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September 20, 2021

VIA POSTING TO FCC ONLINE PUBLIC INSPECTION FILE

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

Re: **Response to Broadcast EEO Audit Letter
Alpha Media Licensee, LLC
KKRV(FM), Wenatchee, WA
Facility ID No. 28635**

EEO Staff:

On behalf of Alpha Media Licensee, LLC, licensee of the above referenced broadcast station in the Wenatchee-Moses Lake, WA station employment unit ("SEU"), the undersigned submits the SEU's response to your letter of August 6, 2021 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 Brent Rhodes, Market Manager, with copies of documentation responsive to your inquiry.

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

Respectfully submitted,

/s/ Joan Stewart

Joan Stewart
Counsel to Alpha Media Licensee, LLC

cc: KKR(FM)

DECLARATION OF BRENT RHODES, MARKET MANAGER

I, Brent Rhodes, hereby declare as follows:

1. I am a Market Manager for Alpha Media Licensee LLC, the licensee of stations KKRK(FM), Wenatchee, WA (FID 28635), KWIQ(AM), Moses Lake North, WA (FID 35886), KWIQ-FM, Moses Lake, WA (FID 35887), KKRT(AM), Wenatchee, WA (FID 28634) and KWLN(FM), Wilson Creek, WA (FID 72880) (collectively, the “Stations”). This Declaration and relevant attachments are being submitted in response to the August 6, 2021 letter of Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division of the Commission’s Enforcement Bureau concerning a random audit of the Station’s EEO compliance (the “EEO Audit Letter”).

2. The Stations employ 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 2(b)(i) of the EEO Audit Letter, the Stations’ two most recent EEO Public File Reports, as described in 47 C.F.R. § 73.2080(c)(6) and covering August 1, 2019—July 31, 2020 and August 1, 2020—July 31, 2021 are appended at Attachment A.

The web address of KWIQ(FM) is: www.kwiq.com, the web addresses of KKRK are: www.jack943.com (KKRV-HD1) and www.kkrv.com, the web address of KKRT is www.kkrt.com, and the web address of KWLN(FM) is www.lanuevaradio.com. A copy of the current EEO Public File Report is included on or linked to from these websites. KWIQ(AM) does not have a station website.

4. In response to Question 2(b)(ii), the date of each full-time hire listed in the Stations’ above-referenced EEO Public File Reports, in accordance with 47 C.F.R. § 73.2080(c)(5)(vi), is included in the internal business records appended at Attachment B. Further, 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 pursuant to 47 C.F.R. § 73.2080(c)(5)(iii), including the recruitment reflected in the above EEO Public File Reports. However, pursuant to the EEO Audit Letter, only one such job notice per position is included at Attachment B.

5. In response to Question 2(b)(iii) of the EEO Audit Letter, the internal business records appended at Attachment B also provide data concerning (a) the total number of interviewees for each vacancy and (b) the referral source for each interviewee for each full-time vacancy filled during the period covered by the above EEO Public File Reports.

6. In response to Question 2(b)(iv) of the EEO Audit Letter, documentation concerning the Stations’ performance of two points worth of recruitment initiative activity during the period covered by the above EEO Public File Reports and as described in § 73.2080(c)(2) is appended at Attachment C with participating personnel noted therein. The Stations employ a total of 10 full-time employees and none of our stations is located in a market with a population of more than 250,000. Accordingly, the Stations are required to perform at least two points worth of

recruitment initiative activity during each two-year period measured from the date the Stations are required to file license renewal applications.

7. In response to Question 2(b)(v) of the EEO Audit Letter, the licensee affirms that it is not aware of any complaints alleging unlawful discrimination in the employment practices of the Stations based on race, color, religion, national origin or sex filed during the current license term before a body with jurisdiction under federal, state, territorial or local law.

8. In response to Question 2(b)(vi) of the EEO Audit Letter, the licensee has disseminated copies of the “EEO Basics Binder,” a comprehensive manual on FCC EEO compliance authored by communications counsel, to personnel at the Stations. The “EEO Basics Binder” includes advice on how stations are to engage in broad recruitment for job vacancies and undertake recruitment initiatives. It also provides sample forms for collecting and maintaining the necessary recruitment records. Alpha also provides online training webinars on FCC EEO compliance to its stations at periodic times throughout the year, hosted by Wiley Rein. Through recent adoption of new software throughout the company, Alpha’s Human Resources department can also issue compliance reminders and encourage additional outreach where necessary. At the local level, while our Business Manager is on long-term leave, I have teamed with our Chief Engineer, Charles Osgood, to conduct recruitment efforts for both vacancy-specific and general outreach initiatives. Charles also performs FCC EEO reporting and recordkeeping duties under my supervision. The Stations’ compliance efforts also include identifying efforts to afford equal employment opportunities to employees through statements in job applications, on its websites, and posted in conspicuous areas within the workplace. This SEU’s employment practices are my ultimate responsibility, working with in-house counsel at our corporate headquarters and, when applicable, outside communications and labor counsel, to assist with compliance.

