



1600 WELLS FARGO CAPITOL CENTER  
150 FAYETTEVILLE STREET  
RALEIGH, NC 27601

T 919.839.0300  
F 919.839.0304  
WWW.BROOKSPIERCE.COM

March 28, 2016

Via First Class Mail

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

Re: WEEK License, LLC EEO Audit Response  
WEEK-TV (Facility ID No. 24801)

Dear Mr. Pulley:

On behalf of WEEK License, LLC ("WEEK"), licensee of WEEK-TV, Peoria, Illinois (Fac. ID No. 24801), please find enclosed WEEK's response to the Media Bureau's February 24, 2016, audit letter requesting data relating to the Employment Unit's EEO program. The responses to the relevant audit data requests are set forth in the enclosed letter.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Sincerely,

BROOKS, PIERCE, McLENDON,  
HUMPHREY & LEONARD, L.L.P.



Stephen Hartzell  
Counsel to WEEK License LLC

Enclosure

cc: Lewis.Pulley@fcc.gov



HOI-19 abc



March 28, 2016

Via First Class U.S. Mail

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

Dear Mr. Pulley:

This letter, together with attached Exhibits 1 through 3, serves as the response by WEEK License, LLC (the "Licensee"), licensee of WEEK-TV, Peoria, Illinois, to the Media Bureau's February 24, 2016, request for audit data relating to the station employment unit's EEO program (the "Audit Letter"). WEEK-TV (the "Station") is the only station in the Employment Unit for purposes of the Commission's EEO rule. The Station operates in the Peoria-Bloomington Nielsen Designated Market Area. Quincy Media, Inc.<sup>1</sup> ("QMI") is the parent company of WEEK License, LLC, and QMI acquired WEEK-TV (along with other television stations) effective as of November 1, 2015, pursuant to the grants of authority in FCC File Nos. BALCDT-20140221ABQ and BALCDT-20151021AGH. Thus, the Licensee's audit responses below cover only the period of time from November 1, 2015, to the date of this letter.

The responses to the relevant audit data requests are set forth below, and relevant documentation is provided in the attached Exhibits.

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***Audit Data Request 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*

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<sup>1</sup> At the time QMI acquired WEEK-TV, QMI was known as Quincy Newspapers, Inc. ("QNI"). In early 2016, QNI changed its name (but not its ownership) to QMI.

*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 C.F.R. § 2080(c)(6).*

**Response:** The EEO Public File Reports covering August 1, 2013, through July 31, 2014, and August 1, 2014, through July 31, 2015, are attached as Exhibits 1 and 2, respectively. Significantly, however, it should be noted that neither of these two EEO Public File Reports were prepared or compiled by the current Licensee, because the current Licensee did not own or operate the Station until after the date of these two reports. Indeed, the information in the two reports does not relate to any hiring or outreach activity performed by the current Licensee. The Licensee submits these reports merely as a courtesy and makes no representations as to the accuracy or completeness of them.

The most recent EEO Public File Report (covering the period August 1, 2014, through July 31, 2015) is posted to the Station's website at [www.cinewsnow.com](http://www.cinewsnow.com) and is located at the following URL address:

[http://media.cinewsnow.com/documents/EEO+Public+File+\(Aug-15\).pdf](http://media.cinewsnow.com/documents/EEO+Public+File+(Aug-15).pdf)

The Report is accessible to viewers by clicking the "FCC-EEO" link at the bottom of each page of the [www.cinewsnow.com](http://www.cinewsnow.com) website and then, on the subsequent page, clicking the "EEO Public File (Aug-2015)" link. These links were created by, and the 2015 EEO Public File Report was posted by, the Station's former owner.

To the current Licensee's knowledge, a list of full-time vacancies filled by the Station under the prior licensee during the relevant two-year period is set forth in the two EEO Public File Reports in Exhibits 1 and 2. Because the Licensee did not compile the vacancy information in the EEO Public File Reports, the Licensee makes no representations as to the accuracy or completeness of the vacancy information.

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***Audit Data Request 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 do not need to 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).*

**Response:** During the period covered by the two EEO Public File Reports, the current Licensee was not the licensee of the Station. As a result, no materials are being submitted in response to this particular audit request.

Since shortly after November 1, 2015 (i.e., the date the current Licensee acquired the Station), the Station has been using a platform developed by Broadcast1Source as its primary system of tracking and managing the documentation of EEO compliance. This system was implemented company-wide several years ago by the Station's parent company, QMI, in an effort to enhance the ability of each of the parent company's station employment units to ensure compliance with the Commission's EEO policies and regulations. Broadcast1Source ([www.broadcast1source.com](http://www.broadcast1source.com)) is a well-known software platform that allows the Station to disseminate job postings to recruitment sources with one "click" and to automatically collect documentation of that notification.

The use of Broadcast1Source by the Station since the acquisition of the Station by QMI has simplified and made more efficient the process by which WEEK-TV sends out and retains job posting notifications. That said, since November 1, 2015, the Station's recruitment program has not been on "auto pilot." To the contrary, since QMI acquired the Station, there have been changes made to the recruitment and hiring process at WEEK-TV to bring it into sync with QMI's company-wide policies and expectations. In addition, on a going-forward basis, the EEO Coordinator and hiring personnel at the Employment Unit will continue to be responsible for managing and updating as necessary the Employment Unit's notification source list and, of course, for ensuring that Employment Unit personnel are educated about, and comply with, the letter and spirit of the FCC's EEO rule.

It may be worth noting that QMI operates the website [www.careersatquincy.com](http://www.careersatquincy.com), which has a "JOBS" tab that provides visitors with access not only to all vacancies at WEEK-TV (see, e.g., <http://www.careersatquincy.com/category/220658/illinois-and-indiana-jobs>) but also at all other co-owned properties. And, the [careersatquincy.com](http://www.careersatquincy.com) website is far more than just a portal for current job openings for the company—it is really a complete tool for members of the public with an interest in broadcast and journalism careers to learn more about the industry, more about industry career opportunities, and hear straight from QMI interns, employees, and executives (including those at WEEK-TV) what it means to be a member of the industry generally and a member of the QMI team specifically.

The Licensee is submitting herewith, as Exhibit 3, a copy of the FCC Form 396-A that was filed in connection with QMI's application to acquire WEEK-TV. Form 396-A provides further information about QMI's plans for WEEK-TV's EEO program.

