

Joan Stewart
202.719.7438
jstewart@wiley.law



Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
Tel: 202.719.7000

May 5, 2022

VIA POSTING TO FCC ONLINE PUBLIC INSPECTION FILE

wiley.law

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

Re: **Response to Broadcast EEO Audit Letter
Alpha Media Licensee, LLC
WFXH-FM, Hilton Head, SC (FID 48367)
WUBB(FM), Bluffton, SC (FID 16844)
WXYY(FM), Rincon, GA (FID 54805)**

EEO Staff:

On behalf of Alpha Media Licensee, LLC, licensee of the above referenced stations in the Hilton Head, SC station employment unit ("SEU"), the undersigned submits the SEU's response to your letter of March 21, 2022 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 Bill McElveen, of Alpha Media Licensee, LLC, 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: WFXH-FM
WUBB(FM)
WXYY(FM)

DECLARATION OF BILL MCELVEEN, REGIONAL PRESIDENT

I, Bill McElveen, hereby declare as follows:

1. I am Regional President for Alpha Media Licensee, LLC (“Alpha”), which is party to a local marketing agreement with Dick Broadcasting Company (“DBC”) and licensee of WFXH-FM, Hilton Head Island, SC (FID 48367), WUBB(FM), Bluffton, SC (FID 16844), and WXYF(FM), Rincon, GA (FID 54805), which were selected to be audited (the “Audited Stations”). The Audited Stations are part of a station employment unit based in Savannah, Georgia/Hilton Head Island, South Carolina that, in addition to the Brokered Stations, also includes WHHW(AM), Hilton Head Island, SC (FID 48366), WRWN(FM), Port Royal, SC (FID 72387), and WGCO(FM), Midway, GA (FID 11674) (the “SEU Stations”). This statement is being submitted in response to the March 21, 2022 letter of Elizabeth E. Goldin, Assistant Chief, Investigations and Hearings Division of the Federal Communication Commission’s Enforcement Bureau, concerning a random audit of EEO compliance (the “EEO Audit Letter”). Pursuant to paragraph 3 of the EEO Audit Letter, Alpha must respond regarding its own full-time employees at the Brokered Station.
2. The SEU employs fewer than five full-time employees as the term is defined in the Federal Communications Commission’s broadcast EEO rule, 47 C.F.R. §73.2080(e)(1). As Alpha’s Regional President, I am responsible for exercising ultimate licensee control over the SEU Stations, including but not limited to serving as the licensee contact, receiving reports from and regularly meeting with the broker, reviewing and monitoring matters concerning station programming, personnel, and finances, and ensuring the stations’ compliance with all FCC obligations.
3. In response to Question 2(b)(6) of the EEO Audit Letter, the licensee affirms that it is not aware of any discrimination complaints filed against the licensee during the current license term.



Bill McElveen

Dated: May 5, 2022

DECLARATION OF RICHARD HARLOW JR., CHIEF OPERATING OFFICER

I, Richard Harlow Jr., hereby declare as follows:

1. I am the Chief Operating Officer for Dick Broadcasting Company ("DBC") which is party to a local marketing agreement with Alpha Media Licensee, LLC ("Alpha") who is the licensee of WFXH- FM, Hilton Head Island, SC (FID 48367), WUBB(FM), Bluffton, SC (FID 16844), and WXYX(FM), Rincon, GA (FID 54805), which were selected to be audited (the "Audited Stations"). The Audited Stations are part of a station employment unit based in Savannah, Georgia/Hilton Head Island, South Carolina that, in addition to the Brokered Stations, also includes WHHW(AM), Hilton Head Island, SC (FID 48366), WRWN(FM), Port Royal, SC (FID 72387), and WGCO(FM), Midway, GA (FID 11674) (the "SEU Stations"). This statement is being submitted in response to the March 21, 2022 letter of Elizabeth E. Goldin, Assistant Chief, Investigations and Hearings Division of the Federal Communication Commission's Enforcement Bureau, concerning a random audit of EEO compliance (the "EEO Audit Letter"). Pursuant to paragraph 3 of the EEO Audit Letter, DBC must respond regarding its own full-time employees at the Brokered Station(s).
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 2(b)(i) of the EEO Audit Letter, 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.
4. In response to Question 2(b)(ii) of the EEO Audit Letter, the web addresses of the stations in this SEU are as follows: www.rock1061.com (WFXH); www.hot983savannah.com (WGCO); www.lapantera961.com (WHHW); www.rewind1079.com (WRWN); www.bob1069.com (WUBB) and www.g100savannah.com (WXYX). A copy of the current EEO Public File Report is included on or linked to each of these websites.
5. In response to Question 2(b)(iii), the date of each full-time hire listed in the SEU's 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, DBC 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.
6. In response to Question 2(b)(iv) 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.
7. In response to Question 2(b)(v) of the EEO Audit Letter, documentation concerning the Unit's performance of four 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. This SEU employs a total of 22 full-time employees and is located in a market with a population of more than 250,000. Accordingly, the SEU is required to perform at least four points worth of

