

February 21, 2024

EEO Division  
Enforcement Bureau  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC 20554

ATTN: Lynn Kalagian-Jones  
Supervisory EEO Specialist

**Re: Amendment to EEO Audit Response**  
**WHBQ-TV, Memphis, Tennessee (FID 12521)**

Dear Ms. Kalagian-Jones:

Imagicomm Memphis, LLC (“Imagicomm” or “Licensee”), the licensee of WHBQ-TV, Memphis, Tennessee (FID 12521) (“WHBQ” or the “Station”), hereby amends its EEO audit response of December 14, 2023, to provide the following information responsive to your email to me of January 16, 2024.

In particular, your email asked for additional information regarding the recruitment of several individuals as to whom it appeared there was “limited to no recruitment” for the vacancies filled by those individuals. In a follow-up telephone call, you informed us that the four specific vacancies in question are the following:

Production Assistant (Date of Hire January 16, 2023)  
Executive Producer (Date of Hire September 7, 2022)  
Photographer (Date of Hire January 25, 2023)  
Production Assistant (Date of Hire January 25, 2023)

Below, we provide you with pertinent general information regarding the broad recruitment activities that were undertaken by WHBQ during the period covered by your inquiry, and specific facts concerning recruitment conducted to fill the four vacancies about which you inquired.

## **Background Information Concerning WHBQ-TV**

The current licensee, Imagicomm, purchased the assets of WHBQ on August 1, 2022. Imagicomm had no previous broadcast ownership or operations experience.

In the first six months following Imagicomm's acquisition of WHBQ, the Station experienced tremendous turnover in its employee ranks. Specifically, when Imagicomm assumed control of the Station, there were 20 openings that needed to be filled immediately. The Station lost an additional 15 employees between December 2022 and February 2023, a number of which, due to the nature of their responsibilities, had to be filled as quickly as possible.

The prior licensee handled much of the Station's recruiting activity, including the responsibility for compliance with FCC recruiting requirements, centrally through a talent acquisition office at its headquarters in Atlanta, Georgia. Many of the Station's historical records and files, including those relating to recruiting, were located at the prior licensee's headquarters offices, not at the Station, and were not provided to Imagicomm at the time of the sale. Consequently, because WHBQ's local station staff had only limited roles in the recruitment process, they had little awareness of or responsibility for compliance with FCC recruitment rules. When the sale of the Station to Imagicomm was completed, the prior licensee did not leave behind any recruitment staff or materials, necessitating that Imagicomm start from scratch in establishing its hiring process.

Following the transition of the Station to Imagicomm ownership, all openings were listed on the Station's website and its LinkedIn page, which together average 400,000 page views per day. Openings also were advertised through online postings on sites such as Indeed.com and JournalismJobs.com.

Additionally, the Station's Production Manager, Ron Crawford, has an ongoing relationship with Roxana Gee, Associate Professor and Internship Coordinator for Film and Video Production at the University of Memphis. He regularly visits Professor Gee's production class, and she gives his contact information to students who are interested in pursuing television production as a career. Mr. Crawford regularly receives emails and resumes from these students.

With these background facts in mind, we provide the following information in response to your particular inquiries.

### **Production Assistant (Date of Hire January 16, 2023)**

The Station has a near perpetual need for Production Assistants, which, like at many stations, is a transitory position. The candidates interviewed for this position came primarily

from a posting on Indeed.com that was initially made on August 26, 2022, for the Production Assistant hired December 1, 2022. The Station received 116 resumes for this position from both the Indeed.com posting and from students at the University of Memphis.

Attached as Exhibit 1 is the Applicant Interview Record for this position showing that six candidates were interviewed for the position. Although the ultimate hire was an employee referral (his father worked at the Station), there clearly was wide dissemination<sup>1</sup> for this position.

### **Executive Producer (Date of Hire September 7, 2022)**

This position was specifically for Executive Producer of Investigations, who oversees all investigative journalism at the Station, as well as overseeing the team that produces the Station's early evening newscasts. This person also is in charge of the Station's FOIA and public records requests. It is critical that the person filling this position have a thorough institutional knowledge of the Memphis market, including investigative journalism, as well as a thorough knowledge of the laws relating to journalism. The previous holder of this position had been at the Station for more than 19 years and her departure left a hole that needed to be filled as quickly as possible. The need to fill this position on an expedited basis truly constituted an exigent circumstance.