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***Audit Data Request 3(c).*** In accordance with Section 73.2080(c)(5)(v), [provide] 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.

**Response:** During the period covered by the two EEO Public File Reports, the current Licensee was not the licensee of the Station. As a result, no information or materials are being submitted in response to this particular audit request.

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***Audit Data Request 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.

**Response:** The total number of full-time employees of the Employment Unit varies over time. The total number of full-time employees in the Employment Unit as of March 9, 2016, was 64. The Employment Unit's Designated Market Area is Peoria-Bloomington. The Employment Unit is located in the Peoria, Illinois, Metropolitan Statistical Area, which has more than 250,000 people. Thus, by the Licensee's calculation, the Employment Unit is required to perform four (4) initiatives in each applicable two-year period.

As noted above, the current Licensee did not own or operate the Station during the period covered by the two EEO Public File Reports that are included as Exhibits 1 and 2, and, as such, the current Licensee is providing no information or records relating to the recruitment initiatives enumerated in the two EEO Public File Reports.

Since the current Licensee acquired the Station, however, and continuing on a going-forward basis, the Station has engaged (and will continue to engage) in a variety of outreach activities sufficient to meet the requirements of Sections 73.2080(c)(2) and (e)(3). For example, under the current Licensee, the Station has implemented an internship program (known as the "Quinternship" program because the Station's parent company is Quincy Media, Inc.) which will routinely constitute, by itself, at least two outreach initiatives over each relevant two-year period. More specifically, WEEK-TV's newly-adopted (and ongoing and continuing) "Quinternship" program features internships in the areas of news, engineering, production, promotions, community advocate services, editing, weather, reporting on special projects, and sports. Relevant Station personnel from the particular departments are involved during each Quinternship session, depending on which department(s) the particular interns are interested in.

The Quinternship program, which selects new interns each session, provides college students with the opportunity to gain valuable hands-on experience in the broadcasting industry. Under the current Licensee, the Station has recently begun to host Quinterns. The Station actively promotes the internship program (as does parent company QMI), coordinates with colleges, accepts applications from and interviews interested students, and provides valuable feedback to the interns. Indeed, as the Quinternship program illustrates, stations in the QMI group (including WEEK-TV) do not engage in EEO-creditworthy outreach activities for the purpose of "checking a box" for compliance with the Commission's EEO regulatory requirements but, rather, stations in the QMI group engage in outreach activities (including the hosting of Quinterns) because reaching out into the community and facilitating the potential careers of people interested in broadcasting and journalism is a "way of life" and a point of corporate cultural emphasis for QMI.

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***Audit Data Request 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.*

**Response:** As discussed above, the current Licensee acquired the station effective as of November 1, 2015. The current Licensee is not aware of any charges of discrimination having been filed against WEEK-TV since acquisition of the Station on November 1, 2015.

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**Introductory Note for Audit Data Requests 3(f), 3(g), and 3(h):** In light of the relatively short period of time the current Licensee has owned and operated the Station (approximately 5 months), some of the information provided below in response to Audit Data Requests 3(f), 3(g), and 3(h) is forward-looking. The information is reflective of the common practices, policies, procedures, and culture of the Station's parent company QMI and the other stations owned and operated by QMI. But, because the current Licensee has not owned the Station for a full year, the Licensee has not yet had the opportunity to engage in all of the types of activities and aspects of employment identified in Audit Data Requests 3(f), 3(g), and 3(h).

***Audit Data Request 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.*

**Response: *Enforcement of EEO Policies.*** It is the Licensee's policy to provide equal employment opportunities to all qualified individuals without regard to their race, color, religion, sex, age, sexual orientation, national origin, disability, or veteran status in all personnel actions, including recruitment, evaluation, selection, promotion, compensation, discipline, training, and termination. The Licensee seeks to promote the realization of equal employment opportunity through a positive, continuing program designed to ensure the realization of each opportunity. To that end, all relevant human resource decision-makers are responsible for, and engage in, fulfilling the Station's EEO policies as described in this response.

Management at the Station and the Licensee's parent company have taken steps to provide an environment which promotes accountability at the Station for EEO policies on a continuing basis. First, when an individual becomes a hiring manager (whether through internal promotion or external hire), the Corporate HR Director provides a three-hour training session on myriad aspects of employment practices, including hiring, recruiting, performance reviews, non-discrimination, harassment, FMLA, FLSA, and other relevant practices. After the acquisition by QMI of the Station, among the "action items" for assimilating the Station into the QMI "family" and corporate culture is to hold one or more training sessions for Station personnel with responsibility for hiring, supervising, or evaluating employees to ensure they would and will be able to identify relevant employment-related issues. The QMI Corporate HR Director will be scheduling such session(s) for WEEK-TV during second quarter 2016.<sup>2</sup> In addition, a "Do's and Don't's" of interviewing practices has been distributed to Station staff involved in the hiring process, to ensure that hiring criteria focus on job qualifications and avoid potentially discriminatory practices. The Corporate HR Director has also recommended that relevant Station personnel attend and participate in state broadcaster association EEO seminars when available. Moreover, periodic, albeit less formal, training and continued implementation occurs when Station personnel discuss, either among themselves or with QMI corporate or other QMI co-owned station personnel, recruitment, outreach activities, and various personnel matters. For example, the Vice President/General Manager and Department Heads will use a portion of their meetings, when warranted, to reinforce EEO policies and EEO program issues, including issues related to the hiring process.

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<sup>2</sup> Because QMI acquired multiple stations at the same time as WEEK-TV, it has not been possible to provide this type of training to all new employment units and personnel yet. QMI is undertaking these training activities in deliberate fashion, in due course. In the meantime, the Vice President/General Manager has overseen regular departmental sessions to review the employee Handbook to ensure that managers are aware of and understand, and can properly communicate with employees about, each company policy, including EEO. In addition, station personnel at another QMI station has been assigned to provide ongoing support to WEEK-TV to help implement the Broadcast1Source system. Furthermore, QMI's Corporate HR Director is currently involved in regular review of all WEEK-TV hires, including a review of hiring offers and employment agreements. In short, while WEEK-TV remains "new" to the QMI corporate "family" of stations, the parent company has been attentive and diligent to ensuring that QMI's EEO policies are implemented and followed even in the early stages of ownership in order to put the Station on the right compliance—and corporate culture—path.



