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March 23, 2012

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MAR 23 2012

Federal Communications Commission
Bureau / Office

Lewis C. Pulley
Assistant Division Chief, Policy Division
Media Bureau/EEO Staff
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Response to Broadcast EEO Audit Letter
Capstar TX, LLC
Station KEZA(FM), Fayetteville, AR
Facility ID No. 12702**

Dear Mr. Pulley:

On behalf of Capstar TX, LLC, licensee of the above referenced broadcast station, and the commonly owned stations in the Fayetteville, Arkansas station employment unit ("SEU"), the undersigned submits the SEU's response to your letter of February 16, 2012 concerning compliance with the Commission's Equal Employment Opportunity rules, 47 C.F.R. § 73.2080. In accordance with your request, this submission consists of a sworn statement by Tony Beringer, Market Manager of the licensee, with copies of documentation responsive to your inquiry.

Should any questions arise concerning this submission, kindly contact the undersigned.

Respectfully submitted,

Elizabeth E. Goldin

Counsel to Capstar TX, LLC

cc: Tony Beringer

DECLARATION OF TONY BERINGER

I, Tony Beringer, hereby declare as follows:

1. I am a Market Manager for Capstar TX LLC, the licensee of Station KEZA(FM), Fayetteville, AR (Fac. ID No. 12702), which is part of a station employment unit based in Fayetteville, AR, and which includes KKIX(FM), Fayetteville, AR (Fac. ID No. 48951), KIGL(FM), Seligman, MO (Fac. ID No. 35014), and KMXF(FM), Lowell, AR (Fac. ID No. 48955) (the "SEU" or "Unit"). The stations in this SEU are commonly owned through subsidiaries ultimately owned and controlled by Clear Channel Communications, Inc. (collectively, "Clear Channel"). This Statement and relevant attachments are being submitted in response to the February 16, 2012 letter of Lewis C. Pulley, Assistant Chief of the Policy Division of the Commission's Media Bureau, concerning a random audit of the SEU's EEO compliance (the "EEO Audit Letter").

2. This SEU employs five or more full-time employees as the term is defined in the broadcast EEO rule of the Federal Communication Commission ("FCC" or the "Commission"), 47 C.F.R. § 73.2080(e)(1).

3. In response to Question 3(a) of the EEO Audit Letter, copies of the SEU's two most recent EEO public file reports, as described in 47 C.F.R. § 73.2080(c)(6), are appended at Attachment A.

The web addresses of the stations in this SEU are as follows: Magic1079.com, KIX104.com, 933theeagle.com, Hotmix1019.com. A copy of the current report is included on or linked to each of these websites.

The date of each full-time hire listed in the SEU's two most recent EEO public file reports, as required by 47 C.F.R. § 73.2080(c)(5)(vi), is included in the internal business records appended at Attachment B.

4. In response to Question 3(b) of the EEO Audit Letter, documentation concerning the recruitment sources used to fill each full-time position during the period covered by the above EEO public file reports, is also appended at Attachment B. Those sources that have notified the SEU that they want to be alerted to job openings at the Unit, as described in § 73.2080(c)(1)(ii), are indicated in the job-specific documentation.

5. In response to Question 3(c) of the EEO Audit Letter, the internal business records appended at Attachment B provide data concerning (a) the total number of interviewees for each vacancy and (b) the referral source for each interviewee for each particular full-time vacancy filled during the period covered by the above EEO public file reports.

6. In response to Question 3(d) of the EEO Audit Letter, documentation concerning the Unit's performance of recruitment initiatives described in § 73.2080(c)(2) during this time period is appended at Attachment C. Station personnel involved in the recruitment initiatives are noted in the documentation. This SEU employs a total of 20 full-time employees and at least one of

our stations is located in a market with a population of more than 250,000. Accordingly, the SEU is required to perform at least four recruitment initiatives during a two-year period.

7. In response to Question 3(e) of the EEO Audit Letter, the licensee affirms that it is not aware of any discrimination complaints filed against licensee of the stations in this SEU during the current license term.

8. In response to Question 3(f) of the EEO Audit Letter, the licensee affirms that Clear Channel has created and deployed an EEO compliance plan, with the assistance of outside communications counsel, known as the Clear Channel Broadcast Diversity Recruitment Plan (the "Recruitment Plan" or "Plan"). The Recruitment Plan was distributed to all regional managers and, through them, disseminated to each SEU in conjunction with the effective date of the current EEO regulations. The Recruitment Plan is also posted on Clear Channel's intranet, which is accessible to all Clear Channel employees, as are instructional compliance checklists. The Plan contains directives as to how Clear Channel SEUs are to engage in broad recruitment for job vacancies and undertake recruitment initiatives, includes sample forms for collecting and maintaining the necessary recruitment data, and provides a quarterly self-assessment program designed to ensure that the SEU follows the Plan's directions and regularly updates corporate headquarters as to the employment unit's progress in the area.

At the corporate level, Clear Channel assists SEUs in understanding and following the Recruitment Plan, regularly providing training via conference calls, responding to SEU requests for assistance and/or calling upon outside counsel for additional guidance when warranted. Furthermore, Clear Channel has a team of internal public inspection file auditors that routinely assesses each SEU's FCC EEO compliance, based on the most recent EEO Public File Report, as part of a quarterly review of overall public file compliance.

At the local level, I, Tony Beringer, am responsible for EEO compliance, and Judy Hudson, our EEO officer, coordinates the day-to-day outreach efforts. Together we strive to regularly update our master recruitment source list, contact a variety of sources designed to reach a broad applicant pool regarding each job opening, and execute general recruitment efforts to reach individuals who might otherwise not be aware of broadcast job opportunities. This includes participating in local job fairs, providing job shadowing and station tour opportunities, encouraging employees to participate in available training designed to promote career advancement, and working with educational institutions to provide students with information about career opportunities in broadcasting. This SEU's compliance efforts include identifying Clear Channel's efforts to afford equal employment opportunities to employees through statements disseminated in job applications and posted in conspicuous areas within the workplace.

9. In response to Question 3(g) of the EEO Audit Letter, the licensee affirms that the SEU understands that it must periodically analyze the effectiveness of its EEO recruitment program by reviewing the productivity of sources on its recruitment list and the outcome of its recruitment initiatives. The company's Recruitment Plan, through the quarterly self-assessment mechanism, provides SEUs with a regular opportunity to consult the corporate headquarters about these issues. To boost the effectiveness of outreach efforts on an ongoing basis, the Recruitment Plan also provides language for station websites, on-air announcements and/or formal letters

encouraging qualified community organizations to contact the SEU to request its job notices. This SEU appeals to potential applicants directly through on-air announcements, sends formal letters to colleges and community organizations encouraging them to contact the SEU's EEO officer to receive job postings, and is constantly searching for new opportunities to promote careers in the broadcasting industry within the communities that the SEU serves.

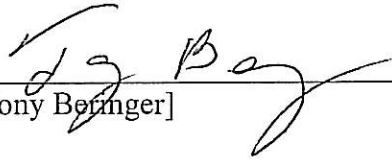
10. In response to Question 3(h) of the EEO Audit Letter, this SEU strives to comply with all federal, state and/or local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that the unit provides equal opportunity and does not discriminate against employees or applicants.

Dated: March 19, 2012

[SIGNATURE PAGE FOLLOWS]

**SIGNATURE PAGE TO
DECLARATION OF [NAME, Market Manager]**

As of the date set forth above, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.



[Tony Beinger]