The position was posted on JournalismJobs.com on August 26, 2022. See Exhibit 2. Three candidates were interviewed for the position. See Exhibit 3. However, two of them were under contract with other stations in the market and could not leave their current positions soon enough to meet WHBQ-TV's needs.

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<sup>1</sup> See In the Matter of Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies, 17 FCC Rcd 24018 \*; 2002 FCC LEXIS 6169 \*\*; 27 Comm. Reg. (P & F) 1394, MM Docket No. 98-204, at paras. (Rel. Nov. 20, 2002) (“... use for each vacancy of a recruitment source or list of recruitment sources ... sufficient to ensure wide dissemination of information about the opening. We will not dictate the number or type of sources that a broadcaster must use. \*\*\*\*\* A broadcaster may widely disseminate job postings through any combination of methods sufficient to ensure that its recruitment efforts are inclusive.”) (footnotes omitted); In the Matter of Petition for Rulemaking Seeking to Allow the Sole Use of Internet Sources for FCC EEO Recruitment Requirements, 32 FCC Rcd 3685 \*; 2017 FCC LEXIS 1221 \*\*; 66 Comm. Reg. (P & F) 793 (“Internet usage has become sufficient to justify allowing online job postings to be used as a sole recruitment source, in circumstances where doing so meets the ‘widely disseminate’ requirement of the rules, and we update our EEO policy to reflect this conclusion.”)(footnotes omitted).

The ultimate hire, Richard Holden, was exceptionally well qualified for the position, as he had 22 years of broadcast journalism experience, 19 of which were in the Memphis market, where he had been a long time Executive Producer. He also had five years' experience as an Assistant News Director, including overseeing investigative journalism. Mr. Holden's unique qualifications included (a) comprehensive knowledge of the local court systems and an ability to handle court records; (b) comprehensive knowledge of local government and politics; (c) local neighborhood and community knowledge, including historical context needed for investigations into environmental justice; (d) knowledge of libel, slander and broadcast law; (e) knowledge of Adobe editing and Photoshop; (f) experience gained by being an Avid iNews "Super User"; (g) knowledge of Chyron, Luci and Axis graphics; and (h) experience with logistics planning. It was difficult to imagine finding a more qualified person for this position. Indeed, since his hiring, Mr. Holden has produced extremely timely and valuable stories on ghost guns, affordable housing, and a link between decreased traffic tickets and increased traffic fatalities, among others. The Station considers itself fortunate that he was available when this position became open.

Imagicomm believes that its recruitment efforts for this position satisfied the Commission's wide dissemination standard, and also that it qualified as an exigent circumstance.<sup>2</sup>

### **Photographer (Date of Hire January 25, 2023)**

The Station's opening for the photojournalist/photographer position was posted on LinkedIn on December 16, 2022, and also on JournalismJobs.com. See Exhibit 4. Eight candidates were interviewed as a result of these job postings; one of those was offered the position but turned it down. Although the person ultimately hired to fill this position came through an internal referral, we believe there was wide dissemination for this position in compliance with the Commission's requirements.

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<sup>2</sup> See MM Docket No. 98-204 at para. 80 (recognizing "the need to replace immediately an employee who departs without notice and whose duties cannot be fulfilled, even briefly, by other station employees [as exigent circumstances]"); para. 85 (exigent circumstances where "a talent [is] so unique and exceptional that a broadcaster could reasonably conclude that a comparable talent is unlikely to be found by recruitment."); para. 50 ("-we would rely on the good faith discretion of broadcasters . . ."); para. 83 ("look[ing] to the entirety of the licensee's recruitment efforts in assessing its compliance with our Rule. \*\*\* In the absence of evidence of such abuse, we would not necessarily find a violation even if we disagreed with a licensee's decision as to a particular hire, as long as it is made in good faith.") (footnotes omitted).

### **Production Assistant (Date of Hire January 25, 2023)**

As noted above, the Production Assistant position is essentially a perpetual job opening. As also noted above, the Station received 116 resumes for this position as a result of both the August Indeed.com posting and resumes received from students at the University of Memphis.

The person hired for this position, Simmone Smith, was one of the candidates interviewed for the Photographer position described above, although she also had submitted a resume for the Production Assistant position. This particular position was for someone to edit the weekend evening newscasts using the Station's Adobe editing system. Ms. Smith, who is Black, seemed particularly well suited for this position as she had experience using the Adobe editing system, which no other Production Assistant at the Station knew how to operate. Accordingly, she was offered the Production Assistant position, which she accepted. In addition to Ms. Smith possessing unique Adobe editing system expertise, the Station also was confronted with an urgent need to add someone with those skills, as the Station had only five other production assistants capable of editing the 53.5 hours per week of newscasts produced by the Station on a 24/7 basis, all of whom were working overtime and were overtaxed.

