

STAMP & RETURN

March 22, 2017

RECEIVED - FCC

MAR 22 2017

Federal Communications Commission
Bureau / Office

BY HAND DELIVERY

EEO Staff
Policy Division

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

Re: WTVD(TV), Facility Id. 8617; Durham, North Carolina
Equal Employment Opportunity Program Audit Response

Dear Mr. Pulley,

We write on behalf of WTVD Television, LLC, a wholly-owned subsidiary of ABC, Inc., licensee of WTVD ("Licensee") in response to your letter dated February 8, 2017 regarding a random audit of the Equal Employment Opportunity ("EEO") program of WTVD, in accordance with Section 73.2080 of the Federal Communication Commission's rules.

WTVD is an equal opportunity employer. WTVD's longstanding policy is to provide equal opportunity for all employees and applicants for employment without regard to race, religion, color, sex, sexual orientation, gender identity, national origin, age, marital status, covered veteran status, mental or physical disability, pregnancy, or any other basis prohibited by state or federal law.

We will address in order each applicable inquiry posed in your letter.

Question 3: Audit Data Requested.

WTVD has 135 full-time employees.

Question 3(a): Annual EEO public file reports. Copies of WTVD's two most recent annual EEO public file reports filed as of August 1, 2015 and August 1, 2016 pursuant to Section 73.2080(c)(6) of the Commission's rules are attached hereto as **Exhibit A**.

On the WTVD website located at <http://abc11.com>, the most recent EEO public file report can be found through the "About ABC11" page, a direct link to the report is: http://dig.abclocal.go.com/wtvd/docs/WTVD_2016_EEO_Report_Revised.pdf.

The dates of the ten (10) full-time hires listed in the EEO public file report filed on August 1, 2015 are:

January 5, 2015 (Investigative Reporter)
September 24, 2014 (ENG/SNG Media Coordinator)
October 27, 2014 (ENG/SNG Media Coordinator)
November 3, 2014 (News Producer)
October 20, 2014 (Photographer/Editor)
November 17, 2014 (Photographer/Editor)
April 20, 2015 (Director of Digital Strategy and Operations)
January 19, 2015 (Sales Service Administrator)
March 16, 2015 (Digital Producer)
May 18, 2015 (Digital Sales & Marketing Director).

The dates of the ten (10) full-time hires listed in the EEO public file report filed on August 1, 2016 are:

September 17, 2015 (News Director)
September 1, 2015 (Reporter)
April 11, 2016 (Anchor/Reporter)
December 3, 2015 (Senior Web Producer)
January 25, 2016 (Reporter)
March 2, 2016 (News Executive Producer)
March 28, 2016 (Video/Digital Journalist)
March 23, 2016 (Producer)
May 9, 2016 (Creative Marketing Producer)
June 6, 2016 (Graphic Artist/Designer).

Question 3(b): Job announcements. The available documentation of job announcements (including copies of all available advertisements, letters, faxes, e-mails, or other communications announcing the position) for the twenty (20) full-time positions filled during the period covered by the two most recent annual EEO public file reports (August 1, 2014 through August 1, 2016) are attached hereto as **Exhibits B1 – B20**.

In compliance with EEO rules, WTVD has widely publicized all full-time job vacancies throughout the reporting years, as detailed in the annual EEO public file reports attached as **Exhibit A**. Distribution of information about vacancies at WTVD included postings on the WTVD website, abc11.com, and on the Walt Disney Company website, disneycareers.com.

WTVD also maintains a distribution/contact list of more than twenty-seven (27) local community-based organizations and schools to which notices of all available full-time positions are sent. This list is updated periodically.

Some WTVD positions were also posted in other outlets, such as the Triangle Chapter of NABJ, the Women's Alliance, The National Association of Hispanic Journalists and the Asian American Journalists Association, as itemized in the annual EEO public file reports attached as **Exhibit A**.

Question 3(c): Interviewees and referral sources.

