
University of Advancing Technology	2016-2017 2017-2018
University of Colorado – Boulder	2017-2018 (requested notices as of February 27, 2018)
University of Oregon	2016-2017

documentation in Exhibits 3-25 was generated by the Station using the Broadcast1Source menu of tools and reports; some manual notifications and two on-air logs are also included.

² As indicated in the email and fax verification reports included in the exhibits, the Illinois Institute of Art terminated its request for vacancy notifications as of November 1, 2018, a date that falls outside the relevant period for this audit response. This recruitment source was notified of all job vacancies during the two-year period covered by this audit.

	2017-2018
VA Department of Rehabilitative Services	2016-2017 2017-2018
VA Employment Commission	2016-2017 2017-2018
WV Division of Rehabilitative Services	2016-2017 2017-2018

The fax and email summary report for each full-time position filled shows that these sources were notified of every full-time job vacancy during the relevant period. One (1) recruitment source that specifically requested job vacancy notifications received them by mail – Mt. Ebenezer Baptist Church. Copies of job notification letters to Mt. Ebenezer Baptist Church have been retained for all full-time vacancies filled during the applicable period and are included with Exhibits 3 through 25.

The Employment Unit did distribute two job vacancy notifications through on-air advertisements on WVVA during the 2016-2017 reporting period, Master Control Operator and Promotions Manager. WVVA retained copies of all log sheets and they are included in the relevant exhibits for the position (Exhibits 9 and 12).

The Promotion Manager and Promotion Assistant positions filled on April 3, 2018, benefit from further explanation. Vacancy notifications were initially sent on March 2, 2018, for the Promotion Manager position. After widespread recruitment to the Unit’s recruitment sources and candidate interviews, the Station’s current full-time Promotion Assistant was promoted to the Promotion Manager position. Vacancy notifications for the newly vacant Promotion Assistant position were then promptly and widely disseminated on March 28, 2018. All the resumes received and candidates interviewed for the Promotion Manager position were considered for the newly vacant Promotion Assistant position. A candidate from the pool considered for the Promotion Manager was hired for the Promotion Assistant position as his qualifications were more appropriate for the assistant than the manager role.

Please note that Exhibits 6 and 10 reflect recruitment notifications sent more than once. In these cases, the Licensee sought additional qualified candidates so refreshed the recruitment.

***Audit Data Request 3(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.*

Response: The total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the applicable period are as follows (again, these positions are listed in the order in which they appear in the Public File Reports):

POSITION FILLED	DATE OF HIRE	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Multimedia Journalist	6/6/2016	5	TV Jobs (3) Non-Employee Referral (1) WVVA-TV & WVVA.COM (1)
Multimedia Journalist/Greenbrier Bureau	6/6/2016	3	TV Jobs (1) Employee Referral (1) WVVA-TV & WVVA.com (1)
Promotion Assistant	6/21/2016	2	Virginia Tech (1) Employee Referral (1)
Morning Anchor/Multimedia Journalist	10/3/2016	3	TV Jobs (1) Agency Referral (1) WVVA Bulletin Board (1)
Chief Meteorologist	8/1/2016	1	Current Employee/Internal Promotion (1)
Weekend Meteorologist/Multimedia Journalist	9/20/2016	3	TV Jobs (3)
Master Control Operator	1/30/2017	6	Station On-Air Ad (5) Work4WV Career Center (1)
Multimedia Journalist	2/6/2017	1	WVVA-TV & WVVA.com (1)
Content Manager	3/6/2017	3	Employee Referral (1) WVVA-TV & WVVA.com (2)
Promotion Manager	4/3/2017	3	Current Employee/Internal Promotion (1) Employee Referral (1) WVVA-TV & WVVA.com (1)
Promotion Assistant ³	4/3/2017	1	Employee Referral (1)
Multimedia Journalist	6/5/2017	3	TV Jobs (2) WVVA-TV & WVVA.com (1)
News Anchor	11/6/2017	2	TV Jobs (2)
Meteorologist/Multimedia Journalist	8/7/2017	1	WVVA-TV & WVVA.com (1)
Morning Anchor/Multimedia Journalist	1/15/2018	1	Current Employee/Internal Promotion (1)
Content Manager	10/30/2017	1	Current Employee/Internal Promotion (1)
News Director	12/4/2017	2	Rick Gevers & Associates (1) Employee Referral (1)
Producer	2/1/2018	2	WVVA-TV & WVVA.com (1) Employee Referral (1)

³³ As discussed above, all interviewees considered for the Promotion Manager position (other than the Promotion Manager hiree) were also considered for the Promotion Assistant position.