Consequently, Licensee believes that its Production Assistant recruitment efforts for this position satisfied the Commission's wide dissemination requirement, and that this position also constituted an exigent circumstance in view of the fact that it had to be filled immediately by someone who had the necessary news editing skills.

### **Conclusion**

As noted above, the Licensee assumed control of this Station in August 2022 and has had to fill an inordinate number of positions since that time without the benefit of the prior licensee's recruitment staff or materials and without the benefit of previous FCC broadcast hiring experience. Since then, the Licensee has informed itself of the FCC's requirements for both recordkeeping and wide dissemination of job openings, and has had numerous meetings with staff to ensure that all involved are knowledgeable about these requirements.

We think it is noteworthy that, even without the benefit of past broadcast ownership experience or the prior licensee's experienced staff and station records, WHBQ's staff is quite diverse. Attached as Exhibit 5 is a chart showing the makeup of the Station's staff. As can be seen, every department of the Station includes both women and persons of color. Among newsroom managers, half (4 of 8) are persons of color. Similarly, the majority of directors are persons of color as well (3 of 5). Overall, the newsroom staff is 55% Black, nearly 3% Hispanic, nearly 3% Asian, and 40.5% female. Looking at all station employees (not just the newsroom), they are 48.7% Black, 2.65% Hispanic, 1.77% Asian and 45% female, truly reflecting the

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Memphis community at large, which is 47% Black, 6% Hispanic and 2% Asian.<sup>3</sup> Of the 15 Station employees who have supervisory/managerial responsibilities, six (40%) are minorities, comprised of five Black and one American Indian/Asian employee. Also, eight of the 15, i.e., a majority, are female. See Exhibit 5. Thus, even without the benefit of prior FCC experience, the Licensee has been very successful in hiring a diverse staff, which is the ultimate goal of the Commission's EEO program.

Please let us know if there are any other questions or if we can provide any further information with regard to this audit.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

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Burt A. Braverman

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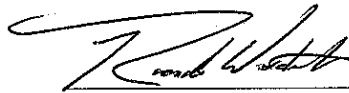
<sup>3</sup> Source: <https://censusreporter.org/profiles/31000US32820-memphis-tn-ms-ar-metro-area/>

**DECLARATION OF RANDY WARDELL**

I, Randy Wardell, hereby declare as follows:

1. I am the News Director at Imagicomm Memphis, LLC, the licensee of WHBQ-TV in Memphis, Tennessee (the "Station").
2. I have read the foregoing "Amendment to EEO Audit Response" and hereby declare under penalty of perjury that all of the facts stated therein are true and correct to the best of my knowledge, information and belief.

Dated this 21 day of February 2024.



\_\_\_\_\_  
Randy Wardell

## **EXHIBIT 1**



# Applicant Interview Record



<b>Position:</b>	<u>Production Assistants</u>	<b>Department:</b>	<u>Production/News</u>
<b>Date Posted:</b>	<u>11/23</u>	<b>Date Closed:</b>	<u>TBD</u>
<b>Person Hired:</b>	<u>Cooper Guidry</u>	<b>Hire Date:</b>	<u>1/16</u>
<b>Replacing:</b>	<u>Bryant Pryor</u>	<b>Hiring Manager</b>	<u>Ron Crawford</u>

	<u>Interview Date</u>	<u>Interviewee Name</u>	<u>Referral Source (How did interviewee hear about the job? BE SPECIFIC)</u>	<u>Additional Information</u>
1	12/23	John Jentesh	INDEED	
2	12/29	Jazmine Burrientos	Email Resume'	
3	12/29	Yael King	Email Resume'	
4	12/29	Shatana Curtis	Email Resume'	
5	01/04	Cooper Guidry	Email Resume'/Refferal	HIRED
6	01/04	Derrick Brown	Email Resume'	
7				
8				
9				
10				
11				
12				

## **EXHIBIT 2**

# Executive Producer of Investigative Journalism

**FOX13**

Memphis, Tennessee



Date Posted	August 26, 2022
Industry	Television
Specialty	Investigative
Required Education	Bachelor's Degree
Job Status	Full-time

## Description:

**Imagicom and FOX13 Memphis have an immediate opening for an Executive Producer of Investigations**

Journalism, real community-serving journalism, has value. You can make a difference in our community. You can make life more affordable, fairer, and safer for the people we serve.

