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ADMITTED IN THE
DISTRICT OF COLUMBIA

PRACTICE BEFORE THE
FEDERAL COMMUNICATIONS
COMMISSION

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March 23, 2016

EEO Staff, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Random EEO Audit Letter dated February 24, 2016
("Audit Letter"), to Adell Broadcasting Corp., licensee of
Station WADL-TV, Mt. Clemens, MI (Facility Id. No.
455)(the "Station")

Dear Sir or Madam:

This is in response to the above-noted EEO Audit Letter. The Station was audited two years ago in 2014 and based upon the staff's review of its 2012 and 2013 EEO public file reports and its response dated March 21, 2014, it was determined that no further action was required. Because the instant audit covers 2014 and 2015, it was determined, although the station was audited within the last two years, that the current audit was not duplicative and should proceed. Accordingly, the following information is provided.

The numbering of the responses below corresponds to the numbering of the Audit Letter.

3. Audit Data Requested:

3.(a). Copies of the two most recent EEO public file reports for 2014 and 2015 are attached (Attachments A and B). The address of the station's website is www.wadldetroit.com. The two most recent EEO public file reports are found at

the website under “Information” labelled “EEO Annual Report.” The date of each full-time hire listed in each report is listed below:

I. Date of each full time hire listed in each report.

<u>Full Time Vacancies</u>	<u>Referral Source of Hiree</u>	<u>No of Interviews</u>	<u>Date</u>
<u>2014 Report</u>			
1. Associate Producer (Shovein)	Specs Howard	1	6/10/13
2. Master Control Operator (Green)	Referral/Contractor	1	4/18/13
3. Account Executive (Horton)	Referral	3	2/19/14
4. Account Executive (Dalin)	Referral	3	2/19/14
5. Account Executive (Farlee)	Referral	3	3/4/14
6. Production Coordinator (Fuquary)	Inter-office promotion	1	4/7/14
7. Editor/Production (Watts)	Transfer form sister station	1	4/4/14
8. Master Control (Newhard)	Michmab	1	4/7/14
9. Production /Editor (Yoder)	Referral	2	5/5/14
<u>2015 Report</u>			
1. President/Station Manager (Bangura)	Referral	1	6/16/14

2. Account Exec (Newman)	Referral	2	6/16/14
3. Account Exec (Allen-Campbell)	Referral	2	6/16/14
4. Accounting Assistant (Young)	Transfer from sister station	1	6/19/14
5. Account Exec ((Batista)	Referral	1	6/19/14
6. Production/Editor (Patterson)	Interoffice promo	1	11/17/14
7. Production/Editor (Clark)	Part time to full time	1	1/5/15
8. Master Control Op (Schoof)	WADL Website	7	4/23/15
9. Account Executive ((Thomas)	Referral	1	4/13/15
10. Production (Phillips)	MAB Job Fair	5	10/23/14

3 (b). For each position filled, dated copies of all ads, bulletins, letters, faxes, e-mails announcing the position. If notice sent to multiple sources, then provide only one notice with list of sources where it was sent. The station attempts to retain all copies of notices of vacancies sent to recruitment sources.

See Attachment C. The items are arranged in chronological order and include the following:

1. Macomb Community College – Master Control Operator – 9/25/13
2. Detroit NAACP – Master Control Operator – 9/25/13
3. Memo re interviews for Master Control Operator – 10/3/13
4. Detroit NAACP – master control operator -1/8/14
5. WADL website – master control operator – 1/8/14

6. Michigan Association of Broadcasters ("MAB") Job Bank -1/8/14
7. College Central Network – master control operator- 1/8/14
8. Macomb Community College – master control operator – 1/8/14
9. Oakland Community College – master control operator – 1/8/14
10. Macomb Community College – account exec. – 3/14/14
11. Detroit NAACP - account exec. – 3/14/14
12. Wayne Community College – account exec. – 3/14/14
13. MAB Job Bank – account exec. – 3/14/14
14. Macomb Community College – account exec. – 3/14/14
15. Oakland Community College – account exec. – 3/14/14
16. Michigan State University – account exec. – 3/14/14
17. Wayne Community College – account exec. – 3/14/14
18. Detroit NAACP – account exec. – 3/14/14
19. MAB – production coordinator – 5/1/14
20. Career Services Online – account exec. – 8/25/14
21. Detroit NAACP – account exec. – 9/25/14
22. MAB Job Bank – account exec. – 9/25/14
22. Michigan State Univ. – account exec. – 9/24/14
23. WADL Website – account exec. – 8/25/14
24. CMU – editor/videographer – 12/31/14
25. Specs Howard – editor/videographer – 12/8/14
26. WADL Website – editor/videographer – 12/8/14
27. MAB Job Bank – editor/videographer – 2/27/15
28. WADL Website – editor/videographer – 2/17/15
29. Specs Howard – editor/videographer – 2/17/15

3(b). Specs Howard School of Media Arts is the only organization that has requested to be notified of job openings at the station.

