

Declaration of Glen H. Harlow
Owner of RGH Communications, Inc.

I, Glen H. Harlow, hereby declare under penalty of perjury that the information which follows is true and correct.

I am the Owner of RGH Communications, Inc. (“Licensee” or “RGH”), the licensee of full-power AM broadcast station WZAP(AM), Bristol, Virginia (Facility Id. No. 55004) (the “Station” or “WZAP”), which is a single station employment unit eligible for the small station exemption.¹ This Declaration is submitted in response to the August 19, 2022 letter of Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau, Federal Communications Commission, concerning a random audit of the Station’s Equal Employment Opportunity (“EEO”) rule compliance (the “EEO Audit Letter”).

In response to Question 2(a) of the EEO Audit Letter, station WZAP employs fewer than five (5) full-time employees as the term is defined in the Commission’s broadcast EEO rule, 47 C.F.R. § 73.2080(e)(1). There are no full-time employees working for the Licensee, with only the two Co-Owners and a single part-time (20 hours per week) employee operating the Station.

In response to Question 2(b)(vi) of the EEO Audit Letter, Licensee affirms that it is not aware of any discrimination complaints filed against it during the current license term.



Glen H. Harlow

Executed on this 27th day of September, 2022.

¹ The Station is a single-station employment unit because it is the only station owned and operated by the Licensee. The Station is eligible for the small station exemption because it is operated by the two Co-Owners and one part-time (20 hours per week) employee.