



ELLIOTT TROSHINSKY  
PRESIDENT & GENERAL MANAGER



March 27, 2017

**Via FedEx Overnight Delivery and Email**

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

Dear Mr. Pulley:

This letter, together with attached Exhibits 1 through 70, serves as the response by Hearst Stations Inc. (the "Licensee"), licensee of KQCA(TV), Stockton, California, and KCRA-TV, Sacramento, California, to the Media Bureau's February 8, 2017, request for audit data relating to the station employment unit's EEO program. KCRA-TV and KQCA (the "Stations") together comprise the Employment Unit for purposes of the Commission's EEO rule (the "Employment Unit" or the "Unit"). The Stations operate in the Sacramento-Stockton-Modesto Nielsen Designated Market Area.

At all times during the period covered by this audit, the Unit has been using 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.

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***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 included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, 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 47 C.F.R. § 73.2080(c)(6).

**Response:** The Employment Unit's EEO Public File Reports covering July 22, 2014 through July 31, 2015, and August 1, 2015 through July 31, 2016, are attached as Exhibits 1 and 2, respectively. Both the 2014-15 and 2015-16 EEO Public File Reports were amended in March 2017 when, in the course of reviewing the Employment Unit's materials and documents in preparing the instant response, a few minor errors were discovered and corrected.<sup>1</sup> 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 Employment Unit's knowledge, is true and correct.

KQCA(TV) does not operate a free-standing website; instead, the Employment Unit maintains only a page for KQCA ([www.KCRA.com/my58](http://www.KCRA.com/my58)) within the [www.KCRA.com](http://www.KCRA.com) website. The Unit's most recent EEO Public File Report (covering the period August 1, 2015, through July 31, 2016) is posted to the [www.KCRA.com](http://www.KCRA.com) website and is located at the following URL address:

<https://htv-prod-media.s3.amazonaws.com/files/kcra-tv-kqca-amended-2015-16-eo-annual-public-file-report-1490392677.pdf>

The Report is accessible to website visitors by clicking on the "EEO Reports" link at the bottom of the [www.KCRA.com](http://www.KCRA.com) home page. Visitors to the [www.KCRA.com/my58](http://www.KCRA.com/my58) webpage are also able to find the "EEO Reports" link at the bottom of that page and can access the Report by clicking on same.

The following is a list of all positions filled by the Employment Unit during the relevant period and the date on which each position was filled. The following list tracks the order in which the positions appear in the Stations' EEO Public File Reports, and the corresponding exhibit numbers we have assigned to them for this response are included for convenience.

POSITION FILLED	DATE FILLED	RESPONSE EXHIBIT NO.
Reporter	8/11/2014	3
Executive News Producer	8/18/2014	4
Account Executive	9/22/2014	5
Anchor/Reporter	9/8/2014	6
Modesto Bureau Reporter	9/22/2014	7
Local Sales Manager	7/28/2014	8
Reporter/Anchor	9/22/2014	9
KCRA Sports Reporter/Anchor	9/22/2014	10
News Photographer/Live Truck Operator	10/7/2014	11
Client Service Specialist	9/2/2014	12
Digital Client Service Specialist	10/6/2014	13

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<sup>1</sup> The amended versions of the 2014-15 EEO Public File Report and the 2015-16 EEO Public File Report are attached as Exhibits 1 and 2, respectively.



POSITION FILLED	DATE FILLED	RESPONSE EXHIBIT NO.
Client Service Specialist	10/20/2014	14
News Reporter	6/15/2015	15
News Editor	12/11/2014	16
KCRA Multicast Producer	1/6/2015	17
Assistant Creative Services Director	1/26/2015	18
Director of Programming	3/30/2015	19
Account Executive	3/30/2015	20
Client Service Specialist	3/30/2015	21
Senior Producer/Editor	4/1/2015	22
Assignment Editor	4/1/2015	23
News Reporter	6/15/2015	24
Producer	6/3/2015	25
Producer	4/20/2015	26
Client Service Specialist	4/27/2015	27
News Editor	6/15/2015	28
Producer/Editor – Bilingual	7/20/2015	29
Client Service Specialist	7/13/2015	30
Director of Engineering	7/13/2015	31
Account Executive	9/15/2015	32
Producer	1/18/2016	33
News Reporter	1/1/2016	34
Assignment Editor	9/7/2015	35
Producer	9/1/2015	36
Broadcast/IT Engineering Maintenance Technician	8/24/2015	37
Modesto Bureau News Photographer/Live Truck Operator	8/11/2015	38
Senior Digital Editor	8/24/2015	39
Broadcast/IT Engineering Maintenance Technician	10/7/2015	40
Meteorologist	1/1/2016	41
Account Executive	7/7/2016	42
Client Service Specialist	9/15/2015	43
Account Executive	11/2/2015	44
Social Media Manager	9/18/2015	45
Client Service Specialist	9/24/2015	46
Assignment Editor	1/11/2016	47
Digital Producer	11/30/2015	48
Regional Accounting Manager	12/14/2015	49
News Reporter	2/22/2016	50
Digital Client Service Specialist	11/30/2015	51
Client Service Specialist	12/1/2015	52
News Reporter	3/14/2016	53