POSITION FILLED	DATE OF HIRE	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Multimedia Journalist (2 positions)	2/14/2018 3/12/2018	7	Virginia Tech (2) WVVA-TV & WVVA.com (2) Agency Referral (1) West Virginia University School of Journalism (1) Employee Referral (1)
Meteorologist/Multimedia Journalist	3/21/2018	5	WVVA-TV & WVVA.com (2) Employee Referral (1) Agency Referral (1) Quincy Media (1)
Multimedia Journalist/Greenbrier County	4/9/2018	4	WV Broadcasters Association (1) WVVA-TV & WVVA.com (2) Ohio University Scripps College of Communications (1)
Multimedia Journalist	4/9/2018	2	Penn State University (1) Former Intern (1)
Multimedia Journalist ⁴	5/31/2018	11	WVVA-TV & WVVA.com (4) Handshake (2) Self Referral (1) WVU Career Center (4)

The Employment Unit has retained additional records related to the interviewees reflected in the table above and is able to provide documentation should it be needed.

Audit Data Request 3(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.

⁴ Another Multimedia Journalist vacancy was filled the next day on June 1, 2018, from this same pool of candidates. That vacancy is not reported in the 2017-2018 EEO Public File Report or in this response because it falls outside the relevant period covered by the 2017-2018 EEO Public File Report and this audit.

Response: The total number of full-time employees of the Employment Unit varies over time. The total number of full-time employees in the Employment Unit as of March 15, 2019, was approximately 42. WVVA’s Designated Market Area is Bluefield-Beckley-Oak Hill, which is located in the Beckley, WV Metropolitan Statistical Area, which has fewer than 250,000 people.⁵ Thus, the Employment Unit is required to perform two (2) initiatives in each applicable two-year period. As detailed in the EEO Public File Reports in Exhibits 1 and 2, WVVA met and exceeded the requirements of the FCC’s EEO rule in this regard for the two-year period ending May 31, 2018.

The Station has attached, as Exhibits 26 and 27, documentation demonstrating performance of the following recruitment initiatives during the period of time covered by this audit:

Participation in Events Sponsored by Educational Institutions (47 C.F.R. § 73.2080(c)(2)(x)) Exhibit 26	
<i>Activity</i>	<i>Personnel Involved</i>
Concord University Spring Career Fair, Athens, WV (March 8, 2018)	Ken White, News Director
Graham High School Career Fair, Bluefield, VA (October 19, 2017)	Audrey Sluss, HR Manager Robyne Ramsey, Sales Assistant
Graham High School Career Fair, Bluefield, VA (October 11, 2016)	Audrey Sluss, HR Manager Travis Roberts, Chief Meteorologist
New River Community and Technical College, Princeton Campus Career Fair (September 21, 2016)	Audrey Sluss, HR Manager

Internship Programs (47 C.F.R. § 73.2080(c)(2)(v)) Exhibit 27	
<i>Activity</i>	<i>Personnel Involved</i>
2017-2018 “Quinternship.” The Station hosted 8 interns in the News, Meteorology, Interactive, and Creative Services Departments	Ken White, News Director Travis Roberts, Chief Meteorologist Paul Hess, Internet Director Patrick Williams, Creative Services Director

⁵ To the extent the Station instead should be classified as located in the Bluefield, WV Micropolitan Statistical Area, it also has fewer than 250,000 people.

Internship Programs (47 C.F.R. § 73.2080(c)(2)(v)) Exhibit 27	
<i>Activity</i>	<i>Personnel Involved</i>
2016-2017 “Quinternship.” The Station hosted 7 interns in the News, Sports, Meteorology, and Interactive Departments	Steve Koriath, News Director Paul Hess, Internet Director Anthony Good, Sports Director Travis Roberts, Chief Meteorologist

The Employment Unit has also conducted additional outreach activities in the applicable period and is able to provide documentation should it be needed. These activities include additional educational institution activities, community group events, job fairs, and training to management.

***Audit Data Request 3(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.*

Response: There have been no such complaints during the applicable time period.

