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August 1, 2014

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**VIA HAND DELIVERY**

**RECEIVED - FCC**

EEO Staff  
Policy Division  
Media Bureau  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

AUG - 1 2014

Federal Communications Commission  
Bureau / Office

**Re: Response to Broadcast EEO Audit Letter  
CC Licenses, LLC  
Station WHRK(FM), Memphis, TN, Facility ID No. 54916, and  
Station WREC(AM), Memphis, TN, Facility ID No. 58396**

EEO Staff:

On behalf of CC Licenses, LLC, licensee of the above referenced broadcast stations, and the commonly owned stations in the Memphis, Tennessee station employment unit ("SEU"), the undersigned submits the SEU's response to your letter of June 10, 2014 concerning compliance with the Commission's Equal Employment Opportunity rules, 47 C.F.R. § 73.2080. In accordance with your request, this submission consists of a sworn statement by Morgan Bohannon, Regional Market Manager, with copies of documentation responsive to your inquiry.

Should any questions arise concerning this submission, kindly contact the undersigned.

Respectfully submitted,

  
Elizabeth E. Goldin

*Counsel to CC Licenses, LLC*

cc: Morgan Bohannon

## DECLARATION OF MORGAN BOHANNON, REGIONAL MARKET MANAGER

I, Morgan Bohannon, hereby declare as follows:

1. I am a Regional Market Manager for CC Licenses LLC, the licensee of Station WHRK(FM)(FID 54916) and WREC(AM)(FID 58396), Memphis, TN which are part of a station employment unit based in Memphis Tennessee and which includes KWNW(FM)(FID 51855), Crawfordsville, AR, WDIA(AM)(FID 69569), Memphis, TN, KJMS(FM)(FID 35874), Olive Branch, MS, WEGR(FM)(FID 58397), Arlington, TN, and WHAL-FM(FID 58399), Horn Lake, MS (the "SEU" or "Unit"). The stations in this SEU are commonly owned through subsidiaries ultimately owned and controlled by Clear Channel Communications, Inc. (collectively, "Clear Channel"). This Statement and relevant attachments are being submitted in response to the June 10, 2014 letter of Lewis C. Pulley, Assistant Chief of the Policy Division of the Commission's Media Bureau, concerning a random audit of the SEU's EEO compliance (the "EEO Audit Letter").

2. This SEU employs five or more full-time employees as the term is defined in the broadcast EEO rule of the Federal Communication Commission ("FCC" or the "Commission"), 47 C.F.R. § 73.2080(e)(1).

3. In response to Question 3(a) of the EEO Audit Letter, copies of the SEU's two most recent EEO public file reports, as described in 47 C.F.R. § 73.2080(c)(6), are appended at Attachment A.

The web addresses of the stations in this SEU are as follows: [www.myv101.com](http://www.myv101.com), [www.mywdia.com](http://www.mywdia.com), [www.hallelujahfm.com](http://www.hallelujahfm.com), [www.k97fm.com](http://www.k97fm.com), [www.1019kissfm.com](http://www.1019kissfm.com), [www.600wrec.com](http://www.600wrec.com), and [www.rock103.com](http://www.rock103.com). A copy of the current report is included on or linked to each of these websites.

The date of each full-time hire listed in the SEU's two most recent EEO public file reports, as required by 47 C.F.R. § 73.2080(c)(5)(vi), is included in the internal business records appended at Attachment B.

4. In response to Question 3(b) of the EEO Audit Letter, the licensee acknowledges that it is required to retain records to document its outreach to the recruitment sources used to fill its full-time positions, including those filled during the period covered by the above EEO public file reports. However, pursuant to the EEO Audit Letter, only one such notice per position is included at Attachment B.

5. In response to Question 3(c) of the EEO Audit Letter, the internal business records appended at Attachment B provide data concerning (a) the total number of interviewees for each vacancy and (b) the referral source for each interviewee for each particular full-time vacancy filled during the period covered by the above EEO public file reports.