9. In response to Question 2(b)(vii) of the EEO Audit Letter, the licensee 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. Our usual recruitment initiatives have been cancelled during the COVID pandemic. We are reaching out to local colleges and schools for virtual opportunities to engage with students and other job seekers.

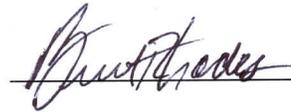
10. In response to Question 2(b)(viii) of the EEO Audit Letter, the Stations strive to comply with all federal, state and/or local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect.

Dated: September 20, 2021

[SIGNATURE PAGE FOLLOWS]

**SIGNATURE PAGE TO DECLARATION OF BRENT RHODES, 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.

A handwritten signature in cursive script, appearing to read "Brent Rhodes", is written over a horizontal line.

Brent Rhodes

ATTACHMENT A

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
EEO PUBLIC FILE REPORT**

October 1, 2018 - September 30, 2019¹

I. VACANCY LIST

See Section II, the “Master Recruitment Source List” (“MRSL”) for recruitment source data

Job Title	Recruitment Sources (“RS”) Used to Fill Vacancy	RS Referring Hiree
Account Executive	1,4,7,8	4

¹ This EEO Public File Report was edited in September 2021 to address reporting discrepancies.

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
EEO PUBLIC FILE REPORT**

October 1, 2018 - September 30, 2019

II. MASTER RECRUITMENT SOURCE LIST (“MRSL”)

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
1	The Wenatchee World 509-663-5161 14 N. Mission Wenatchee, WA 98801	No	3
2	WorkSource - WA State Employment Department 509-665-6605 215 Bridge St. Wenatchee, WA 98801	No	0
3	Washington State Broadcasters Association (“WSBA”) 360-705-0774 724 Columbia St., NW, Suite 310 Olympia, WA 98501	No	0
4	On-Air Announcements (<i>one or more SEU stations</i>)	No	5
5	Craig’s List 1-800-664-0633 https://wenatchee.craigslist.org	No	0
6	Inside Radio 800-248-4242 365 Union St. Littleton, NH 03561	No	0
7	Alpha Media Careers Website www.alphamediausa.com/careers	No	4
8	Indeed (<i>automated posting from Alpha Media careers website</i>) www.indeed.com	No	0
TOTAL INTERVIEWEES OVER REPORTING PERIOD			12

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
EEO PUBLIC FILE REPORT**

October 1, 2018 - September 30, 2019

III. RECRUITMENT INITIATIVES

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
1	EEO Management Training	On August 28, 2019, our Market Manager participated in a ThinkHR training program provided by Alpha Media called “Workplace Harassment Prevention for Managers.”
2	EEO Management Training	On September 4, 2019, our Chief Engineer participated in a ThinkHR training programs provided by Alpha Media called “Bullying and Violence in the Workplace.”

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
EEO PUBLIC FILE REPORT**

October 1, 2019-September 30, 2020¹

I. VACANCY LIST

See Section II, the “Master Recruitment Source List” (“MRSL”) for recruitment source data

Job Title	Recruitment Sources (“RS”) Used to Fill Vacancy	RS Referring Hiree
<i>No Full-Time Vacancies Were Filled During the Reporting Period.</i>		

¹ This EEO Public File Report was revised in September 2021 to address reporting discrepancies.

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
EEO PUBLIC FILE REPORT**

October 1, 2019-September 30, 2020

II. MASTER RECRUITMENT SOURCE LIST (“MRSL”)

RS Number	RS Information	Source Entitled to Vacancy Notification? (Yes/No)	No. of Interviewees Referred by RS Over Reporting Period
<i>As Noted in Sec. I, No Full-Time Vacancies Were Filled During the Reporting Period.</i>			

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
EEO PUBLIC FILE REPORT**

October 1, 2019-September 30, 2020

III. RECRUITMENT INITIATIVES

	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
1	Management-level training addressing equal employment opportunity and preventing discrimination.	On October 9, 2019, our SEU's Business Manager took part in a training webinar entitled, "The FCC's Equal Employment Opportunity Rules: The Nuts and Bolts for Alpha Media," presented by Alpha Media's communications counsel, Wiley Rein LLP.