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

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

9. In response to Question 2(b)(vii) of the EEO Audit Letter, the DBC affirms that at the local level its Market Manager and department heads are responsible for enforcing EEO policies. These policies are outlined in the company handbook which is distributed to all employees when hired. All job postings include a statement regarding DBC's EEO policy. DBC's Human Resources department provides advice on how SEUs are to engage in broad recruitment for job vacancies, undertake recruitment initiatives and provides sample forms for collecting and maintaining the necessary recruitment records. DBC also provides online training webinars on EEO compliance to its stations at periodic times throughout the year. Additionally, DBC uses a software platform to provide additional training on preventing discrimination and harassment as well as ways to increase diversity and inclusion. DBC's Human Resources department also issues compliance reminders and encourages additional outreach where necessary.

This SEU's employment practices are the ultimate responsibility of Aaron Wilborn, the SEU's Market Manager, working in conjunction with our corporate headquarters and, when applicable, outside employment and labor counsel.

In response to Question 2(b)(viii) of the EEO Audit Letter, 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. This SEU makes routine updates to its list of sources, we have built relationships with Colleges so they can recommend students that are graduating to our SEU for employment opportunities and we are definitely working on ways to improve upon our recruitment initiatives and build more relationships with organizations that are interested in employment issues.

10. In response to Question 2(b)(ix) 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 they provide equal opportunity and do not have a discriminatory effect.

Date: May 5, 2022

[SIGNATURE PAGE FOLLOWS]

**SIGNATURE PAGE TO
DECLARATION OF RICHARD HARLOW JR.,
CHIEF OPERATING OFFICER**

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 "R. Harlow, Jr.", is written over a solid horizontal line.

Richard Harlow, Jr.

ATTACHMENT A

EEO PUBLIC FILE REPORT

FOR

**WHHW(AM), WRWN(FM),
WUBB(FM), WFXH(FM),
WGCO(FM) & WXYX(FM)**

This EEO Public File Report
Covers the period August 1, 2019 through July 31, 2020

EEO Annual Public File Report

**WHHW(AM), WRWN(FM),
WUBB(FM), WFXH(FM),
WGCO(FM) & WXY Y(FM)**

The purpose of this EEO Public File Report is to comply with Section 73.2080 (c)(6) of the Federal Communications Commission's EEO Rule. This Report has been prepared on behalf of Dick Broadcasting Company, Inc., Greensboro, North Carolina, d/b/a as WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM). This Report will be placed in WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM) public inspection file and posted on WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM)'s website.

The information contained in this Report covers the period August 1, 2019 through July 31, 2020 (the "Reporting Period").

Attachments 1 through 3 are intended to provide the information required by the FCC's EEO Rule. Attachments 1 and 2 contain the following information for each full-time vacancy:

- * The recruitment source(s) used to fill each vacancy, identified by name, address, contact person and telephone number;
- * The recruitment source that referred the hiree for each full-time vacancy;
- * The total number of persons interviewed for each full-time vacancy; and,
- * The total number of interviewees referred by each recruitment source used in connection with each vacancy.

Attachment 3 contains a list and brief description of outreach initiatives undertaken pursuant to the FCC's EEO Rule during the Reporting Period.

Questions concerning this Report should be directed to Richard Harlow, General Manager, at (336) 274-8042.

