

June 7, 2023

**VIA Online Public Files of:
WCON (AM) and WCON-FM**

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

**Re: EEO Audit Response for Habersham Broadcasting Company
Station Employment Unit Consisting of Stations:**

WCON (AM), Cornelia, GA (Facility ID No. 25813)
WCON-FM, Cornelia, GA (Facility ID No. 25814)

Compliance Manager: Clayton Foster, *cfoster@habershambroadcasting.com*

Dear Ms. Goldin:

By notice dated April 24, 2023, the Commission notified Habersham Broadcasting Company (“Habersham”) that WCON-FM had been randomly selected for an audit of its EEO program. Habersham considers WCON-FM and WCON (AM) to be part of a Station Employment Unit (together, the “SEU” or “Unit”). Habersham’s responses to the Commission’s April 24 notice follow.

2. Audit Data Requested.

(b) If the Unit employs five or more full-time employees, provide the following information:

(i) Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).

Copies of the Unit’s EEO Public File Reports covering the periods 12/01/2020-11/30/2021 and 12/01/2021-11/30/2022 are attached. **(Attachment A.)**

(ii) For each station in the Unit that maintains a website, the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so

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

Website List

WCON-FM: <https://mycountry993.com>

WCON (AM): <http://www.1077thebreeze.com>

(iii) For each of the Unit's full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), the date of hire as required by section 73.2080(c)(5)(vi) as well as dated copies of all advertisements, bulletins, letters, faxes, e-mails or other communications announcing the position, as described in section 73.2080(c)(5)(iii). However, to reduce the burden of responding to this audit, if a job notice was sent to, the Unit may include in its response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional multiple sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other recruitment sources) that has notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).

FULL-TIME POSITIONS FILLED 12/01/2020-11/30/2022

<u>POSITION</u>	<u>RECRUITMENT SOURCE</u>	<u>DATE HIRED</u>
Marketing Consultant	Personal Inquiry	January 1, 2022

Attached are dated copies of all advertisements, bulletins, letters, faxes, e-mails, log sheets for on-air ads, or other communications announcing the positions, as described in Section 73.2080(c)(5)(iii). See Attachment B.

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

See Attachment C

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

1. The Unit has 7 full-time employees.
2. Neither station is in a market in which the population is 250,000 or more.
3. The Unit is required to perform two points worth of initiative activities within a two-year period.
4. Section 73.2080(c)(2) Initiatives undertaken by Habersham during the period covered by the above-noted EEO Public File Reports are described in **Attachment D**.

(vi) Any pending or resolved complaints involving the Unit filed during the Unit's current license term(s) 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 the Unit must report all complaints, regardless of their status or disposition.

There are no pending or resolved complaints involving this SEU filed since the licensee became the owner of the stations in this SEU before anyone having competent jurisdiction under federal, state, territorial, or local law, alleging unlawful discrimination in the employment practices of the SEU on the basis of race, color, religion, national origin, or sex.

(vii) In accordance with section 73.2080(b), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.

Responsibilities of Vice President/Manager:

1. Participate in and actively support the company's EEO policy as it relates to recruitment, selection, evaluation, compensation, training, promotion and termination. Includes being knowledgeable and conversant with the FCC EEO Rules and understanding the compliance issues that safeguard the station's FCC license
2. Take a proactive role in supporting the company's EEO policy to prevent harassment of any kind within the workplace, at off-site places of company business and at company-sponsored social venues
3. Develop company Equal Employment Opportunity (EEO) policy
4. Ensure compliance with state and federal legal requirements
5. Inform employees of the EEO policy
6. Review job structure, job descriptions and employment practices to ensure effective EEO
7. Ensure that Annual EEO report is generated and posted
8. Assist and collaborate with legal counsel on all station license renewals, random FCC EEO audits, and public inspection files
9. Audit the contents of the company's bulletin boards and public inspection files to ensure compliance information is posted and up-to-date
10. Complete and distribute Job Postings and Job Descriptions
11. Review all submitted applications and interview qualified applicants for all job openings
12. Review the qualifications of all applicants and employees to ensure qualified individuals are treated in a nondiscriminatory manner when hiring, promotion, transfer, and termination actions occur
13. Ensure that all questions asked during the interview pertain only to the specific job requirements/needs of the open position
14. Review the job performance of each employee to assess whether personnel actions are justified based on the employee's performance of his or her duties and responsibilities
15. Applicants are informed of the EEO Policy orally and through its inclusion on job postings.

