

August 19, 2022

Dear Licensee:

1. In accordance with 47 CFR § 73.2080(f)(4), [Station call sign] (the Station) and all other stations, if any, in the same station employment unit (defined by 73.2080(e)(2) as commonly owned stations in the same market that share employees) (the Unit) has been randomly selected for an audit of its Equal Employment Opportunity (EEO) program. A copy of section 73.2080 of the Federal Communications Commission (FCC or Commission) rules can be found here: https://www.fcc.gov/enforcement/eb-eeo/equal-employment-opportunity-rules.

2. Audit Data Requested.

(a) If the Unit has fewer than five full-time employees (defined by section 73.2080(e)(1) as employees regularly assigned to work 30 hours a week or more), submit a response listing the Unit's full-time employees identified by job title (no personal names should be provided), the number of hours each is regularly assigned to work per week, and a response to Question 2(b)(vi) below. Please also see Questions 3 and 4 below for guidance regarding brokers and brokered stations.

(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).

(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).

(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 multiple sources, 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 sources used to announce the vacancy were retained,

as required by section 73.2080(c)(5)(iii).³ 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).

(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.

(v) Dated documentation demonstrating performance 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.

(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.

(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.

³ For on-air announcements that aired multiple times to advertise the position, you may send a traffic log summary documenting the timeframe during which the announcements aired (in lieu of the log in its entirety). The log showing all air dates and times may be required for additional verification, but the Unit need not provide with its initial response.

(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.

(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.

(x) If your entity is a religious broadcaster and any of the Unit's full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. 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.

(c) Resumes, company training manuals, posters, employee handbooks, and corporate guidebooks are not required to be submitted. If any of the information in these or similar materials is relevant to any part of this audit letter, the Unit may provide a summary of any content if it so wishes. If this audit requires an unusually burdensome volume of documentation, the Unit may contact EEO staff at (202) 418-1450 prior to the response deadline to discuss alternative ways of condensing the information.

3. Time Brokerage—Licensee of brokered station(s) receives audit letter.

If any station included in the Unit is subject to a time brokerage agreement, the licensee must immediately forward a copy of this letter to the broker under each such agreement. Additionally, if the Unit employs fewer than five full-time employees, the licensee must respond by providing a list of the Unit's full-time employees listed by job title, the number of hours each employee is assigned to work, and a response to Question 2(b)(vi) above. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 2(b).

4. Time Brokerage—Broker receives audit letter.

(a) **Broker receives audit letter from brokered station licensee.** The broker must submit information requested in 2(b) above concerning information relating only to its own full-time

employees working on behalf of the brokered station, as required by section 73.2080(f)(3) of the Commission's rules. If recruitment activity for those brokered station employees is maintained with that of other stations licensed to you, and you lack the ability to separate the information, submit information pertaining to both.

(b) **Broker receives audit letter directly from Commission.** If any station in the Unit is licensed to you, submit information requested in 2(b) above for the Unit's EEO program. If recruitment activity pertaining to full-time employees working on behalf of another station you broker is maintained with that of the Unit, and you lack the ability to separate the information, submit information pertaining to both.

(c) **Broker described in 4(a) or 4(b).** If full-time employees at the station you broker, combined with full-time employees at the Station (or Unit), total fewer than five, you need only respond to this letter by submitting a list of full-time employees (identified by job title and number of hours regularly assigned to work per week) for both the brokered station(s) and subject Station as well as a response to Question 2(b)(vi).

5. Procedures.

(a) The response to this audit letter must be uploaded to the FCC-hosted online public inspection file (https://publicfiles.fcc.gov/) belonging to each station in the Unit by no later than October 7, 2022. The response should be placed in the EEO Audits, Investigations, and Complaints subfolder in the online public file (found at EEO Records>>Additional Documents>> EEO Audits, Investigations, and Complaints). Include in the response the Station's Facility ID Number and an e-mail address of a Station representative.