* * * * *

**WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM),
WXYY(FM) EEO PUBLIC FILE REPORT
August 1, 2019-July 31, 2020**

I. VACANCY LIST

Position Title	Total No. Interviewees for the Vacancy	Recruitment Source of Hiree	Recruitment Sources Utilized (see attached list of sources)
Account Executive	7	19	19, 20, 24, 26
Traffic Manager	3	29	3, 19, 24, 29
Promotions Team Tech	7	20, 25, 26	19, 20, 24, 25, 26

Total number of persons interviewed during the Reporting Period: 17

**WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM),
 WXYF(FM) EEO PUBLIC FILE REPORT
 August 1, 2019-July 31, 2020**

II.MASTER RECRUITMENT SOURCE LIST (“MRSL”)

1	Internal Posting
2	All Access Website www.allaccess.com
3	Employee Referral
4	Armstrong Atlantic University 11935 Abercorn Street Savannah, GA 31419 Attention: Career Services
5	Employment Security Commission P O Box 995 Columbia, SC 29202 Attention: Job Bank
6	Georgia Department of Labor 5520 White Bluff Road Savannah, GA 31405 Attention: Job Bank
7	National Association of Colored People 918 Martin Luther King Boulevard Savannah, GA 31406 Attention: Janet Barksdale
8	National Association of Black Broadcasters P O Box 3191 Atlanta, GA 30302 Attention: Lo Jelks
9	National Association of Broadcasters 1771 N Street, NW Washington, DC 20036 Attention: Career Center
10	National Association of Hispanic Broadcasters 1000 National Press Building Washington, DC 20045-2001 Attention: Leticia Salazar
11	National Black MBA Association 180 N. Michigan Avenue, Ste. 1515 Chicago, IL 60601 Attention: Job Bank
12	Radio Advertising Bureau P O Box 972036 Dallas, TX 75397-2036 Attention: Classified Ads
13	Savannah College of Art and Design 342 Bull Street Savannah, GA 31401 Attention: Newspaper
14	Savannah State University 3219 College Street Savannah, GA 31404 Attention: Student Services
15	Savannah Technical University 5717 White Bluff Road Savannah, GA 31405 Attention: Career Services
16	South University

	711 Mall Boulevard Savannah, GA 31406 Attention: Career Services
17	Georgia Association of Broadcasters 8046 Roswell Road, Ste. 100-A Atlanta, GA 30350
18	South Carolina Association of Broadcasters One Harbison Way, Ste. 112 Columbia, SC 29212
#	<u>SOURCE INFORMATION</u>
19	Linked In Website www.linkedin.com
20	On-Air Announcements (<i>one or more SEU stations</i>)
21	Savannah Help Wanted Website www.regionalhelpwanted.com/savannah-jobs
22	Traffic Directors Guild of America Website www.tdga.org/
23	Monster Website www.monster.com
24	Indeed Website www.indeed.com
25	South Carolina Broadcasters Association Job Fair (<i>see Section III</i>)
26	Walk-In/Self-Referral
27	Station Website Postings (<i>one or more SEU stations</i>)
28	Internal Transfer/Promotion
29	Internal promotion of employee from part-time to full-time

OUTREACH ACTIVITIES FOR THE PERIOD AUGUST 1, 2019-JULY 31, 2020

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXYY(FM)
has engaged in the following outreach activities during the period covered by this Report:

Activity Classification*	Type of Activity	Brief Description
10	School Speaking Events	Station employees spoke, on several occasions, to various educational facilities, including; Oct 1, 2019 SCCPSS SLP Program: On-Air Staff Nov 20, 2019 Glynn County Schools: On-Air Staff Nov 21,2019 SCCPSS SLP Program: On-Air Staff Jan 22, 2020 Glynn County Schools: On-Air Staff Jan 23,2020 SCCPSS SLP Program: On-Air Staff Feb 19,2020 Glynn County Schools: On-Air Staff Feb 20,2020 SCCPSS SLP Program: On-Air Staff Feb 28,2020 Garden City Elementary: On-Air Staff
6	Job Bank	Continuous postings through Paylocity onto Indeed.com.
16	Advertising	Date: Any Openings Dick Broadcasting Company routinely advertises any open position on each of the Savannah stations and their respective audio streams and all stations notated websites including: www.rock1061.com , www.961theisland.com , www.g100savannah.com , www.hot983savannah.com , www.rewind1079.com , www.bob1069.com , & www.dickbroadcasting.com . In addition, groups and organizations who wished to be notified of openings are encouraged to make their request to the station(s) via phone, fax, e-mail or in person.