(viii) In accordance with section 73.2080(c)(3), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of 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.

An evaluation of the station's compliance with the wide dissemination requirement is conducted on an annual basis. Job openings are communicated and posted for all eligible employees. Openings are posted on our website. Various other recruitment sources are utilized, including colleges, career fairs, and the Chamber of Commerce. In addition, employment agencies may be utilized for specialized positions. Employees are hired based on objective, job-related qualification standards from an analysis of duties, functions and competencies relevant to the job. Current employees are mentored regarding the criteria needed for promotions and personal growth. An inclusive culture in the workplace is promoted by fostering an environment of professionalism and respect for personal differences. The company fosters open communication and early dispute resolution.

(ix) As required by section 73.2080(c)(4), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of 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.

Vice President/Manager makes compensation decisions regarding staff on the basis of established pay procedures.

Principles applicable to all salary decisions:

- o Equal pay without regard to age, color, disability, ethnicity, gender, marital status, national origin, race, religion, sexual orientation, or veteran status
- o Emphasis on internal equity within the company
- o Determinants of all salary decisions include:
 - The employee's job-related qualifications and performance
 - Pay of other employees performing similar work
 - Company's fiscal status
 - External market considerations for similar work in the relevant labor market segment based on geographical considerations (local, state, regional, or national)
- o Availability of funds
- o Holiday pay – Provided to all full-time employees effective immediately from their full-time start date
- o Vacation pay – All full-time employees are given 1 week of vacation pay each year after completing six months. One or more years of employment, employees are given 2 weeks' vacation pay each year.

• Selection Process- Habersham Broadcasting Company is an equal opportunity employer striving for broad and inclusive outreach, and all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, national origin, disability status, genetic information, or any other characteristic protected by applicable law. All employment is decided based on qualifications, merit, and business need. In order to ensure these requirements are met:

- o All job vacancies are open for a minimum of at least five business days following communication of the job posting to company recruitment sources.
- o The hiring manager must review all submitted applications and interview qualified applicants.
- o Decisions to hire individuals must be based on specified job-related criteria. To fulfill this obligation, the hiring manager only solicits information (via submitted applications/resumes and interviews) which directly relates to an applicant's ability to perform the tasks of the job opening.

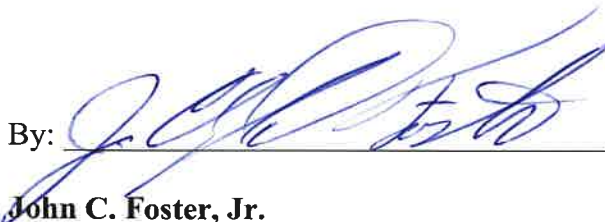
• Promotions and Transfers- the company ensures that promotion decisions are in accord with principles of equal employment opportunity by imposing only valid job requirements for promotional opportunities. Decisions to promote an individual are based on specified job-related criteria, the individuals' ability to perform the tasks of sought-after position, and the company's needs.

• Discharge/Termination- All decisions are based upon objective criteria. Performance deficiencies and other disciplinary action are administered according to established company policies and are administered without regard to individuals on the basis of their race, sex, color, religion, national or ethnic origin, age, disability, military service, sexual orientation, gender identity, or gender expression.

Please direct any questions to the undersigned.

Respectfully submitted,

Habersham Broadcasting Company

By: 

John C. Foster, Jr.