(b) Any extension of time must be requested at least five days prior to aforementioned deadline (via email to EB-EEO@fcc.gov), indicate the additional time the Unit believes it needs to complete its response (not to exceed 45 days) and will be granted only upon a showing of good cause. Unless and until an extension is granted, the original deadline remains in effect.

(c) If the Unit submitted an EEO audit response in 2020 or 2021 and/or the most recent license renewal application(s) applicable to the Unit were granted after August 1, 2020, send an email to EB-EEO@fcc.gov for additional guidance on whether a response is required. In the email, provide a reference to the relevant filings/applications before the Commission.

(d) The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. (*See* 47 CFR § 1.16.). To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; 47 CFR § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with section 73.2080(g).

(e) As required by sections 73.3526(e)(10) (commercial stations) and 73.3527(e)(11) (noncommercial educational stations), a copy of this letter and the response must be placed in the FCC-hosted online public inspection file belonging to each station in the Unit. Consequently, the response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. The FCC does not require that employment units retain such information in their records, or that such information be provided in response to this letter.

(f) Upon receipt, audit responses will be reviewed for completeness. If any questions arise or there are missing materials, EEO staff will contact you. The Enforcement Bureau no longer issues letters to licensees upon completion of our review of audit responses.

Should you have any questions, please contact EEO Staff at EB-EEO@fcc.gov or (202) 418-1450. Thank you for your cooperation.

Sincerely,

/s/ Elizabeth Goldin

Elizabeth E. Goldin Assistant Chief, Investigations & Hearings Division Enforcement Bureau

CALL SIGN	SERVICE	CITY OF LICENSE	STATE	FACILITY ID	LICENSEE NAME
KBVU	DTV	EUREKA	CA	58618	Esteem Broadcasting of California LLC
KCAT	AM	PINE BLUFF	AR	30138	Broadcast Industry Group, LLC
KCRA-TV	DTV	SACRAMENTO	CA	33875	Hearst Stations Inc.
KEYT-TV	DTV	SANTA BARBARA	CA	60637	NPG of California, LLC
KGMD-TV	DTV	HILO	н	36914	Nexstar Media, Inc.
КНХТ	FM	ERATH	LA	54650	Townsquare Media of Lafayette, LLC
KJEF	AM	JENNINGS	LA	8168	Townsquare License LLC
кјмн	FM	LAKE ARTHUR	LA	22962	Townsquare License LLC
ΚΚΡΧ-ΤΥ	DTV	SAN JOSE	CA	22644	ION Media San Jose License, Inc.
KLLN	FM	NEWARK	AR	48700	Cedar Ridge School District
КМТС	FM	RUSSELLVILLE	AR	58266	Russellville Educ B/C Foundation
KMTR	DTV	EUGENE	OR	35189	KMTR Television, LLC
κωνχ	FM	MONROE	LA	48976	Holladay Broadcasting of Louisiana, LLC
KNBC	DTV	LOS ANGELES	CA	47906	NBC Telemundo License LLC
KOPB-TV	DTV	PORTLAND	OR	50589	Oregon Public Broadcasting
KTLN	FM	THIBODAUX	LA	4219	UNIVERSITY OF NEW ORLEANS
KUAP	FM	PINE BLUFF	AR	6113	Board of Trustees of the University of Arkansas
KVLO	FM	HUMNOKE	AR	28114	Arkansas County Broadcasters, Inc.
KVMA-FM	FM	SHREVEPORT	LA	53030	Cumulus Licensing LLC
KZBL	FM	NATCHITOCHES	LA	7824	Baldridge-Dumas Communications, Inc.
WAHP	FM	BELTON	SC	67212	Radio Training Network Inc
WAKL	FM	GAINESVILLE	GA	48727	Educational Media Foundation
WANS	AM	ANDERSON	SC	21829	The Power Foundation
WASG	AM	DAPHNE	AL	51141	Alabama Radio Corporation
WAXS	FM	OAK HILL	WV	52789	Plateau Broadcasting , Inc.
WAYM	FM	SPRING HILL	TN	58421	HOPE MEDIA GROUP
WBAD	FM	LELAND	MS	28876	Interchange Communications, Inc.