The interviewees and referral sources for ten (10) full-time positions listed in the EEO public file report filed on August 1, 2015 are:

1. One (1) candidate was interviewed for the Investigative Reporter position (hired on January 5, 2015). This candidate was an internal candidate (employed by WTVD) and was hired;
2. Ten (10) candidates were interviewed for the ENG/SNG Media Coordinator position (hired on September 24, 2014), and the referral sources listed for those interviews were nine (9) internal candidates (employed by WTVD) and one (1) disneycareers.com candidate, who was hired;
3. Ten (10) candidates were interviewed for the ENG/SNG Media Coordinator position (hired on October 27, 2014), and the referral sources listed for those interviews were nine (9) internal candidates (employed by WTVD) and one (1) disneycareers.com candidate from which one internal candidate was hired;
4. Five (5) candidates were interviewed for the News Producer position (hired on November 3, 2014), and the referral sources listed for those interviews were: three (3) Disney industry referral candidates, from which one (1) was hired, and two (2) abc11.com candidates;
5. Three (3) candidates were interviewed for a Photographer/Editor position (hired on October 20, 2014), and the referral sources listed for those interviews were: three (3) disneycareers.com candidates from which one was hired;

6. Three (3) candidates were interviewed for a Photographer/Editor position (hired on November 17, 2014), and the referral sources listed for those interviews were: three (3) disneycareers.com candidates from which one was hired;
7. Twenty-five (25) candidates were interviewed for the Director of Digital Strategy and Operations position (hired on April 20, 2015), and the referral sources listed for those interviews were: twenty-five (25) disneycareers.com candidates, one of whom was hired;
8. Two (2) candidates were interviewed for the Sales Service Administrator position (hired on January 19, 2015), and the referral sources listed for those interviews were: two (2) internal candidates (employed by WTVD) of whom one was hired;
9. Two (2) candidates were interviewed for the Digital Producer position (hired on March 16, 2015), and the referral sources listed for those interviews were: two (2) abc11.com candidates of whom one was hired;
10. Four (4) candidates were interviewed for the Digital Sales and Marketing Director position (hired on May 18, 2015), and the referral sources listed for those interviews were: three (3) abc11.com candidates and one (1) internal candidate (employed by WTVD), who was hired.

The interviewees and referral sources for ten (10) full-time positions listed in the EEO public file report filed on August 1, 2016 are:

1. Nine (9) candidates were interviewed for the News Director position (hired on September 17, 2015), and the referral sources listed for those interviews were: four (4) disneycareer.com candidates, one of whom was hired, and five (5) internal candidates (employed by WTVD);
2. Two (2) candidates were interviewed for the Reporter position (hired on September 1, 2015), and the referral sources listed for those interviews were: two (2) disneycareers.com candidates, one of whom was hired;¹
3. Two (2) candidates were interviewed for the Anchor/Reporter position (hired on April 11, 2016), and the referral sources for these interviews were: two (2) candidate referrals from talent agents, one of whom was hired;²
4. Five (5) candidates were interviewed for the Senior Web Producer position (hired on December 3, 2015), and the referral sources listed for those interviews were:

¹ The referral source for one of the candidates was not listed in the original 2016 annual EEO report. In the course of preparing its response to this EEO audit, the station found certain EEO recruitment information that was not reflected in the 2016 EEO report. Where such discrepancies exist, we note them in this response and have included the information in a revised EEO report, which will be placed in the station's online public file and on its website. A copy of the revised 2016 EEO report is included as part of Exhibit A.

² Information about one candidate for this position and the referral source for both interviewees was not listed in the 2016 annual EEO report. See supra footnote 1.

one (1) disneycareers.com candidate, one (1) candidate referral from an industry colleague, one (1) internal candidate (employed by WTVD), one (1) LinkedIn candidate, and one (1) indeed.com candidate, who was hired;

5. Three (3) candidates were interviewed for the Reporter position (hired on January 25, 2016), and the referral sources listed for those interviews were: one (1) candidate referral from industry colleague, and two (2) agent referral candidates, one of whom was hired;
6. Three (3) candidates were interviewed for the News Executive Producer position (hired on March 2, 2016), and the referral sources listed for those interviews were: three (3) disneycareers.com candidates, one of whom was hired;
7. Two (2) candidates were interviewed for the Video/Digital Journalists position (hired on March 28, 2016), and the referral sources listed for those interviews were: two (2) disneycareers.com candidates, one of whom was hired;
8. Three (3) candidates were interviewed for the Producer position (hired on March 23, 2016), and the referral sources listed for those interviews were: three (3) disneycareers.com candidates, one of whom was hired;³
9. Twelve (12) candidates were interviewed for the Creative Marketing Producer position (hired on May 9, 2016), and the referral sources listed for those interviews were: seven (7) disneycareers.com candidates and five (5) internal candidates (employed by WTVD), one of whom was hired;⁴
10. Seven (7) candidates were interviewed for the Graphic Artist Designer position (hired on June 6, 2016), and the referral sources listed for those interviews were: Three (3) indeed.com candidates and four (4) disneycareer.com candidates, one of whom was ultimately hired.⁵