POSITION FILLED	DATE FILLED	RESPONSE EXHIBIT NO.
Tech Operator	2/8/2016	54
News Photographer/Live Truck Operator	3/24/2016	55
Producer	4/11/2016	56
Director	2/22/2016	57
Topical Producer/Editor	3/25/2016	58
Digital Media Manager	3/14/2016	59
National Sales Manager	3/21/2016	60
Tech Operator	4/18/2016	61
Tech Operator	4/4/2016	62
Topical Promotion Producer/Editor	5/31/2016	63
Client Service Specialist	5/9/2016	64
Producer	6/20/2016	65

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**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 do not need to 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:** The Employment Unit filled 63 full-time vacancies during the applicable period. For each job opening, the Employment Unit has attached (as Exhibits 3 through 65) copies of records demonstrating that notifications announcing the job openings were sent to recruitment sources used by the Unit. For each of the job openings listed in response to Audit Data Request 3(a), the attached documentation begins with a Fax and Email Verification Summary Report produced by Broadcast1Source<sup>2</sup> showing a detailed job description and the date

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<sup>2</sup> 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 such notification. The Fax and Email Verification Summary Reports and accompanying documentation in Exhibits 3-65 were generated by the Employment Unit using the Broadcast1Source menu of tools and reports.



and time that each email or facsimile notification of the job opening was sent to the listed referral sources.<sup>3</sup> Each exhibit also contains a Job Notification Details Report (another report generated by the Broadcast1Source software), which also captures the notifications that Employment Unit personnel manually posted during the relevant reporting periods (rather than distributed by fax or email).<sup>4</sup> The attached exhibits illustrate that for the period covered by the audit, the Stations had a regular practice of sending vacancy notifications to a variety of sources, which, in the aggregate, were reasonably calculated to reach the Unit's entire community.

The Unit has included copies of communications to recruitment sources that have requested full-time job vacancy notifications. The Stations are advised that Broadcast1Source does not retain printable "copies" of automatic emails distributed to recruitment sources, but the system instead produces reports (i.e., the Fax and Email Verification Summary Reports and the Job Notification Details Reports included in the exhibits) that provide the date and time of emails or facsimiles to recruitment sources. The Unit had five recruitment sources that requested notification during the period covered by the 2014-15 and 2015-16 EEO Public File Reports, and a sixth recruitment source requested notification effective May 2, 2016.<sup>5</sup> The Fax and Email Verification Summary Reports and Job Notification Details Reports verify that vacancy notifications were, in fact, sent to these sources.

Additionally, it should be noted that a few recruitment sources reported by interviewees as the sources of referral were not directly notified by the Unit. These include aggregators and republishers of job site listings such as Indeed.com, LinkedIn, and others.

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***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

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<sup>3</sup> Certain discrepancies exist in the enumeration of recruitment sources between the Annual EEO Public File Reports and the Fax and Email Verification Summary Reports—i.e., the recruitment source number assigned to a given recruitment source in the Annual EEO Public File Report may not, in some instances, be the same number assigned to that recruitment source in the Fax and Email Verification Summary Reports. While the Unit understands that this may be confusing, there is no regulatory significance to any disparate enumeration; indeed, most importantly, the Fax and Email Verification Summary Reports (coupled with the Job Notification Details Reports provided for each vacancy) and the Annual EEO Public File Reports reflect that the same recruitment sources received notification of job vacancies, regardless of the numbers assigned to those recruitment sources in the different reports.

<sup>4</sup> Such manual postings are also reflected in the EEO Public File Reports.

<sup>5</sup> This sixth recruitment source that requested notification is RMC Employment Services.