CALL SIGN	SERVICE	CITY OF LICENSE	STATE	FACILITY ID	LICENSEE NAME
WBEL-FM	FM	CAIRO	IL	87567	AMERICAN FAMILY ASSOCIATION
WBIN-TV	DTV	DERRY	NH	14682	Univision Local Media, Inc.
WBMH	FM	GROVE HILL	AL	8607	Pine City Radio, LLC
WBNO-FM	FM	BRYAN	ОН	72782	Impact Radio, LLC
WBRI	AM	INDIANAPOLIS	IN	54706	Heritage Christian Radio, Inc.
WCFL	FM	MORRIS	IL	28304	University of Northwestern-St. Paul
WCNC	AM	ELIZABETH CITY	NC	49438	East Carolina Radio of Elizabeth City, Inc.
WCNR	FM	KESWICK	VA	52394	Tidewater Communications, LLC
WCOG	AM	GREENSBORO	NC	74203	Winston-Salem-Greensboro Broadcasting Company, LLC
WCSR-FM	FM	HILLSDALE	МІ	71298	McKibbin Media Group, Inc.
WCSZ	AM	SANS SOUCI	SC	25235	REDEMPTION STRATEGIES BROADCASTING, LLC
WCYN	AM	CYNTHIANA	КҮ	71307	WCYN Broadcasting, Inc.
WCYN-FM	FM	CYNTHIANA	КҮ	71308	Cumulus Licensing LLC
WDGG	FM	ASHLAND	КҮ	21436	Fifth Avenue Broadcasting Co., Inc.
WDLR	AM	MARYSVILLE	ОН	29636	Delmar Communications, Inc.
WDUR	AM	DURHAM	NC	36943	Arohi Media LLC
WEAA	FM	BALTIMORE	MD	43794	MORGAN STATE UNIVERSITY
WEBK	FM	SOCIETY HILL	SC	175269	RICHBURG EDUCATIONAL BROADCASTERS, INC.
WEDH	DTV	HARTFORD	СТ	13602	Connecticut Public Broadcasting Inc
WEMM- FM	FM	HUNTINGTON	WV	43860	Bristol Broadcasting Co., Inc.
WERC-FM	FM	HOOVER	AL	62278	iHM Licenses, LLC
WERM	AM	FAIRHOPE	AL	32848	Eternity Media Group WERM
WESP	FM	DOTHAN	AL	6891	Alabama Media, LLC
WFCM	AM	SMYRNA	TN	58737	Iglesia Misionera Jesucristo Viene Pronto, Inc.
WFSQ	FM	TALLAHASSEE	FL	21803	Florida State University
WGLU	FM	WARNER ROBINS	GA	29129	Educational Media Foundation

CALL SIGN	SERVICE	CITY OF LICENSE	STATE	FACILITY ID	LICENSEE NAME
WGPL	AM	PORTSMOUTH	VA	69560	Friendship Cathedral Family Worship Center, Inc.
WGUO	FM	RESERVE	LA	70279	Southeastern Broadcasting, Inc.
WHBC-FM	FM	CANTON	ОН	4488	Alpha Media Licensee LLC
WHRP	FM	GURLEY	AL	22264	Cumulus Licensing LLC
WHTH	AM	HEATH	ОН	57937	RUNNYMEDE INC.
WHTX	AM	WARREN	ОН	70531	Sagittarius Communications, LLC
WIBL	FM	FAIRBURY	IL	86178	Pilot Media, LLC
WIGO	AM	MORROW	GA	60918	McL/McM Georgia, LLC
WINW	AM	CANTON	ОН	8549	CAP III Media, Inc.
WIRO	AM	IRONTON	ОН	61685	KW Ministries, Inc.
WIVT	DTV	BINGHAMTON	NY	11260	Nexstar Broadcasting, Inc.
WJCF	AM	MUNCIE	IN	1724	New Beginnings Movement, Inc.
WJCK	FM	PIEDMONT	AL	28334	Immanuel Broadcasting Network, Inc.
WJER	AM	DOVER-NEW PHILADELPHIA	ОН	73134	WJER RADIO LLC
WJZ-FM	FM	CATONSVILLE	MD	1916	Audacy License, LLC
WKAT	AM	MIAMI	FL	43034	Radio Piment Bouk, Inc.
WKBH	AM	HOLMEN	WI	56617	Relevant Radio, Inc.
WKCL	FM	LADSON	SC	10340	Chapel Of The Holy Spirit Bible School
WKEY	AM	COVINGTON	VA	73157	WVJT, LLC
WKFN	AM	CLARKSVILLE	TN	65202	Saga Communications of Tuckessee, LLC
WKGL-FM	FM	LOVES PARK	IL	38638	Cumulus Licensing LLC
WKJN	FM	CENTREVILLE	MS	53025	North Shore Broadcasting Co., Inc.
WKKI	FM	CELINA	ОН	60848	Sonshine Communications Corporation
WKNK	FM	CALLAWAY	FL	42371	RoRo Investments, LLC
WLFL	DTV	RALEIGH	NC	73205	WLFL Licensee, LLC
WLIJ	AM	SHELBYVILLE	TN	27632	Hopkins Farms Broadcasting, Inc.