***For "Activity Classification", use "1" through "16" in accordance with attached list.**

EEO PUBLIC FILE REPORT

FOR

**WHHW(AM), WRWN(FM),
WUBB(FM), WFXH(FM),
WGCO(FM) & WXYX(FM)**

This EEO Public File Report
Covers the period August 1, 2020 through July 31, 2021

EEO Annual Public File Report

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM)

The purpose of this EEO Public File Report is to comply with Section 73.2080 (c)(6) of the Federal Communications Commission's EEO Rule. This Report has been prepared on behalf of Dick Broadcasting Company, Inc., Greensboro, North Carolina, d/b/a as WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM). This Report will be placed in WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM) public inspection file and posted on WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXY Y(FM)'s website.

The information contained in this Report covers the period August 1, 2020 through July 31, 2021 (the "Reporting Period").

Attachments 1 through 3 are intended to provide the information required by the FCC's EEO Rule. Attachments 1 and 2 contain the following information for each full-time vacancy:

- * The recruitment source(s) used to fill each vacancy, identified by name, address, contact person and telephone number;
- * The recruitment source that referred the hiree for each full-time vacancy;
- * The total number of persons interviewed for each full-time vacancy; and,
- * The total number of interviewees referred by each recruitment source used in connection with each vacancy.

Attachment 3 contains a list and brief description of outreach initiatives undertaken pursuant to the FCC's EEO Rule during the Reporting Period.

Questions concerning this Report should be directed to Richard Harlow, General Manager, at (336) 274-8042.

* * * * *

**WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM),
WXYX(FM) EEO PUBLIC FILE REPORT
August 1, 2020-July 31, 2021**

I. VACANCY LIST

Position Title	Total No. Interviewees for the Vacancy	Recruitment Source of Hiree	Recruitment Sources Utilized (see attached list of sources)
Sales Account Executive	5	3	1, 3, 19, 24, 27

Total number of persons interviewed during the Reporting Period: 5

**WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM),
 WXYF(FM) EEO PUBLIC FILE REPORT
 August 1, 2020-July 31, 2021**

II.MASTER RECRUITMENT SOURCE LIST (“MRSL”)

1	Internal Posting
2	All Access Website www.allaccess.com
3	Employee Referral
4	Armstrong Atlantic University 11935 Abercorn Street Savannah, GA 31419 Attention: Career Services
5	Employment Security Commission P O Box 995 Columbia, SC 29202 Attention: Job Bank
6	Georgia Department of Labor 5520 White Bluff Road Savannah, GA 31405 Attention: Job Bank
7	National Association of Colored People 918 Martin Luther King Boulevard Savannah, GA 31406 Attention: Janet Barksdale
8	National Association of Black Broadcasters P O Box 3191 Atlanta, GA 30302 Attention: Lo Jelks
9	National Association of Broadcasters 1771 N Street, NW Washington, DC 20036 Attention: Career Center
10	National Association of Hispanic Broadcasters 1000 National Press Building Washington, DC 20045-2001 Attention: Leticia Salazar
11	National Black MBA Association 180 N. Michigan Avenue, Ste. 1515 Chicago, IL 60601 Attention: Job Bank
12	Radio Advertising Bureau P O Box 972036 Dallas, TX 75397-2036 Attention: Classified Ads
13	Savannah College of Art and Design 342 Bull Street Savannah, GA 31401 Attention: Newspaper
14	Savannah State University 3219 College Street Savannah, GA 31404 Attention: Student Services

15	Savannah Technical University 5717 White Bluff Road Savannah, GA 31405 Attention: Career Services
16	South University 711 Mall Boulevard Savannah, GA 31406 Attention: Career Services
17	Georgia Association of Broadcasters 8046 Roswell Road, Ste. 100-A Atlanta, GA 30350
18	South Carolina Association of Broadcasters One Harbison Way, Ste. 112 Columbia, SC 29212
19	Linked In Website www.linkedin.com
20	On-Air Announcements (<i>one or more SEU stations</i>)
21	Savannah Help Wanted Website www.regionalhelpwanted.com/savannah-jobs
22	Traffic Directors Guild of America Website www.tdga.org/
23	Monster Website www.monster.com
24	Indeed Website www.indeed.com
25	South Carolina Broadcasters Association Job Fair (<i>see Section III</i>)
26	Walk-In/Self-Referral
27	Station Website Postings (<i>one or more SEU stations</i>)
28	Internal Transfer/Promotion
29	Internal promotion of employee from part-time to full-time