(again, these positions are listed in the order in which they appear in the EEO Public File Reports).<sup>6</sup>

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Reporter	8	Careers.HearstTelevision.com (4) LinkedIn.com (1) NSB Talent Agency (1) NWT Group (1) Naso Group (1)
Executive News Producer	5	Careers.HearstTelevision.com (3) Current Employee (1) LinkedIn.com (1) The LornaDave Agency (1)
Account Executive	7	Current Employee (1) Employee Referral (1) Former Employee Referral (1) Indeed.com (3) Spots N Dots (1)
Anchor/Reporter	4	Careers.HearstTelevision.com (2) Employee Referral (1) NWT Group (1)
Modesto Bureau Reporter	7	Careers.HearstTelevision.com (5) Employee Referral (1) Ken Linder & Associates Inc. (1)
Local Sales Manager	5	Careers.HearstTelevision.com (1) Current Employee (1) Spots N Dots (3)
Reporter/Anchor	6	Careers.HearstTelevision.com (4) Employee Referral (1) National Association of Black Journalists (1)
KCRA Sports Reporter/Anchor	5	Careers.HearstTelevision.com (3) Former Employee Referral (1) National Association of Black Journalists (1)
News Photographer/Live Truck Operator	4	Careers.HearstTelevision.com (1) Employee Referral (2) TV Jobs (1)

<sup>6</sup> This same information is compiled in Broadcast1Source as a standalone report, and, therefore, is included as Exhibit 70 attached hereto. While the names of interviewees have been redacted from the attached exhibits, the referral source for each interviewee is included in that documentation.



POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Client Service Specialist	5	CA State University, Chico (1) Employee Referral (1) Indeed.com (2) Runyon Salzman Einhorn, Inc. (1)
Digital Client Service Specialist	4	Careers.HearstTelevision.com (1) Indeed.com (3)
Client Service Specialist	8	Career Fair (1) Current Employee (1) Employee Referral (1) Indeed.com (3) Previous Applicant (2)
News Reporter	6	Careers.HearstTelevision.com (3) Ken Linder & Associates Inc. (2) NSB Talent Agency (1)
News Editor	2	Careers.HearstTelevision.com (1) Former Employee (1)
KCRA Multicast Producer	3	Careers.HearstTelevision.com (1) Employee Referral (1) Indeed.com (1)
Assistant Creative Services Director	9	602 Communications (1) Careers.HearstTelevision.com (6) Current Employee (1) Indeed.com (1)
Director of Programming	5	Careers.HearstTelevision.com (1) Former Employee (1) Indeed.com (2) Non-Employee Referral (1)
Account Executive	3	Employee Referral (2) Non-Employee Referral (1)
Client Service Specialist	9	Employee Referral (3) Indeed.com (5) University of California-Davis (1)
Senior Producer/Editor	5	Careers.HearstTelevision.com (2) Current Employee (3)
Assignment Editor	5	Careers.HearstTelevision.com (3) Current Employee (1) Employee Referral (1)
News Reporter	5	Employee Referral (1) Ken Linder & Associates Inc. (1) Napoli Management Group (2) Willinger Talent Agency (1)

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Producer	8	Careers.HearstTelevision.com (3) Employee Referral (2) TV Jobs (3)
Producer	7	Careers.HearstTelevision.com (4) Employee Referral (1) TV Jobs (2)
Client Service Specialist	9	Careers.HearstTelevision.com (3) Indeed.com (6)
News Editor	5	Careers.HearstTelevision.com (1) Employee Referral (3) TV Jobs (1)
Producer/Editor – Bilingual	4	Careers.HearstTelevision.com (3) Employee Referral (1)
Client Service Specialist	7	Careers.HearstTelevision.com (4) Indeed.com (2) Job Journal (1)
Director of Engineering	1	Current Employee (1)
Account Executive	3	Careers.HearstTelevision.com (1) Employee Referral (1) Job Fair (1)
Producer	2	Careers.HearstTelevision.com (2)
News Reporter	2	Employee Referral (1) Non-Employee Referral (1)
Assignment Editor	2	Careers.HearstTelevision.com (1) Current Employee (1)
Producer	1	Employee Referral (1)
Broadcast/IT Engineering Maintenance Technician	4	Careers.HearstTelevision.com (2) Current Employee (1) Indeed.com (1)
Modesto Bureau News Photographer/Live Truck Operator	3	Careers.HearstTelevision.com (1) Employee Referral (1) Indeed.com (1)
Senior Digital Editor	4	Current Employee (1) Employee Referral (3)
Broadcast/IT Engineering Maintenance Technician	4	Careers.HearstTelevision.com (3) Indeed.com (1)
Meteorologist	2	Current Employee (1) Napoli Management Group (1)
Account Executive	1	Employee Referral (1)
Client Service Specialist	6	Careers.HearstTelevision.com (1) Employee Referral (2) Indeed.com (3)



POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Account Executive	4	Careers.HearstTelevision.com (3) Employee Referral (1)
Social Media Manager	3	Employee Referral (1) Indeed.com (1) TV Jobs (1)
Client Service Specialist	6	Careers.HearstTelevision.com (2) Employee Referral (1) Indeed.com (3)
Assignment Editor	2	Careers.HearstTelevision.com (1) Employee Referral (1)
Digital Producer	2	Employee Referral (2)
Regional Accounting Manager	3	Employee Referral (1) Indeed.com (1) LinkedIn.com (1)
News Reporter	3	Napoli Management Group (1) Naso Group (1) Willinger Talent Agency (1)
Digital Client Service Specialist	2	Employee Referral (1) Indeed.com (1)
Client Service Specialist	7	Careers.HearstTelevision.com (4) Employee Referral (1) Indeed.com (2)
News Reporter	2	Current Employee (1) Naso Group (1)
Tech Operator	5	Current Employee (5)
News Photographer/Live Truck Operator	3	Careers.HearstTelevision.com (2) Former Employee Referral (1)
Producer	5	Careers.HearstTelevision.com (5)
Director	2	Employee Referral (1) Indeed.com (1)
Topical Producer/Editor	5	Careers.HearstTelevision.com (1) Current Employee (1) Indeed.com (2) TV Jobs (1)
Digital Media Manager	3	Careers.HearstTelevision.com (1) Current Employee (2)
National Sales Manager	9	Careers.HearstTelevision.com (4) Current Employee (3) Indeed.com (1) Non-Employee Referral (1)
Tech Operator	4	Careers.HearstTelevision.com (2) Current Employee (2)

POSITION FILLED	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Tech Operator	3	Careers.HearstTelevision.com (2) Current Employee (1)
Topical Promotion Producer/Editor	4	Indeed.com (3) LinkedIn.com (1)
Client Service Specialist	4	Careers.HearstTelevision.com (2) Indeed.com (1) SimplyHired.com (1)
Producer	5	Careers.HearstTelevision.com (5)

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***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.*

**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 February 9, 2017 was 180. The Employment Unit's Designated Market Area is Sacramento-Stockton-Modesto, which has more than one million people. The Employment Unit is located in the Sacramento-Arden-Arcade-Roseville, California, Metropolitan Statistical Area, which also has more than 250,000 people. Thus, by the Employment Unit's calculation, the Employment Unit is required to perform four (4) initiatives in each applicable two-year period. As detailed below, the Employment Unit met and exceeded the requirements of the FCC's EEO rule in this regard.

During the period of time covered by the two most recent EEO Public File Reports, the Employment Unit engaged in the following recruitment initiatives described under Section 73.2080(c)(2) and has attached, as Exhibits 66 through 69, documentation demonstrating performance of the following recruitment initiatives:



<b>Internship Program</b> <b>(47 C.F.R. § 73.2080(c)(2)(v))</b> <b>Exhibit 66</b>	
<i>Activity</i>	<i>Personnel Involved</i>
<p>2014-15 &amp; 2015-16: During both reporting periods covered by the public file reports, the Employment Unit sponsored its ongoing and continuing internship program with positions in the area of news, production, promotions, community advocate services, editing, weather, reporting on special projects, and sports. The Stations' employees provide mentorship to students participating in the program. The program selects new interns each session, and it provides college students with the opportunity to learn and acquire skills in the broadcasting industry. During the two-year period, the Stations hosted more than 80 interns over the course of multiple sessions in each year. The Stations actively promote the internship program, coordinate with colleges, accept applications from interested students, and provide valuable feedback to the interns.<sup>7</sup></p>	<p>General Manager          News Director          Assistant News Director          Executive News Producer          Digital Media Manager          Executive Assistant to General Manager</p>

<b>Participation in Job Fairs</b> <b>(47 C.F.R. § 73.2080(c)(2)(i))</b> <b>Exhibit 67</b>	
<i>Activity</i>	<i>Personnel Involved</i>
<p>September 6, 2014: Participated in "Hiring Our Heroes" Hiring Fair at the BT Collins Reserve Center in Sacramento, CA</p> <p>April 2, 2015: Participated in "32<sup>nd</sup> Annual USC Annenberg Career Connection Internship &amp; Job Fair" at the University of Southern California in Los Angeles, CA</p>	<p>Business Manager          Director of Engineering</p> <p>News Director</p>

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<sup>7</sup> The documents attached as Exhibit 66 include the internship program's policies, a blank application for the program, and the Station-intern agreement. All student-intern names have been redacted.