CALL SIGN	SERVICE	CITY OF LICENSE	STATE	FACILITY ID	LICENSEE NAME
WLJN	AM	ELMWOOD TOWNSHIP	MI	24603	GOOD NEWS MEDIA, INC.
WLKD	AM	MINOCQUA	WI	55210	Raven License Sub, LLC
WLKT	FM	LEXINGTON-FAYETTE	KY	29575	iHM Licenses, LLC
WLLX	FM	LAWRENCEBURG	TN	53664	ROGER W. WRIGHT
WLRO	AM	DENHAM SPRINGS	LA	37815	iHM Licenses, LLC
WLYF	FM	MIAMI	FL	30827	Audacy License, LLC
WMMJ	FM	BETHESDA	MD	54712	Radio One Licenses, LLC
WMOR-FM	FM	MOREHEAD	KY	73279	Morgan County Industries Inc.
WMOV	AM	RAVENSWOOD	WV	24585	Vandalia Media Partners LLC
WMQM	AM	LAKELAND	ΤN	42369	WMQM, Inc.
WMRY	FM	CROZET	VA	6130	James Madison University Board of Visitors / State of Virginia
WMTD	AM	HINTON	WV	6013	MOUNTAINPLEX MEDIA, LLC
WMVG	AM	MILLEDGEVILLE	GA	73302	Oconee Communications Company, LLC
WMVM	FM	GOODMAN	WI	59353	WRVM, Inc
WMYM	AM	MIAMI	FL	12833	Actualidad 990AM Licensee, LLC
WNIA	FM	TARBORO	NC	172953	Nash Community College
WNKW	AM	NEON	KY	37154	Sunshine Media Group,LLC
WNVM	FM	CIDRA	PR	1891	NEW LIFE BROADCASTING INC.
WNYI	DTV	ITHACA	NY	34329	Word of God Fellowship, Inc.
WONC	FM	NAPERVILLE	IL	49179	WONC/North Central College
WOVV	FM	OCRACOKE	NC	173549	Ocracoke Community Radio, Inc.
WOWB	FM	BREWTON	AL	40428	Agape Educational Media, Inc.
WOWL	FM	BURNSVILLE	MS	79355	Southern Community Services, Inc.
WPFC	AM	BATON ROUGE	LA	31172	Victory & Power Ministries, Inc.
WPNA-FM	FM	HIGHLAND PARK	IL	74177	Alliance Radio, LLC
WPNT	DTV	PITTSBURGH	PA	73907	WCWB Licensee, LLC
WPRH	FM	PARIS	TN	93121	AMERICAN FAMILY ASSOCIATION

