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Federal Communications Commission
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March 31, 2014

VIA COURIER

Mr. Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **KAKW-DT, Killeen, TX (Facility ID 148)**
Response to 2014 Random EEO Audit

Dear Mr. Pulley:

KAKW License Partnership, L.P., licensee of station KAKW-DT, Killeen, TX ("KAKW" or the "Station"), hereby responds (the "Response Letter") to your letter dated February 18, 2014, stating that the Station has been randomly selected for an EEO audit. The Station is commonly owned with and comprises the same employment unit as station KTFO-CD, Austin, TX ("KTFO"), which also is licensed to KAKW License Partnership, L.P. (together with KAKW, the "Stations" or the "Employment Unit"). The licensee is a subsidiary of Univision Communications Inc. ("Univision").

The responses, which are provided in the order of the requests in Section 3 of your letter, were prepared under my general supervision with the assistance of Blanca Gaytan, the Employment Unit's Accounting Assistant, who also serves as the Employment Unit's EEO Officer, and Norma Amaya, Senior Human Resources Generalist. As a parent company, Univision establishes basic EEO policies for its employment units and provides human resources and certain other administrative services to those employment units.

- 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)."

The license renewal application filing anniversary date for the Stations is April 1. Exhibit A, therefore, attaches the EEO Public File Reports for the periods April 1, 2011 to March 31, 2012 and April 1, 2012 to March 25, 2013. The cover sheets supplied in Exhibit B identify the dates of each full-time hire covered by the reports. KAKW and KTFO share a website, available at: <http://univisionaustin.univision.com/>. The KAKW/KTFO website posts the Employment Unit's most recent EEO Public File Report at: <http://s0.uvnimg.com/files/2013/04/10786/austineecoreport2012-2013.pdf>.

- 3(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 two-year reporting period covered by the two most recent EEO Public File Reports, the Stations hired 12 full-time employees. Exhibit B includes a cover sheet for each of those openings which identifies the position, the number of interviewees for each opening and the referral source for each interviewee and hiree. Each job vacancy cover sheet is followed by copies of e-mails, advertisements and other communications or records reflecting announcements of the open position. Recruitment sources have notified the Employment Unit

that they want to be notified of job openings in accordance with Section 73.2020(c)(1)(ii), and the Employment Unit notified all such sources in the ordinary course.

- 3(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.”**

Exhibit B indicates the number of interviewees and referral source for each interviewee for each vacancy and includes documentation for each full-time position filled during the two-year reporting period.

- 3(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.”**

Exhibit C includes a cover sheet noting the supplemental outreach initiatives undertaken by the Employment Unit between April 1, 2011 and March 25, 2013, and identifying the personnel involved to the extent that information is not reflected in accompanying documentation. The cover sheets pertaining to all supplemental outreach initiatives are followed by documentation that reflects the date, personnel involved, and performance of each initiative.

The Stations currently have 23 full-time employees. The Stations are not located in a “smaller market,” as defined in Section 73.2080 of the FCC’s rules, and the Employment Unit is therefore required to perform four supplemental initiatives over the course of the two-year period covered by these reports.

- 3(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.”**

Since the start of the current license term, which commenced July 31, 2006, the Stations have not received or resolved any such complaint.

- 3(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.”**

Ms. Gaytan oversees implementation of the EEO efforts and policies of the Employment Unit and is responsible for ensuring that the Employment Unit provides equal employment opportunity in all employment decisions. Luis Patino, Vice President and General Manager, plays an active role in ensuring that the Employment Unit effectively implements its recruitment and related programs as an equal opportunity employer. Employees in Department Head and supervisor-level positions are responsible for understanding, observing and implementing the Employment Unit’s EEO policy in all employment related matters so as to prevent discrimination and to provide equal employment opportunities to both employees and applicants under consideration for positions at the Employment Unit. In addition, Norma Amaya, Senior Human Resources Generalist, provides ongoing consultation and periodic training on EEO matters.