<b>Participation in Job Fairs            (47 C.F.R. § 73.2080(c)(2)(i))            Exhibit 67</b>	
<i>Activity</i>	<i>Personnel Involved</i>
May 6, 2015: Participated in Sacramento City College Annual Career Day	General Sales Manager, KCRA-TV General Sales Manager, KQCA General Manager
August 12-14, 2015: Participated in Asian American Journalism Association Career Fair at the Annual AAJA National Convention in San Francisco, CA	Assistant News Director
March 22, 2016: Participated in “33 <sup>rd</sup> Annual USC Annenberg Career Connection Internship & Job Fair” at the University of Southern California in Los Angeles	News Director
July 21, 2016: Participated in “All Veterans Career Fair” at the Aerospace Museum of California in McClellan Park, CA	Director of Engineering Corporate Director of Veteran Recruiting

<b>Provision of Training to Management Level Personnel as to            Methods of Ensuring Equal Employment Opportunity and Preventing Discrimination            (47 C.F.R. § 73.2080(c)(2)(xiv))            Exhibit 68</b>	
<i>Activity</i>	<i>Personnel Involved</i>
July 19, 2016: Hearst’s Director of Veteran Recruiting visited the Employment Unit to provide training to hiring managers relating to the hiring of U.S. Armed Forces veterans. Among the topics covered in the training session were: how to evaluate the past employment and duties of Armed Services personnel and the “transferability” or applicability of those skills and qualifications to a broadcast/newsgathering/digital business; the process and “pipeline” for identifying, interviewing, and attracting qualified candidates from the Armed Services pool; ensuring non-discrimination in the consideration and hiring of veterans and periodic leave status; and common misconceptions about veteran employment.	General Manager Director of Engineering News Director Program Director Creative Services Director Promotion Manager General Sales Manager, KCRA-TV General Sales Manager, KQCA



<b>Participation in Programs Sponsored by Educational Institutions Relating to Careers in Broadcasting            (47 C.F.R. § 73.2080(c)(2)(x))            Exhibit 69</b>	
<i>Activity</i>	<i>Personnel Involved</i>
November 20, 2014: Speaking engagement at Sacramento State University. KQCA's General Sales Manager spoke to a group of college students who were interning in the University's athletics department about career opportunities in broadcasting and about how the television business works (from a sales perspective).	General Sales Manager, KQCA
March 3, 2015: Speaking engagement at California State University—Sacramento. One of the Stations' executive producers spoke to a communications class about the Stations' internship program and careers in broadcasting.	Executive Producer
March 27, 2015: Speaking engagement at John C. Kimball High School in Tracy, CA. One of the Stations' news reporters spoke to dozens of high school students about the job duties of a reporter and about career opportunities in broadcasting.	News Reporter
April 16, 2015: Hosted Sacramento high school students and assisted them on a project. The Employment Unit's Creative Services Director hosted a class of high school students from Sacramento New Tech High School at the Stations. In addition to giving them a tour of the Stations, he gave an hour-long lecture about working in the promotional side of the television news business and on what it takes to make a good promotional "spot." The Creative Services Director then worked with the students over the next several weeks, providing direct feedback to them and their teacher on a project they worked on for a non-profit entity (creating a promotional spot for that entity).	Creative Services Director
June 15-16, 2015: Participation in 2015 NAB Educational Foundation Media Sales Institute at Arizona State University. KCRA-TV's General Sales Manager and National Sales Manager attended a training program for approximately 20 college graduates interested in broadcast sales. The Stations' personnel who attended	General Sales Manager, KCRA-TV National Sales Manager, KCRA-TV

<b>Participation in Programs Sponsored by Educational Institutions Relating to Careers in Broadcasting            (47 C.F.R. § 73.2080(c)(2)(x))            Exhibit 69</b>	
<i>Activity</i>	<i>Personnel Involved</i>
<p>watched the participants present a media marketing strategy and interviewed participants for open sales positions.</p> <p>October 6, 2015: Speaking engagement at Bella Vista High School in Fair Oaks, CA. An executive producer and an anchor/reporter from the Stations spoke with high school students regarding careers in broadcasting.</p> <p>November 3, 2015: Speaking engagement at Sacramento State University. The Employment Unit's General Sales Manager was a guest lecturer for a class of 35 senior and/or graduating students studying communications. In addition to providing the students with a real-world perspective about the state of the television news business, he also discussed possible job opportunities and career paths for "Millennials" in the business.</p> <p>March 15, 2016: Speaking engagement at Moreau Catholic High School in Hayward, CA. One of the Stations' sports anchor/reporters spoke to a "sport and society" class regarding career opportunities in sports media.</p> <p>June 15-16, 2016: Participation in 2016 NAB Educational Foundation Media Sales Institute at Arizona State University. KCRA-TV's General Sales Manager attended a training program for approximately 15 college graduates interested in broadcast sales. She watched the participants present a media marketing strategy and interviewed participants for open sales positions.</p>	<p>Executive Producer Anchor/Reporter</p> <p>General Sales Manager, KQCA</p> <p>Sports Anchor/Reporter</p> <p>General Sales Manager, KCRA-TV</p>

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***Audit Data Request 3(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 all complaints must be reported, regardless of their status or disposition.*

**Response:** The Stations are not aware of any complaints alleging discrimination during their current license terms (which date back to December 1, 2014).