***Audit Data Request 3(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: Enforcement of EEO Policies. It is the Employment Unit’s policy to provide equal employment opportunities to all qualified individuals without regard to their race, color, religion, national origin, sex, age, sexual preference, marital status, handicap, or veteran status in all personnel actions, including recruitment, evaluation, selection, promotion, compensation, discipline, training, and termination. The Unit seeks to promote the realization of equal employment opportunity through a positive, continuing program designed to ensure the realization of each opportunity. To that end, all relevant human resource decision-makers are

responsible for, and engage in, fulfilling the Employment Unit's EEO policies as described in this response.

Management at the Station and parent company QMI have taken steps to provide an environment which promotes accountability at the Station for the Employment Unit's EEO policies on a continuing basis. First, when an individual becomes a hiring manager (whether through internal promotion or external hire), the Corporate HR Director provides a three-hour training session on myriad aspects of employment practices, including hiring, recruiting, performance reviews, non-discrimination, harassment, FMLA, FLSA, and other relevant practices. All WVVA personnel with responsibility for hiring, supervising, or evaluating employees have been duly trained to be able to identify relevant employment-related issues. In addition, a "Do's and Don't's" of interviewing practices is routinely distributed to Station staff involved in the hiring process, to ensure that hiring criteria focus on job qualifications and avoid potentially discriminatory practices. The Corporate HR Director has periodically and repeatedly recommended that relevant Station personnel attend and participate in state broadcaster association EEO seminars. Moreover, periodic, albeit less formal, training and continued implementation occurs when Station personnel discuss, either among themselves or with QMI or other co-owned station personnel, recruitment, outreach activities, and various personnel matters. For example, the General Manager and Department Heads use a portion of their meetings, when necessary, to reinforce EEO policies and EEO program issues, including issues related to the hiring process.

The Station has three levels of management to ensure enforcement of Employment Unit EEO policies: a Vice President/General Manager, Department Heads, and station EEO Coordinator. Each level of management has significant input into the hiring, training, disciplining, terminating, and daily supervision of Station employees, although the station EEO Coordinator level is generally more administrative in nature. It is the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training, and termination of employees to ensure adherence to the Employment Unit's policies and program. Above the station level, the corporate parent's executives and officers—with a particular emphasis on the Corporate HR Director—also serve to facilitate the successful maintenance of the Unit's EEO program.

The Station has used a hiring protocol that is designed to ensure the Unit widely disseminates vacancy notifications and maintains records consistent with the Commission's EEO rule. In fact, WVVA began using the widely-available Broadcast1Source platform and tools on October 1, 2009, in an effort to better manage and make more efficient the Station's EEO program. The Unit periodically discusses its use of and the efficacy of Broadcast1Source with the corporate parent executives in an effort to evaluate the extent to which the Broadcast1Source platform remains a useful compliance tool for the Station, in furtherance of the Commission's EEO rule.

When a position opens, the Department Head notifies the General Manager and station EEO Coordinator of the opening and discusses the job responsibilities, the qualifications required, and the recruiting sources to be used to fill the position. The Department Head is responsible for preparing a job opening notification that describes the responsibilities of the

position, job requirements, application deadline, and contact information. The Department Head submits the job description to the station EEO Coordinator for review and processing. The station EEO Coordinator is responsible for distributing the job opening announcement to appropriate referral sources via fax, email, mail, or Internet posting. The Unit uses Broadcast1Source as its principal vehicle for dissemination of vacancy notices. Because some recruitment sources require manual posting that cannot be automated through the use of the Broadcast1Source platform, the station EEO Coordinator not only uses Broadcast1Source to notify appropriate recruitment sources of the vacancy but also manually mails or posts the vacancy with any recruitment sources that require use of a manual posting process.

The Department Head is responsible for review of applications and resumes and is also responsible for evaluating the quality of the candidates. Once a pool of candidates is identified, the Department Head conducts an initial round of interviews. For some positions, when multiple qualified candidates who have become “finalists” for a position have been identified, the Unit makes use of a commercially available assessment tool offered by a firm called Profiles International to help the Station distinguish between and among the finalist candidates. In situations where the Unit uses the assessment tool, the Unit also consults with a third-party employment consultant from Goranson Consulting (located in Erie, Colorado) to ensure that the Stations’ use of the assessment tool is appropriate, normalized, and non-discriminatory.

For WVVA’s outreach initiatives, members of the Unit’s staff have established a number of relationships with various schools and colleges and other organizations within the community, to expand the Station’s outreach initiatives.