Vice President and *Corporate Secretary*, verifying the accuracy and completeness of this Response

Attachment A

Annual EEO Public File Reports:

12/01/2020-11/30/2021 and 12/01/2021-11/30/2022

EEO PUBLIC FILE REPORT*
Habersham Broadcasting Company
WCON – FM, WCON (AM)
12/01/2020 – 11/30/2021

Section 1. Vacancy List

Job Title	All Recruitment Sources (RS) Used to Fill Vacancy	Number of Interviewees Referred by Each RS	RS that Referred the hiree
WCON had No Full Time Hires during the reporting period.	N/A	N/A	N/A

** Section 2 of this Report was revised to add the names of the contacts at Piedmont and North Georgia Tech College; Section 3 of this Report was revised to add the title of the Habersham representative participating in Career Fairs; typographical corrections were made elsewhere and extraneous information removed.*

Section 2. Recruitment Source List

RS Number	RS Information	RS Entitled to Vacancy Notification? (Yes/No)	No. of Interviews Referred by RS over 12-month period
1	Piedmont College 1021 Central Avenue Demorest, Ga. 30535 Contact: Dr. Dale Van Canfort 706-778-3000	No	N/A
2	North Georgia Tech College 1500 Highway 197 N Clarkesville, Ga. 30523 Contact: Leslie Foster 706-754-7700	No	N/A
3	Habershambroadcasting.com Clayton Foster 540 North Main St. Cornelia, Ga. 30531 706-778-2241	No	N/A
4	Northeast Georgian Classified 2440 Old Athens Hwy. Cornelia, Ga. 30531 706-778-4215	No	N/A
5	Personal Inquiry Clayton Foster 450 North Main St. Cornelia, Ga. 30531 706-778-2242	No	N/A
6	Internal Source	No	N/A

Section 3. Recruitment Initiatives

Type of Recruitment Initiative	Brief Description of Activity
<p>Internships</p> <p>Outreach Initiatives by Participation in Events Sponsored by Educational Institutions designed to inform and educate members of the public about careers in broadcasting.</p> <p>Sponsorship of Events that we participated in for the purpose of helping the community and raising awareness of careers in broadcasting.</p>	<p>WCON extensively uses interns from local high schools and colleges. A student from Toccoa Falls Bible College was used by WCON from December 2020 to November 30, 2021. This intern assisted with on air and production duties.</p> <p>WCON Vice President/Manager participated in the Georgia Association of Broadcasters Grady College of Journalism and Mass Communication's 2021 Career Fair. The Career Fair was held on February 18th, 2021. WCON Vice President/Manager also participated in a Job and Career Fair at North Georgia Technical College on November 3rd, 2021.</p> <p>WCON regularly gives tours of the radio station ranging from Senior adults to Elementary School students.</p> <p>WCON sponsored events during the reporting period include: The National Day of Prayer at the Cornelia Depot, The Chattahoochee Mountain Fair Talent Show, Habersham County Little League Sporting Events and Games, Local Scout Troops, Fellowship of Christian Athletes, Habersham 911 Kids Truck or Treat Fest, and other various Habersham County Chamber of Commerce Events. Life South Blood Mobile Donation with Hayes of Baldwin, Banks County Sherriff's Office Toy Distribution, 5th Grade Fun Day at Fairview Elementary, 5th Grade Fun Day at Cornelia Elementary, Hall County Relay for Life, Lake Burton Fun Run to benefit Volunteer Fire Departments, Forsyth County Relay for Life Kickoff event.</p>

Community Involvement by Ownership

Clayton Foster, VP of Daily Operations and Corporate Secretary; Clayton is active with Christ Place Church, Boy Scouts, and the Georgia Association of Realtors. He also serves on the Habersham County Chamber of Commerce Board of Directors (2023 Chairman Elect), member of the Dream Source Partnership at Cherokee Bluff High School in Hall County and finally Clayton Foster is the team statistician for Habersham Central High School Raider Football.