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***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.* The Employment Unit has three levels of management to ensure enforcement of Employment Unit EEO policies: a General Manager, Department Heads, and supervising managers. Each level of management has significant input into the hiring, training, disciplining, terminating, and daily supervision of station employees. Additionally, Human Resources is actively involved in the Employment Unit's EEO program.

Management at the Employment Unit has taken steps to monitor and enforce the Employment Unit's EEO policies on a continuing basis. At the time the Commission's new EEO rules were implemented in March 2003, training was provided by the Unit's lawyers to key station personnel. Additionally, at the time of their implementation, the then-new rules were reviewed and discussed by the General Manager during meetings with Department Heads and supervising managers. Continued periodic, albeit less formal, training occurs when Unit personnel discuss recruitment, outreach activities, and various personnel matters. For example, the General Manager and Department Heads use a portion of their weekly meeting, when necessary, to reinforce EEO policies and EEO program issues, including issues related to the hiring process and the Unit's EEO program and policies.

Throughout the course of the current license term, the Employment Unit 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 rules. As discussed above, the Employment Unit uses the Broadcast1Source software platform to track and manage the documentation of its EEO compliance. When a position opens, Department Heads or supervising managers (depending on the vacancy) notify the General Manager and Business Manager of the opening and discuss the job responsibilities, the qualifications required, and the recruiting sources to be used to fill the position. After being notified of the opening and discussing qualifications with the relevant hiring manager, the job posting is forwarded to the Unit's parent company's Corporate Human Resources department which (1) uses

Broadcast1Source to notify appropriate recruitment sources of the vacancy and (2) manually posts the vacancy with any chosen sources that require use of a manual posting process.

For outreach initiatives, the Business Manager collects documentation of the Employment Unit's outreach activities from various Employment Unit participants and maintains the documentation in the private file (such documentation is maintained electronically using the Broadcast1Source tools). The General Manager is involved in discussions, which are typically informal, among Employment Unit participants, Human Resources, the Business Manager, and Department Heads related to the effectiveness of current outreach activities and additional future outreach efforts. In addition, many Employment Unit employees have established a number of relationships with various schools and colleges and other organizations, both within the community and nationally known, to expand the Unit'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 Harassment Policy, which includes, among other things, a "plain language" definition of harassment and a procedure for employees to follow to report incidents involving harassment, discrimination or retaliation. The handbook also includes a specific statement relating to EEO, which states as follows:

It is the policy of the Company to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, national origin, religion, sex, age, disability, citizenship, marital status, sexual orientation or any other characteristic protected by law. Company prohibits and will not tolerate any such discrimination or harassment.

The following language appears in the collective bargaining agreement for Employment Unit employees who are union members<sup>8</sup>:

Local 45 of the International Brotherhood of Electrical Workers

Both parties shall continue to afford equal opportunity in employment to all qualified persons, including but not limited to cooperating in the development of programs to assure qualified minority persons an equal opportunity for employment, and no person shall be discriminated against employment or otherwise because of race, color, religion, national origin, sex, age (40 years of age or older), and shall comply with the Americans with Disabilities Act. The Employer will post all regular job openings, full-time and part-time, when such openings occur.

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<sup>8</sup> Currently, one union has members at the Employment Unit: Local 45 of the International Brotherhood of Electrical Workers.



As depicted in the image below, the Employment Unit's website homepage, [www.KCRA.com](http://www.KCRA.com), contains a link, "Careers," that allows website visitors to navigate to Employment Unit employment opportunities.



When potential applicants click on the "Careers" hyperlink, they are taken to the Employment Unit's parent company's Hearst Television Careers website, specifically to a page listing the Employment Unit's open positions, which prominently features a statement concerning the company's status as an equal opportunity employer. The statement reads:

Hearst Television is an Equal Opportunity Employer with respect to females, minorities, veterans and individuals with disabilities. If you are an individual with a disability and need assistance in applying for a position, please contact us at [HTV.careers@hearst.com](mailto:HTV.careers@hearst.com).

In addition, about a decade ago, the Employment Unit's parent company implemented at its stations (including KCRA-TV and KQCA) an online training course concerning the recognition and prevention of workplace sexual harassment; Unit employees are required to complete this course on a biennial basis.

For job applicants, the Employment Unit generally includes on vacancy recruitment notices the following statement (or a close variation thereof):

Job posted by an EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER  
EOE M/F/D/V

In addition, the standard job application used by the Stations (and its parent Company) contains the following statements:

We consider applicants for all positions without regard to race, color, religion, sex, national origin, age, marital or veteran status, the presence of a non-job related medical condition or handicap, or any other legally protected status.