3(c). Provide the total number of interviews for each vacancy and the referral source for each interviewee.

The full time vacancies and the number of persons interviewed for each position has been set forth above. The station receives a number of resumes as a result of its recruitment efforts and keeps these resumes on file for future consideration as new openings occur. Consequently, it does not conduct extensive interviews for each vacancy since it has a number of qualified applicants on file. It also recruits extensively for part time positions and will then promote existing part time employees to full time jobs sometimes without conducting extensive interviews. It also hires persons who are employed at its "sister station," the Word Network,

which is the largest African American religious network in the world. The information requested, is set forth *seriatim* for each full time vacancy.

2014

1. Associate Producer (Shovein)

This applicant was originally employed through a mentor program on 5/17/13. After demonstrating much success in this program, she was hired full time. Her original referral source was the Specs Howard School of Media Arts.

2. Master Control Operator (Green)

This applicant had previously been a contractor for the station who was hired full time on 7/19/13.

3. Account Executive (Horton)

Three persons were interviewed all were referrals.

4. Account Executive (Dalin)

Three persons were interviewed all were referrals.

5. Account Executive (Farlee)

Three persons were interviewed all were referrals.

6. Production Coordinator (Fuquary)

This was an inter-office promotion.

7. Editor/Production (Watts)

This was an inter-office promotion

8. Master Control (Newhard)

This was an inter-office promotion. Original referral source as MichMab.

9. Production/Editor (Yoder)

Two persons were interviewed. One was a referral and the successful applicant was a promotion.

2015

1. President/Station Manager (Bangura)

This was a referral.

2. Account Executive (Newman)

Two persons were interviewed, both referrals.

3. Account Executive ((Allen-Campbell)
Two persons were interviewed, both referrals.

4. Accounting Assistant (Young)
Transfer from sister station.

5. Account executive (Batista)
This was a referral.

6. Production/Editor (Patterson)
This was an inter-office promotion.

7. Production/Editor (Clark)
Part-time to full-time

8. Master control (Schoof)
There were 7 interviews for this position from the following referral sources:
WADL website (2); MAB Career Fair (2); MAB Job Fair (1); and one referral.
The successful applicant's referral source was the WADL website.

9. Account executive (Thomas)
This was a referral.

10. Production (Phillips)
There were 5 persons interviewed for this position all were from the Specs Howard
/MAB Job Fair.

3(d). Provide documentation of recruitment initiatives specifying the station
personnel involved in each. [The station is required to perform four initiatives
within a two- year period].

2014 Report:

Four Job Fairs:

1. Macomb County Career Expo 7/31/13
Jamie Harrington, HR Manager
2. Specs Howard School of Media Arts 9/6/13
Jamie Harrington, HR Manager
3. Michigan Association of Broadcasters Foundation ("MAB") 10/2/13

Jamie Harrington, HR Manager

4. MAB Foundation 3/12/14 (paid to attend, but could not make the fair due to poor weather conditions) WADL aired PSAs to promote the event.

5. Macomb Community College Job Fair 4/29/14

Jamie Harrington, HR Manager

2015 Report

Five Job Fairs:

1. Straight Gate International Church Job Fair 7/13/14

Jamie Harrington , Yolitha Gardner

2. Jobfair Giant, Best Western, Sterling Hts. – Macomb County 7/31/14

Jamie Harrington, HR Manager

3. Macomb Community College 4/28/15

Jamie Harrington, HR Manager

4. MAB Foundation/ Specs Howard School of Media Arts Career Fair 10/2/14

Jamie Harrington and Kenneth Templin

5. MAB Foundation 3/11/15 (WADL aired PSA's to promote event)

Jamie Harrington and Kenneth Templin

Attached are documents demonstrating the station's involvement with the following job fairs (see Attachment D):