OUTREACH ACTIVITIES FOR THE PERIOD AUGUST 1, 2020-JULY 31, 2021

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXYY(FM)
has engaged in the following outreach activities during the period covered by this Report:

Activity Classification*	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
10	School Speaking Events	Station employees spoke, on several occasions, to various educational facilities, including: Sept 16, 2020 SCCPSS SLP Program: On-Air Staff Sept 23, 2020 Brunswick County Schools: On-Air Staff Sept 24, 2020 SCCPSS SLP Program: On-Air Staff Jan 27, 2021 Glynn County Schools: On-Air Staff Feb 11, 2021 SCCPSS SLP Program: On-Air Staff Feb 24, 2021 Glynn County Schools: On-Air Staff Mar 24, 2021 Glynn County Schools: On-Air Staff Mar 25, 2021 SCCPSS SLP Program: On-Air Staff Apr 19, 2020 Georgia Southern Univ: On-Air Staff Apr 28, 2021 Glynn County Schools: On-Air Staff Apr 29, 2021 SCCPSS SLP Program: On-Air Staff
6	Job Bank	Continuous postings through Paylocity onto Indeed.com.
14	Management Training	Training of Anti-Harassment, Cyber Security Awareness and Diversity & Inclusion. Market Manager participated in this training.
16	Advertising	Date: Any Openings Dick Broadcasting Company routinely advertises any open position on each of the Savannah stations and their respective audio streams and all stations notated websites including: www.rock1061.com, www.961theisland.com, www.g100savannah.com, www.hot983savannah.com, www.rewind1079.com, www.bob1069.com, & www.dickbroadcasting.com. In addition, groups and organizations who wished to be notified of openings are encouraged to make their request to the station(s) via phone, fax, e-mail or in person.

ATTACHMENT B

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM), WXYF(FM)

VACANCY DATA FORM

Full-Time Job Title: Traffic Manager	Date Filled: 11/11/2019
Recruitment Source ("RS") Referring Hiree: Internal Promotion	Total Number of Interviewees: 3

RS#	RS Information	Source Entitled to Vacancy Notification?	Number of Interviewees Referred by RS for the Full-Time Vacancy
3	Employee Referral	No	1
19	LinkedIn www.linkedin.com	No	
24	Indeed www.indeed.com		1
29	Internal Promotion	No	1
	Total Interviewees		3

Job Posted: August 13, 2019

Job Closed: November 25, 2019

Traffic Manager Coordinator, Radio Broadcasting

Traffic Managers in broadcasting are responsible for managing the placement of commercial advertising for broadcasting operations. Handles all aspects of assigned stations(s) including placing bumped spots, rearranging spots on log in non-competitive slots, assigning cart numbers on production orders, making sure all copy is turned in, adding daily networks to log, changing computer data when necessary. Produces daily commercial logs by obtaining information, importing orders, and capturing commercial advertising schedules. Enters commercial advertising schedules and maintains database by reviewing and resolving error reports with the ultimate goal of optimizing revenue. Interfaces with Sales Management regarding inventory issues. Collaborates with management, Account Executives and Sales Support to ensure commercial spots are executed in accordance with contract provisions. Monitors changes and resolves Traffic department discrepancies. Manages flow of information and service inquiries in Sales. Coordinates with other departments to maintain commercial inventory and to provide billing information. Resolves discrepancies between Sales, Continuity, Programming, and Traffic. Posts logs on a daily basis; prints log reports and files on a monthly basis. Completes all network production (i.e., barter spots, affidavits). May require flexibility in work schedules. May back up other Traffic Coordinators when sick or on vacation when needed.

Qualifications: Proficient in Microsoft Office suite, social networking platforms. Ability to learn new systems quickly. Proven ability to read and interpret documents such as insertion/purchase orders. Excellent time management; ability to plan and organize, set priorities and multi- task in a fast-paced environment. Strong attention to detail, and high work standards. Excellent written and oral communication skills. Demonstrated data entry skills Ability to work independently and with a team

Work Experience: Prefer 2-5 years' experience in automated broadcast traffic system.