Under QMI's ownership, the Station has four levels of management to ensure enforcement of Employment Unit EEO policies: a Vice President/General Manager of the Station, Department Heads, hiring managers, and EEO Coordinator. Each level of management has significant input into the hiring, training, disciplining, terminating, and daily supervision of Station employees, although the EEO Coordinator level is generally more administrative in nature. It is the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training, and termination of employees to ensure adherence to the Station's EEO policies and program. Above the Station, the parent company's executives and officers—with a particular emphasis on the Corporate HR Director—also serve to facilitate the successful maintenance of the Station's EEO program.

Following the November 1, 2015, acquisition by QMI, the Station has been "onboarded" into QMI's hiring protocol, which is designed to ensure the Station widely disseminates vacancy notifications and maintains records consistent with the Commission's EEO rule. Use of the widely-available Broadcast1Source software platform and database tools (which QMI has been using since 2009) will put the Station in a position to effectively manage and make more efficient the Station's EEO program. Training in the use of the Broadcast1Source platform was provided by QMI to relevant WEEK-TV personnel, which created a robust opportunity for the Station to discuss various recruitment practices (including recruitment sources) and plans with the Station's parent company executives.

Under the protocol and policy that have been put into place since QMI acquired the Station in November 2015, when a position at WEEK-TV opens, the Department Head or supervising manager (depending on the vacancy) notifies the Vice President/General Manager and EEO Coordinator of the opening and discusses the job responsibilities, the qualifications required, and the recruiting sources to be used to fill the position. The Department Head or supervising manager is responsible for preparing a job opening notification that describes the responsibilities of the position, job requirements, application deadline, and contact information. The Department Head or supervising manager submits the job description to the EEO Coordinator for review and processing. The EEO Coordinator is responsible for distributing the job opening announcement to appropriate referral sources via fax, email, mail, or Internet posting. Now that the Station uses Broadcast1Source, that platform serves as the Station's principal vehicle for dissemination of vacancy notices to a wide variety of recruitment sources. Because some recruitment sources require manual posting that cannot be facilitated or automated through the use of the Broadcast1Source platform, the EEO Coordinator not only uses Broadcast1Source to notify appropriate recruitment sources of the vacancy but also manually posts the vacancy with any chosen sources that require use of a manual posting process.

The Department Head or supervising manager is responsible for review of applications and résumés and is also responsible for evaluating the quality of the candidates. Once a pool of candidates is identified, the Department Head or hiring manager conducts an initial round of interviews. For some positions, when multiple qualified candidates who have become "finalists" for a position have been identified, the Station makes/will make use of a commercially available assessment tool offered by a firm called Profiles International to help the Station distinguish between and among the finalist candidates. In situations where WEEK-TV uses the assessment



tool, the Station also consults/will consult with a third-party employment consultant named Goranson Consulting (who is located in Peoria, Illinois) in order to ensure that the Station's use of the assessment tool is appropriate, normalized, and non-discriminatory.

For WEEK-TV's outreach initiatives, the Station will make use members of the Station staff have established a number of relationships with various schools and colleges and other organizations within the community, to expand the Station's outreach initiatives.

*Unit's Efforts to Inform Employees and Applicants of EEO Policies and Program.* Since acquiring the Station, the current Licensee has introduced (and maintains) an employee handbook containing the Station's EEO Policy (which is the parent company's EEO Policy), which states as follows:

### **Equal Employment Opportunity Policy**

WEEK is an equal opportunity employer and conducts all practices relating to recruitment, hiring, promoting, discipline, and all of the terms and conditions of employment in a manner which does not discriminate on the basis of race, color, religion, sex, age, sexual orientation, national origin, disability, or any other legally protected status under federal, state or local law.

In addition, until recently, the Handbook also contained the following passage:

#### **EEO COORDINATOR**

To insure the enforcement of the company's Equal Employment Opportunity Policy, the company has appointed the Director of Human Resources, Jena Schulz, as the EEO Coordinator. The EEO Coordinator will act as an omnibus person for employees who have equal employment problems and/or claims of harassment in the work place. If you believe that you are a victim of a form of discrimination or harassment, contact the EEO Coordinator at (217) 221-3405. The EEO Coordinator will review each contact and respond to the employee regarding such contact as soon as practical. You may also contact your top level manager if you wish to voice a complaint or problem. However, please avail yourself of the EEO Coordinator whenever you feel that you or another employee is the victim of discrimination or harassment.

At the suggestion of local counsel, in an effort to meet certain new Illinois<sup>3</sup> Department of Human Rights expectations relating to workplace anti-harassment issues, QMI has updated the above-referenced anti-harassment policy so that it now reads as follows:

### **Anti-Harassment Policy**

The company wishes to maintain a high-quality working environment for all our employees and to prevent offensive situations. As such, the company will not tolerate any form of harassment or intimidation because of race, color, religion,

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<sup>3</sup> WEEK-TV's parent company, QMI, is headquartered in Illinois.

national origin, sex, disability, sexual orientation, age or any other classification protected by law.

Specifically, any form of sexual harassment violates company policy. Sexual harassment is defined as: Any unwelcome sexual advances, requests for sexual favors or any conduct of a sexual nature when: (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. The courts have determined that sexual harassment is a form of discrimination under Title VII of the U.S. Civil Rights Act of 1963, as amended in 1991. Employees must refrain from any and all conduct which could be interpreted as being harassing in nature, including, but not limited to: (1) unwelcome sexual advances, (2) requests for sexual acts or favors, and (3) other verbal or physical conduct of a harassing nature.

The company takes an equally broad view with respect to defining and prohibiting harassment for any other reason, including but not limited to, race, color, gender, religion, age, disability, or national origin. In keeping with this policy, the company will not tolerate harassment for any reason by a manager, supervisor or employee of the company, client or vendor.

The company prides itself on presenting a professional image, both to the public and within the organization. For that reason, practical jokes, horseplay, pranks, or uses of foul or offensive language will subject participants to Corrective Action that may include immediate termination of employment.

All employees are expected to behave in a professional and mature fashion. Courtesy toward your co-workers is expected. Displays of hostility or disruptions caused by workplace disagreements may be cause for Corrective Action.