David Foster, VP of Sale and CFO, is a member of The Rotary Club of Habersham County; and a Co-Chair of Early Act and the Chair for the Lee Arrendale Award for Vocational Excellence for Rotary District 6910. David is the radio voice of Habersham Central, regularly active in the Habersham County Chamber of Commerce, member of the Habersham EMC Board of Directors, Habersham County Football Ring of Honor President, Habersham Central Tipoff Club Treasurer, Habersham County Academic Booster Club Treasurer, Member of the Habersham County Partnership for Growth (EDC), North Georgia Technical College Foundation Board, Piedmont College Board of Trustees, and a member of Level Grove Baptist Church.

John C. Foster, WCON Co Owner & CEO, is regularly active in participation with Rotary Club of Habersham County, and the Habersham County Chamber of Commerce. Mr. Foster is a member of Level Grove Baptist Church.

EEO PUBLIC FILE REPORT*
Habersham Broadcasting Company
WCON – FM, WCON (AM)
12/01/2021 – 11/30/2022

Section 1. Vacancy List

Job Title	All Recruitment Sources (RS) Used to Fill Vacancy	Number of Interviewees Referred by Each RS	RS that Referred the hiree
WCON had one Full-Time Hire during the reporting period: Marketing Consultant	Piedmont College 1021 Central Avenue Demorest, Ga. 30535 Contact: Dr. Dale Van Canfort 706-778-3000	1	N/A
	North Georgia Tech College 1500 Highway 197 N Clarkesville, Ga. 30523 Contact: Leslie Foster 706-754-7700	0	N/A
	Habershambroadcasting.com Clayton Foster 540 North Main St. Cornelia, Ga. 30531 706-778-2241	1	N/A
	Personal Inquiry Clayton Foster 450 North Main St. Cornelia, Ga. 30531 706-778-2242	2	1
	GAB Grady College of Journalism and Mass Communication's 2021 Career Fair	0	N/A

**Sections 1 and 2 of this Report were revised to add the title of the full-time hire, the names of the contacts at Piedmont and North Georgia Tech College, and a clarification that interviews for this position took place in the period covered by the 2020-2021 EEO Public File Report; Section 3 was revised to add the title of the Habersham representative participating in the Career Fairs; minor typographical corrections were also made.*

Section 2. Recruitment Source List

RS Number	RS Information	RS Entitled to Vacancy Notification? (Yes/No)	No. of Interviews Referred by RS over 12-month period*
1	Piedmont College 1021 Central Avenue Demorest, Ga. 30535 Contact: Dr. Dale Van Canfort 706-778-3000	No	1
2	North Georgia Tech College 1500 Highway 197 N Clarkesville, Ga. 30523 Contact: Leslie Foster 706-754-7700	No	0
3	Habershambroadcasting.com Clayton Foster 540 North Main St. Cornelia, Ga. 30531 706-778-2241	No	1
4	GAB Grady College of Journalism and Mass Communication's 2021 Career Fair	No	0
5	Personal Inquiry Clayton Foster 450 North Main St. Cornelia, Ga. 30531 706-778-2242	No	2

*There was one full-time hire during the reporting period December 1, 2021, to November 30, 2022; Title: Marketing Consultant. There were a total of 4 interviews for this position, all of which took place in the period covered by the 2020-2021 EEO Public File Report.

Sponsorship of Events that we participated in for the purpose of helping the community and raising awareness of careers in broadcasting.

WCON sponsored events during the reporting period include: The National Day of Prayer at the Cornelia Depot, The Chattahoochee Mountain Fair Talent Show, Habersham County Little League Sporting Events and Games, Local Scout Troops and the Scouts American Values Dinner, Fellowship of Christian Athletes, Habersham 911 Kids Trunk or Treat Fest, and other various Habersham County Chamber of Commerce Events.

WCON also participated in the following events: The Marine Corps Reserve Toy Collection, 5th Grade Fun Day at Fairview Elementary, 5th Grade Fun Day at Cornelia Elementary, Hall County Relay for Life, Lake Burton Fun Run to benefit Volunteer Fire Departments and Relay for Life Songwriters Night for Charity.