Unit’s Efforts to Inform Employees and Applicants of EEO Policies and Program. The Employment Unit maintains a handbook containing the Employment Unit’s EEO Policy, which states as follows:

Equal Employment Opportunity Policy

WVVA Television is an equal opportunity employer and conducts all practices relating to recruitment, hiring, promoting, discipline, and all of the terms and conditions of employment in a manner which does not discriminate on the basis of race, color, religion, sex, age, sexual orientation, national origin, disability, or any other legally protected status under federal, state or local law.

The Handbook also contains the following passage, which refers to the QMI corporate parent EEO Coordinator⁶:

⁶ The EEO Coordinator referred to in the QMI corporate policies is a different person than the *station* EEO Coordinator referred to elsewhere in this response. The corporate EEO Coordinator referred to in the policies is QMI’s Corporate HR Director, Jena Schulz. The station EEO Coordinator is an employee at WVVA.

EEO COORDINATOR

To insure the enforcement of the company's Equal Employment Opportunity Policy, the company has appointed the Director of Human Resources, Jena Schulz, as the EEO Coordinator. The EEO Coordinator will act as an omnibus person for employees who have equal employment problems and/or claims of harassment in the work place. If you believe that you are a victim of a form of discrimination or harassment, contact the EEO Coordinator at [NUMBER REDACTED]. The EEO Coordinator will review each contact and respond to the employee regarding such contact as soon as practical. You may also contact your top level manager if you wish to voice a complaint or problem. However, please avail yourself of the EEO Coordinator whenever you feel that you or another employee is the victim of discrimination or harassment.

In addition, QMI has put in place an anti-harassment policy that reads as follows:

Anti-Harassment Policy

The company wishes to maintain a high-quality working environment for all our employees and to prevent offensive situations. As such, WVVA Television will not tolerate any form of harassment or intimidation because of race, color, religion, national origin, sex, disability, sexual orientation, age or any other classification protected by law.

Specifically, any form of sexual harassment violates company policy. Employees must refrain from any and all conduct which could be interpreted as being harassing in nature, including, but not limited to: (1) unwelcome sexual advances, (2) requests for sexual acts or favors, and (3) other verbal or physical conduct of a harassing nature.

The company takes an equally broad view with respect to defining and prohibiting harassment for any other reason, including but not limited to, race, religion, age, disability, or national origin. In keeping with this policy, the company will not tolerate harassment for any reason by a manager, supervisor or employee of the company, client or vendor.

WVVA Television prides itself on presenting a professional image, both to the public and within the organization. For that reason, practical jokes, horseplay, pranks, or uses of foul or offensive language will subject participants to Corrective Action that may include immediate termination of employment.

All employees are expected to behave in a professional and mature fashion. Courtesy toward your co-workers is

expected. Displays of hostility or disruptions caused by workplace disagreements may be cause for Corrective Action.

If you feel you have been harassed in violation of this policy you should report such incidents directly to your supervisor. You may also report such incidents to Jena Schulz, EEO Coordinator, at [REDACTED]. There will be no reprisal against you for any such report.

The company will conduct a prompt investigation of any complaints or violations of this policy. Confidentiality cannot be promised, although each situation will be handled discreetly. In determining whether the alleged conduct constitutes prohibited harassment, the nature of the conduct, the totality of the circumstances and the context in which the alleged incident occurred will be investigated. The company considers harassment in violation of this policy to be a major offense that can result in the suspension, termination, or other appropriately severe reprimand of the offender.

Employees should understand that this policy applies to each and every member and employee of the Company, including the Board of Directors, owners and management, all full-time, part-time and temporary employees, independent contractors and visitors.

The Employment Unit also maintains a bulletin board at the Station to provide employees with information about the Employment Unit's non-discrimination and EEO policies.

For job applicants, the Employment Unit generally includes on vacancy recruitment notices the following statement: "WVVA is an Equal Opportunity Employer" or "EOE."

The Unit's website homepage (www.WVVA.com) contains the link CAREERS AT WVVA (under the heading "Contact Us") relating to the Unit's employment opportunities. When a potential applicant clicks on the CAREERS hyperlink, he or she is taken to a listing of positions currently available at the Station and a link titled "WVVA Employment Application." The Application prominently includes the following language directed at potential applicants:

When completing, do not identify race, color, gender, age, national origin, citizenship, religion or provide any extraneous information.