If you feel you have been harassed in violation of this policy you should report such incidents directly to your supervisor. You may also report such incidents to Jena Schulz, EEO Coordinator, at (800) 373-9444. There will be no reprisal against you for any such report. The company will not retaliate against any employee for reporting or making a complaint of harassment or assisting in the investigation of a complaint.

The company will conduct a prompt investigation of any complaints or violations of this policy. Confidentiality cannot be promised, although each situation will be handled discreetly. In determining whether the alleged conduct constitutes prohibited harassment, the nature of the conduct, the totality of the circumstances and the context in which the alleged incident occurred will be investigated. The company considers harassment in violation of this policy to be a major offense that can result in the suspension, termination, or other appropriately severe reprimand of the offender.

The purpose of this policy is to establish prompt, thorough and effective procedures for responding to every complaint so that problems can be identified and remedied internally. However, an employee has the right to contact the Illinois Department of Human Rights (IDHR) or EEOC about filing a formal complaint. An IDHR complaint must be filed within 180 days of the alleged incident (s) unless it

is a continuing offense. A complaint with EEOC must be filed within 300 days. An appeal process is available through the Illinois Human Rights Commission (IHRC) after IDHR has completed its investigation of the complaint. Where the company has an effective sexual harassment policy in place and the complaining employee fails to take advantage of that policy and allow the company an opportunity to address the problem, such employee may, in certain cases, lose the right to further pursue the claim against the company. IDHR contact information: Chicago: 312-814-6200 or 800-662-3942; Springfield: 217-785-5100; Marion: 618-993-7463; TTY: 866-740-3953. IHRC contact information: Chicago: 312-814-6269 [TTY 312-814-4760]; Springfield: 217-785-4350 [TTY 217-557-1500];

Employees should understand that this policy applies to each and every member and employee of the Company, including the Board of Directors, owners and management, all full-time, part-time and temporary employees, independent contractors and visitors.

The aforementioned revision to the Station's (and parent company's) anti-harassment policy aptly illustrates that both QMI and the Licensee are committed to the ongoing maintenance of an organic, active EEO program. Ongoing examination—and revisions when and where relevant—demonstrate the Licensee's commitment to a continuing assessment of its EEO program and policies.

For Station employees that are members of a union,<sup>4</sup> the language below appears in their current collective bargaining agreement:

SAG-AFTRA

The STATION and SAG-AFTRA shall not discriminate against Employees because of sexual orientation and will not unlawfully discriminate against Employees because of age, sex, religion, disability, race, national origin, marital status or veteran status and shall comply with all state and federal laws dealing with various forms of employment discrimination, including but not limited to the above. In addition, SAG-AFTRA agrees to cooperate with the STATION with respect to matters involving the Americans with Disabilities Act.

In addition, a bulletin board is maintained at the Station to provide employees with information about the Licensee's non-discrimination and EEO policies.

For job applicants, the Station typically includes on vacancy recruitment notices either "EOE" or "WEEK is an Equal Opportunity Employer." In addition, the QMI standard form employment application prominently includes the following language directed at potential applicants:

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<sup>4</sup> Currently, SAG-AFTRA (Peoria Local of the Screen Actors Guild - American Federation of Television and Radio Artists) is the only union with members at WEEK-TV.



When completing, do not identify race, color, gender, age, national origin, citizenship, religion or provide any extraneous information.

\* \* \*

The company will consider all applicants without discrimination on any basis prohibited by law and is an equal employment opportunity employer.

Thus, in the aggregate, the Station educates, at numerous points and through various means, its employees and applicants about its non-discrimination and equal opportunity policies.

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***Audit Data Request 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.*

**Response:** The Station consistently and periodically monitors and analyzes its EEO recruitment program. The Station's Administrative Assistant maintains and updates the recruitment source list, adding new sources and contact information as warranted and in consultation with the Vice President/General Manager and relevant Department Heads. In fact, during the period following QMI's November 2015 acquisition of the Station, in addition to relevant Station personnel receiving Broadcast1Source training, the Station worked with the Corporate HR Director and other QMI stations to revise and expand the Station's recruitment source list. Ultimately, the goal of the Station's recruitment process is two-fold: first, it is to provide notification to recruitment sources such that the outreach is reasonably calculated to reach the entire community; second, it is to provide notification to recruitment sources that are reasonably expected to result in reaching qualified applicants, particularly when a position requires a specialized skill-set—for example, engineering vacancies are more likely to result in a pool of qualified applicants when they are placed with engineering-specific resources—for such specialized positions, the Station evaluates the recruitment source list and attempts to identify and add "targeted" sources to the list as appropriate. Thus, recruitment outreach is discussed at the time of every vacancy and is periodically reviewed with the Corporate HR Director and/or the Station's FCC counsel to ensure compliance with the broad outreach requirements.

Moreover, communication that naturally occurs within the larger QMI corporate "family" contributes/will contribute to WEEK-TV's self-evaluation of its recruitment program. For example, when the Corporate HR Director receives a request from an organization to be added to the recruitment source list of one or more co-owned stations, she communicates among the EEO Coordinators at all of the stations in the group. Similarly, the EEO Coordinators at each of the commonly-owned stations communicate with each other about recruitment sources and job openings. In addition, QMI periodically convenes Company-wide meetings for various "categories" of personnel, and those meetings typically include a discussion of the Commission's and the company's EEO requirements and policies, including recruitment.

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***Audit Data Request 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.*

**Response:** The Station's Vice President/General Manager will work with QMI's corporate management team periodically to examine the Station's pay, benefits, seniority practices, promotions, and selection techniques and tests. One focus of these efforts is to assure that such practices by the Station provide equal employment opportunity and do not have a discriminatory effect.