ATTACHMENT B

**KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)
VACANCY DATA FORM**

Full-Time Job Title: Account Executive	Date Filled: 10/1/2018
Recruitment Source ("RS") Referring Hiree: On-Air Announcements	Total Number of Interviewees: 12

RS#	RS Information	Source Entitled to Vacancy Notification?	Number of Interviewees Referred by RS for the Full-Time Vacancy
1	The Wenatchee World 509-663-5161 14 N. Mission Wenatchee, WA 98801	No	3
4	On-Air Announcements (<i>one or more SEU stations</i>)	No	5
7	Alpha Media Careers Website www.alphamediausa.com/careers	No	4
8	Indeed (<i>automated posting from Alpha Media careers website</i>) www.indeed.com	No	0

Preview

Bilingual Account Executive (Spanish, English)

Sales & Marketing ACCOU01321

Posting Details

- Posted: August 31, 2018
- Closed: September 26, 2018

-
- Full-Time

• Locations

Wenatchee

Wenatchee, WA, USA

Job Details

Description

Alpha Media – Wenatchee, WA is seeking a dynamic, results-oriented Bilingual Account Executive with a proven track record of building and maintaining ongoing relationships with existing clients through the entire sales cycle. The ideal candidate must possess proven business development and sales experience and be a self-starter that is able to work with clients to meet marketing objectives and sell the value of Alpha Media local radio and digital brands.

Alpha Media is a diverse multimedia company sharing your favorite music, sports and news across a variety of platforms. Whether it's on your phone, desktop, tablet, Alexa, Google Home or in your car, our stations will enhance your journey. We hire and retain top talent who are unique, innovative and vibrant. We believe in creating progressive products, world-class events, and building strong relationships in our communities.

Headquartered in Portland, Oregon, Alpha Media operates 229 radio stations within 50 markets across the United States covering all formats.

We are live and local and can't wait to talk to you!

Responsibilities for this position may include:

- Sell radio and digital advertising
- Successfully uncover and close new, non-radio advertisers utilizing plans comprised of local spot and/or digital/non-spot revenue areas.
- Understand digital marketing including mobile and programmatic digital advertising
- Ensure that company initiatives and tools provided are used and maximized
- Participate in weekly sales meetings and training sessions
- Negotiate direct and agency business
- Input client orders and copy using company provided software
- Ensure attainment of monthly, quarterly and annual local + NTR + digital budget goals

Requirements of this position include the following:

- Bilingual in Spanish/English.
- Strong written and oral communication skills.
- Able to thrive in a fast-paced, high-growth, rapidly changing culture and environment.
- Must be an enthusiastic and hardworking person who exudes passion for Alpha Media's unique platform and value proposition.
- This position requires a fully insured personal vehicle and valid driver's license.

Preference may be given to candidates who have the above experience plus the following:

- Experience building strategic presentations and dynamically presenting them to clients.
- A proven track record delivering strong and consistent sales growth while consistently exceeding revenue targets.
- Experience and knowledge of Microsoft Office programs.

If you feel you are a qualified candidate and want to join a fast moving, growing entity submit your cover letter and resume ASAP by clicking the Apply button.

Alpha Media is an equal opportunity employer and participates in E-Verify.

ATTACHMENT C

KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)

RECRUITMENT INITIATIVES FORM

October 1, 2018 - September 30, 2019

	Type of Recruitment Initiative (Menu Selection)	Date	Brief Description of Activity & Scope of Broadcaster's Participation <i>(where applicable, include job title(s) of station staff involved in the activity)</i>
1.	EEO Management Training	August 2019	Our Market Manager and Business Manager participated in a ThinkHR training program provided by Alpha Media called "Workplace Harassment Prevention for Managers."
2.	EEO Management Training	September 4, 2019	Our Chief Engineer participated in a ThinkHR training program provided by Alpha Media called "Bullying and Violence in the Workplace."



CERTIFICATE OF ACHIEVEMENT

This is to certify that

Gary Patrick

has completed the course:

Workplace Harassment Prevention for Managers – Multi-State
Edition, version 2.0 (Title VII)

August 28, 2019



CERTIFICATE OF ACHIEVEMENT

This is to certify that

Kelley Rose

has completed the course:

Workplace Harassment Prevention for Managers – Multi-State Edition, version 2.0 (Title VII)

August 21, 2019

KKRV(FM), KKRT(AM), KWIQ-FM, KWIQ(AM), KWLN(FM)

RECRUITMENT INITIATIVES FORM

October 1, 2019 - September 30, 2020

	Type of Recruitment Initiative (Menu Selection)	Date	Brief Description of Activity & Scope of Broadcaster's Participation <i>(where applicable, include job title(s) of station staff involved in the activity)</i>
1.	EEO Management Training	October 9, 2019	Our SEU's Business Manager took part in a training webinar entitled, "The FCC's Equal Employment Opportunity Rules: The Nuts and Bolts for Alpha Media," presented by Alpha Media's communications counsel, Wiley Rein LLP.

The FCC's Equal Employment Opportunity Rules: The Nuts & Bolts for Alpha Media

On October 9, 2019, the following individual(s) in Alpha's station employment unit located in Wenatchee participated in the above-noted training webinar presented by Wiley Rein, LLP.

	Participant(s) (name & job title)	Signature
1.	Kelley Rose Business/HR	K. Rose
2.	Manager	
3.		
4.		

October 9, 2019

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