Macomb County Career Expo 7/31/13

Specs Howard Career Fair 9/6/13

MAB Foundation/Specs Howard School Career Fair 10/2/13

MAB Foundation 3/12/14 including the schedule of PSA's run on the station promoting the event

Macomb Community College 4/29/14

Detroit Summit Career Fair/Straight Gate International Church 7/13/14

Great Lakes Broadcasting Conference/Job Fair Giant Sterling Hts. 7/31/14

Macomb Community College 4/28/15

Mab Foundation/Specs Howard 10/2/14 including the schedule of PSA's run on the station promoting the event

MAB Foundation 3/11/15

3(e). There are no pending or resolved complaints against the station.

3(f). Over the last eight years, management has been responsible for insuring that employees and job applicants are informed of the station's non-discriminatory

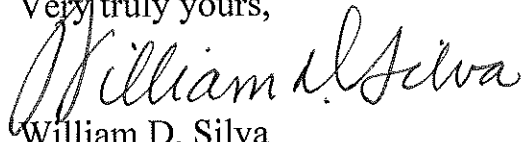
policies. This is accomplished through individual meetings, group meetings and through the posting of EEO notices.

3(g). Over the last eight years, management has regularly reviewed the station's recruitment program. This review and analysis generally occurs in mid-year around the time the annual EEO public file report is prepared. The station has a relatively stable work force and does not experience a great amount of turnover in full time employees. The diversity of its workforce seems to indicate that it has achieved a broad and inclusive outreach in the community. For example, the station has a total of 29 full-time employees. Of these, 11 are African Americans and 18 are Caucasian. There are 4 managers. Of these, 3 are African Americans and 3 are women.

3(h). Over the last eight years, management has been mindful of its responsibility to insure that its policies relating to pay, benefits, seniority practices, promotions and selection techniques do not have a discriminatory effect. These policies are reviewed on a regular basis and employee input is taken into consideration.

There follows the Statement Under Penalty of Perjury of Ralph Lameti, an officer and director of the licensee, supporting the statements made herein. Should there be any questions concerning this response, please communicate with the undersigned.

Very truly yours,



William D. Silva

Counsel for Adell Broadcasting Corp.

STATEMENT UNDER PENALTY OF PERJURY

I, Ralph Lameti, hereby state under penalty of perjury that the following facts are true and correct to the best of my knowledge and belief:

1. I am an officer and director of Adell Broadcasting Corporation, licensee of Station WADL-TV, Mt. Clemens, Michigan.
2. I have reviewed the foregoing response to the EEO Audit Letter of the Federal Communications Commission dated February 24, 2016, and the attachments thereto.
3. The response is accurate and complete.

3/24/16

Date

Ralph Lameti

Ralph Lameti

ATTACHMENT A

Annual EEO Public File Report Form
Station WADL-TV

Annual EEO Public File Report

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080(c)(6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of the Station WADL-TV, Mt. Clemens, Michigan, and is required to be placed in the public inspection files of this station and posted on its website.

The information contained in this Report covers the time period beginning June 1, 2013, to and including June 1, 2014 (the "Applicable Period").

The FCC's 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080(c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c)(2) of the FCC rules.

Appendices 1, 2 and 3 which follow have been designed, in the aggregate, to provide the required information. Please note that the numbers listed on Appendix 2 under the column entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of the full-time job positions listed on Appendix 1.

For purposes of this Report, a vacancy was deemed "filled" not when the offer was extended but when the hiree accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person, over the telephone or by e-mail.

Appendix 1 to

Annual EEO Public File Report Form

Covering the Period from 6/1/2013 to 6/1/2014

Section 1: Vacancy Information

<u>Full-time Positions Filled By Job Title</u>	<u>Recruitment Source of Hiree</u>	<u>Total Number of Interviewees from All sources for This Position</u>
1. Associate Producer (Shovein)	Specs Howard F/T	1
2. Master Control Operator (Green)	Referral/Contractor Hired F/T F/T	1
3. Account Executive (Horton)	Referral F/T	3
4. Account Executive (Dalin)	Referral F/T	3
5. Account Executive (Farlee)	Referral F/T	3
6. Production Coordinator (Fuquary)	Inter-office Promotion F/T	1
7. Editor/Production (Watts)	Transfer from Sister Station F/T	1
8. Master Control Operator (Newhard)	Michmab F/T	1
9. Production/Editor (Yoder)	Referral F/T	2