***Compensation and Benefit Levels.*** The Employment Unit's compensation levels for employees are/will be reviewed on at least an annual basis during budget preparation by the Vice President/General Manager and the Department Heads, in coordination with the parent company's corporate officers and executives, to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. It is common for the Company to set a target percent for compensation increases for all applicable employees, which is then subject to variation—upwards or downwards—based on each employee's particular degree of growth, performance, exceptional efforts, and extraordinary circumstances. Any variations from the target percent increase proposed by the Station's Vice President/General Manager would be reviewed by QMI executives and President to ensure that non-discriminatory, meritorious, and fair decisions are being made. Compensation may be increased for myriad reasons, including merit, fairness, and to ensure that rates of pay are non-discriminatory. For positions that can be evaluated based on the local marketplace, such as receptionists, sales assistants, administrative assistants, and other support positions, the Station may consider the pay range in the local market area for a similar type position. For positions that are unique to the broadcast industry, such as news anchors, reporters, photographers, traffic directors, production personnel, and television management positions, the Station may assess compensation ranges by using resources from relevant industry sources and the union agreement as applicable.

Benefits are determined by the QMI corporate management team, led by the President, Vice President, and Corporate HR Director, which team reviews the benefits plan on annual and as-needed basis. Full-time employees are, generally, offered the same benefit package.

***Seniority Practices and Promotions.*** Internal promotions are based upon the combination of available positions, internal applicant qualifications and interviews, performance appraisals, and discussions among the Vice President/General Manager, the relevant Department Head, and/or the supervising manager, all of whom have responsibilities for enforcing aspects of the Employment Unit's EEO policies. The Station's routine practice—as encouraged by parent company QMI—is/will be to give an interview to virtually every internal candidate who expresses an interest in a higher-level position. This process embodies a recognition that it is important not only to *recognize* growth potential among existing employees but also to *facilitate and encourage*

such growth. If a current employee applies and interviews for an open position but is ultimately not selected for it, Station managers would discuss with the employee how she or he might be better prepared the next time a similar opportunity becomes available, what additional steps the employee might consider taking to burnish his or her qualifications and skills, and how the employee can work towards meeting his or her career goals. In short, the Station is using internal job vacancies as an opportunity to provide concrete mentorship and guidance to current employees to foster their growth and help them realize their full potential.

*Selection Techniques.* After providing notices of job vacancies to a wide and diverse array of educational institutions, professional and non-profit organizations, and internet resources, the selection process is based upon the experience, qualifications, and talents of the candidates. The Vice President/General Manager, Department Head, and/or supervising manager consult on each selection. The Station's policy is, generally, to perform and document EEO recruitment prior to making a formal offer of employment.

*Union Cooperation.* As referenced above, WEEK-TV has a collective bargaining agreement with SAG-AFTRA. Relevant non-discrimination language from the current collective bargaining agreement is set forth above. Union members may use the grievance procedures set forth in the collective bargaining agreement to enforce those provisions. In any event, the Station would cooperate fully with the union in the event a discrimination issue arose with respect to a covered union member.

\*\*\*\*\*

The remaining audit data requested is not applicable because the Employment Unit is not a religious broadcaster, and the Station is not brokered by another company.


A copy of this letter and the attached Exhibits are being uploaded to the online public inspection file for WEEK-TV.

If you have any questions regarding this response or need any further information, please contact our attorney Stephen Hartzell at (919) 839-0300.

THE REMAINDER OF THIS PAGE IS INTENTIONALLY BLANK;  
SIGNATURE IS ON FOLLOWING PAGE.



Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Mark Desantis', with a large, sweeping flourish extending to the right.

Mark Desantis

Vice President/General Manager  
WEEK License, LLC, licensee of WEEK-TV

**WEEK-TV**  
**Response to February 24, 2016, EEO Audit Letter**

**EXHIBIT LIST**

Exhibit 1	EEO Public File Report (August 1, 2013 – July 31, 2014)
Exhibit 2	EEO Public File Report (August 1, 2014 – July 31, 2015)
Exhibit 3	FCC Form 396-A (File No. B396A-20140221ABX)

## Exhibit 1

EEO Public File Report (August 1, 2013 – July 31, 2014)



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## WEEK-TV

### Eeo Public File Report Aug 1, 2013- July 31, 2014

#### Job Vacancy

Position Title	Recruitment Source(s) utilized to fill the vacancy	RS Referring Hire
News Producer	1-16, 20,23,30,36	20
MMJ	1-16, 28, 36	8(IL College)
News Content Manager	1, 4, 12,13, 30, 36, 37	37
Sales Account Executive	1-16,30,33,36	36
MMJ	1-16, 28, 36	4
Internet Sales Account Executive	24	24
Sales Account Executive	1-16,18,30,33,36	18
Anchor	1-16, 28,36	4
Web Producer	1-16, 36	36
Weekend Anchor/MMJ	1-16,36	36
MMJ	1-16, 36	4
Weekend Weather Anchor/MMJ	1-16, 28, 36	4
Producer	1-16, 20,23,30,36	4
Producer	1-16, 20,23,30,36	20
MMJ	1-16, 36	4
Weekend Weather Anchor/MMJ	1-16,36,37	1
Local Programming Producer	1-16, 20, 28, 36	20
Receptionist	1-16, 20, 36	20

**WEEK-TV**  
**EEO Public File Report**  
**August 1, 2013- July 31st 2014**  
**Master Recruitment Source List**

RS Number	RS Information	Source Entitled to Vacancy Notification	No of Interviews Referred by RS Over Reporting Period
1	Alliance of State Broadcasters Association <a href="http://www.careerpage.org">www.careerpage.org</a> online post		1
2	Bradley University Smith Career Center 1501 W Bradley Ave Peoria, IL 61625 Sandy McDermott contact phone: 309-677-2510 <a href="mailto:sandymc@bradley.edu">sandymc@bradley.edu</a>		
3	Bradley University Dept of Communications 1501 W Bradley Ave Peoria, IL 61625 Dr Ali R Zohoori, Chairperson <a href="mailto:zohoori@bradley.edu">zohoori@bradley.edu</a>		
4	Broadcast Employment Service/TVJobs.com PO Box 4116, Oceanside, CA Mark Halloway <a href="mailto:Jobs@tvjobs.com">Jobs@tvjobs.com</a>		19
5	Brown College 1440 Northland Dr Mendota Hgts, MN Mike Kronforst <a href="mailto:mkronforst@browncollege.edu">mkronforst@browncollege.edu</a>		
6	Collective Talent Michael Bille <a href="mailto:bille@michaelsmedia.com">bille@michaelsmedia.com</a>		
7	Columbia College Chicago Career Center 600 S Michigan Avenue, Chicago, IL 60605 Evonne Mathews <a href="mailto:columbiaworks@colum.edu">columbiaworks@colum.edu</a>		