We are searching for an Executive Producer to oversee our Investigative Content. FOX13 Investigates and Your Money set the editorial agenda in Memphis. It is our journalism that shapes our community.

The Executive Producer will be responsible for the oversight of relevant, well-paced memorable newscasts that have high production value.? The successful candidate will excel at owning breaking news and showcasing investigative/ enterprise content.?

The Executive Producer will also schedule and oversee all investigative content.?. The candidate must be creative and able to work with a research-based framework.

### WHAT YOU WILL DO:

- Supervise Investigative Reporters and Photographers
- Oversee scheduling of all investigative content
- Oversee newscasts, making sure they meet research goals and the mission of FOX13 Memphis to be the go-to source for weather, breaking news and daily investigative journalism
- Supervise producers, making sure newscasts are filled with valuable content that is clear and easy to understand
- Ensure producers execute meter and quarter hour tease strategies
- Ensure newscasts regularly showcase and execute process language
- Copy edit newscasts and approve reporter scripts with fundamental journalistic and legal understanding
- Maximize graphics and pre-production elements for newscasts
- Attend editorial meetings and contribute story ideas
- Develop and critique producers and set coverage expectations
- Understand brand and manage newscasts so product is consistent with brand
- Communicate daily with News Director and news management
- Work with news managers to craft special coverage plans
- Be the leader in wall-to-wall breaking news coverage

- Understand and execute research plans
- Consistently integrate references/ pushes to our digital and social media products

**WHAT YOU WILL BRING:**

- A minimum of 5 years professional experience in local TV news is preferred??
- Prior news management experience is a plus?
- Bachelor's degree (B. A.) from four-year College or University in Journalism or Communications preferred?
- Ability to define problems, collect data, establish facts, and draw valid conclusions?
- Must be thoroughly professional in all aspects of journalism

Email your reel and resume to [randy.wardell@fox13memphis.com](mailto:randy.wardell@fox13memphis.com)

**When applying, mention you saw this opening listed at JournalismJobs.com.**

Job ads copyrighted by JournalismJobs.com © 1998-2023

	<b>BEST WESTERN PLUS FLOWOOD I...</b> <b>From \$93</b> Info	<b>SLEEP INN &amp; SUITES AIRB</b> <b>From \$80</b> Info
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## **EXHIBIT 3**

## Applicant Interview Record

<b>Position:</b>	Executive Producer	<b>Department:</b>	News
<b>Date Posted:</b>	09.01.22	<b>Date Closed:</b>	09.19.22
<b>Person Hired:</b>	Richard Holden	<b>Hire Date:</b>	09.07.22
<b>Replacing:</b>	Claire Jones	<b>Hiring Manager</b>	Randy Wardell

	<u>Interview Date</u>	<u>Interviewee Name</u>	<u>Referral Source (How did interviewee hear about the job? BE SPECIFIC)</u>	<u>Additional Information</u>
1	09.02.2022	Richard Holden	Referral from Valerie Calhoun and Claire Jones	Top candidate – long time EP and Assistant News Director in the market
2	09.01.2022	Ben Hogan	Internal Candidate	
3	09.03.2022	Istvan Bardos	Internal Candidate	
4				
5				
6				
7				
8				
9				
10				
11				
12				

## **EXHIBIT 4**



## Photojournalist

FOX13 Memphis · Memphis, TN · 1 year ago

On-site · Full-time

51-200 employees

See recent hiring trends for FOX13 Memphis. [Retry Premium for \\$0](#)

No longer accepting applications

### Meet the hiring team



**Dameon Banks** 1st  
Operations Manager at FOX13 Memphis  
Job poster · LinkedIn member since 2012  
133 mutual connections

Message

### About the job

FOX13 Memphis is looking for a Photographer/Videographer to join our team!

Are you a photographer with a trained eye? Are you able to tell a strong visual story in still and moving images? Are you versed with the modern equipment, hardware and software needed to do it? Television is a visual medium, and Photojournalists weave the tapestry of the stories we tell.

WHBQ-TV has an opening for a full-time Photojournalist who has the ability to identify and acquire the best pictures and sound, and put them together to tell stories that will impact our community. You will operate state-of-the-art broadcast equipment for live and produced segments.

