



West Tennessee Public TV Council
P.O. Box 966
Martin, TN 38237

May 6, 2024

To the Online Public Files of the station(s) in the Employment Unit

Re: WLJT-DT, Lexington, TN
Facility ID No. 71645
EEO Audit Response

West Tennessee Public TV Council, d/b/a/ West TN PBS, licensee of Digital TV broadcast station WLJT-DT, Lexington, Tennessee, hereby responds to the letter dated March 22, 2024, from Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau. This response provides information relating to the licensee’s employment unit (the “Unit”), which includes the following stations:

WLJT-DT, Lexington, TN, Facility ID No. 71645

The following are our responses to the questions in part 2(b) of the audit letter.

(i) Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).

The 2022–2023 Annual EEO Public File Report for the period from March 22, 2022 – March 21, 2023, is attached as **Exhibit 1**. The 2023–2024 Annual EEO Public File Report for the period from March 22, 2023 – March 21, 2024 is attached as **Exhibit 2**.

(ii) For each station in the Unit that maintains a website, the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit’s most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).

The most recent annual EEO Public File Report is linked on the following website:

CALL SIGN	DOMAIN
WLJT-DT	www.westtnpbs.org

(iii) For each of the Unit’s full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), the date of hire as required by Section 73.2080(c)(5)(vi) as well as 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 the burden of responding to this audit, if a job notice was sent to multiple sources, the Unit may

include in its response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other recruitment sources) that has notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).

The Unit hired three (3) full-time employees during the period under review. For documentation, see **Exhibit 3**. Notice to all additional sources not referenced in **Exhibit 3** were retained, as required by section 73.2080(c)(5)(iii).

Full Time Position Filled By Job Title and Date Filled	Recruitment Source that Referred the Person Hired	Number of Persons Interviewed
General Manager & CEO ¹ January 1, 2023	Word of Mouth	5
Producer/Director/Sound Engineer March 1, 2023	Social Media/ WestTNPBS.org	2
Master Control Operator March 15, 2023	Word of Mouth	1

(iv) As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.

Total Number of Persons Interviewed for the Unit's three full-time vacancies: **8** (See tables above for a breakdown per vacancy)

Recruitment Sources Referring Interviewees	Number of Persons Interviewed that the Source Referred
Word of Mouth	6
Public Media Jobs (Current) Classified Department	
Social Media/ WestTNPBS.org	2
NETA - www.netaonline.org/careers-public-media	
TOTAL	8

¹ Please see **Exhibits 1 and 2** for a corresponding list of recruitment sources.

(v) Dated documentation demonstrating performance of the Unit's recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit's total number of full-time employees and state whether the population of the market in which any of the Unit's stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission's rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth, sixth and eighth anniversaries of that date). If the Unit performed more than the required amount in its response, i.e., two or four points worth. If any documentation provided appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask for additional verification.

Total Number of Full-Time Employees: **11**

West TN PBS employs more than 10 full-time individuals in the Unit but operates in a market where the population is less than 250,000. Accordingly, the Unit is required to participate in two recruitment initiatives over a two-year period.

Annual participation in scholarship program designed to assist students interested in pursuing a career in broadcasting.

- UT Martin Communications Scholarship Program – **Exhibit 4**

Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting.

- Carroll County Technical Center- Huntingdon, TN - **Exhibit 5**
April 27, 2022 - 300 participants
- Sunny Hill Intermediate School (Haywood Co) - **Exhibit 5**
May 18, 2022 - 360 participants
- Ripley Career Expo Pathways2Possibilities - **Exhibit 5**
March 8-9, 2023 - 3,195 participants
- Carroll County Technical Center, Huntingdon, TN - **Exhibit 5**
April 6, 2023 - 350 Participants
- Trenton Rosenwald Middle School - Trenton, TN - **Exhibit 5**
May 5, 2023 - 80 Participants
- Huntingdon High School K-8 - Huntingdon, TN - **Exhibit 5**
October 6, 2023 - 650 Participants
- Fulton High School - Fulton, KY - **Exhibit 5**
May 22, 2023 - 50 Participants
- Carroll County Technical Center (Semester 1) Huntingdon, TN - **Exhibit 5**
October 25, 2023 - 350 Participants

- Ridgemont Elementary School - Union City, TN - **Exhibit 5**
February 27, 2024 - 20 Participants
- Lexington High School - Lexington, TN - **Exhibit 5**
March 14, 2024 - 20 Participants
- Carroll County Technical Center (Semester 2) Huntingdon, TN - **Exhibit 5**
March 20, 2024 - 400 Participants
- Lake Road Elementary - Union City, TN - **Exhibit 5**
March 22, 2024 - 100 Participants

Established internship programs designed to assist members of the community to acquire skills needed for broadcast employment.

- West TN PBS offers internships for college students throughout the year. Internships are specifically designed to provide training and experience for students interested in the various aspects of broadcasting. Internships are offered to students of all colleges, universities, and trade schools. During the period covered by the two most recent EEO Public File Reports, the Unit has had five participants. See **Exhibit 6**.

*Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination. See **Exhibit 7** for related documentation.*

(vi) Any pending or resolved complaints involving the Unit filed during the Unit's current license term(s) 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 the Unit must report all complaints, regardless of their status or disposition.

None.

(vii) In accordance with section 73.2080(b), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.

The General Manager is responsible for implementation and administration of the station's EEO policies at the Unit. EEO policy implementation is reviewed annually during the budget process by the licensee's General Manager & CEO as well as periodically throughout the year during meetings with Unit management.

All printed, online and on-air radio advertisements for full-time employment include "Equal Opportunity Employer." The licensee's employment application states that it is an "Equal Opportunity Employer", and its Employee Handbook reaffirms this commitment, stating that "WLJT does not discriminate in

employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law.”

The Unit’s complete EEO policy is included in the Employee Handbook. See **Exhibit 8**, p. 4 for more details. All employees are required to acknowledge that they have received the Handbook and to sign a form that they have read and understood it.

(viii) In accordance with section 73.2080(c)(3), during the Unit’s current license term(s) (or since acquisition of the Unit (if during that period), a description of 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.

The Unit’s management team meets throughout the year to discuss any openings that may be on the horizon or that are currently open and discusses its recruitment efforts and to ensure compliance. The General Manager & CEO is aware of all full-time recruitment efforts that occur for openings and reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives. In addition, the Unit has its communications counsel review its Annual EEO Public File Report each year. Counsel provides suggestions for improvement to the recruitment program if necessary.

(ix) As required by section 73.2080(c)(4), during the Unit’s current license term(s) (or since acquisition of the Unit (if during that period), a description of 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.

Senior management meets each year at budget time to analyze pay levels for each position within each department. During that time, senior management evaluates compensation and benefits to ensure all employees regardless of race, color, religion, national origin or sex have equal opportunities for and access to any pay increase, promotions or job openings within the Unit.

There are no union contracts or union employees with the Unit.

(x) If your entity is a religious broadcaster and any of the Unit’s full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

The licensee is not a religious broadcaster.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based on information provided by the General Manager & CEO, Finance Administrative Assistant, and Director of Production.

Peter J. Noll

Peter Noll
General Manager & CEO
West TN PBS

Attachments: Exhibits 1 – 8