It is the policy of Hearst Corporation to provide equal employment opportunity to all individuals without regard to race, color, religion, sex,

national origin, age, disability, or alienage. Discriminatory employment practices are specifically prohibited by the Federal Communications Commission. If you believe your equal employment rights have been violated, you may contact the FCC in Washington, DC 20554, or other appropriate state or local agency. Hearst Corporation will provide reasonable accommodations for otherwise qualified individuals with disabilities. (Note: Hearst Television Inc. complies with the Americans with Disabilities Act (ADA) and all applicable federal, state and local laws.)

Furthermore, the Unit schedules for broadcast an EEO Public Service Announcement several times per week on both of the Stations' primary channels and multicast channels. The 30-second spots include audio and graphics with the following messages:

KQCA My 58 is an equal opportunity employer and dedicated to providing broad outreach regarding job vacancies at the station. KQCA seeks the help of local organizations in referring qualified job applicants to our station. If your organization would like to receive our job vacancy information, please contact KQCA My 58 at 916-325-3235. That's 916-325-3235.

KCRA 3 is an equal opportunity employer and dedicated to providing broad outreach regarding job vacancies at the station. KCRA seeks the help of local organizations in referring qualified job applicants to our station. If your organization would like to receive our job vacancy information, please contact KCRA 3 at 916-325-3235. That's 916-325-3235.

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

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***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 continually monitors and analyzes its EEO recruitment program. The Business Manager tracks the Unit's EEO activities and recruitment and reports that information to the General Manager on a monthly basis. The Business Manager and Corporate HR maintain and update 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 Employment Unit 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 vacancy and is often reviewed with the Unit's FCC counsel to ensure compliance with the broad outreach requirements.

Moreover, when the job functions associated with the posting of vacancy notices were centralized in the Corporate Human Resources department, the Employment Unit undertook, in connection with Corporate HR, a careful and deliberate evaluation of the recruitment sources currently used by the Unit. Finally, as an additional layer of monitoring and assessment, the Corporate HR department continues to monitor and help the Unit evaluate its vacancy outreach efforts and recruitment source list.

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***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:** *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, the Business Manager, and the Department Heads to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. Compensation and benefits are also reviewed during annual employee evaluations for those employees who receive such evaluations. Furthermore, from time to time the General Manager, along with individual Department Heads, will review compensation and benefits for groups of employees with similar or like jobs to ensure fairness, equal opportunities for all employees, and that compensation and benefit levels do not have a discriminatory effect. Compensation may be increased for myriad reasons, including merit, fairness, and to ensure that rates of pay are non-discriminatory.

For members of the labor union, compensation and benefits increases are determined by the union agreement.

*Seniority Practices and Promotions.* Employment Unit managers conduct annual performance appraisals for appropriate categories of employees. Internal promotions are based upon the results of the performance appraisals and discussions among the General Manager, the

relevant Department Head, and/or supervising manager, all of whom have responsibilities for enforcing aspects of the Employment Unit's EEO policies.

*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, Department Head, and/or the supervising manager consult on each selection. As described above, the Employment Unit's policy and practice is to perform and document EEO recruitment prior to making a formal offer of employment.

*Union Cooperation.* As stated above, the Employment Unit has a collective bargaining agreement with Local 45 of the International Brotherhood of Electrical Workers. Relevant non-discrimination language from the current collective bargaining agreement is set forth above. Union members may use the grievance procedures set forth in the collective bargaining agreement to enforce that provision. In any event, the Unit would cooperate fully with the respective union in the event a discrimination issue arose with respect to a covered union member.

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The remaining audit data requested is not applicable because the Employment Unit is not a religious broadcaster, and neither of the Stations is brokered by another company.

The Employment Unit is uploading a copy of this letter and the attached Exhibits to the online public inspection files for both KQCA and KCRA-TV.

If you have any questions regarding this response or need any further information, please call our attorney Tim Nelson at (919) 839-0300.

THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK;  
SIGNATURE IS ON FOLLOWING PAGE



Respectfully submitted,

A handwritten signature in blue ink, reading "Elliott Troshinsky". The signature is fluid and cursive, with a large initial "E" and a long, sweeping tail.