6. In response to Question 3(d) of the EEO Audit Letter, documentation concerning the Unit's performance of four recruitment initiatives described in § 73.2080(c)(2) during this time period is appended at Attachment C. Station personnel involved in the recruitment initiatives are

noted in the documentation. This SEU employs a total of 50 full-time employees and at least one of our stations is located in a market with a population of more than 250,000. Accordingly, the SEU is required to perform at least four recruitment initiatives during a two-year period.

7. In response to Question 3(e) of the EEO Audit Letter, the licensee is aware of the following discrimination complaints filed against one or more stations in this SEU:

A complaint alleging sex discrimination was filed against the licensee by Claudia Ballentine, an Account Executive, on February 26, 2009 at the U.S. Equal Employment Opportunity Commission and the Tennessee Human Rights Commission. *See* EEOC Charge No. 490-2009-01149. The matter was settled by the parties on May 27, 2009.

A complaint alleging sex and disability discrimination was filed against the licensee by Ann Johnson, an On-Air Personality, on October 16, 2006 at the U.S. Equal Employment Opportunity Commission. *See* EEOC Charge No. 493-2006-02739. The matter was settled by the parties through EEOC conciliation on April 5, 2007.

8. In response to Question 3(f) of the EEO Audit Letter, the licensee affirms that Clear Channel has created and deployed an EEO compliance plan, with the assistance of outside communications counsel, known as the Clear Channel Broadcast Diversity Recruitment Plan (the "Recruitment Plan" or "Plan"). The Recruitment Plan was distributed to all regional managers and, through them, disseminated to each SEU in conjunction with the effective date of the current EEO regulations. The Plan contains directives as to how Clear Channel SEUs are to engage in broad recruitment for job vacancies and undertake recruitment initiatives, includes sample forms for collecting and maintaining the necessary recruitment data, and provides a quarterly self-assessment program designed to ensure that the SEU follows the Plan's directions and regularly updates corporate headquarters as to the employment unit's progress in the area.

At the corporate level, Clear Channel assists SEUs in understanding and following the Recruitment Plan, responding to SEU requests for assistance and/or calling upon outside counsel for additional guidance when warranted. Furthermore, Clear Channel has a team of internal public inspection file auditors that routinely assesses each SEU's FCC EEO compliance, based on the most recent EEO Public File Report, as part of a review of overall public file compliance. Finally, with the recent deployment of applicant tracking system software called OpenHire throughout the company, Clear Channel has been conducting training sessions with its SEUs on its hiring policies and procedures, including compliance with the FCC's EEO broad outreach rules.

At the local level, Jackie Porter, Business Manager and Frankie Edwards Accounts Receivables Assistant are responsible for overseeing compliance with the Commission's EEO rules. Together, they are responsible for posting every full time job vacancy to a wide-range of sources and overseeing hiring managers with regards to their interviewing and hiring activity. The SEU also reaches out to many local organizations and schools to educate job seekers about careers in broadcasting. This SEU's compliance efforts include identifying Clear Channel's efforts to afford equal employment opportunities to employees through statements disseminated in job applications and posted in conspicuous areas within the workplace.

9. In response to Question 3(g) of the EEO Audit Letter, the licensee affirms that the SEU understands that it must periodically analyze the effectiveness of its EEO recruitment program by reviewing the productivity of sources on its recruitment list and the outcome of its recruitment initiatives. The company's Recruitment Plan, through the quarterly self-assessment mechanism, provides SEUs with a regular opportunity to consult the corporate headquarters about these issues. To boost the effectiveness of outreach efforts on an ongoing basis, reaches out to many local organizations and schools to education job seekers about careers in broadcasting. The SEU also reaches out to qualified community organizations via its station websites and on-air announcements encouraging them to contact the SEU to request its job notices.

10. In response to Question 3(h) of the EEO Audit Letter, this SEU 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 unit provides equal opportunity and does not discriminate against employees or applicants. This SEU's employment practices are my ultimate responsibility, working in conjunction with in-house counsel at Clear Channel corporate headquarters and, when applicable, outside employment and labor counsel.

Dated: August 1, 2014

[SIGNATURE PAGE FOLLOWS]

**SIGNATURE PAGE TO  
DECLARATION OF MORGAN BOHANNON, REGIONAL MARKET MANAGER**

As of the date set forth above, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Morgan Bohannon 