



Allison Zolot
Senior Vice President & General Counsel

May 6, 2024

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EEO Staff
Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

RE: EEO Audit – KUAD-FM, Windsor, CO (Facility ID 49538)

Dear Sir or Madam:

Townsquare Media of Fort Collins, Inc., the licensee of broadcast station KUAD-FM, Windsor, Colorado, hereby responds to the Commission’s notice of audit issued to KUAD-FM. This response includes information about the following stations, which, with KUAD-FM, comprise the Townsquare Media of Fort Collins, Inc.’s employment unit (referenced to herein as “Townsquare Fort Collins,” the “Unit,” or “Stations”):

KKPL(FM), Laporte, CO (Facility ID 54394)
KMAX-FM, Wellington, CO (Facility ID 84497)
KTRR(FM), Loveland, CO (Facility ID 50375)

The following subparagraphs correspond to the numbered paragraphs in the FCC’s audit notice.

i. *Public File Reports.* Copies of the Unit’s two most recent EEO public file reports for the periods covering December 1, 2021 to November 30, 2022 (“2021-2022 Reporting Period”) and December 1, 2022 to November 30, 2023 (“2022-2023 Reporting Period”) (the 2021-2022 Reporting Period and the 2022-2023 Reporting Period, together, the “Audit Period”) are attached as Exhibit 1 and Exhibit 2, respectively. As noted on the face of the reports, both were amended on May 6, 2024.

ii. *Websites.* The Stations’ website addresses are <https://k99.com/>, <https://999thepoint.com/>, <https://943TheX.com/>, and <https://retro1025.com/>. The Unit’s most recent public file report is posted on each of these websites.

iii. *Supporting Documentation for Vacancies.* Among other sources, Townsquare Fort Collins uses a recruiting company called Greenhouse to export vacancy listings to a variety

of sources, including Indeed.com, LinkedIn.com, ZipRecruiter.com, and the Townsquare Media Careers webpage. The text of the notice that was posted to Greenhouse sources is included in Exhibit 3, along with screenshots from Greenhouse showing the Greenhouse sources that were notified about each vacancy. Exhibit 3 also includes information excerpted from reports that Greenhouse provides to Townsquare Fort Collins. These reports indicate the Greenhouse source that referred each applicant for the various full-time positions filled during the Audit Period. Not all of these applicants were interviewed. No recruitment sources have requested to be notified of vacancies. The dates of all full-time hires during the Audit Period are provided in the EEO public file reports (see Exhibit 1 and Exhibit 2).

iv. *Total Number of Interviewees and Referral Sources.* The total number of interviewees for each full-time vacancy filled during the Audit Period and the referral sources for each interviewee are provided in the EEO public file reports for the Audit Period (see Exhibit 1 and Exhibit 2).

v. *Documentation of Recruitment Initiatives.* The Unit currently has a total of 11 full-time employees. The population of the market in which the Stations operate is more than 250,000.¹ Therefore, the Unit is required to perform four points worth of recruitment initiatives within a two-year period pursuant to 47 C.F.R. §§ 73.2080(c)(2) and (e)(3).

The Unit engaged in a number of recruitment initiatives during the Audit Period, as shown in the EEO public file reports attached as Exhibit 1 and Exhibit 2. (Note that the EEO public file report covering December 1, 2021 to November 30, 2022 is part of the December 1, 2020 to November 30, 2022 two-year term, and the EEO public file report covering December 1, 2022 to November 30, 2023 is part of the December 1, 2022 to November 30, 2024 two-year term.) The Unit personnel involved in each recruitment initiative are listed in these reports, and documentation of the initiatives is provided in Exhibit 4.

vi. *Discrimination Complaints.* There are no pending or resolved complaints alleging unlawful discrimination in the employment practices of the Unit during the current license term.

vii. *Management's EEO Responsibilities.* EEO compliance is an integral function of management at all levels within the Unit. The Market President requires department managers to attend weekly meetings, during which they discuss general employment issues and training, as well as methods for handling problems that might arise in these areas. The department managers also are taught to conduct interviews and performance reviews in a manner that is in line with the Unit's EEO policy. The Market President works with the department heads to ensure that decisions regarding hiring and promotion are carried out in a non-discriminatory fashion. All job openings must be filtered through the Market President, who is responsible for EEO compliance.

¹ The Stations operate in the Fort Collins-Loveland, CO Metropolitan Statistical Area, which had a population of 359,066 according to the 2020 U.S. Census.

No job can be filled by a department head without prior approval of the Market President, who signs off on EEO compliance. The management team is informed of EEO requirements by written guidelines forwarded by the Colorado Broadcasters Association, the National Association of Broadcasters, and the Unit's legal services. Though the department managers actively participate in the process, the Market President bears the ultimate responsibility for enforcement of the Unit's EEO policy.

Townsquare Fort Collins makes a concerted effort to ensure that both employees and applicants are well-informed of the Unit's EEO policy. Upon commencement of employment, every employee receives a copy of Townsquare Media's Employee Policy Manual, which contains a description of the Unit's EEO policy. The EEO policy and other employment-related regulations are also posted in common areas of the Stations, and all the Stations' websites post that Townsquare Media is an Equal Opportunity Employer. In addition, management periodically holds department head meetings to discuss EEO and other employment-related issues. Applicants are informed of the Unit's EEO policies through the application process. Job notices inform potential applicants that Townsquare Media is an equal opportunity employer and state the company's EEO policy.

viii. *Analysis of EEO Program's Effectiveness.* The success of Townsquare Fort Collins' EEO recruiting program is vital to the success of the Unit, and management therefore devotes a significant amount of time and resources to evaluating the success of its outreach initiatives, and the program as a whole. The Market President and the heads of the various departments assess the success of each outreach initiative on a case-by-case basis. After each job fair, community event, or other outreach initiative, the participants in that event, together with management, analyze the relative success of the event, including number of attendees, interest levels, number and quality of applications received (if applicable), and the like. Likewise, management actively evaluates the sources and methods by which it advertises specific job vacancies in order to ensure that the Stations receive a wide variety of qualified applicants for all employment positions.

Management recognizes that a large part of the Unit's recruitment program involves its efforts to post all available positions on widely used job-related websites. The Unit periodically adds organizations to its recruitment source list as they come to its attention and checks on organizations to confirm their contact information. Thus, the process of constant self-evaluation allows the Unit to continue to utilize the most effective methods, while strategizing how to strengthen its other outreach efforts.

Management has determined that participation in events/programs with local schools, coupled with its vacancy-specific announcements and its internship program, allows station personnel to come into contact with, and select its employees from, a wide cross-section of members in the community. And it continually evaluates and modifies its program to ensure and optimize recruiting success. In addition, Townsquare Fort Collins draws upon the human

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resources and recruiting departments of its parent, Townsquare Media, to monitor and ensure its own EEO compliance.

ix. *Analysis of Pay, Benefits and Selection Techniques.* Townsquare Fort Collins 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 opportunities to all employees and applicants.

Townsquare Fort Collins does not have any union agreements, is not a religious broadcaster, and is not subject to a time brokerage agreement.

I certify that the information and statements herein are true, complete, and correct to the best of my knowledge and belief and are made in good faith. I acknowledge that the attached exhibits are considered material representations.

Please address any questions concerning this letter to Townsquare Fort Collins' counsel, Emilie de Lozier of Wilkinson Barker Knauer LLP, at (202) 383-3378.

Very Truly Yours,



Allison Zolot
Senior Vice President
General Counsel