8	<p>Eureka College Career Services  Augustana College  Aurora University  Benedictine University  Blackburn College  Concordia University  Dominican University  Elmhurst College  Greeneville College  Illinois College  Illinois Wesleyan University  Judson College  Knox College  Lake Forest College  Lewis University  MacMurray College  Millikin University  Monmouth College  North Central College  North Park University  Olivet Nazarene University  Quincy University  Rockford College  Saint Xavier University  Trinity Christian College  University of St Francis  Wheaton College</p> <p>300 e College Avenue Eureka, IL 61530  phone contact 309-467-6421  <a href="mailto:srich@eureka.edu">srich@eureka.edu</a></p>		1
9	<p>Heartland Community College  1500 W Raab Rd., Normal, IL 61761  Pamela Westerdahl  phone contact: 309-268-8047  <a href="mailto:workforce.services@heartland.edu">workforce.services@heartland.edu</a></p>		
10	<p>IDES Employment Service  406 Elm St Peoria, IL 61605  Vince Knight  phone contact: 309-495-8927  <a href="mailto:Vince.Knight@illinois.gov">Vince.Knight@illinois.gov</a></p>	Yes	
11	<p>Illinois Central College Placement Service  One College Dr Room L-221, E Peoria, IL 61635  Dawn Gries  phone contact: 309-694-5321  <a href="mailto:dgries@icc.edu">dgries@icc.edu</a></p>		



12	Illinois Center for Broadcasting Bob Hillman Placement Director <a href="mailto:bhillman@beonair.com">bhillman@beonair.com</a>	Yes	
13	Medialine PO Box 51909 Pacific Grove, CA Mark Shilstone <a href="mailto:medialine@medialine.com">medialine@medialine.com</a>		
14	Midstate College Placement Department 411 W Northmoor Rd Peoria, IL 61614-3558 Krystal Hansen phone contact: 309-692-4092 <a href="mailto:khansen@midstate.edu">khansen@midstate.edu</a>		
15	Indeed from another posting 1-16		5
16	University of IA School of Journalism and Mass Communications Jennifer Hemmingsen <a href="mailto:jennifer-hemmingsen@uiowa.edu">jennifer-hemmingsen@uiowa.edu</a>		
17	Illinois State University Career Center Campus Box 2520 Normal, IL 61790-2520 Tim Asis phone contact: 309-438-2200		

18	Employee Referral		1
19	Application already on file		
20	Current Employee		9
22	Former Employee		
23	Former Intern		1
24	Word of Mouth		2
25	On air Advertisement		
26	Client Referral		
27	National Rep Firm Referral		
28	Talent Agency Referral		

29	Career Builder.com		
30	Best Jobs/Indeed.com Central Illinois Barb Ruck <a href="mailto:barb.ruck@aaimea.org">barb.ruck@aaimea.org</a>		
31	Monster.com online posting		
32	LostRemote.com online posting		
33	PeoriaHelpWanted.com Peoria/Bloomington Lisa Secrest 800-365-8630, option 1 PeoriaHelpWanted.com <a href="mailto:EmployerSupport@RegionalHelpWanted.com">EmployerSupport@RegionalHelpWanted.com</a>		
34	Spots and Dots Publication Patrick Kelley <a href="http://spotsndots.com">spotsndots.com</a>		
35	Peoria Journal Star contact: fax 309-686-3079 phone 309-686-3230		
36	Station Website CInewsNow.com		7
37	Rick Gevers and Assoc (newsletter) Rick Gevers PO box 577 Zionsville, IN 46077-0577 317-769-7900 pho 317-769-7910 Fax <a href="mailto:job.info@mediabistro.com">job.info@mediabistro.com</a> <a href="mailto:rick@rickgevers.com">rick@rickgevers.com</a>		1
Total Interviews over reporting period			47

## Initiatives

- Activity : Job Fair

Date: September 19, 2013

Participant Title: Human Resources and Managing News Editor

Activity Description: Bradley University Fall Job Fair. We collected resumes for possible intern positions available within the News, Creative Services, Sales and Website.

- Activity: Job Fair

Date February 13, 2014

Participant Title: Human Resources

Activity Description: Bradley University Spring Job and Internship Fair. We collected resumes for possible intern positions available within News, Creative Services, Sales and Website.

- The Station maintains and supports the Tom Connor Scholarship with Bradley University for those students that are interested in a career in broadcasting. The recipient of the award has the opportunity to intern with the station but is not required to do so.
- The station also maintains an Internship program. Interns are selected by the staff of News and Production Departments to give those students the experience of working in a broadcast environment. Students receive academic credit for the time spent with the station. The internships are usually done on an academic quarter and are done year round. For the 2013-2014 reporting period, we sponsored 15 interns.
- All upper level job openings are posted with the trade magazine that pertains to that field. Some of those postings have been with Spots and Dots, a sales related trade magazine and Society of Broadcast Engineers trade magazine. In addition, we have used Media Bistro for some of our postings.
- The station also participates in "Job Shadowing" The news department has done a minimum of four of these per year. This program allows local high school junior or seniors to experience the broadcasting experience for a day.

## Exhibit 2

EEO Public File Report (August 1, 2014 – July 31, 2015)



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## WEEK-TV

### Eeo Public File Report Aug 1, 2014- July 31, 2015

#### Job Vacancy

Position Title	Recruitment Source(s) utilized to fill the vacancy	RS Referring Hire
Internet Sales Account Executive	1-15, 21, 27, 33	21
Sales Account Executive	1-15, 21, 27, 33	33
Morning Weather/Anchor	1-15, 19,33, 35	19
Multi Media Journalist	1-15, 18, 33	33
News Anchor	1-15,18, 33	2
Multi Media Journalist	1-15, 33	33
Sales Account Executive	1-15,19, 21, 22, 27, 30, 33	19

