

August 17, 2023¹

Elizabeth E. Goldin
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Station WRDF-FM, Columbia City, Indiana (Facility ID No. 29204)

Dear Ms. Goldin:

Fort Wayne Catholic Radio Group, Inc. (the “Licensee”), licensee of station WRDF(FM), hereby responds to the letter dated April 24, 2023 (the “Audit Letter”) requesting information and materials in connection with the audit of the EEO program of WRDF-FM and other stations in the station employment unit (the “Employment Unit”), as defined by Section 73.2080(e)(2) of the Commission’s rules.² The Employment Unit consists of WRDF and WRDI, Nappanee, Indiana (Facility ID No. 49174) (collectively, the “Stations”).

In compiling the requested information and materials and preparing its response, the Licensee has relied on an examination of its files and records and due inquiry of current employees who are knowledgeable of employment-related issues at the Employment Unit.

The responses below correspond to paragraphs as they are set forth in the Audit Letter. The Licensee is a religious broadcaster and its responses are provided in accordance with paragraph 2(b)(x) of the Audit Letter.

Paragraph 2(b)(i)

Attachment A hereto contains copies of the Employment Unit’s two most recent EEO public file reports.

Paragraph 2(b)(ii)

The current EEO public file report is available on the Stations’ website at <https://www.redeemerradio.com/>.

¹ Amended October 5, 2023.

² The Licensee regrets the late filing of this response and has retained new communications counsel to ensure prompt responses to Commission requests going forward.

Paragraphs 2(b)(iii)-(iv)

In accordance with paragraph 2(b)(x) of the Audit Letter, job titles and dates filled, recruitment sources used, and sources that referred the persons hired are provided below. The Licensee does not have five or more full-time positions that are not subject to a religious qualification; therefore, the Licensee is not providing records related to these hires. *See* Audit Letter, paragraph 2(b)(x).

Job Title	Date Filled	Recruitment Sources Used	Referral Source of Hiree
Podcast/Sound Editor	12/6/2021	RedeemerRadio.com, Indeed.com, ZipRecruiter, LinkedIn, Catholic Podcast Network, Catholicjobs.com	ZipRecruiter
Chief Marketing Officer	1/25/2022	RedeemerRadio.com; Redeemer Radio Facebook page; Indeed.com; Word of Mouth/employee, volunteer, board referrals; ZipRecruiter; LinkedIn	ZipRecruiter
Underwriter/Account Executive	3/1/2022	Word of mouth/employee, volunteer, board referrals	Word of mouth/employee, volunteer, board referrals
Chief Development Officer	2/27/2023	WRDF/WRDI on-air announcements; Redeemer Radio Facebook page; Word of Mouth/employee, volunteer, board referrals; ZipRecruiter	ZipRecruiter
Finance Director	2/27/2023	Redeemer Radio Facebook page, ZipRecruiter	ZipRecruiter

Paragraph 2(b)(v)

The Licensee is a religious broadcaster. Paragraph 2(b)(v) is inapplicable to the Employment Unit. *See* Audit Letter, paragraph 2(b)(x).

Paragraph 2(b)(vi)

To Licensee's knowledge, there have been no complaints involving the Stations filed during their current license terms, before any body having competent jurisdiction under Federal, State, territorial or local law, alleging unlawful discrimination in the employment practices of the Stations on the basis of race, color, religion, national origin, or sex.

Paragraph 2(b)(vii)

The management of the Employment Unit works actively to facilitate effective implementation and enforcement of its equal opportunity and nondiscrimination practices and policies. The General Manager has ultimate responsibility for ensuring that applicable EEO policies are effectively implemented and followed during the hiring process. The General Manager is also responsible for seeing that the Employment Unit complies with its EEO policies in its day-to-day operations, and is ultimately responsible for disseminating information about vacancies and addressing any employee concerns regarding the EEO policies. The General Manager works to ensure compliance with federal and state laws regarding employment practices.

Pursuant to 47 C.F.R. § 73.2080(b), the Employment Unit uses a variety of methods to inform current employees and job applicants of its EEO policies. The Employment Unit's current employees are informed of the EEO policy through an employee handbook which each employee receives at the time of hire. The Employment Unit informs job applicants of its policies through printed advertisements and on-air announcements regarding job vacancies, which clearly state that it is an equal opportunity employer. Notices posted in the employee break room inform applicants and employees that the Employment Unit is an equal opportunity employer. Management is available to answer employees' or applicants' questions regarding the EEO policy.

The Licensee complies with applicable federal, state and local laws governing nondiscrimination in employment. This applies to terms and conditions of employment including hiring, placement, compensation, benefits, and termination.

Paragraphs 2(b)(viii-ix)

The Employment Unit conducts ongoing evaluations of its EEO recruitment program, pursuant to 47 C.F.R. § 73.2080(c)(3), in a good-faith attempt to ensure that its efforts broadly reach potential qualified applicants. The General Manager periodically reviews recruitment data and the recruitment source list to assess the effectiveness of the Employment Unit's recruitment efforts.