1. Account Executive (Earl)	Southfield Job Fair Giant Contractor	3
2. Account Executive (Watson)	WADL Website Contractor	2
3. Account Executive (Fakhoury)	MAB Job Fair Specs Howard Contractor	2
4. Master Control Operator (Ellis)	MAB Job Fair Specs Howard Contractor	6
5. Master Control Operator (Xiong)	Macomb Community College Contractor	6
6. Account Executive (Vincent)	Referral Contractor	1
7. Master Control Operator (Newhard)	MichMab Contractor	1

Total Number of Persons Interviewed During Applicable Period: 23

Appendix 2 to

Annual EEO Public File Report Form

Covering the Period from 6/1/2013 to 6/1/2014

Section 2: Recruitment Source Information

Recruitment Source (Name, Address, Telephone Number, Contact Person)	Total Number of Interviewees This Source Has Provided During This Period (If Any)	Full-time Positions for Which This Source Was Utilized
1. WADL Web Site	3	1
2. WADL on-air announcement	0	0
3. Resume on file from prior recruitment	0	0
4. Craigslist	0	0
5. Media Recruiters Ad	0	0
6. MichMAB	1	1
7. Macomb Community College	0	0
8. Specs Howard Job Fair	1	1
9. Inter-office Promotion	3	3
10. Referral (word of Mouth)	6	5
11. Detroit NAACP	0	0
12. Macomb Community College Job Fair	0	0
13. Macomb County Career Expo	1	1
14. MAB Career Fair at Specs Howard School	6	2
15. USPS mailed to Station	0	0
16. Southfield Job Fair Giant	1	1

17. Specs Howard School Recruitment Source 1 0

18. Station Transfer 1 1

Appendix 3 to

Annual EEO Public File Report Form

Covering the Period from 6/1/2013 to 6/1/2014

Section 3: WADL- TV continues to have a stable work force and does not experience a great amount of turnover in full time employees. However, WADL-TV has taken steps over the last year to achieve a broad and inclusive outreach in the community for actual vacancies and positions that have opened up for full time employment and contractors.

During the last year, 6/2013-6/2014, there were nine full time positions open at WADL-TV , and were filled by promoting within the station, Specs Howard School of Broadcast, Station Transfer, Southfield Job Giant, MAB Job Fair and even referrals. WADL-TV also had seven contractor positions open at the station, that were filled, one of the seven were hired full time.

WADL-TV participated in four job fairs during that period at the following institutions:

- Macomb County Career Expo 7/31/13
- Specs Howard School of Broadcast 9/6/13
- MAB Foundation 10/2/13
- MAB Foundation 3/12/14 (paid to attend, could not make the fair due to poor weather conditions-) WADL aired PSA's to promote the event
- Macomb Community College Job Fair 4/29/14

In general, the station does many different types of job fairs to promote EEO in the Metro Detroit Communities. All resumes obtained from the job fairs are kept on file at the station in an event a vacancy opens up.

WADL-TV also reaches out to offer internships to current college students at local colleges majoring in broadcasting/cinematic arts programs during all job fairs.

ATTACHMENT B

Annual EEO Public File Report Form
Station WADL-TV

Annual EEO Public File Report

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080(c)(6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of the Station WADL-TV, Mt. Clemens, Michigan, and is required to be placed in the public inspection files of this station and posted on its website.

The information contained in this Report covers the time period beginning June 1, 2014, to and including June 1, 2015 (the "Applicable Period").

The FCC's 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080(c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c)(2) of the FCC rules.

Appendices 1, 2 and 3 which follow have been designed, in the aggregate, to provide the required information. Please note that the numbers listed on Appendix 2 under the column entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of the full-time job positions listed on Appendix 1.

For purposes of this Report, a vacancy was deemed "filled" not when the offer was extended but when the hiree accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person, over the telephone or by e-mail.