The Employment Unit notifies applicants for job openings of its basic EEO policy commitment on employment applications and publications of job notices. When hired, regular employees are required acknowledge receipt of a Univision Employee Handbook within a week of employment, which covers, among other things, Univision EEO policies. Also, employees periodically receive a written reminder notice of the Employment Unit’s basic EEO policies, including Univision’s sexual harassment policy. In addition, EEO notices that explain various rights and responsibilities relating to equal employment opportunity are placed on bulletin boards in the Employment Unit’s offices. As a further effort to help ensure that effective steps are being taken to build and maintain a diverse workforce, Univision schedules training sessions regarding

EEO compliance and non-discrimination practices in the workplace for the EEO Officer, managers and supervisor-level employees. Additional guidance on FCC requirements is provided by myself, as Associate General Counsel, and by our outside legal counsel.

3(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.”

The Employment Unit’s EEO Officer is responsible for reviewing the effectiveness of the Employment Unit’s EEO recruitment policies on an ongoing basis as well as annually, pursuant to the provisions of the Univision EEO Program. The EEO Program is a compliance plan created in connection with the FCC’s adoption of revised standards in 2003 as a guide to each Univision employment unit. It contains guidance on how Univision employment units are to engage in broad recruitment for full-time job vacancies and to undertake supplemental outreach initiatives. It also provides sample forms for collecting and maintaining necessary recruitment data.

The EEO Officer, Ms. Gaytan, with assistance from Ms. Amaya, Senior Human Resources Generalist, and counsel, helps assess recruitment and outreach efforts in the course of the Employment Unit’s preparation of the Annual EEO Public File Report. The review includes assessment of the Employment Unit’s recruitment sources to help ensure that they reflect a diverse array of sources designed to reach all segments of the community.

As EEO Officer, Ms. Gaytan observes the following general practice in accordance with the Univision EEO Program: Once a vacancy becomes available, the pertinent Department Head, with the assistance of the EEO Officer as necessary, prepares a job posting description in compliance with the Univision EEO Program. After the posting is approved by Luis Patino, Vice President and General Manager, the EEO Officer publicizes the job opening, including by notifying an array of recruitment sources identified on the Employment Unit’s master referral list, which is periodically updated and revised by the EEO Officer. During this process, the EEO Officer records pertinent information regarding the hiring process on internal forms. At the close of each hiring, the Department Head provides information summarizing the individuals interviewed and the recruitment source as identified by interviewees and the hiree. The Department Head then submits this information, along with supporting documentation, to the EEO Officer for final review before filing. Ms. Gaytan creates a Job File folder for each full-time opening, which contains all compiled information and related backup documents.

- 3(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.”**

The Employment Unit 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 Employment Unit provides equal opportunity and does not discriminate against employees or applicants. Univision sets policies regarding employee benefits on a company-wide basis. As noted, the Employment Unit, with guidance and assistance from the Univision Regional HR Director, is responsible for ensuring equal employment opportunity in all employment related decisions in accordance with Univision policy and applicable legal requirements.

The VP General Manager of the Employment Unit and relevant Department Heads review compensation, promotions and selection techniques on a yearly basis in connection with preparation of a business plan for the upcoming year. They do so within the context of basic parameters established by Univision. Such matters are also reviewed on an as-needed basis throughout the year. Also, the VP General Manager, in conjunction with Department Heads, reviews promotion and salary increase decisions at the time they are made.

The Stations do not have an agreement with any labor union.

- 3(i) “If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit’s EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.”**

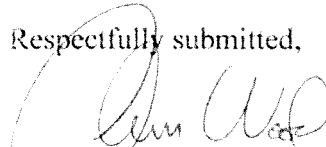
This request is not applicable.

Mr. Lewis Pulley
KAKW-DT (148)
March 25, 2014
Page 7

Please contact me if you have any questions about this Response Letter.

I certify that the statements in this Response Letter are true, correct and complete to the best of my knowledge and belief, and are made in good faith.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Wood", is written over the typed name.

Christopher G. Wood
Senior Vice President and
Associate General Counsel

Attachments (Exhibits A-C)