CALL SIGN	SERVICE	CITY OF LICENSE	STATE	FACILITY ID	LICENSEE NAME
WPXI	DTV	PITTSBURGH	РА	73910	WPXI, LLC
WQAL	FM	CLEVELAND	ОН	72889	Audacy License, LLC
WQKV	FM	WARSAW	IN	89586	Educational Media Foundation
WQNS	FM	WAYNESVILLE	NC	41008	iHM Licenses, LLC
WQOS	AM	CORAL GABLES	FL	74165	Relevant Radio, Inc.
WQQB	FM	RANTOUL	IL	73229	S.J. Broadcasting, LLC
WQSI	FM	UNION SPRINGS	AL	9782	Tiger Communications, Inc.
WQXB	FM	GRENADA	MS	10672	THE RAYANNA CORP.
WRAZ-FM	FM	LEISURE CITY	FL	61646	South Broadcasting System, Inc.
WREO-FM	FM	ASHTABULA	ОН	54566	Media One Group, LLC
WRHD	FM	FARMVILLE	NC	26020	Inner Banks Media, LLC
WROX	AM	CLARKSDALE	MS	11611	WROX, LLC
WRRG	FM	RIVER GROVE	IL	68153	Triton College (Community College Dist. #504)
WRSW	AM	WARSAW	IN	73968	Kensington Digital Media of Indiana, L.L.C.
WRUO	FM	MAYAGUEZ	PR	69434	Radio Universidad de Puerto Rico
WRVL	FM	LYNCHBURG	VA	37249	Liberty University, Inc.
WSMR	FM	SARASOTA	FL	64255	University of South Florida Board of Trustees
WSRT	FM	GAYLORD	МІ	1159	MacDonald Garber Broadcasting, Inc.
WTIL	AM	MAYAGUEZ	PR	40780	WIFREDO G. BLANCO-PI
WTRT	FM	BENTON	КҮ	88122	Heartland Ministries, Inc.
WTVR-TV	DTV	RICHMOND	VA	57832	Scripps Broadcasting Holdings LLC
WUAT	AM	PIKEVILLE	TN	10397	WUAT, LLC
WUMP	AM	MADISON	AL	39590	Cumulus Intermediate Holdings LLC
WUNL-TV	DTV	WINSTON-SALEM	NC	69360	University of North Carolina
WVEK-FM	FM	WEBER CITY	VA	14721	Holston Valley Broadcasting Corporation
WVFL	FM	FOND DU LAC	WI	91710	VCY America Inc
WVIT	DTV	NEW BRITAIN	СТ	74170	NBC Telemundo License LLC

CALL SIGN	SERVICE	CITY OF LICENSE	STATE	FACILITY ID	LICENSEE NAME
WVJZ	FM	CHARLOTTE AMALIE	VI	62113	GARK, LLC
WWDC	FM	WASHINGTON	DC	8682	iHM Licenses, LLC
WWOG	FM	COOKEVILLE	TN	60780	SOMERSET EDUCATIONAL BROADCASTING FOUNDATION
WXGO	AM	MADISON	IN	17624	Dubois County Broadcasting, Inc.
WYAL	AM	SCOTLAND NECK	NC	74223	Sky City Communications, Inc.
WYCD	FM	DETROIT	MI	1089	Audacy License, LLC
WYCE	FM	WYOMING	MI	24773	Grand Rapids Cable Access Center Inc.
WYPX-TV	DTV	AMSTERDAM	NY	13933	INYO Broadcast Licenses LLC
WYSU	FM	YOUNGSTOWN	ОН	74434	Youngstown State University
WYXE	AM	GALLATIN	TN	3424	Iglesia Hispana de Nashville, Inc.
WZAP	AM	BRISTOL	VA	55004	RGH Communications, Inc.
WZEE	FM	MADISON	WI	41980	iHM Licenses, LLC
WZLA-FM	FM	ABBEVILLE	SC	60101	WZLA-FM
WZME	DTV	BRIDGEPORT	СТ	70493	TV-49, Inc.
WZSR	FM	WOODSTOCK	IL	53505	Alpha Media Licensee LLC
WZWP	FM	WEST UNION	ОН	74301	SOMERSET EDUCATIONAL BROADCASTING FOUNDATION
WZYQ	FM	MOUND BAYOU	MS	191535	FENTY L. FUSS