Question 3(d): Documentation of recruitment initiatives. WTVD currently has one hundred thirty five (135) full-time employees. WTVD's city of license is Raleigh/Durham/Fayetteville, North Carolina, and this market includes a metropolitan area with a population of 250,000 persons or more. Therefore, pursuant to Section 73.2080(c)(2) and (e)(3) of the Commission's rules, WTVD is required to perform at least four (4) EEO initiatives within a two-year period. During the 2015 and 2016 EEO public file reporting periods, the following recruitment initiatives were undertaken:

³ The 2016 annual EEO report omitted information regarding one interviewee. See supra footnote 1.

⁴ The 2016 annual EEO report omitted information regarding eleven interviewees. See supra footnote 1.

⁵ The 2016 annual EEO report omitted information regarding six interviewees. See supra footnote 1.

1. Internship Programs

WTVD has an ongoing student internship program open to college juniors and seniors in the region. During the reporting period, WTVD had a total of nineteen (19) interns from six (6) colleges and universities:

1 student(s) Elon University	Summer '15	News
1 student(s) Univ. of Alabama	Summer '15	News
2 student(s) UNC-Chapel Hill	Summer '15	News
1 student(s) Duke University	Summer '15	News
1 student(s) Elon University	Spring '15	News
3 student(s) UNC-Chapel Hill	Spring '15	News
3 student(s) UNC-Chapel Hill	Fall '15	News
1 student(s) Univ. of Mississippi	Summer '16	News
1 student(s) A&T University	Summer '16	News
2 student(s) UNC-Chapel Hill	Summer '16	News
1 student(s) Duke University	Spring '16	News
1 student(s) UNC-Chapel Hill	Spring '16	News
1 student(s) UNC-Chapel Hill	Fall '16	News.

2. WTVD Minority Advisory Committee Student Career Seminar⁶

WTVD created the Minority Advisory Committee in 1971 to provide a forum for minority points of view. The committee's primary focus is to offer input regarding employment opportunities and programming as they relate to minority viewers. Station representatives meet with the Committee at least bimonthly, or as necessary through the year. This Committee also works closely with the station to host an annual half-day seminar for minority journalism students. Students receive information about internships, job opportunities, and they have the opportunity to meet and talk with WTVD's anchors, reporters and management regarding career paths and current industry trends. On Saturday, October 3, 2015 WTVD and its Minority Advisory Committee held the event in Chapel Hill. ABC News National Correspondent Geo Benitez was scheduled as the keynote speaker, but was unexpectedly assigned to hurricane coverage. ABC News sent National Correspondent Alex Perez to participate.

⁶ Information about this recruitment initiative was omitted from the 2016 EEO report. See supra footnote 1.

3. Job Banks

WTVD utilizes a list of organizations whose membership includes substantial participation of women and minorities that receive notice of job postings. WTVD sends upper level job openings to the following organizations: The NAACP, Delta Sigma Theta, Inc., Triangle Chapter of the National Association of Black Journalists, The Alliance for Women in Media, National Association of Hispanic Journalists, and The American Asian Journalists Association.

4. Job Fair Participation⁷

WTVD continues to participate in minority journalists' conferences with the help of the ABC corporate office. ABC organizes and sets up a booth for the ABC-owned stations to participate as recruiters at these conferences. WTVD's Assistant News Director, Brandon Sherer, and WTVD's Community Affairs Director, Monica Barnes, attended the National Association of Black Journalists conference in Minneapolis, Minnesota, August 5 – August 9, 2015.

WTVD also sends Anchor/Reporter Anthony Wilson to the National Association of Black Journalists Conference annually (he attended in Boston, July 30 – August 3, 2014, and in Minnesota, August 5 – August 9, 2015), to serve as a recruiter and an instructor for the NABJ Student Multimedia Project. College juniors and seniors from universities across the country are awarded fellowships to participate in this week-long program during which they produce daily television newscasts and newspapers, create and maintain the convention websites, and coordinate and manage corporate communications for NABJ workshops.