Community Involvement by Ownership

Clayton Foster, VP of Daily Operations and Corporate Secretary; Clayton is active with Christ Place Church, Boy Scouts, and the Georgia Broadcasting Association. He also serves on the Habersham County Chamber of Commerce Board of Directors (2023 Chairman Elect), member of the Dream Source Partnership at Cherokee Bluff High School in Hall County and Clayton Foster is the team statistician for Habersham Central High School Raider Football.

David Foster, VP of Sales and CFO, is a member of The Rotary Club of Habersham County; and a Co-Chair of Early Act and the Chair for the Lee Arrendale Award for Vocational Excellence for Rotary District 6910. David is the radio voice of Habersham Central, regularly active in the

Habersham County Chamber of Commerce, member of the Habersham EMC Board of Directors, Habersham County Football Ring of Honor President, Habersham Central Tipoff Club Treasurer, Habersham County Academic Booster Club Treasurer, Member of the Habersham County Partnership for Growth (EDC), North Georgia Technical College Foundation Board, Piedmont College Board of Trustees, Habersham Food to Kids, and a Deacon/member of Level Grove Baptist Church.

John C. Foster, WCON Co-Owner & CEO, is active in participation with Rotary Club of Habersham County. Mr. Foster is a member of Level Grove Baptist Church.

Attachment B

Advertisements, bulletins, letters, faxes, e-mails, log sheets for on-air ads, or other communications announcing the positions as described in Section 73.2080(c)(5)(iii).

Careers

Interested in working with the amazing team at Habersham Broadcasting Company? View our career opportunities below:

MARKETING CONSULTANT

Do you have what it takes to help local businesses in Northeast Georgia businesses grow and succeed in an ever-changing, competitive marketing landscape? Habersham Broadcasting is searching for dedicated, self-starting individuals to join our sales team! Our representatives uncover partnership opportunities with area businesses and lead with creative ideas to help small businesses stand out utilizing our two over-the-air broadcast signals and digital properties. Interested in learning more? Send an email to Clayton Foster.

Requirements

- Prior experience in broadcast media and/or sales.
- Firm understanding of local advertising.
- Driven, outgoing personality

Habersham Broadcasting Company is an equal opportunity employer.

*This announcement ran on the <https://habershambroadcasting.com/> website during the month of June 2021



The substance of the attached <https://habershambroadcasting.com/> website announcement for the Marketing Consultant position was shared with contacts from Piedmont College and North Georgia Tech College in June 2021 by phone, as well as with applicants who learned of the position through personal inquiry. Information about careers in radio in general, and the open Marketing position in specific, was shared with students visiting the Habersham booth at the GAB Grady College Career Fair on February 18, 2021.

Attachment C

Question 2.b(iv):

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

2020-2021 EEO Public File Report: There were no full-time vacancies filled during the reporting period December 1, 2020, to November 30, 2021.

2021-2022 EEO Public File Report: There was one full-time hire during the reporting period December 1, 2021, to November 30, 2022; Title: Marketing Consultant. There were a total of 4 interviews for this position, all of which took place in the period covered by the 2020-2021 EEO Public File Report:

Job Title	All Recruitment Sources (RS) Used to Fill Vacancy	Number of Interviewees Referred by Each RS	RS that Referred the hiree
Marketing Consultant	Piedmont College 1021 Central Avenue Demorest, Ga. 30535 Contact: Dr. Dale Van Canfort 706-778-3000	1	N/A
	North Georgia Tech College 1500 Highway 197 N Clarkesville, Ga. 30523 Contact: Leslie Foster 706-754-7700	0	N/A
	Habershambroadcasting.com Clayton Foster 540 North Main St. Cornelia, Ga. 30531 706-778-2241	1	N/A

	Personal Inquiry Clayton Foster 450 North Main St. Cornelia, Ga. 30531 706-778-2242	2	1
	GAB Grady College of Journalism and Mass Communication's 2021 Career Fair	0	N/A