#### WHAT YOU WILL DO:

Operate and maintain a professional quality video camera and related news gathering equipment; be -- or quickly become -- proficient at field troubleshooting. Be familiar with and understand non-linear editing techniques to meet deadlines and create high-impact stories.

Operate and maintain live equipment including microwave, satellite, and LiveU backpack.

Work with reporters in the field to turn visually-creative, memorable stories as well as interesting, active live shots.

Bring story ideas and creative energy to the table every day.

Email your resume to [dameon.banks@fox13memphis.com](mailto:dameon.banks@fox13memphis.com)

[See less ^](#)

### Set alert for similar jobs

Photojournalist, Memphis, TN

Set alert

### How you match



Stand out by adding skills associated with the job post

**Skills associated with the job post**

Identified by LinkedIn

📌 **10 skills missing on your profile**

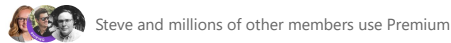
Backpack, Cameras, Editing, Editorial, Live Shots, Non-linear Editing, Photograph...

🔧 Add skills you have to your profile to stand out to the employer. [Add skills](#)

Show all skills →

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**About the company**



**FOX13 Memphis**  
998 followers

✓ Following

Broadcast Media Production and Distribution • 51-200 employees • 85 on LinkedIn

FOX13 Memphis brings breaking news, local investigations, team coverage from Severe Weather Center 13 and live reports 24/7 from across the Mid-South.

Show more

**More jobs**



**School Photographer**

Lifetouch  
Mount Vernon, OH (On-site)

20 hours ago



**News Photographer**

Sinclair Inc.  
Providence, RI (Hybrid)



3 days ago 5 applicants



**News Photojournalist**

Sinclair Inc.  
Baltimore, MD (Hybrid)



10 connections work here



**Lead Photographer**

Skyview Experts  
Grand Rapids Metropolitan Area  
(Remote)



Response time is typically 6 days

4 days ago



**Producer / Photojournalist - CNN (Philadelphia)**

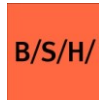
CNN  
United, PA (Remote)



4 connections work here

2 weeks ago

2 weeks ago Easy Apply



**Photographer**

BSH Home Appliances...  
New Bern, NC (On-site)

3 hours ago



**Photographer**

Obama Foundation  
Chicago, IL (On-site)



Your profile matches this job

3 days ago



**News Photographer**

Sinclair Inc.  
Nashville, TN (Hybrid)



2 company alumni work here

1 day ago



**Content Creator / Studio Photographer**

TRG  
Dallas, TX (Hybrid)

4 days ago



**Visual Storyteller/Photojournalist**

TEGNA  
Sacramento, CA (On-site)



10 connections work here

3 days ago **6 applicants**



**News Photographer - Washington DC (15935)**

Getty Images  
Washington, DC (Hybrid)

2 days ago



**Photographer**

Tesla  
Fremont, CA (On-site)

2 weeks ago

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**Developing Your Professional Image in a New Job**

273,043 viewers

**Betty Liu on Career Success**

233,321 viewers

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**Professional Networking**

318,934 viewers

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Go to your Settings.
-  **Recommendation transparency**  
Learn more about Recommended Content.

Select Language

English (English)