5. Participation in Events Sponsored by Educational Institutions⁸

- a. March 20, 2015: Speaker, Heritage HS Women's Career Leadership Symposium, Wake Forest, attended by Elaina Athans, Reporter;
- b. April 10, 2015: Speaker, North Carolina Central University, Honor Society Induction Ceremony and Career Fair, Durham, attended by Monica Barnes, Community Affairs and Programming Director;
- c. May 12, 2015: Public Relations Society of America-Career Day, North Carolina State University Chapter, Raleigh, attended by Jon Camp, Reporter;
- d. February 23, 2015: New Century Int'l Middle School Career Day, Fayetteville, attended by Nicole Carr, Reporter;

⁷ Information about this recruitment initiative was omitted from the 2016 EEO report. See supra footnote 1.

⁸ Information about this recruitment initiative was omitted from the 2016 EEO report. See supra footnote 1.

- e. May 29, 2015: Alpha Academy Career Day, Fayetteville, attended by Nicole Carr, Reporter;
- f. October 12, 2015: Granville Central High School Career Day, attended by Steve Daniels, Anchor;
- g. March 5, 2015: Meredith College Career Day, Raleigh, attended by Tamara Gibbs, Investigative Team Reporter;
- h. January 21, 2015: Leesville Road High School Career Day, attended by Don Schwenneker, meteorologist;
- i. February 28, 2015: Marbles Museum “Future Me” Career Day Fair, Raleigh, attended by Heather Waliga, Anchor/Reporter;
- j. June 10, 2015: Research Triangle Charter Academy Career Day, Durham, attended by Diane Wilson, I-Team Consumer Reporter;
- k. October 11, 2015: Young Women’s Leadership Academy Career Fair, Raleigh, attended by Tisha Powell, Anchor;
- l. February 27, 2016: Marbles Museum “Future Me” Career Fair, Raleigh, attended by Elaina Athans, Reporter, meteorologist Liz Horton and anchor Heather Waliga;
- m. March 31, 2016: Person High School Career Fair, Roxboro, attended Tim Pulliam, Reporter;
- n. April 6, 2016: Fort Bragg School Career Fair, Fayetteville, attended by Don Schwenneker, meteorologist;
- o. February 25, 2016: Falls Lake Academy Career Fair, Creedmoor, attended by Steve Stewart, meteorologist.

6. Station Tours⁹

- a. Feb 16, 2015: YMCA Guides “Dads and Daughters”, Durham;
- b. July 10, 2015: Masonic Home for Children at Oxford;
- c. June 11, 2015: Girls to Queens “empowering middle school aged girls all over the Triangle”, Durham;

⁹ Information about this recruitment initiative was omitted from the 2016 EEO report. See supra footnote 1.

- d. April 25, 2016: ABC11 Super Fan, themed birthday party tour for 12-year old Lily Champan and friends, Raleigh;
- e. October 9, 2015: UNC-Chapel Hill School of Journalism (Visiting International Scholars), Chapel Hill;
- f. May 26, 2016: Triangle Day School, Durham;
- g. May 24, 2016: Fort Bragg Special Warfare Company, Fayetteville;
- h. June 27, 2016: Duke TIP program (for academically gifted 6th and 7th graders), Durham.

Information and documentation about selected recruitment initiatives is attached hereto as **Exhibit C**.

Question 3(e): EEO complaints during current license term. WTVD has not had any EEO complaints during this current license term.

Question 3(f): EEO enforcement policies and responsibilities. In accordance with Section 73.2080(b) of the Commission's rules, the Licensee, together with its parent and affiliated companies ABC, Inc. and The Walt Disney Company, is an equal opportunity employer committed to maintaining a strong policy and practice of prohibiting discrimination. The responsibility for maintaining this policy and practice rests primarily with the management of the Licensee, including the President and General Manager of WTVD, the Director of Operations and Business Planning, and Department Heads responsible for hiring and promotion. However, all employees of the Licensee are expected to be aware of its EEO policy and assist in effectively maintaining it. The methods by which the Licensee's EEO policies and practices are communicated, implemented, reviewed and, if necessary, revised are as follows:

1. The Walt Disney Company maintains a strong equal employment opportunity policy, included in the Employee Policy Manual, which is available to all full-time employees on the company's online portal (<http://enterpriseportal.disney.com>), and is attached hereto as **Exhibit D**. A copy of the Equal Employment Opportunity Policy is made available to all WTVD employees at their new employee orientation and is contained in relevant excerpts from the Employee Policy Manual attached hereto as **Exhibit E**. All employees of The Walt Disney Company are also expected to be familiar with the company's Standards of Business Conduct, which contains a commitment to diversity and to a work environment that is free of discrimination and sexual harassment. A copy of the Standards of Business Conduct is made available to all WTVD employees at their time of hire, and is attached hereto as **Exhibit F**. The file for each WTVD employee contains a signed acknowledgement that they have read and understood the Standards of Business Conduct, a sample of which is attached as **Exhibit G**.

