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POSTED TO KFSF-DT ONLINE PUBLIC INSPECTION FILE

Mr. Lewis C. Pulley
Assistant Chief, Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **KFSF-DT (Facility ID 51429), Vallejo, CA Response to 2020
Random EEO Audit**

Dear Mr. Pulley:

Unimas San Francisco LLC, licensee of KFSF-DT, Vallejo, CA (“KFSF-DT” or the “Station”), hereby responds (the “Response Letter”) to your letter dated February 6, 2020, stating that the Station has been randomly selected for an EEO audit. The Station is commonly owned with and comprises the same employment unit as: KSOL(FM), San Francisco, CA and KSQL(FM), Santa Cruz, CA (licensed to Univision Radio San Francisco, Inc.); KVVV(FM), Santa Clara, CA, KBRG(FM), San Jose, CA, KSQL(FM), Santa Cruz, CA, and KVVZ(FM), San Rafael, CA (licensed to Univision Radio Stations Group, Inc.); and KDTV-DT, San Francisco, CA and KDTV-CD, Santa Rosa, CA (licensed to KDTV License Partnership, G.P.) (together with KFSF-DT, the “Stations” or the “Employment Unit”). All licensees are subsidiaries of Univision Communications Inc. (“Univision”).

These responses, which are provided in the order of the requests in Section 3 of your letter, were prepared under my general supervision with the assistance of Elizabeth Ibarra, who serves as the Employment Unit’s EEO Officer. As a parent company, Univision establishes basic EEO policies for its employment units and provides human resources and certain other administrative services to those employment units.

3(a) “Copies of the Unit’s two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites,

provide each web address. If the Unit's most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit's most recent EEO public file report must be linked to either the Unit's site or the general corporate site, pursuant to 47 C.F.R. § 2080(c)(6)."

The license renewal application filing anniversary date for the Stations is August 1. Exhibit A, therefore, attaches the EEO Public File Reports for the periods August 1, 2017 - July 31, 2018 and August 1, 2018 - July 31, 2019. The cover sheets supplied in Exhibit B identify the dates of each full-time hire covered by the reports. The Stations have a joint website, from which their most recent EEO public file report is accessible via hyperlink: <https://www.univision.com/local/san-francisco-kdvtv>;
<https://st1.uvning.com/4f/d6/bcc0afa6401394bd26f910e82ce7/sf-tv-radio-combined-eeo-report-2018-2019.pdf>.

3(b) “For each of the Unit’s full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in Section 73.2080(c)(5)(iii). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).”

During the two-year reporting period covered by the two most recent EEO Public File Reports, the Stations hired 27 full-time employees. Exhibit B includes a cover sheet for each of those openings which identifies the position, the number of interviewees for each opening, and the referral source for each interviewee and hiree. Each cover sheet is followed by

copies of letters, emails, and other communications sent to recruitment sources to notify them of the vacancy. The Stations' practice is to retain copies of all letters, emails, and notices sent to all sources used, as required by Section 73.2080(c)(5)(iii).

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."

Each of the two Annual EEO Public File Reports attached as Exhibit A provides the total number of interviewees for all full-time Employment Unit vacancies filled during the reporting period and the referral sources of the interviewees. The cover sheets in Exhibit B further indicate the number of interviewees for each position and the referral source for each interviewee.

3(d) "Documentation of the Unit's 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."

Each of the two Annual EEO Public File Reports attached as Exhibit A provides a description of the supplemental outreach initiatives undertaken by the Employment Unit during the reporting period. Exhibit C includes cover sheets describing activities sufficient to constitute four or more initiatives under 47 C.F.R. sec. 73.2080(c)(2), and identifying the personnel involved to the extent that information is not reflected in accompanying documentation. These cover sheets are followed by documentation that reflects the performance of each initiative.

The Stations currently have 82 full-time employees. The Station is located in an OMB metropolitan area with a population of greater than 250,000 persons. Accordingly, the Station is not located in a "smaller market," as defined in Section 73.2080 of the FCC's rules, and the Station is therefore required to perform four supplemental initiatives over the course of the two-year period covered by these reports.