Attachment D

2020-2021 Section 73.2080(c)(2) Recruitment Initiatives

Type of Recruitment Initiative	Brief Description of Activity
<p align="center">Internships</p> <p>Outreach Initiatives by Participation in Events Sponsored by Educational Institutions designed to inform and educate members of the public about careers in broadcasting.</p> <p>Sponsorship of Events that we participated in for the purpose of helping the community and raising awareness of careers in broadcasting.</p>	<p>WCON extensively uses interns from local high schools and colleges. A student from Toccoa Falls Bible College was used by WCON from December 2020 to November 30, 2021. This intern assisted with on air and production duties.</p> <p>WCON Vice President/Manager participated in the Georgia Association of Broadcasters Grady College of Journalism and Mass Communication's 2021 Career Fair. The Career Fair was held on February 18th, 2021. WCON Vice President/Manager also participated in a Job and Career Fair at North Georgia Technical College on November 3rd, 2021.</p> <p>WCON regularly gives tours of the radio station ranging from Senior adults to Elementary School students.</p> <p>WCON sponsored events during the reporting period include: The National Day of Prayer at the Cornelia Depot, The Chattahoochee Mountain Fair Talent Show, Habersham County Little League Sporting Events and Games, Local Scout Troops, Fellowship of Christian Athletes, Habersham 911 Kids Truck or Treat Fest, and other various Habersham County Chamber of Commerce Events. Life South Blood Mobile Donation with Hayes of Baldwin, Banks County Sherriff's Office Toy Distribution, 5th Grade Fun Day at Fairview Elementary, 5th Grade Fun Day at Cornelia Elementary, Hall County Relay for Life, Lake Burton Fun Run to benefit Volunteer Fire Departments, Forsyth County Relay for Life Kickoff event.</p>

<p>Community Involvement by Ownership</p>	<p>Clayton Foster, VP of Daily Operations and Corporate Secretary; Clayton is active with Christ Place Church, Boy Scouts, and the Georgia Association of Realtors. He also serves on the Habersham County Chamber of Commerce Board of Directors (2023 Chairman Elect), member of the Dream Source Partnership at Cherokee Bluff High School in Hall County and finally Clayton Foster is the team statistician for Habersham Central High School Raider Football.</p> <p>David Foster, VP of Sale and CFO, is a member of The Rotary Club of Habersham County; and a Co-Chair of Early Act and the Chair for the Lee Arrendale Award for Vocational Excellence for Rotary District 6910. David is the radio voice of Habersham Central, regularly active in the Habersham County Chamber of Commerce, member of the Habersham EMC Board of Directors, Habersham County Football Ring of Honor President, Habersham Central Tipoff Club Treasurer, Habersham County Academic Booster Club Treasurer, Member of the Habersham County Partnership for Growth (EDC), North Georgia Technical College Foundation Board, Piedmont College Board of Trustees, and a member of Level Grove Baptist Church.</p> <p>John C. Foster, WCON Co Owner & CEO, is regularly active in participation with Rotary Club of Habersham County, and the Habersham County Chamber of Commerce. Mr. Foster is a member of Level Grove Baptist Church.</p>
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2021-2022 Section 73.2080(c)(2) Recruitment Initiatives

Type of Recruitment Initiative	Brief Description of Activity
<p>Internships</p> <p>Outreach Initiatives by Participation in Events Sponsored by Educational Institutions designed to inform and educate members of the public about careers in broadcasting.</p>	<p>WCON extensively uses interns from local high schools and colleges. One student from Habersham Central High School and one student from Charter Mountain Education were used by WCON from December 2021 to November 30, 2022. These interns assisted with on air and production duties.</p> <p>WCON Vice President/Manager participated in the Georgia Association of Broadcasters Grady College of Journalism and Mass Communication's 2022 Career Fair. The Career Fair was held on February 8th, 2022.</p> <p>WCON Vice President/Manager participated in a Job and Career Fair at the Habersham Ninth Grade Academy on April 6th, 2022.</p> <p>WCON Vice President/Manager also participated in a Job and Career Fair at Fairview Elementary School on May 20th, 2022.</p> <p>WCON regularly gives tours of the radio station ranging from Senior adults to Elementary School students.</p> <p>WCON management spoke to the Habersham County Kiwanis Club on April 27th, 2022, with topics covering the history of WCON and Careers in Broadcasting.</p>

Sponsorship of Events that we participated in for the purpose of helping the community and raising awareness of careers in broadcasting.