In addition, all full-time employees of The Walt Disney Company are required to complete periodic on-line Compliance Training, which includes business conduct, harassment and fair employment practices training.

2. ABC, Inc. distributes a Harassment Policy document to all WTVD employees at their time of hire. A copy of the Harassment Policy document and as contained in the related excerpt from the Employee Policy Manual is attached hereto as **Exhibit H**. The policy establishes a complaint process for employees to follow if they believe that they have been subject to discrimination, a copy of which is attached as **Exhibit I**. All complaints are promptly reviewed and investigated by trained professionals from the Disney ABC Television Group Human Resources Department and/or ABC, Inc. Legal Department. ABC, Inc. requires all stations to post information regarding EEO, harassment and complaints policies in a common area near their already required Federal and State labor law posters.
3. The ABC Media Networks Human Resource Department and the ABC Law & Regulation Department have given presentations, sent memos and conducted conference calls with managers and other station employees explaining the Commission's EEO rules and emphasizing the importance of strict compliance with them. The Legal Department works closely with WTVD management and personnel on an ongoing basis to address any questions and to facilitate and improve compliance.
4. The President and General Manager of WTVD, along with the Director of Operations and Business Planning, have the primary responsibility for implementing, monitoring and improving compliance with company EEO policies and those of the Commission. They also act as a liaison to the community at large and help to ensure that WTVD's job openings are disseminated widely. WTVD station management reviews resumes and schedules interviews, sometimes in conjunction with the station's Disney ABC Television Group Human Resources recruiting representative. They were also responsible for making the following efforts to implement and improve compliance with EEO policies:
 - Oversee the implementation and updating of WTVD outreach/recruitment initiatives, which are detailed in the foregoing responses and in the annual EEO public file reports;
 - Recruit widely for all job openings;
 - Evaluate the effectiveness of programs and procedures;
 - Order the scheduling of on-air announcements pertaining to EEO outreach;
 - Maintain and update WTVD's community organizations mailing list; and
 - Maintain documentation required by the Commission's rules.

Question 3(g): EEO recruitment program review and analysis. In accordance with Section 73.2080(c)(3) of the Commission's rules, WTVD station personnel are responsible for engaging in an ongoing effort to analyze its EEO recruitment program and to ensure its effectiveness. To this end:

1. WTVD managers periodically reviewed contacts on its community organizations mailing list for accuracy.
2. WTVD managers reviewed the Applicant Flow Logs from any full-time positions hired to verify that applicants are coming from a variety of sources.
3. From August 1, 2014 through August 1, 2016, WTVD broadcast 25 on-air EEO announcements on WTVD's primary channel (D1) with information for organizations on how to receive notification of future vacancies at WTVD by being added to its contact list.
4. Additionally, the Director of Operations and Business Planning and the Community Affairs and Programming Director have assumed implementation and monitoring responsibilities, which include:
 - Developing the policy statements and affirmative action programs;
 - Developing internal and external communication procedures, as appropriate;
 - Designing and maintaining an internal audit and reporting system that will identify any areas requiring remedial action and develop programs to correct those problem areas and determine the degree to which the goals and objectives have been reached.
 - Monitoring the following internal practices:
 - Proper display of EEO posters and policies; and
 - Full participation of minority, female, and disabled employees in all WTVD sponsored educational, training, recreational, and social activities;
 - Assisting management in solving any identified problems. It shall be the responsibility of department heads, managers, and supervisors to provide the EEO Coordinator with such information and/or statistical data as may be necessary to measure progress toward the attainment of goals and to assure good faith efforts to implement the Affirmative Action Plan. Such information and/or statistical data shall be used to identify and analyze areas of minority and female underutilization, and in setting reasonable goals for correcting any identified deficiencies. To that end, WTVD prepares a Zone of Reasonableness Report (ZOR) which is shared six (6) times per year with the WTVD Minority Advisory Committee to assess and evaluate WTVD's commitment to diversity in the workplace;
 - Keeping management informed of the latest developments in the equal employment opportunity area;

- Assisting employees in solving problems and resolving EEO complaints;
- Serving as a liaison between WTVD and appropriate women and minority advocacy groups;
- Serving as a liaison between WTVD and appropriate EEO enforcement agencies;
- Participating in and/or supporting local minority organizations, women's organizations, community action groups and community service programs;