The Employment Unit regularly analyzes the effectiveness of its EEO practices and policies in an effort to ensure that they do not have a discriminatory effect, as required by 47 C.F.R. § 73.2080(c)(4). The General Manager examines employee pay

rates, benefits, seniority practices, promotions, and selection techniques to ensure that employees are treated fairly and equally. The Employment Unit makes promotion decisions based only on skills, abilities, and experience. The Employment Unit's full-time employees are offered identical benefits including insurance and paid leave. It is the Employment Unit's policy that the General Manager must review and approve all promotion and termination decisions.

The Employment Unit has not entered into any agreement with any union.

Paragraph 2(b)(x)

The Licensee is a religious broadcaster and the responses contained herein are provided in accordance with paragraph 2(b)(x) of the Audit Letter. The positions filled during the period covered by the 2022 EEO public file report were subject to a religious qualification. The positions filled during the period covered by the 2023 EEO public file report were not subject to a religious qualification.

Paragraphs 3 and 4

Paragraphs 3 and 4 are not applicable. No station in the Employment Unit is subject to a time brokerage agreement and the Licensee is not a broker.

Paragraph 5(a)

The e-mail address that should be contacted about this response is:
spippin@lrmansenter.com.

Should any questions arise regarding this information, please contact the undersigned's counsel, F. Scott Pippin, at (202) 429-8970.

Respectfully submitted,

/s/

Mike Rorick
Chief Financial Officer

Attachment A

Annual EEO Public File Report for Year Ending March 31, 2022 – Amended

Fort Wayne Catholic Radio Group & Saint Joseph Catholic Radio Group DBA Redeemer Radio—an (EEO) Equal Opportunity Employer

WRDF Columbia City/Fort Wayne, WRDI Nappanee/South Bend

Period Covered: April 1, 2021-March 31, 2022

Fort Wayne Catholic Radio Group & Saint Joseph Catholic Radio Group DBA Redeemer Radio are compliant with the (EEO) Equal Opportunity Employment Rules and are committed to providing equal employment opportunity to all qualified individuals without regard to race, age, gender, color, national origin, religious beliefs, marital status, veteran status, disability, or any other characteristic protected by law in all personnel actions. Redeemer Radio is dedicated to providing broad outreach regarding job vacancies. We seek the help of local organizations in referring qualified applicants for employment. Referral organizations that wish to receive our job vacancy information should contact Cindy Black @ cindy.black@redeemerradio.com or call 260.436.9598. Please include the organization name, contact person, mailing address, e-mail address, and telephone number.

The purpose of this EEO Public File Report (“Report”) is to comply with Section 73.2080(c)(6) of the FCC Rules. This Report has been prepared on behalf of Radio Station(s) WRDF and WRDI and is required to be placed in the public inspection files and posted on the station’s website.

RECRUITMENT RESOURCES FOR REDEEMER RADIO – WRDF & WRDI

- #1 On-Air spots on WRDF & WRDI
- #2 RedeemerRadio.com website
- #3 Today’s Catholic Weekly Newspaper
915 S. Clinton St
Fort Wayne, IN 46802
- #4 Redeemer Radio Facebook page
- #5 Indeed.com online job listings
- #6 Word of mouth / employee, volunteer, board referrals
- #7 Catholic Church Bulletins
- #8 Emails to contact list & donor list.
- #9 ZipRecruiter
- #10 LinkedIn
- #11 Catholic Podcast Network
- #12 Catholicjobs.com

As of March 31, 2022, there were no organizations that have requested WRDF or WRDI send job posting information when a position becomes available.

EQUAL EMPLOYMENT OPPORTUNITY PUBLIC FILE REPORT

This report is required by Section 73.2080(c)(6) of the Rules of the Federal Communications Commission for broadcast station employment units with five or more full-time employees. It is to be included in our public file on or before the anniversary of our renewal of license application, which is April 1 of each year. Our “employment unit” consists of Fort Wayne Catholic Radio Group dba Redeemer Radio (“Redeemer Radio”), licensee of radio station WRDF and sole member of the licensee of radio station WRDI.

PERIOD COVERED: April 1, 2021, through March 31, 2022.

I. LIST OF FULL-TIME JOB VACANCIES FILLED BY OUR EMPLOYMENT UNIT DURING THE PERIOD (BY JOB TITLE):

Position	Recruit Source	# Apps	#Interviews	Hire Source
Podcast/Sound Editor	2,5,9,10,11,12	630	28	9
Chief Marketing Officer	2,4,5,6,9,10	24	3	9
Underwriter/Account Executive	6	1	1	6

The positions above required the incumbent to be a practicing Catholic. In particular, the Underwriter/Account Executive position required a specialized candidate with strict Roman Catholic religious formation to ensure that all noncommercial educational underwriting on our stations strictly adheres to the teachings and directives of the Roman Catholic Church. Due to the unique nature and skills required of this position, the licensee identified and hired an individual who was well formed in the Roman Catholic faith with a firm grasp of the acceptability requirements for our underwriters and sponsorship announcements.

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Position	Recruit Source	# Apps	#Interviews	Hire Source
Chief Development Officer	1, 4, 6, 9	13	3	9
Finance Director	4,9	87	5	9

The position(s) above does not require the incumbent to be a practicing Catholic.