WCON sponsored events during the reporting period include: The National Day of Prayer at the Cornelia Depot, The Chattahoochee Mountain Fair Talent Show, Habersham County Little League Sporting Events and Games, Local Scout Troops and the Scouts American Values Dinner, Fellowship of Christian Athletes, Habersham 911 Kids Trunk or Treat Fest, and other various Habersham County Chamber of Commerce Events.

WCON also participated in the following events: The Marine Corps Reserve Toy Collection, 5th Grade Fun Day at Fairview Elementary, 5th Grade Fun Day at Cornelia Elementary, Hall County Relay for Life, Lake Burton Fun Run to benefit Volunteer Fire Departments and Relay for Life Songwriters Night for Charity.

Community Involvement by Ownership

Clayton Foster, VP of Daily Operations and Corporate Secretary; Clayton is active with Christ Place Church, Boy Scouts, and the Georgia Broadcasting Association. He also serves on the Habersham County Chamber of Commerce Board of Directors (2023 Chairman Elect), member of the Dream Source Partnership at Cherokee Bluff High School in Hall County and Clayton Foster is the team statistician for Habersham Central High School Raider Football.

David Foster, VP of Sales and CFO, is a member of The Rotary Club of Habersham County; and a Co-Chair of Early Act and the Chair for the Lee Arrendale Award for Vocational Excellence for Rotary District 6910.

David is the radio voice of Habersham Central, regularly active in the Habersham County Chamber of Commerce, member of the Habersham EMC Board of Directors, Habersham County Football Ring of Honor President, Habersham Central Tipoff Club Treasurer, Habersham County Academic Booster Club Treasurer, Member of the Habersham County Partnership for Growth (EDC), North Georgia Technical College Foundation Board, Piedmont College Board of Trustees, Habersham Food to Kids, and a Deacon/member of Level Grove Baptist Church.

John C. Foster, WCON Co-Owner & CEO, is active in participation with Rotary Club of Habersham County. Mr. Foster is a member of Level Grove Baptist Church.

Habersham Broadcasting Company

Recruitment Initiatives

Documentation for the following Recruitment Initiatives from this reporting period is attached:

1. Participation in four career fairs
2. Sponsorship of two nonconcurrent student internships



**GEORGIA
ASSOCIATION OF
BROADCASTERS**

6 West Druid Hills Drive NE, Suite 330

February 18, 2021

Habersham Broadcasting
540 North Main St.
Cornelia, GA 30531

The Georgia Association of Broadcasters wants to thank you for attending the 2021 GAB/UGA Career Fair, which took place on February 10, 2021. We are extremely grateful that your organization took the time to participate in this very successful event. The FCC recognizes 16 different EEO initiatives that stations can use, each counting for one EEO initiative. In total, your station must achieve *two* EEO initiatives during the 2-year period.

Your station's participation in the 2020 Grady Career Fair may be counted toward obtaining EEO Prong 3 Credit under the Federal Communications Commission's rules. The specific requirement reads: "Participation in at least four events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities."

Please include this letter along with any other applicable materials in your FCC EEO records.

Congratulations, and thank you once again for your participation.

Best,

A handwritten signature in blue ink that reads 'Bob Houghton'.

Bob Houghton
President
Georgia Association of Broadcasters

November 3, 2021

Mr. David Foster

WCON

PO BOX 100

Cornelia, GA 30531

Dear Mr. Foster,

On Behalf of North Georgia Technical College, I would like to thank you for your support at our Job Fair and Career Expo held in our new Industrial Technology Center building. It was a great success! We had over 20 local companies in attendance. Many students were interviewed for available positions at the event with great potential for employment. Your contributions to this event were key to our success. We appreciate our relationship with your radio station and hope to continue to work in partnership with you for future events.