Elliott Troshinsky

President and General Manager  
Hearst Stations Inc., licensee of KQCA & KCRA-TV

**KQCA(TV) & KCRA-TV**  
**Response to February 8, 2017 EEO Audit Letter**

**EXHIBIT LIST**

Exhibit 1	EEO Public File Report (July 22, 2014 – July 31, 2015)
Exhibit 2	EEO Public File Report (August 1, 2015 – July 31, 2016)
Exhibit 3	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Reporter (date filled 8/11/2014)
Exhibit 4	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Executive News Producer (date filled 8/18/2014)
Exhibit 5	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive (date filled 9/22/2014)
Exhibit 6	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Anchor/Reporter (date filled 9/8/2014)
Exhibit 7	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Modesto Bureau Reporter (date filled 9/22/2014)
Exhibit 8	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Local Sales Manager (date filled 7/28/14)
Exhibit 9	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Reporter/Anchor (date filled 9/22/2014)
Exhibit 10	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of KCRA Sports Reporter/Anchor (date filled 9/22/2014)
Exhibit 11	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Photographer/Live Truck Operator (date filled 10/7/2014)
Exhibit 12	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 9/2/2014)
Exhibit 13	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Digital Client Service Specialist (date filled 10/6/2014)
Exhibit 14	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 10/20/2014)
Exhibit 15	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Reporter (date filled 6/15/2015)



Exhibit 16	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Editor (date filled 12/11/2014)
Exhibit 17	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of KCRA Multicast Producer (date filled 1/6/2015)
Exhibit 18	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Assistant Creative Services Director (date filled 1/26/2015)
Exhibit 19	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Director of Programming (date filled 3/30/2015)
Exhibit 20	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive (date filled 3/30/2015)
Exhibit 21	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 3/30/2015)
Exhibit 22	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Senior Producer/Editor (date filled 4/1/2015)
Exhibit 23	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Assignment Editor (date filled 4/1/2015)
Exhibit 24	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Reporter (date filled 6/15/2015)
Exhibit 25	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer (date filled 6/3/2015)
Exhibit 26	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer (date filled 4/20/2015)
Exhibit 27	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 4/27/2015)
Exhibit 28	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Editor (date filled 6/15/2015)
Exhibit 29	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer/Editor – Bilingual (date filled 7/20/2015)
Exhibit 30	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 7/13/2015)

Exhibit 31	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Director of Engineering (date filled 7/13/2015)
Exhibit 32	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive (date filled 9/15/2015)
Exhibit 33	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer (date filled 1/18/2016)
Exhibit 34	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Reporter (date filled 1/1/2016)
Exhibit 35	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Assignment Editor (date filled 9/7/2015)
Exhibit 36	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer (date filled 9/1/2015)
Exhibit 37	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Broadcast/IT Engineering Maintenance Technician (date filled 8/24/2015)
Exhibit 38	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Modesto Bureau News Photographer/Live Truck Operator (date filled 8/11/2015)
Exhibit 39	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Senior Digital Editor (date filled 8/24/2015)
Exhibit 40	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Broadcast/IT Engineering Maintenance Technician (date filled 10/7/2015)
Exhibit 41	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Meteorologist (date filled 1/1/2016)
Exhibit 42	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive (date filled 7/7/2016)
Exhibit 43	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 9/15/2015)
Exhibit 44	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive (date filled 11/2/2015)
Exhibit 45	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Social Media Manager (date filled 9/18/2015)



Exhibit 46	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 9/24/2015)
Exhibit 47	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Assignment Editor (date filled 1/11/2016)
Exhibit 48	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Digital Producer (date filled 11/30/2015)
Exhibit 49	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Regional Accounting Manager (date filled 12/14/2015)
Exhibit 50	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Reporter (date filled 2/22/2016)
Exhibit 51	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Digital Client Service Specialist (date filled 11/30/2015)
Exhibit 52	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 12/1/2015)
Exhibit 53	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Reporter (date filled 3/14/2016)
Exhibit 54	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Tech Operator (date filled 2/8/2016)
Exhibit 55	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of News Photographer/Live Truck Operator (date filled 3/24/2016)
Exhibit 56	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer (date filled 4/11/2016)
Exhibit 57	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Director (date filled 2/22/2016)
Exhibit 58	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Topical Producer/Editor (date filled 3/25/2016)
Exhibit 59	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Digital Media Manager (date filled 3/14/2016)
Exhibit 60	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of National Sales Manager (date filled 3/21/2016)

Exhibit 61	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Tech Operator (date filled 4/18/2016)
Exhibit 62	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Tech Operator (date filled 4/4/2016)
Exhibit 63	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Topical Promotion Producer/Editor (date filled 5/31/2016)
Exhibit 64	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Client Service Specialist (date filled 5/9/2016)
Exhibit 65	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer (date filled 6/20/2016)
Exhibit 66	Copies of documents relating to internship programs
Exhibit 67	Copies of documents relating to participation in job fairs
Exhibit 68	Copies of documents relating to provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination
Exhibit 69	Copies of documents relating to participation in programs sponsored by educational institutions relating to careers in broadcasting
Exhibit 70	Copy of Interview Recruitment Source Report from Broadcast1Source