



2233 Wisconsin Ave., NW, Ste. 226
Washington, DC 20007

Barry S. Persh

(202) 776-2458

bpersh@graymillerpersh.com

December 12, 2023

Submitted via Online Public Inspection File

EEO Staff
Investigations & Hearings Division, Enforcement Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

NOTE: No Filing Fee Required

Re: Response to EEO Audit Letter
Mississippi Authority for Educational Television
Station WMAE-TV, Booneville, MS (Facility ID 43170)

Dear EEO Staff:

On behalf of Mississippi Authority for Educational Television, we transmit herewith a response to an FCC audit letter request for information concerning the EEO program of noncommercial educational television station WMAE-TV, Booneville, Mississippi.

Should any questions arise concerning this response, kindly contact the undersigned individual.

Very truly yours,

Barry Persh

Barry S. Persh
bpersh@graymillerpersh.com
Counsel for Mississippi Authority
for Educational Television

Enclosure



December 11, 2023

EEO Staff
Investigations & Hearings Division, Enforcement Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: **Response to EEO Audit Letter**
Mississippi Authority for Educational Television
Station WMAE-TV, Booneville, MS (Facility ID 43170)

EEO Staff:

Mississippi Authority for Educational Television (“MAET” or “MPB”) hereby responds to an FCC audit letter dated October 30, 2023 requesting information concerning the EEO program of noncommercial educational television station WMAE-TV, Booneville, Mississippi. The WMAE-TV employment unit (the “Unit”) employs more than five full-time employees, and MAET therefore provides the following information in response to the audit request.

Item # 2(b)(i). MAET encloses copies of the Unit’s annual EEO public file reports for the periods covering (i) February 1, 2022 to January 31, 2023 and (ii) February 1, 2021 to January 31, 2022 as Attachment 1.

Item # 2(b)(ii). The MAET station web site is available at: <https://www.mpbonline.org>. The annual EEO public file report is posted at: <https://www.mpbonline.org/more/legal/public-files-reports/>.

Item # 2(b)(iii). The dates of hire for the positions filled during the periods covered by the 2022-2023 and 2021-2022 annual EEO public file reports are as follows:

Job Title	Date of Hire
Broadcast Network Technician	4/11/2022
News Reporter	5/16/2022
Master Control Operator	7/1/2022
Public Relations Coordinator	7/5/2022
Public Relations Director	7/5/2022
Administrative Support Assistant IV	8/1/2022

WMAE-TV EEO Audit Response

Public Relations Specialist II	9/1/2022
News Reporter	9/19/2022
Executive Director	9/19/2022
Motion Graphics Designer	10/1/2022
Human Resources Director	11/16/2022
Education Program Development Specialist I	12/5/2022
Digital Media Strategist	1/1/2023
Administrative Support Specialist IV	1/9/2023
Executive Assistant	1/11/2023
Chief of Staff	4/5/2021
Special Projects Office IV	5/1/2021
ETV-Executive Producer	5/18/2021
ETV-Broadcast Technician, Lead	6/1/2021
ETV-Producer/Director	9/1/2021
Deputy Administrator	9/1/2021
ETV-Broadcast Technician, Lead	9/15/2021
Staff Officer I	10/1/2021
ETV-Project Technician	12/6/2021
Office Director I	1/1/2022
Branch Director II	1/1/2022
Branch Director II	1/10/2022
Education Specialist	1/10/2022

MAET encloses, at Attachment 2, documentation of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions filled during the period covered by the two annual EEO public file reports noted above (for the 2022-2023 and 2021-2022 annual reporting periods). No organizations notified MAET that they wanted to be notified of job openings.

Item # 2(b)(iv). The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2022-2023 and 2021-2022 reports are as follows:

WMAE-TV EEO Audit Response

Job Title	Total # of Interviews	# of Interviewees by Referral Source
Broadcast Network Technician	1	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 LinkedIn 0 State Personnel Board 0 Other Source 1
News Reporter	5	Agency Job Posting (MAET) 5 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 LinkedIn 0 Public Media Journalist Assoc. 0 Corporation for Public Broadcasting (CPB) 0 Other Source 1
Master Control Operator	3	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 LinkedIn 0 State Personnel Board 2 Referral 1
Public Relations Coordinator	4	Agency Job Posting (MAET) 0 Agency Website 4 Agency Radio Station 0 Agency Social Media 0 LinkedIn 0 PRAM 0 State Personnel Board 0
Public Relations Director	5	Agency Job Posting (MAET) 0 Agency Website 2 Agency Radio Station 0 Agency Social Media 0 Corporation for Public Broadcasting (CPB) Employment Security Comm. 0 LinkedIn 1 National Education Telecommunications Association (NETA) 0 Public Relations Assoc. of MS 0 State Personnel Board 2
Administrative Support Assistant IV	5	Agency Job Posting (MAET) 1 Agency Website 1 Agency Radio Station 0 Agency Social Media 0 LinkedIn 0 State Personnel Board 1 Other Sources 3
Public Relations Specialist II	3	Agency Job Posting (MAET) 0 Agency Website 2 Agency Social Media 0 Broadcast Employment Svcs. 0 LinkedIn 0 Other 1
News Reporter	4	Agency Job Posting (MAET) 3 Agency Website 0 Agency Social Media 0

WMAE-TV EEO Audit Response

		Public Media Jobs 0 Public Media Journalist Assoc. 0 Corporation for Public Broadcasting (CPB) 0 Agency Radio Station 0 LinkedIn 0 Other Source 1
Executive Director	5	Agency Job Posting (MAET) 0 Agency Website 5 Agency Social Media 0 Agency Radio Station 0 Mississippi Assoc. of Broadcasters (MAB) 0 National Education Telecommunications Association (NETA) 0 LinkedIn 0 Current 0
Motion Graphics Designer	4	Agency Job Posting (MAET) 0 Agency Website 2 Agency Social Media 0 Agency Radio Station 0 National Education Telecommunications Association (NETA) 0 Public Media Journalists Assoc. 0 LinkedIn 0 State Personnel Board 2 Other Source 0
Human Resources Director	3	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 LinkedIn 0 State Personnel Board 3
Education Program Development Specialist I	3	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 LinkedIn 0 State Personnel Board 3
Digital Media Strategist	3	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 Public Relations Assoc. of MS (PRAM) 0 LinkedIn 0 State Personnel Board 3
Administrative Support Specialist IV	1	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 LinkedIn 0 State Personnel Board 1
Executive Assistant	7	Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 State Personnel Board 7
Chief of Staff	3	Agency Job Posting (MAET) 1 Agency Website 0 Agency Social Media 0 Agency Radio Station 0

WMAE-TV EEO Audit Response

		<p>Capital Area Human Resource Association (CAHRA-SHRM) 0 Corporation for Public Broadcasting (CPB) 0 SimplyHired.com 0 State Personnel Board 1 Other Source 1</p>
Special Projects Office IV	2	<p>Agency Job Posting (MAET) 0 Agency Website 1 Agency Radio Station 0 Agency Social Media 0 Alabama Broadcaster's Association 0 Catholic Charities 0 Citizen Soldiers for Life 0 Employment Security Commission 0 Grambling State University 0 JournalismJobs.com 0 Midtown Partners Inc. 0 Mississippi Association of Broadcasters (MAB) 0 Minnesota Public Radio 0 Journalist Associations 0 National Education Telecommunications Association (NETA) 0 National Education Writers Association 0 New Horizon Membership Development 0 Public Relations Assoc. of MS Chapters 0 Radio Television Digital News Assoc. (RTDNA) 0 Southern Public Relations Federation 1 SimplyHired.com 0 State Personnel Board 0 The Jewish-Christian Foundation, Inc. 0</p>
ETV-Executive Producer	4	<p>Agency Job Posting (MAET) 0 Agency Website 4 Agency Radio Station 0 Agency Social Media 0 Alabama Broadcaster's Assoc. 0 Catholic Charities, Inc. 0 Citizen Soldiers for Life 0 Corporation for Public Broadcasting (CPB) Employment Security Comm. 0 The Jewish-Christian Foundation, Inc 0 JournalismJobs.com 0 Midtown Partners, Inc. 0 Minnesota Public Radio 0 Mississippi Assoc. of Broadcasters (MAB) 0 National Assoc. of Hispanic Journalists 0 National Education Telecommunications Association (NETA) 0 National Education Writers Association 0 Public Relations Assoc. of MS 0 SimplyHired.com 0 State Personnel Board 2 Regional Universities 0</p>
ETV-Broadcast Technician, Lead	6	<p>Agency Job Posting (MAET) 1 Agency Website 1 Agency Radio Station 0 Agency Social Media 0 Alabama Broadcaster's Assoc 0 All Access 0 Broadcast Employment Svcs. 0 Broadcasters' Desktop Resource 0</p>