## **EXHIBIT 5**

Name	Title	Race	Gender	White		Black		Male		Female	
<b>Newsroom Managers</b>											
	News Director	White	Male		4		4		7		1
	Operations Manager	Black	Male	50%		50%		87.50%		12.50%	
	Managing Editor	White	Male								
	Senior Executive Producer	Black	Female								
	Investigative Executive Producer	White	Male								
	Morning Executive Producer	White	Male								
	Production Manager	Black	Male								
	Chief Photographer	Black	Male								
<b>Anchors</b>											
	Morning News Anchor	Black	Male		2		5		4		3
	Morning News Anchor	White	Female	28.57%		71.43%		57.14%		42.26%	
	Midday News Anchor	Black	Female								
	Evening News Anchor	White	Male								
	Evening News Anchor	Black	Female								
	Weekend Evening Anchor	Black	Male								
	Weekend Morning Anchor	Black	Male								
<b>Meteorologists</b>											
	Chief Meteorologist	Black	Male		3		2		2		3
	Morning Lead Meteorologist	Black	Female	60%		40%		40%		60%	
	Weekend Evening Meteorologist	White	Male								
	Weekend Morning Meteorologist	White	Female								
	Morning Second Meteorologist	White	Female								
<b>Content Center</b>											
	Evening Assignment Lead	Black	Female		3		2	1	3		3
	Morning Assignment Lead	White	Female	50%		33%	17%	50%		50%	
	Morning Digital Producer	White	Male								
	Lead Digital Producer	White	Male								
	Digital Content Producer	Asian American	Male								
	Digital Content Producer	Black	Female								
<b>Producers</b>											
	6pm Producer	White	Female		5		5		6		4
	Midday Producer	Black	Male	50%		50%		60%		40%	
	Weekend Morning Producer	Black	Female								
	5pm Producer	White	Male								
	Morning Producer	Black	Female								
	Weekend Evening Producer	Black	Male								
	10pm Producer	White	Female								
	Morning Producer	White	Female								
	9pm Producer	White	Male								
	Morning Producer	Black	Female								
<b>Reporters</b>											
	Dayside Reporter	White	Female		3		4	1	1		1
	Morning Reporter/Anchor	Hispanic	Female	33.33%		44.44%	11.11%	11.11%		11.11%	88.89%
	Dayside Reporter	Black	Female								
	Nightside Reporter	White	Male								
	Consumer Investigative Reporter	White	Female								
	Investigative Reporter	Black	Female								
	Nightside Reporter	Black	Female								
	Nightside Reporter	Black	Female								
	Morning Reporter	Asian American	Female								
<b>Photojournalists</b>											
	Morning Photographer	Black	Male		3		7		8		2
	Investigative Producer/Photographer	Black	Female	30%		70%		80%		20%	
	Evening Photographer	Black	Male								
	Morning Photographer	White	Male								
	Evening Photographer	White	Male								
	Lead Morning Photographer	Black	Male								
	Dayside Photographer	White	Male								
	Dayside Photographer	Black	Female								
	Dayside Photographer	Black	Male								
	Overnight Photographer	Black	Male								
<b>Editors</b>											
	Morning Editor	Black	Male		1		2	1	3		1
	Morning Editor	Hispanic	Female	25%		50%	25%	75%		25%	

Evening Editor	White	Male
Evening Editor	Black	Male

**Directors**

Evening Director	Black	Female
Morning Director	White	Male
Weekend Morning Director	Black	Female
Weekend Evening Director	Black	Male
Evening Director	White	Male

<b>White</b>	<b>Black</b>		<b>Male</b>	<b>Female</b>
2	3		3	2
40%	60%		60%	40%

**Production Assistants**

Editor/Production Assistant	Black	Male
Morning Production Assistant	White	Male
Morning Production Assistant	Black	Male
Evening Production Assistant	Black	Male
Editor/Production Assistant	White	Female
Evening Production Assistant	White	Female
Evening Production Assistant	Black	Male
Evening Production Assistant	Black	Male
Morning Production Assistant	Black	Male
Morning Production Assistant	Black	Female

<b>White</b>	<b>Black</b>		<b>Male</b>	<b>Female</b>
3	7		7	3
30%	70%		70%	30%

<b>Overall Newsroom</b>						
<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Male</b>	<b>Female</b>	
29	41		2	2	44	30
39.19%	55.41%	2.71%	2.71%	59.46%	40.54%	
<b>Memphis Metro Area</b>						
<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>			
41%	47%	6%	2%			
<b>Primary Gatekeepers - Managers and Anchors</b>						
<b>White</b>	<b>Black</b>					
6	9					
40%	60%					
<b>On Air Presenters - Anchors, Meteorologists, Reporters</b>						
<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>			
8	11		1	1		
38.09%	52.38%	4.76%	4.76%			

**Other Departments**

Finance  
 Engineering  
 Administrative  
 Creative Services  
 Sales  
 Traffic  
 Non-News Total

<b>White</b>	<b>Black</b>	<b>Hispanic</b>	<b>Asian</b>	<b>Male</b>	<b>Female</b>
1					1
6	5				8
1	1				1
6	1	1			4
8	6				3
2	1				1
<b>24</b>	<b>14</b>	<b>1</b>			<b>18</b>
62%	36%	3%			46%

<b>Total Station</b>	<b>53</b>	<b>55</b>	<b>3</b>	<b>2</b>	<b>62</b>	<b>51</b>
	<b>46.90%</b>	<b>48.67%</b>	<b>2.65%</b>	<b>1.77%</b>	<b>54.87%</b>	<b>45.13%</b>