



Allison Zolot
Senior Vice President & General Counsel

May 6, 2024

VIA Upload to Online Public Inspection Files

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

RE: EEO Audit – WGRD-FM, Grand Rapids, MI (Facility ID 55650)

Dear Sir or Madam:

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

WFGR(FM), Grand Rapids, MI (Facility ID 25837)
WLHT-FM, Grand Rapids, MI (Facility ID 37457)
WNWZ(AM), Grand Rapids, MI (Facility ID 55648)
WTRV(FM), Walker, MI (Facility ID 72529)

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 June 1, 2021 to May 31, 2022 (“2021-2022 Reporting Period”) and June 1, 2022 to May 31, 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://wgrd.com/>, <https://wfgr.com/>, <https://mix957gr.com/>, <https://mymagicgr.com/>, <https://rivergrandrapids.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 Grand Rapids 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 Grand Rapids. 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. In addition, Townsquare Grand Rapids used a platform called Handshake to notify area universities of certain vacancies. Exhibit 3 contains screenshots from Handshake showing the Handshake sources that were notified about those vacancies, as well as the text of the notice that was posted to such sources. Townsquare Grand Rapids also advertised two vacancies with the Grand Rapids Chamber of Commerce. Exhibit 3 contains a screenshot confirming such posting. 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 21 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 2021-2022 EEO public file report is part of the 2020-2022 two-year term, and the 2022-2023 EEO public file report is part of the 2022-2024 two-year term.) The Unit personnel involved in each recruitment initiative are listed in the EEO 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

¹ The Stations operate in the Grand Rapids-Wyoming-Kentwood, MI Metropolitan Statistical Area, which had a population of 1,087,592 according to the 2020 U.S. Census.

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. 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 Michigan Association of Broadcasters, 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 Grand Rapids 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 of 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 Grand Rapids' 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, allows station personnel to come into contact

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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 Grand Rapids draws upon the human resources and recruiting departments of its parent, Townsquare Media, to monitor and ensure its own EEO compliance.

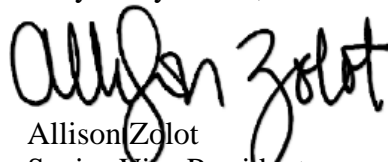
ix. *Analysis of Pay, Benefits and Selection Techniques.* Townsquare Grand Rapids strives to comply with all federal, state, and/or local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that the Unit provides equal opportunities to all employees and applicants.

Townsquare Grand Rapids 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 Grand Rapids' counsel, Emilie de Lozier of Wilkinson Barker Knauer LLP, at (202) 383-3378.

Very Truly Yours,



Allison Zolot
Senior Vice President
General Counsel