WMAE-TV EEO Audit Response

		<p>Citizen Soldiers for Life 0 C Cubed, Inc. 0 Media Match 0 Mississippi Assoc. of Broadcasters (MAB) 0 Mississippi Film Commission 0 National Education Telecommunications Association (NETA) 0 SimplyHired.com 0 State Personnel Board 1 Colleges and Universities 0 Other Sources 3</p>
ETV- Producer/Director	3	<p>Agency Job Posting (MAET) 0 Agency Website 3 Broadcast Employment Svcs. 0 Mississippi Film Commission 0 SimplyHired.com 0</p>
Deputy Administrator	6	<p>Agency Job Posting (MAET) 1 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 Capital Area Human Resource Association 0 SimplyHired.com 0 State Personnel Board 4 Other Source 1</p>
ETV-Broadcast Technician, Lead	2	<p>Agency Job Posting (MAET) 0 Agency Website 1 Agency Social Media 0 Agency Radio Station 0 Alabama Broadcaster's Assoc. 0 Catholic Charities, Inc. 0 Citizen Soldiers for Life 0 Employment Security Comm. 0 JournalismJobs.com 0 Midtown Partners, Inc. 0 Minnesota Public Radio 0 Mississippi Assoc. of Broadcasters (MAB) 0 National Education Telecommunications Association (NETA) 0 National Education Writers Association 0 Public Relations Assoc. of MS 0 SimplyHired.com 1 Southern Public Relations Federation 0 Regional Universities 0</p>
Staff Officer I	2	<p>Agency Job Posting (MAET) 0 Agency Website 0 Agency Social Media 0 Agency Radio Station 0 Journalist Associations 0 National Education Telecommunications Association (NETA) 0 SimplyHired.com 0 Regional Universities 0 Other Source 2</p>
ETV-Project Technician	1	<p>Agency Job Posting (MAET) 0 Agency Website 0 State Personnel Board 1</p>
Office Director I	3	<p>Agency Job Posting (MAET) 0 Agency Website 3 Agency Social Media 0 Agency Radio Station 0</p>

WMAE-TV EEO Audit Response

Branch Director II	1	Agency Job Posting (MAET) 1 Agency Website 1 Agency Social Media 0 Agency Radio Station 0
Branch Director II	4	Agency Job Posting (MAET) 0 Agency Website 1 Agency Social Media 0 Agency Radio Station 0 SimplyHired.com 3 State Personnel Board 0
Education Specialist	3	Agency Job Posting (MAET) 0 Agency Website 1 SimplyHired.com 1 State Personnel Board 1

Item # 2(b)(v). MAET encloses documentation of recruitment initiatives performed during the periods covered by the 2022-2023 and 2021-2022 public file reports as Attachment 3. The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the WMAE-TV Unit is 76. The market for the Unit has a population of more than 250,000 persons. Based on these factors, MAET is required to perform four (4) initiatives within a two-year period.

During the periods covered by the 2022-2023 and 2021-2022 reports, MAET completed the following initiatives, involving station personnel as indicated:

Internship Program

- Following Covid-19 restrictions, MAET was able to re-initiate its intern program with an intern working for the Radio Director. The contact for the intern candidates was made by the Director of Radio while participating in the University of Southern Mississippi's 2022 Spring Career and Internship Expo on 3/23/2022.
- *Station personnel involved:* Director of Radio

Participation in Job Fairs

- University of Southern Mississippi's 2022 Spring Career and Internship Expo – 3/23/2022
Station personnel involved: A) Human Resources Director; B) Director of Radio
- Mississippi College 2022 General Career Fair – 3/8/2022
Station personnel involved: A) Human Resources Director; B) Director of Radio; C) Communications Director
- CommunityBrands' Public Media Virtual Career Fair – 3/11/2022
Station personnel involved: A) Human Resources Director; B) Director of Radio
- Jackson State University Fall 2022 Career Expo – 9/29/2022
Station personnel involved: A) Human Resources Director; B) Director of Radio

Training programs designed to enable station personnel to acquire skills that could qualify them for higher-level positions

- MAET provided numerous training opportunities for station personnel to acquire skills. See 2022-23 and 2021-22 annual EEO public file reports at Attachment 1 for details and station personnel involved.