**WEEK-TV**  
EEO Public File Report  
August 1, 2014- July 31st 2015  
**Master Recruitment Source List**

RS Number	RS Information	Source Entitled to Vacancy Notification	No of Interviews Referred by RS Over Reporting Period
1	Alliance of State Broadcasters Association <a href="http://www.careerpage.org">www.careerpage.org</a> online post	n	
2	Broadcast Employment Service/TVJobs.com PO Box 4116, Oceanside, CA Mark Halloway <a href="mailto:Jobs@tvjobs.com">Jobs@tvjobs.com</a>	n	7
3	Bradley University Smith Career Center 1501 W Bradley Ave Peoria, IL 61625 Sandy McDermott contact phone: 309-677-2510 <a href="mailto:sandymc@bradley.edu">sandymc@bradley.edu</a>	n	
4	Bradley University Dept of Communications 1501 W Bradley Ave Peoria, IL 61625 Dr Ali R Zohoori, Chairperson <a href="mailto:zohoori@bradley.edu">zohoori@bradley.edu</a>	n	
5	Brown College 1440 Northland Dr Mendota Hgts, MN Mike Kronforst <a href="mailto:mkronforst@browncollege.edu">mkronforst@browncollege.edu</a>	n	
6	Collective Talent Michael Bille <a href="mailto:bille@michaelsmedia.com">bille@michaelsmedia.com</a>	n	
7	Columbia College Chicago Career Center 600 S Michigan Avenue, Chicago, IL 60605 Evonne Mathews <a href="mailto:columbiaworks@colum.edu">columbiaworks@colum.edu</a>	n	

8	<p>Eureka College Career Services  Augustana College  Aurora University  Benedictine University  Blackburn College  Concordia University  Dominican University  Elmhurst College  Greeneville College  Illinois College  Illinois Wesleyan University  Judson College  Knox College  Lake Forest College  Lewis University  MacMurray College  Millikin University  Monmouth College  North Central College  North Park University  Olivet Nazarene University  Quincy University  Rockford College  Saint Xavier University  Trinity Christian College  University of St Francis  Wheaton College</p> <p>300 e College Avenue Eureka, IL 61530  phone contact 309-467-6421  <a href="mailto:srich@eureka.edu">srich@eureka.edu</a></p>	n	
9	<p>Heartland Community College  1500 W Raab Rd., Normal, IL 61761  Pamela Westerdahl  phone contact: 309-268-8047  <a href="mailto:workforce.services@heartland.edu">workforce.services@heartland.edu</a></p>	n	
10	<p>IDES Employment Service  406 Elm St Peoria, IL 61605  Vince Knight  phone contact: 309-495-8927  <a href="mailto:Vince.Knight@illinois.gov">Vince.Knight@illinois.gov</a></p>	Y	

11	Illinois Central College Placement Service One College Dr Room L-221, E Peoria, IL 61635 Dawn Gries phone contact: 309-694-5321 <a href="mailto:dgries@icc.edu">dgries@icc.edu</a>	n	
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12	Medialine PO Box 51909 Pacific Grove, CA Mark Shilstone <a href="mailto:paul@medialine.com">paul@medialine.com</a>	n	
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13	Midstate College Placement Department 411 W Northmoor Rd Peoria, IL 61614-3558 Krystal Hansen phone contact: 309-692-4092 <a href="mailto:khansen@midstate.edu">khansen@midstate.edu</a>	n	
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14	Indeed  from another posting 1-16	n	
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15	University of IA School of Journalism and Mass Communications Jennifer Hemmingsen <a href="mailto:jennifer-hemmingsen@uiowa.edu">jennifer-hemmingsen@uiowa.edu</a>	n	
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16	Employee Referral	n	
17	Application already on file	n	
18	Current Employee	n	3
19	Former Employee	n	4
20	Former Intern	n	
21	Word of Mouth	n	4
22	On air Advertisement	n	1
23	Client Referral	n	
24	National Rep Firm Referral	n	
25	Talent Agency Referral	n	



26	Career Builder.com	n	
27	Best Jobs/Indeed.com Central Illinois Barb Ruck <a href="mailto:barb.ruck@aaimea.org">barb.ruck@aaimea.org</a>	n	
28	Monster.com online posting	n	
29	LostRemote.com online posting	n	

30	PeoriaHelpWanted.com Peoria/Bloomington Lisa Secrest 800-365-8630, option 1 PeoriaHelpWanted.com <a href="mailto:EmployerSupport@RegionalHelpWanted.com">EmployerSupport@RegionalHelpWanted.com</a>	n	
31	Spots and Dots Publication Patrick Kelley <a href="http://spotsndots.com">spotsndots.com</a>	n	
32	Peoria Journal Star contact: fax 309-686-3079 phone 309-686-3230	n	
33	Station Website CINewsNow.com	n	8
34	Rick Gevers and Assoc (newsletter) Rick Gevers PO box 577 Zionsville, IN 46077-0577 317-769-7900 pho 317-769-7910 Fax <a href="mailto:job.info@mediabistro.com">job.info@mediabistro.com</a> <a href="mailto:rick@rickgevers.com">rick@rickgevers.com</a>	n	
35	<u>Media Match</u> 2014 Media Match US LTD 8112 1/2 W 3rd St Suite A Los Angeles, CA 90048 <a href="http://www.media-match.com">http://www.media-match.com</a> <a href="mailto:info@mediamatch.com">info@mediamatch.com</a>	n	
Total Interviews over reporting period			27

## Initiatives

- Activity : Job Fair

Date: September 18, 2014

Participant Title: Human Resources

Activity Description: Bradley University Fall Job Fair. We collected resumes for possible intern positions available within the News, Creative Services, Sales and Website.

- Activity: Job Fair

Date: February 19, 2015

Participant Title: Human Resources

Activity Description: Bradley University Spring Job and Internship Fair. We collected resumes for possible intern positions available within News, Creative Services, Sales and Website.

- Activity: Career Fair

Date: December 5, 2014

Participant Title: News Director and Creative Services Manager

Activity Description: Richwood's High School in Peoria, IL held a career fair. Spoke with 25 students regarding job availability and careers in the TV field. At least two indicated they would follow up with an internship and several others were interested in part-time work once in college. Students were encouraged to continue their education and career field.

- The Station maintains and supports the Tom Connor Scholarship with Bradley University for those students that are interested in a career in broadcasting. The recipient of the award has the opportunity to intern with the station but is not required to do so.
- The station also maintains an Internship program. Interns are selected by the staff of News and Production Departments to give those students the experience of working in a broadcast environment. Students receive academic credit for the time spent with the station. The internships are usually done on an academic quarter and are done year round. For the 2014-2015 reporting period, we sponsored 2 interns.
- The station also participates in "Job Shadowing" The news department has done a minimum of four of these per year. This program allows local high school junior or seniors to experience the broadcasting environment for a day.