* * *

The company will consider all applicants without discrimination on any basis prohibited by law and is an equal employment opportunity employer.

Moreover, the Unit has an ongoing training program that relates directly to non-discrimination and anti-harassment. In 2017, QMI procured and implemented a new training

video library including, among other topics, anti-harassment and non-discrimination educational materials. The videos are created to correspond with employee roles. This means training is specific to managers or to non-managerial employees. Further, managers view both targeted videos; viewing the training video specific to their role as manager and also in their role as employee. This provides managers with additional insight and familiarizes managers with the training being provided to the employees they supervise.

Employees with supervisory authority—i.e., managers—at each of QMI's stations (including the Employment Unit subject to this EEO audit) are required to watch the assigned series of anti-harassment and non-discrimination training materials and to successfully execute a quiz on each video which assesses whether the managers are familiar with the anti-harassment and non-discrimination concepts and policies. Managers must successfully complete the training modules annually and certificates of successful completion are added to each manager's personnel file.

In addition, all non-managerial employees must engage with a series of anti-harassment and non-discrimination video training modules that educate them with respect to the recognition of inappropriate (harassment and/or discrimination) behavior by supervisors and other employees and on the steps to take to report such behavior. Non-managerial employees must successfully complete the training modules annually and certificates of completion are added to each non-managerial employee's personnel file.

Finally, during the onboarding process for new employees, all new hires are required to engage with anti-harassment and non-discrimination training modules as part of the on-boarding process also completing the quizzes with results placed in the personnel file.

Thus, the video training module library is yet another tool that the Employment Unit uses to notify employees of all levels of how to recognize, respond to, and report discrimination and harassment issues that may arise in the workplace.

In the aggregate, then, the Unit educates, at numerous points and through various means, its employees and applicants about its non-discrimination and equal opportunity policies.

***Audit Data Request 3(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: The Employment Unit consistently and periodically monitors and analyzes its EEO recruitment program. The station EEO Coordinator maintains and updates the recruitment source list, adding new sources and contact information as warranted and in consultation with the General Manager and relevant Department Heads. The goal of the Unit's recruitment process is two-fold: first, it is to provide notification to recruitment sources such that

the outreach is reasonably calculated to reach the entire community; second, it is to provide notification to recruitment sources that are reasonably expected to result in reaching qualified applicants, particularly when a position requires a specialized skill-set, for example, engineering vacancies are more likely to result in a pool of qualified applicants when they are placed with engineering-specific resources—for such specialized positions, the Station evaluates the recruitment source list and attempts to identify and add “targeted” sources to the list as appropriate. Thus, recruitment outreach is discussed at the time of every full-time vacancy and is periodically reviewed with the Station’s FCC counsel (on at least an annual basis) to ensure compliance with the broad outreach requirements.

Moreover, communication that naturally occurs within the larger corporate “family” contributes to WVVA’s self-evaluation of its recruitment program. For example, when the Corporate HR Director receives a request from an organization to be added to the recruitment source list of one or more co-owned stations, she communicates among the station EEO Coordinators at all of the stations in the group. Similarly, the station EEO Coordinators at each of the commonly-owned stations communicate with each other about recruitment sources and job openings, and most of the station EEO Coordinators in the group, including WVVA’s station EEO Coordinator, attended a QMI-wide meeting in June 2018 that included a discussion of the Commission’s EEO requirements, including recruitment.

***Audit Data Request 3(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.*

Response: The Station’s Vice President/General Manager works with the QMI corporate management team periodically to examine the Employment Unit’s pay, benefits, seniority practices, promotions, and selection techniques and test. One focus of these efforts is to assure that such practices by the Stations provide equal employment opportunity and do not have a discriminatory effect.

Compensation and Benefit Levels. The Employment Unit’s compensation levels for all employees are reviewed on at least an annual basis during budget preparation by the General Manager and the Department Heads, in coordination with the corporate parent’s officers and executives, to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. It is common for QMI to set a target percent for compensation increases for all applicable employees, which is then subject to variation—upwards or downwards—based on each employee’s particular degree of growth, performance, exceptional efforts, and extraordinary circumstances. Any variations from the target percent increase proposed by WVVA’s General Manager would be reviewed by the corporate parent’s executives and President to ensure that non-discriminatory, meritorious, and fair decisions are being made. Compensation and benefits are also reviewed during annual employee evaluations for those

employees who receive such evaluations. Compensation may be increased for myriad reasons, including merit, fairness, and to ensure that rates of pay are non-discriminatory. For positions that can be evaluated based on the local marketplace, such as sales assistants, administrative assistants, and other support positions, the Unit may consider the pay range in the local market area for a similar type position. For positions that are unique to the broadcast industry, such as news anchors, reporters, photographers, production personnel, and television management positions, the Employment Unit may assess compensation ranges by using resources from relevant industry sources.