Leslie Foster

Associate Vice-President for Economic Development
Economic Development
Clarkesville Campus
ITC 251
+1 706-754-7715 | lfoster@northgatech.edu
website: northgatech.edu



Monday - Thursday | Closed Fridays
A unit of the Technical College System of Georgia



May 11, 2022

Mr. David Foster
Habersham Broadcasting/WCON
Main Street
Cornelia, Georgia 30531

David:

I wanted to personally thank you for participating in last month's Ninth Grade Academy Career Fair. It was another successful event, and with participants like you and WCON, the event was outstanding for our students and the community.

We had participation from over thirty businesses and professional services firms, including government, education, and military employers. The student participation exceeded 115.

We look forward to your participation next year!

Thank you,

A handwritten signature in black ink that reads "Charlie".

Charlie Fiveash
Executive Director



**GEORGIA ASSOCIATION
OF BROADCASTERS**

6 West Druid Hills Drive NE, Suite 330
Atlanta, GA 30329

August 8, 23

Habersham Broadcasting
540 North Main Street
Cornelia, GA 30531

The Georgia Association of Broadcasters wants to thank you for attending the 2022 GAB/UGA Career Fair, which took place on February 8, 2022. We are extremely grateful that your organization took the time to participate in this very successful event. The FCC recognizes 16 different EEO initiatives that stations can use, each counting for one EEO initiative. In total, your station must achieve *two* EEO initiatives during the 2-year period.

Your station's participation in the 2022 Grady Career Fair may be counted toward obtaining EEO Prong 3 Credit under the Federal Communications Commission's rules. The specific requirement reads: "Participation in at least four events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshops, and similar activities." Your participation in this event counts as $\frac{1}{4}$ of a credit in this category.

Please include this letter along with any other applicable materials in your FCC EEO records.

Congratulations, and thank you once again for your participation.

Best,

A handwritten signature in blue ink that reads "Bob Houghton".

Bob Houghton
President
Georgia Association of Broadcasters

Habersham Broadcasting Company
WCON-FM and WCON (AM)
Student Internship Completion Certification

This is to certify that **Latonio Harmonson** completed Habersham Broadcasting Company's thirteen-week Student Internship Program at its WCON-FM and AM studios on April 15, 2022. Latonio was recommended for the Habersham Internship Program by Morris Brooks, Work-Based Learning Coordinator, Habersham Central High School, based on Latonio's interest in pursuing a career in broadcasting. Latonio now has a part-time position at WCON while he continues to pursue his education.

Habersham Broadcasting's Internship Program is designed to help student participants acquire the skills necessary to obtain employment in the broadcast industry. Student Interns are supervised by Clayton Foster, Habersham's Vice President and Corporate Secretary. During this Program, interns learn about a variety of areas such as audio production and promotions, sales, and traffic. They are also provided the opportunity to shadow experienced station personnel and receive hands-on training in many areas such as programming and on-air broadcasting.



Clayton Foster
Vice President
Habersham Broadcasting Company

Acknowledged:



Latonio Harmonson

Habersham Broadcasting Company
WCON-FM and WCON (AM)
Student Internship Program Completion Certification

This is to certify that **Logan Bennet** completed Habersham Broadcasting Company's thirteen-week Student Internship Program at its WCON-FM and AM studios on December 16, 2022. Logan was recommended for the Habersham Internship Program by Myra Chandler, his Guidance Counselor at Mountain Education Charter High School, based on Logan's interest in pursuing a career in broadcasting. Logan now works part-time at WCON while he continues to pursue his education.

Habersham Broadcasting's Internship Program is designed to help student participants acquire the skills necessary to obtain employment in the broadcast industry. Student Interns are supervised by Clayton Foster, Habersham's Vice President and Corporate Secretary. During this Program, interns learn about a variety of areas such as audio production and promotions, sales, and traffic. They are also provided the opportunity to shadow experienced station personnel and receive hands-on training in many areas such as programming and on-air broadcasting.



Clayton Foster
Vice President
Habersham Broadcasting Company

Acknowledged:



Logan Bennet