Question 3(h): Efforts to analyze hiring and promotion. The WTVD President and General Manager and WTVD personnel are aware that all hiring, promotion, pay and benefits are to be conducted in a manner that is free of improper discrimination of any kind. The importance of equal employment opportunity is reinforced in training periodically conducted by ABC, Inc.'s Legal Department, which explains the company's equal opportunity policies. The WTVD President and General Manager and Manager of Human Resource Services also periodically consult with the ABC, Inc.'s Legal Department on a case-by-case basis regarding equal employment opportunity questions and issues. As for the specific issues of pay, benefits, promotions and selection techniques:

- 1. Compensation and Benefits:** The President and General Manager, Manager of Human Resource Services and Department Heads determine the salary requirement for each open position, prior to a job offer being made. In addition, once per year, the President and General Manager and the Director of Operations and Business Planning, review all salaries to make sure no person or group is out of line with station and market salaries. Moreover, the same group of individuals discusses the job responsibilities, scope of work and specific knowledge and skills needed to perform any job before annual merit increases, promotions or bonuses are issued in order to ensure proper compensation and promotion practices are being followed. All Benefit plans are reviewed, communicated and executed by The Walt Disney Company's Corporate Benefits Department and are presented annually to all employees. Information is readily available to all employees via the corporate intranet site. In addition, there is related electronic and mail communication distributed to all employees.
- 2. Promotions:** All job openings are posted internally for a minimum of two weeks to allow current employees the opportunity to apply for any open positions throughout the company. Internal candidates are considered for promotion whenever possible. All internal promotions are reviewed by Disney ABC Television Group Human Resources and Corporate Compensation.
- 3. Selection Techniques:** Once a full-time position becomes available, the following preliminary process is enacted:
 - a. Internal Job Posting is completed which includes job requirements and compensation. It is reviewed and approved by local and senior

management, Disney ABC Television Group Human Resources, Corporate Compensation and Corporate Finance.

- b. Applicants are reviewed by Disney ABC Television Group Human Resources as well as local and senior management. Applicants are selected based on academics, experience and skill level. Interviews of selected applicants are conducted by WTVD's President and General Manager, and/or Department Heads.
 - c. An Applicant Flow Log is maintained for all positions including the names, ethnicity and gender and referral sources of all interviewed applicants.
4. **Tests:** Criminal background checks are conducted by a third-party vendor on all part-time and full-time applicants.

Question 3(i): Religious broadcaster. WTVD is not a religious broadcaster.

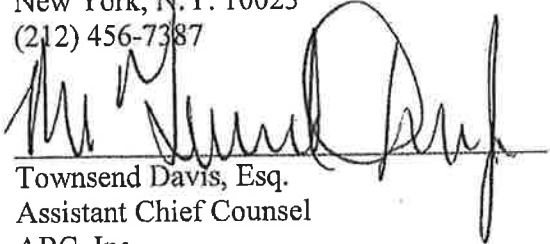
Question 4: Time Brokerages. WTVD has not entered into any time brokerage agreements.

Please contact the undersigned if you have any further questions or if you would like the Licensee to provide any additional information or materials.

Respectfully submitted,



John W. Zucker, Esq.
Deputy Chief Counsel
ABC, Inc.
Assistant Secretary
77 West 66th Street
New York, N.Y. 10023
(212) 456-7387



Townsend Davis, Esq.
Assistant Chief Counsel
ABC, Inc.
77 West 66th Street
New York, N.Y. 10023
(212) 456-6855



Susan L. Fox, Esq.
Vice President, Government Relations
The Walt Disney Company
425 3rd Street, SW, Suite 1100
Washington, D.C. 20024
(202) 222-4780

cc: WTVD (TV) Online Public Inspection File

DECLARATION

WTVD (TV) (ID # 8617); Raleigh/Durham/Fayetteville, NC
Response to FCC Audit of Station's Equal Employment Opportunity Program

I, John W. Zucker, Assistant Secretary of ABC, Inc., licensee of the above referenced station, certify under penalty of perjury that the foregoing and supporting information is true and correct to the best of my knowledge, information and belief, based upon information that has been provided to me.


Signature

3/22/17
Date

bcc: John Zucker, Esq.
Susan Fox, Esq.
Greg Macek, Esq.
Ian Rosenberg, Esq.
Maherin Gangat, Esq.
Tanya Menton, Esq.
Grace Kavadoy