Education: High school diploma or equivalent

Certifications: None required

Location: Savannah, Georgia

Dick Broadcasting Co. Inc. of Tennessee provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.

This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM), WXYX(FM)

VACANCY DATA FORM

Full-Time Job Title: Account Executive	Date Filled: 01/28/2020
Recruitment Source ("RS") Referring Hiree: LinkedIn(www.linkedin.com)	Total Number of Interviewees: 7

RS#	RS Information	Source Entitled to Vacancy Notification?	Number of Interviewees Referred by RS for the Full-Time Vacancy
19	LinkedIn www.linkedin.com	No	2
20	On-Air Announcements (one or more SEU stations)	No	1
24	Indeed www.indeed.com	No	3
26	Walk-In Referral	No	1
	Total Interviewees		7

Job Posted: October 21, 2019

Job Closed: January 13, 2020

Senior Account Executive-Savannah GA/Hilton Head SC

This position offers a unique career opportunity. We are looking for passionate, driven, resourceful, organized, customer-focused problem solvers who have great communication skills and the ability to cultivate client relationships. This candidate must be a highly motivated, personally accountable, committed player who has the ability to create high dollar-potential prospects to develop new opportunities for both the advertiser and DBC Media. A passion and natural talent for cold calling in-person and/or by phone is critical to your success in this sales position. Proven sales experience with demonstrated results of multiple platform selling is a must. Can you be direct and convincing when it is right for the client? Do you naturally earn trust with the people you meet? Do you always live up to your commitments, even if it requires going the extra mile? Do you consistently out-produce others with whom you work? Do you have the integrity and drive we are looking for? If this is you, we should talk. DBC might just have a job with YOUR name on it. Only those with an endless supply of can-do positive energy, a passion for sales and marketing, and a mastery of multi-tasking need apply!

Ideal candidate will have:

- 3-5 years' media experience developing new business relationships in an outside sales role as a recognized top-performer
- Strong understanding of lead generation & account management
- Bachelor's Degree or equivalent experience

We Offer:

- Very Competitive pay
- Medical, Dental, Vision Insurance and 401k package
- Career Advancement Opportunities
- Paid Vacation & Holidays

Dick Broadcasting Co. Inc. of Tennessee provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.

This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM), WXYX(FM)

VACANCY DATA FORM

Full-Time Job Title: Account Executive	Date Filled: 10/12/2020
Recruitment Source ("RS") Referring Hiree: Employee Referral	Total Number of Interviewees: 5

RS#	RS Information	Source Entitled to Vacancy Notification?	Number of Interviewees Referred by RS for the Full-Time Vacancy
1	Internal Postings	No	
3	Employee Referrals	No	2
19	LinkedIn www.linkedin.com	No	1
24	Indeed www.indeed.com	No	1
27	Station Website Postings (one or more SEU stations)	No	1
	Total Interviewees		5

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM), WXYX(FM)

VACANCY DATA FORM

Full-Time Job Title: Account Executive	Date Filled: 11/30/2020
Recruitment Source ("RS") Referring Hiree: Employee Referral	Total Number of Interviewees: 5

RS#	RS Information	Source Entitled to Vacancy Notification?	Number of Interviewees Referred by RS for the Full-Time Vacancy
1	Internal Postings	No	
3	Employee Referrals	No	2
19	LinkedIn www.linkedin.com	No	1
24	Indeed www.indeed.com	No	1
27	Station Website Postings (one or more SEU stations)	No	1
	Total Interviewees		5

Job Posted: January 13, 2020

Job Closed: July 7 2021

Senior Account Executive-Savannah GA/Hilton Head SC

This position offers a unique career opportunity. We are looking for passionate, driven, resourceful, organized, customer-focused problem solvers who have great communication skills and the ability to cultivate client relationships. This candidate must be a highly motivated, personally accountable, committed player who has the ability to create high dollar-potential prospects to develop new opportunities for both the advertiser and DBC Media. A passion and natural talent for cold calling in-person and/or by phone is critical to your success in this sales position. Proven sales experience with demonstrated results of multiple platform selling is a must. Can you be direct and convincing when it is right for the client? Do you naturally earn trust with the people you meet? Do you always live up to your commitments, even if it requires going the extra mile? Do you consistently out-produce others with whom you work? Do you have the integrity and drive we are looking for? If this is you, we should talk. DBC might just have a job with YOUR name on it. Only those with an endless supply of can-do positive energy, a passion for sales and marketing, and a mastery of multi-tasking need apply!

