

Date: 1-10-2024

Memo to:
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Equal Employment Opportunity (EEO) October 2023 Broadcast EEO Audit.
Attachments referenced and included: Attachment A, B, and C

SM-WURV-FM, LLC, and a wholly-owned subsidiary of SummitMedia LLC ("Summit") hereby responds to the FCC's October 2023 Audit letter directed to the above-referenced station. WURV is part of a single employment unit with the following stations, each of which is licensed to another wholly-owned subsidiary of Summit: WKHK-FM/WKLR-FM/WJSR-FM/WURV-FM.

This employment unit currently consists of twenty-four (24) full-time employees. Accordingly, Summit hereby responds to each of the applicable lettered paragraphs of the Audit Letter:

2(b):

- (i) Copies of the employment unit's two most recent EEO Public File Reports dated 6/1/2021-5/31/2022 and 6/1/2022-5/31-2023 are available on WURV's website at the address:

<https://publicfiles.fcc.gov/fm-profile/WURV/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/1b74835e-5508-f993-c5ee-561601a09716>

Copies of the most recent EEO Public File reports are also included in **Attachment A**.

- (ii) Unit website addresses:

WKHK-FM	https://www.k95country.com/
WKLR-FM	https://www.classicrock965.fm/
WJSR-FM	https://www.awesome1009.com/
WURV-FM	https://www.1037yourvariety.com/
Corporate	https://www.summitmediacorp.com

- (iii) Unit had 12 full-time positions filled during the reporting period. Included in **Attachment B** is supporting documentation. Copies of all communications announcing the job openings listed in the employment, as reflected in the EEO Public File Reports. Documents are generally organized according to position, as reflected in the EEO Public File Reports.

Digital Sales Account Manager	06/01/2021
Operations Manager/PD	06/14/2021
Sales Account Executive	07/06/2021
Sales Account Executive	09/03/2021
On Air Personality	11/03/2021
Administrative Assistant	08/01/2022
Promotions & Marketing Director	09/21/2022
Sales Account Executive	10/31/2022
On Air Personality	12/12/2022
Sales Account Executive	05/08/2023
Sales Account Executive	05/08/2023
Program Director	12/12/2022

- (iv) The requested information regarding the total number of interviewees for each vacancy and the referral source for each interviewee is included in **Attachment A** with supporting documentation in **Attachment B**.
- (v) Unit had eight (8) recruitment initiatives over the time period, with included supporting documentation in **Attachment C**.
- (vi) The unit is not aware of any pending or resolved discrimination complaints filed against the employment unit during the period of time covered by this response.
- (vii) When a station or the employment unit as a whole identify a job need, an initial job description and job advertisement are prepared by the employment unit's VP/Chief People Officer based on consultation with the manager requesting the hire. After completion of the initial job description, the description is sent to the Department Head of the department requesting the hire for review and to determine whether there are any suggested recruitment sources that should be used in addition to Summit's standard sources. Once the Department Head has approved the job description, a job requisition form is submitted to the VP-Finance and VP-Chief People Office, who both oversee the EEO program. The VP-CPO works with the unit's Department Head to notify all recruitment sources. The hiring team reviews applications, schedules and conducts interviews as appropriate. Before making any offer, the Department Head must provide the VP-CPO and the VP Finance with complete documentation of the EEO outreach efforts related to the position. In all job postings, Summit includes a statement confirming that it offers equal employment opportunity to all qualified

applicants. Summit also makes employees aware of its EEO policies through new employee training, including a Policy Manual given to each new hire.

(viii) SummitMedia and SEU's have conducted self-audits of our EEO policies to review and correct any deficiencies with our recruitment efforts, recruitment sources list, recruitment initiatives, and our public filing process. Participating unit management includes our VP/Chief People Officer, VP/Finance, Payroll and Benefit Specialist, and the SEU Business Manager and General Manager. Leadership met 11-17-2022, 1-19-2023, 3-8-2023, 4-6-2023. Ongoing efforts were established to conduct both 6 month and 11 month self-audit reviews. The unit also engages with its employees to seek feedback on the effectiveness of its recruitment efforts and to seek input with respect to its EEO policies and to identify additional resources to be used in connection with recruitment. Finally, the unit works closely with educational institutions in the community as well as the state broadcast association to both reach out to potential applicants joining the workforce and to ensure Summit's recruiting practices remain germane to the next generation of broadcasters.

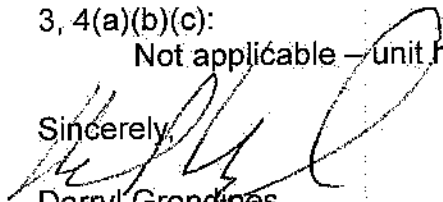
(ix) The unit has implemented a number of policies to analyze the employment unit's pay, benefits, seniority practices, promotions, and selection techniques to ensure that they provide equal opportunity and do not have a discriminatory effect. Summit's employee manual details the company's non-discriminatory measures for pay, benefits, seniority, and promotions. All new employees are given formal performance evaluations after a 180-day training period, and all employees are evaluated verbally on an ongoing basis by their supervisors. Special written evaluations may also be conducted to advise employees of any performance or disciplinary problems. Summit will continue to evaluate and revise these processes as necessary to ensure equal opportunity is provided. Summit is not party to any union agreements at the employment unit.

(x) Not applicable – unit is not a religious broadcaster.

3, 4(a)(b)(c):

Not applicable – unit has no time brokerage agreements.

Sincerely,


Darryl Grondines
Senior Vice President Finance
SummitMedia LLC