- 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.”**

During the Stations’ current license term no such complaints have been filed against the Stations.

- 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.”**

Raul Rodriguez, President and General Manager, is responsible for ensuring that the Employment Unit provides equal employment opportunity in all employment decisions. In addition, in accordance with EEO policies, the EEO Officer, Ms. Ibarra, works with Mr. Rodriguez to ensure that the Employment Unit effectively implements its recruitment and related programs as an equal opportunity employer. This includes maintaining and periodically updating and revising a list of recruitment sources; publicizing job openings (upon approval of the job posting by the relevant Department Manager); and maintaining records of information relating to the recruitment, interview, and hiring process. The Employment Unit’s EEO Officer also is responsible for reviewing the effectiveness of the Employment Unit’s EEO recruitment policies on an ongoing basis as well as annually.

Employees in Department Manager and supervisor level positions are responsible for understanding, communicating, observing and implementing the Employment Unit’s EEO policy in all employment related matters so as to prevent discrimination and provide equal employment opportunities to employees, as well as applicants under consideration for positions. This includes ensuring that job descriptions comply with Univision’s EEO policies and that information relating to the individuals interviewed and hired is provided to the EEO Officer.

The Employment Unit notifies applicants for job openings of its basic EEO policy commitment on employment applications and other publications of job notices. When hired, regular employees are required to acknowledge receipt of a Univision Employee Handbook, which covers, among other things, Univision EEO policies. In addition, EEO notices that

explain various rights and responsibilities relating to equal employment opportunity are placed on bulletin boards in the Employment Unit's offices. As a further effort to help ensure that effective steps are being taken to build and maintain a diverse workforce, Univision schedules training sessions regarding EEO compliance and non-discrimination practices in the workplace for the EEO Officer every two years. Additional guidance on FCC requirements is provided by myself, as Associate General Counsel, and by our outside legal counsel.

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."

The Employment Unit's EEO Officer is responsible for reviewing the effectiveness of the Employment Unit's EEO recruitment policies on an ongoing basis as well as annually, pursuant to Univision's EEO policies. The EEO Officer, Ms. Ibarra, assesses recruitment and outreach efforts in the course of the Employment Unit's preparation of the Annual EEO Public File Report. The review includes assessment of the Employment Unit's recruitment sources to help ensure that they reflect a diverse array of sources designed to reach all segments of the community.

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."

The Employment Unit strives to comply with all federal, state and/or local laws regarding pay, benefits, seniority practices, promotions and selection techniques, and tests to ensure that the Employment Unit provides equal opportunity and does not discriminate against employees or applicants. Univision sets policies regarding employee benefits on a company-wide basis. As noted, the Employment Unit is responsible for ensuring equal employment opportunity in all employment related decisions in accordance with Univision policy and applicable legal requirements.

As the Employment Unit's President and General Manager, Mr. Rodriguez reviews compensation, promotions and selection techniques on an annual basis in connection with preparation of a business plan for the upcoming year within the context of basic parameters established by Univision. Such matters are also reviewed on an as-needed basis

throughout the year. Mr. Rodriguez also reviews promotion and salary increase decisions at the time they are made.

The Stations have agreements with two labor unions: SAG AFTRA and NABET. Managers of the Employment Unit work to ensure that hiring and employment practices with regard to unionized employees are consistent with all legal and collective bargaining requirements.

- 3(i) “If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit’s EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.”**

This request is not applicable.

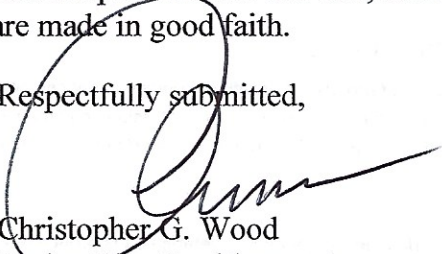
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Please contact me if you have any questions about this Response Letter.

I certify that the statements in this Response Letter are true, correct and complete to the best of my knowledge and belief, and are made in good faith.

Respectfully submitted,



Christopher G. Wood
Senior Vice President and
Associate General Counsel

Attachments (Exhibits A-C)