Ideal candidate will have:

- 3-5 years' media experience developing new business relationships in an outside sales role as a recognized top-performer
- Strong understanding of lead generation & account management
- Bachelor's Degree or equivalent experience

We Offer:

- Very Competitive pay
- Medical, Dental, Vision Insurance and 401k package
- Career Advancement Opportunities
- Paid Vacation & Holidays

Dick Broadcasting Co. Inc. of Tennessee provides equal employment opportunities to all employees and applicants for employment and prohibits discrimination and harassment of any type without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.

This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

ATTACHMENT C

OUTREACH ACTIVITIES FOR THE PERIOD AUGUST 1, 2020-JULY 31, 2021

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGO(FM) & WXYF(FM)
has engaged in the following outreach activities during the period covered by this Report:

Activity Classification*	Type of Recruitment Initiative (Menu Selection)	Brief Description of Activity
10	School Speaking Events	Station employees spoke, on several occasions, to various educational facilities, including; Sept 16, 2020 SCCPSS SLP Program: On-Air Staff Sept 23, 2020 Brunswick County Schools: On-Air Staff Sept 24, 2020 SCCPSS SLP Program: On-Air Staff Jan 27, 2021 Glynn County Schools: On-Air Staff Feb 11, 2021 SCCPSS SLP Program: On-Air Staff Feb 24, 2021 Glynn County Schools: On-Air Staff Mar 24, 2021 Glynn County Schools: On-Air Staff Mar 25, 2021 SCCPSS SLP Program: On-Air Staff Apr 19, 2020 Georgia Southern Univ: On-Air Staff Apr 28, 2021 Glynn County Schools: On-Air Staff Apr 29, 2021 SCCPSS SLP Program: On-Air Staff
6	Job Bank	Continuous postings through Paylocity onto Indeed.com.
14	Management Training	Training of Anti-Harassment, Cyber Security Awareness and Diversity & Inclusion. Market Manager participated in this training.
16	Advertising	Date: Any Openings Dick Broadcasting Company routinely advertises any open position on each of the Savannah stations and their respective audio streams and all stations notated websites including: www.rock1061.com , www.961theisland.com , www.g100savannah.com , www.hot983savannah.com , www.rewind1079.com , www.bob1069.com , & www.dickbroadcasting.com . In addition, groups and organizations who wished to be notified of openings are encouraged to make their request to the station(s) via phone, fax, e-mail or in person.

OUTREACH ACTIVITIES FOR THE PERIOD AUGUST 1, 2019-JULY 31, 2020

WHHW(AM), WRWN(FM), WUBB(FM), WFXH(FM), WGCO(FM) & WXYX(FM)
has engaged in the following outreach activities during the period covered by this Report:

Activity Classification*	Type of Activity	Brief Description
10	School Speaking Events	Station employees spoke, on several occasions, to various educational facilities, including; Oct 1, 2019 SCCPSS SLP Program: On-Air Staff Nov 20, 2019 Glynn County Schools: On-Air Staff Nov 21,2019 SCCPSS SLP Program: On-Air Staff Jan 22, 2020 Glynn County Schools: On-Air Staff Jan 23,2020 SCCPSS SLP Program: On-Air Staff Feb 19,2020 Glynn County Schools: On-Air Staff Feb 20,2020 SCCPSS SLP Program: On-Air Staff Feb 28,2020 Garden City Elementary: On-Air Staff
6	Job Bank	Continuous postings through Paylocity onto Indeed.com.
16	Advertising	Date: Any Openings Dick Broadcasting Company routinely advertises any open position on each of the Savannah stations and their respective audio streams and all stations notated websites including: www.rock1061.com, www.961theisland.com, www.g100savannah.com, www.hot983savannah.com, www.rewind1079.com, www.bob1069.com, & www.dickbroadcasting.com. In addition, groups and organizations who wished to be notified of openings are encouraged to make their request to the station(s) via phone, fax, e-mail or in person.

***For "Activity Classification", use "1" through "16" in accordance with attached list.**