## Exhibit 3

FCC Form 396-A (File No. B396A-20140221ABX)

Federal Communications Commission Washington, D.C. 20554	Approved by OMB 3060-0120 (February 2003)	FOR FCC USE ONLY
<b>FCC 396-A</b>		
<b>BROADCAST EQUAL EMPLOYMENT OPPORTUNITY MODEL PROGRAM REPORT</b>		FOR COMMISSION USE ONLY FILE NO. B396A - 20140221ABX
Read INSTRUCTIONS Before Filling Out Form		

**Section 1**

QUINCY NEWSPAPERS, INC.		
Mailing Address P.O. BOX 909		
City QUINCY	State or Country (if foreign address) IL	ZIP Code 62306 - 0909
Telephone Number (include area code) 2172235100	E-Mail Address (if available)	
FCC Registration Number: 0002821783	Facility ID Number 24801	Call Sign WEEK-TV
<input checked="" type="radio"/> Application for Construction Permit for New Station <input checked="" type="radio"/> Application for Assignment of License <input type="radio"/> Application for Transfer of Control <input type="radio"/> Amendment to pending application		
a. Service Type: DT b. Community of License: City: PEORIA State: IL		

**INSTRUCTIONS**

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to ensure equal employment opportunity. This is submitted to the Commission as the Model EEO Program. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

**Guidelines for a Model EEO Program and a Model EEO Program are attached.**

NOTE: Check appropriate box, sign the certification below and return to FCC:

- ☐ Station employment unit will employ fewer than 5 full-time employees; therefore no written program is being submitted.
- ☒ Station employment unit will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

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

Signed	Name of Respondent RALPH M. OAKLEY
Title PRESIDENT	Date 02/21/2014

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT  
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT  
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).



## MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

### I. GENERAL POLICY

It will be our policy to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have adopted an Equal Employment Opportunity Program which includes the following elements:

### II. RESPONSIBILITY FOR IMPLEMENTATION

Name: JENA SCHULZ

Title: CORPORATE DIRECTOR OF HR

will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

### III. POLICY DISSEMINATION

To ensure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts will be made:

☒ The station's employment application forms will contain a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

☒ Appropriate notices will be posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, State or Federal agency if they believe they have been the victims of discrimination.

☒ We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.

☐ Other (specify)

[Exhibit 1]

### IV. RECRUITMENT

To ensure that information concerning each full-time vacancy is widely disseminated, we propose to use the following list of recruitment sources consistent with the requirements of 47 C.F.R. Section 73.2080:

[Exhibit 2]

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. We have estimated that each response to this collection of information will average 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0120), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to [jboley@fcc.gov](mailto:jboley@fcc.gov). Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0120.

**THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.**

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## Exhibits

### Exhibit 2

#### Description: RECRUITMENT SOURCES

THE EMPLOYMENT UNIT WILL BE COMPOSED OF WEEK-TV, PEORIA, ILLINOIS. THE PROPOSED ASSIGNEE HAS IMPLEMENTED AND OVERSEES THE ONGOING CONDUCT OF EEO PROGRAMS AT ALL 15 OF ITS FULL-SERVICE BROADCAST STATIONS AND WILL SIMILARLY IMPLEMENT AN EEO PROGRAM AT THIS EMPLOYMENT UNIT THAT COMPLIES WITH THE COMMISSION'S EEO RULES. TO THAT END, THE PROPOSED ASSIGNEE INTENDS TO UTILIZE A VARIETY OF RECRUITMENT SOURCES DESIGNED TO INFORM QUALIFIED POTENTIAL JOB APPLICANTS IN THE COMMUNITY OF THE AVAILABILITY OF FULL-TIME POSITIONS AT THE STATION. THE SPECIFIC RECRUITMENT SOURCES USED MAY VARY DEPENDING ON THE NATURE OF THE POSITION SOUGHT TO BE FILLED. THE LICENSEE IS LIKELY TO USE A VARIETY OF SOURCES INCLUDING LOCAL PRINT PUBLICATIONS, AREA COLLEGES AND UNIVERSITIES (SUCH AS, FOR EXAMPLE, ILLINOIS STATE UNIVERSITY AND BROWN COLLEGE), ORGANIZATIONS WITH SUBSTANTIAL PARTICIPATION BY WOMEN AND MINORITIES, STATE BROADCASTERS ASSOCIATIONS, AND STATE AND LOCAL EMPLOYMENT AGENCIES. THE LICENSEE WILL ALSO USE A VARIETY OF DIGITAL AND WEB-BASED RECRUITMENT SOURCES, WHICH HAVE PROVEN TO BE FERTILE RECRUITMENT SOURCES FOR THE ASSIGNEE'S OTHER STATIONS, SUCH AS TVJOBS.COM, THE STATION WEBSITE, AND THE ASSIGNEE'S CORPORATE WEBSITE. MOST POSITIONS WILL ALSO BE POSTED INTERNALLY THROUGHOUT THE EMPLOYMENT UNIT AND CO-OWNED STATIONS TO GIVE EXISTING EMPLOYEES OPPORTUNITIES FOR ADVANCEMENT. POSITIONS REQUIRING SPECIALIZED SKILLS MAY BE ADVERTISED IN PROFESSIONAL AND TRADE PUBLICATIONS THAT SERVE THE BROADCAST INDUSTRY NATIONALLY AND REGIONALLY. THE ASSIGNEE'S 'QUINTERNSHIP' PROGRAM, WHEREBY ITS STATIONS HOST PAID STUDENT 'QUINTERNS,' ALSO HAS A TRACK RECORD OF SERVING AS A FRUITFUL AVENUE FOR RECRUITMENT AND IT TOO WILL BE IMPLEMENTED AT THE STATION SUBJECT TO THIS FORM 396-A REPORT. INITIAL IMPLEMENTATION OF THE EEO PROGRAM WILL BE OVERSEEN BY THE ASSIGNEE'S CORPORATE DIRECTOR OF HR, WITH ONGOING OVERSIGHT SHIFTING TO THE EMPLOYMENT UNIT'S SENIOR PERSONNEL.

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### Attachment 2

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