Benefits are determined by the QMI management team, led by the President, Vice President, and Corporate HR Director, which team reviews the benefits plan on an annual and as-needed basis. All full-time employees are entitled to the same benefit package.

Seniority Practices and Promotions. Internal promotions are based upon the combination of available positions, internal applicant qualifications and interviews, performance appraisals, and discussions among the General Manager and the relevant Department Head, all of whom have responsibilities for enforcing aspects of the Employment Unit's EEO policies. WVVA's routine practice—as encouraged by the Unit's corporate parent—is to give an interview to virtually every internal candidate who expresses an interest in a higher-level position. The Unit's (and QMI's) view is that it is important not only to *recognize* growth potential among existing employees but also to *facilitate and encourage* such growth. If a current employee applies and interviews for an open position but is ultimately not selected for it, WVVA managers discuss with the employee how she or he might be better prepared the next time a similar opportunity becomes available, what additional steps the employee might consider taking to burnish his or her qualifications and skills, and how the employee can work towards meeting his or her career goals. In short, WVVA uses job vacancies at the station as an opportunity to provide concrete mentorship and guidance to current employees to foster their growth and help them realize their full potential.⁷

Selection Techniques. After providing notices of job vacancies to a wide and diverse array of educational institutions, professional and non-profit organizations, and Internet resources, the selection process is based upon the experience, qualifications, and talents of the candidates. The General Manager and Department Head consult on each selection. As described above, the Employment Unit's policy is to perform and document EEO recruitment prior to making a formal offer of employment.

No Union Agreements. The Employment Unit does not have any agreements with unions in place at this time.

⁷ In this regard, the Employment Unit effectively maintains, as an additional outreach activity, a mentoring program at the Stations. Although the Unit's efforts in this regard are regular, deliberate, consistent, and effective, the nature of these particular mentoring activities does not lend itself to "record keeping" in a meaningful fashion, which is why the Unit is not claiming "credit" for this activity in the response above to Audit Request 3(d).

The remaining audit data requested is not applicable because the Licensee is not a religious broadcaster, and WVVA is not brokered by another company.

WVVA is uploading a copy of this letter and the attached exhibits to the Station's online public inspection file.

If you have any questions regarding this response or need any further information, please call or email our attorney Elizabeth Spainhour at 919-839-0300 or espainhour@brookspierce.com.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ralph M. Oakley". The signature is fluid and cursive, with the first name "Ralph" being the most prominent part.

Ralph M. Oakley, President of
WVVA License, LLC

WVVA(TV)
Response to February 14, 2019, EEO Audit Letter

EXHIBIT LIST

Exhibit 1	EEO Public File Report (June 1, 2016-May 31, 2017)
Exhibit 2	EEO Public File Report (June 1, 2017-May 31, 2018)
Exhibit 3	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist
Exhibit 4	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist/Greenbrier Bureau
Exhibit 5	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Promotion Assistant
Exhibit 6	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Morning Anchor/Multimedia Journalist
Exhibit 7	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Chief Meteorologist
Exhibit 8	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekend Meteorologist/Multimedia Journalist
Exhibit 9	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Master Control Operator
Exhibit 10	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist
Exhibit 11	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Content Manager
Exhibit 12	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Promotion Manager
Exhibit 13	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Promotion Assistant
Exhibit 14	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist
Exhibit 15	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Anchor
Exhibit 16	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Meteorologist/Multimedia Journalist
Exhibit 17	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Morning Anchor/Multimedia Journalist
Exhibit 18	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Content Manager
Exhibit 19	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Director
Exhibit 20	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer
Exhibit 21	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist

Exhibit 22	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Meteorologist/Multimedia Journalist
Exhibit 23	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist/Greenbrier County
Exhibit 24	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist
Exhibit 25	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist
Exhibit 26	Copies of Broadcast1Source documentation of educational institution outreach activities
Exhibit 27	Copies of Broadcast1Source documentation of internship outreach activities