



## RIVER RAT RADIO GROUP

August 23<sup>rd</sup>, 2021

Elizabeth Goldin, Esq., Assistant Chief  
Investigations & Hearings Division, Enforcement Bureau  
Federal Communications Commission  
45 L Street, N.E.  
Washington, D.C. 20554

**Re: EEO Audit of KPKR (FM), Parker, Arizona (FIN: 170952)**

To Whom It May Concern:

River Rat Radio, LLC ("RRR") hereby responds to the letter from the Commission's EEO Staff, dated August 6, 2021 ("Letter"), informing RRR that the employment unit ("Unit") associated with KPKR (FM), Parker, Arizona ("Station") has been randomly selected for an audit of its EEO program. Please note that the Unit also consists of KDMM (FM), Parker Strip, Arizona (Facility No. 198737) and KXBB (FM), Cienega Springs, Arizona (Facility No. 198736). This response is intended to cover all stations.

The Unit is not required under the rules of the Federal Communications Commission to have an EEO recruitment program due to the nature of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more). The Unit has two (2) full-time employees, one of whom is the General Sales Manager and the other of whom is the Office Manager. Each employee is regularly assigned to work forty (40) hours per week.

There are no pending or resolved complaints involving the Unit 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.

Item 4 to the Letter, regarding time brokerage, is not applicable to this Unit.

Should you have any questions regarding the foregoing response, please contact our attorney, Mark B. Denbo, at 202-350-9656 or [mdenbo@fccworld.com](mailto:mdenbo@fccworld.com).

The undersigned hereby certifies to the accuracy and completeness of this response.

Sincerely,

Sanford Cohen  
Manager  
River Rat Radio, LLC.