

April 12, 2018

Federal Communications Commission  
Media Bureau  
445 12th Street, SW  
Washington, DC 20554

RE: Equal Employment Opportunity Audit

This letter is in direct response to your letter dated February 26, 2018 in accordance with 47 C.F.R. § 73.2080(f)(4) of the Commission's rules. Each area will be addressed separately.

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 included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, 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).

Please refer to our digital public file to see WBAZ-FM's two most recent EEO public file reports titled "Long Island Radio Broadcasting EEO for February 2017 - January 2018" and "Long Island Radio Broadcasting EEO for February 2016 - January 2017". Our web address is [www.wbaz.com](http://www.wbaz.com) and we post our EEO Public File Reports annually on the bottom of our website's home page, located at: <http://wbaz.com/pages/company-eeo>

In terms of the hire dates for the full-time hires for each report:

Director of Sales – April 4, 2016  
Business Manager – November 7, 2016  
Production Director – May 15, 2017  
Account Executive – February 23, 2016  
Account Executive – August 15, 2016  
Account Executive – October 31, 2016  
Account Executive – January 10, 2017  
Account Executive – September 11, 2017  
Account Executive – September 19, 2017  
Account Executive – September 27, 2017

(b) For each Unit 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 time period, February 1, 2016 through January 31, 2018, WBAZ-FM filled ten open positions: one Director of Sales, one Business Manager, one Production Director and seven Account Executives.

WBAZ-FM (and parent company Long Island Radio Broadcasting) has recently undergone a transition in leadership, particularly on the business side. Due to this, we do not possess copies of any communication announcing the filled positions. Going forward, with new leadership in place, we will be much improved in that area. During April 2016, WBAZ-FM ran an on-air sales solicitation spot for several weeks, however we do not possess any logs prior to February 2017. WBAZ-FM does have an mp3 of the aforementioned sales solicitation spot and can provide that upon request. From December 13, 2017 through December 24, 2017, WBAZ-FM ran another on-air sales solicitation spot several times per day. Please refer to the file in our digital public file titled "WBAZ-FM December 13, 2017 Log Sheet" for a copy of the log sheet for the first day we began airing the 2017 sales solicitation spot. On December 13, 2017, the on-air sales solicitation spot ran at: 2:19AM, 6:03AM, 11:17AM, 3:52PM and 9:20PM. The WBAZ-FM on-air sales solicitation spot ran during the aforementioned time period at the same frequency and during the same dayparts as outlined for December 13, 2017. Additional log sheets for that time period can be provided upon request.

Director of Sales position:

This position was filled after a referral from Laurie Kahn of the Media Staffing Network ([mediastaffingnetwork.com](http://mediastaffingnetwork.com))

Business Manager position:

This position was filled from word of mouth.

Account Executive position:

Five Account Executives were hired based off word of mouth. One Account Executive position was filled after a referral from a radio consultant, Steve Lappa. For Steve Lappa's contact information, please refer to the file in our digital public file titled "Long Island Radio Broadcasting EEO for February 2017 – January 2018". One Account Executive position was filled after a candidate responded to an Indeed.com job posting. For a copy of the Ineed.com job posting, please refer to the file in our digital public file titled "Long Island Radio Broadcasting EEO for February 2017 – January 2018".

Production Director position:

This position was filled in-house when we promoted one of our current staff members.

(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.

As referenced above, WBAZ-FM (and parent company Long Island Radio Broadcasting) has recently undergone a transition in leadership, particularly on the business side. It is to the best of our knowledge that with each of the ten full-time hires, the only interviews that were conducted were with the employee that wound up being hired. As stated above, the Director of Sales position was filled after a referral from Laurie Kahn of the Media Staffing Network ([mediastaffingnetwork.com](http://mediastaffingnetwork.com)) and one Account Executive position was filled after a referral from a radio consultant, Steve Lappa.

(d) Documentation of Unit 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.

WBAZ-FM participated in several career and internship job fairs: the Five Towns College Career Fair in April 2016, Southampton High School College and Career Readiness Day in October 2016, East Hampton High School on March 30, 2016, YMCA East Hampton Career Fair on March 8, 2016, Suffolk County Department of Labor Job Fair at Middle Country Public Library on April 29, 2016, and the Five Towns College Career Fair on April 25, 2017. WBAZ-FM also sponsors an internship program initiative where during the periods covered in our EEO public files report: we recruited interns through Five Towns College, SUNY Oneonta, The University of New Haven, Lynn University, Westhampton High School, Penn State University, The University of Tampa. WBAZ-FM had a total of eleven interns during the period of February 2016 through January 2018. We also give many tours of our station every year. WBAZ-FM have worked with Elementary and High School students including classes for children with special needs giving them opportunities to learn about and participate in the station operations. We never turn anyone down when asked to give a tour and we held six tours during the periods covered in our EEO public files report.

WBAZ-FM takes our recruitment initiative very seriously. Our Director of Operations and Programming, News Director and Assistant Operations Director, Production Director and Promotions Director are all hands-on in our recruitment efforts. WBAZ-FM has a total of sixteen full-time employees. The population in WBAZ-FM's market exceeds 250,000 residents and thus, WBAZ-FM is required to perform four initiatives within a two-year period. However, with the transition referenced above, WBAZ-FM has not retained documentation for the aforementioned recruitment efforts but with new leadership in place, this has already changed in the new year.

(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.

WBAZ-FM has received zero EEO complains.

(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.

Starting at the top with WBAZ-FM's owner, and all the way down to each member of management, WBAZ-FM prides itself on being welcoming and enforcing proper EEO policies. Management frequently expresses interest in ensuring that WBAZ-FM is a diverse unit and is proud to report a current staff of wide ranging and diverse employees. On top of having easy access to literature for both current employees and potential job applicants, management also takes into consideration how we can improve our outreach and always incorporates feedback from both staff and job applicants. Going forward, new leadership looks to improve how WBAZ-FM projects and communicates new hires as well as future job openings.

(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.

Those at WBAZ-FM are frequently discussing how we can reach more candidates and with new leadership, are looking to expand our outreach in terms of career/job fairs in areas we have previously not been as well represented as we'd like. The line of communication should be improved going forward and even so, WBAZ-FM has not experienced any EEO problems in need of resolving.

(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.

WBAZ-FM has had a collaborative management group and has always been concerned about how to best serve its staff. In the spring of 2017, we changed payroll systems as a way to offset the cost of rising benefits and provide a more user-friendly payroll experience. WBAZ-FM always looks in house first when there's an opportunity for promotion and encourages everyone to feel they are deserving and will not be discriminated against. WBAZ-FM does not currently have any union agreements.

If you have any questions or would like us to provide you with any other information, please contact me at 631-267-7800 or [plabozetta@libroadcasting.com](mailto:plabozetta@libroadcasting.com). WBAZ-FM's Facility ID Number is 52061.

Sincerely,

Peter Labozetta  
WBAZ-FM/Long Island Radio Broadcasting Assistant Operations Director and News Director