Appendix 1 to

Annual EEO Public File Report Form

Covering the Period from 6/1/2014 to 6/1/2015

Section 1: Vacancy Information

Full-time Positions Filled By Job Title	Recruitment Source of Hiree	Total Number of Interviewees from All sources for This Position
1. President/Station Mngr (Bangura)	Referral F/T	1
2. Account Executive (Newman)	Referral F/T	2
3. Account Executive (Allen-Campbell)	Referral F/T	2
4. Accounting Assistant (Young)	Transfer From Sister Station F/T	1
5. Account Executive (Bastista)	Referral F/T	1
6. Production/Editor (Patterson)	Promotion within F/T	1
7. Production/Editor (Clark)	Transfer From Sister Station P/T	1
8. Production/Editor (Clark)	Part time to Full time F/T	1
9. Master Control Op (Schoof)	WADL Website F/T	7
10. Account Executive (Thomas)	Referral F/T	1
11. Editor (Rutley)	Referral P/T	5

12. Production
(Phillips)

MAB Job Fair
P/T

5

Total Number of Persons Interviewed During Applicable Period:

21

Appendix 2 to

Annual EEO Public File Report Form

Covering the Period from 6/1/2014 to 6/1/2015

Section 2: Recruitment Source Information

Recruitment Source (Name, Address, Telephone Number, Contact Person)	Total Number of Interviewees This Source Has Provided During This Period (If Any)	Full-time Positions for Which This Source Was Utilized
1. WADL Web Site	2	1
2. WADL on-air announcement	1	0
3. Resume on file from prior recruitment	0	0
4. Media Recruiters Ad	0	0
5. MichMAB website	0	0
6. Macomb Community College	0	0
7. Specs Howard Job Fair	3	0
8. Inter-office Promotion	1	1
9. Referral (word of Mouth)	6	5
10. Macomb Community College Job Fair	0	0
11. Macomb County Career Expo	0	0
12. MAB Career Fair	4	1
13. USPS mailed to Station	0	0
14. Specs Howard School Recruitment Source	0	0
15. Station Transfer	2	2
16. Part time to full time	1	1

17. Straight Gate Church Job Fair

0

0

Appendix 3 to
Annual EEO Public File Report Form
Covering the Period from 6/1/2014 to 6/1/2015

Section 3: WADL-TV continues to have a stable work force. WADL does not experience a great amount of turnover in full time employees, with the exception of Account Executives. However, WADL-TV has taken steps over the last year to achieve a broad and inclusive outreach in the community for actual vacancies and positions that have opened up for full time employment and contractors.

During the last year, 6/2014-6/2015, there were *nine* full time positions open at WADL-TV , and were filled by promoting within the station, Referrals, MAB Career Fair, Station Transfer, WADL Website, and even referrals. WADL-TV also had three contractor positions open at the station, one of the three were hired full time.

WADL-TV participated in Five job fairs during that period at the following institutions:

- Straight Gate International Church Job Fair 7/13/14
 - No Recruitments for WADL, but we did use the applications/resume for our sister Station Church of the Word , and several candidates were Hired.
- Jobfair Giant, Best Western Sterling Hts –Macomb County 7/31/14
- MAB Foundation/Specs Howard School Career Fair 10/2/14
- MAB Foundation 3/11/15 WADL aired PSA's to promote the event
- Macomb Community College Job Fair 4/28/15

In general, the station does many different types of job fairs to promote EEO in the Metro Detroit Communities. All resumes obtained from the job fairs are kept on file at the station in an event a vacancy opens up.

WADL-TV Attended Flagship Academy's Career Day on Thursday May 21, 2015 while there, WADL spoke with children from Kindergarten through 8th grade about working in the Broadcasting Industry and the education path needed to succeed.

WADL-TV also reaches out to offer internships to current college students at local colleges majoring in broadcasting/cinematic arts programs during all job fairs and has a posting on our WADL website.

FACT SHEET EMPOWERMENT DAYS

- Date:** Friday July 18 & Saturday July 19, 2014
- Conference Host:** Dr. Bill Winston
- Theme:** **Detroit Summit: Revitalizing lives through Economic Empowerment**
- Location:** Straight Gate International Church,
10100 Grand River Avenue
Detroit, Michigan
ALL daytime and evening sessions are FREE and open to the public
- Website:** www.empowermentdays.com
- Phone:** 866-816-4653
- Speakers include:** Ken Brown, Donald Lawrence, Dr. Dennis Kimbro, Michele Hoskins,
Deena Marie Carr

Description:

Come hear from successful entrepreneurs and business leaders who are influencing and transforming industries and communities through economic development. Through daytime workshops and evening speaker sessions, those in both the church and marketplace will learn how to dominate in their industries and impact the economic destiny of their city.