Training to management level personnel as to methods of ensuring equal employment opportunity and prevention

- In September of 2022, every Mississippi Public Broadcasting employee completed the CPB Harassment and Bias Prevention Training, as required by the Corporation for Public Broadcasting.
Station personnel involved: Executive Director; Chief Operations Officer; Chief Financial Officer; Human Resources Director; News Director; Director of Radio; Director of Television; Director of Technical Services; Director of Education; Director of Communications; Director of Underwriting; All other staff

Item # 2(b)(vi). MAET reports the following complaints alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex filed during the current license term before any body having competent jurisdiction under applicable law:

A complaint was administratively filed on January 22, 2015 with the U.S. Equal Employment Opportunity Commission (“EEOC”) with EEOC Charge Number 846-2015-08617. The charge was filed by Lasharne Patton (“Patton”), and her complaint alleged racial discrimination under Title VII of the Civil Rights Act. MAET had reassigned some job duties within her department, including transferring some job duties from Patton to other less compensated employees. Patton’s pay was not changed, she was not demoted, and neither her working hours nor working conditions changed in any way as a result of the restructuring of job duties in that department. No finding was made by the EEOC of discrimination, and the matter ended at that administrative stage in the third quarter of 2015 and is now closed.

A complaint was administratively filed on September 6, 2022 with the U.S. Equal Employment Opportunity Commission (“EEOC”) with EEOC Charge Number 423-2022-01276. The charge was filed by Tara Wren (“Wren”), and her complaint alleged racial discrimination and retaliation under Title VII of the Civil Rights Act. MAET had reassigned an administrative assistant position from the department that Wren directed, and Wren claimed that the move was due to her race. The complaint included additional allegations regarding staffing of a grant matter, decisions to post vacant positions, the make-up of interview panels, departmental transfer decisions, and review of an internal complaint. No finding was made by the EEOC of discrimination, and the matter ended at that administrative stage in the third quarter of 2023 and is now closed.

Item # 2(b)(vii). Responsibilities of each level of Unit management responsible for implementing the Unit’s EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

Applicants: For every MAET job applicant, there are ample opportunities for the applicant to be exposed to MAET’s EEO Policy. Every printed job posting contains an EEO statement at the top or bottom of the advertisement, whether in print or on the internet. Applicants who research MAET via the internet will find the EEO/FCC policy located near the bottom of the main page at www.mpbonline.org and may also learn of the EEO policy under the “Legal” section. In addition, on-air job announcements include MAET’s EEO Policy. Also, the applicant might learn of the EEO Policy through the Careers page on the website. The Internship Application is available online and informs the potential intern of MAET’s EEO Policy on the application. The website’s About page also includes a link to the Mississippi State Personnel Board’s webpage which also states that agencies of the state of Mississippi are equal employment opportunity employers. A representative from the Human Resources Department sits in with all interviews in order to assist,

WMAE-TV EEO Audit Response

answer any questions from applicants regarding the EEO Policy, and to serve as educational support to supervisors looking to fill a vacancy.

Employees: MAET utilizes a variety of methods to continually inform and remind employees of MAET's EEO Policy including (1) website, (2) posters, (3) ongoing training, (4) job postings, (5) MAET Policy Handbook, and (6) Mississippi State Personnel Board State Employee Handbook. Once an applicant becomes an employee, he/she is informed of MAET's EEO Policy during the Employee Orientation that occurs within the first two (2) weeks of employment. The employee is given a copy of MAET's Policy Handbook containing sections regarding equal employment opportunity. The employee is also given a copy of the Mississippi State Personnel Board's State Employee Handbook which contains an equal employment opportunity statement. As noted above, the EEO Policy is posted throughout the agency's website. The agency displays current Equal Employment Opportunity posters in four separate conspicuous places throughout the agency. When an employment position becomes available, the job announcement is posted on the Careers page of the agency website and MAET's EEO Policy can be found on those announcements. The agency also has a designated Equal Employment Opportunity Commission representative.

Management/Supervisors: All of the resources/instructional opportunities available to employees and applicants are also available to management/supervisors. Managers are further educated by (1) weekly meetings, (2) email reminders, (3) counseling with Human Resources Director, (4) counseling with the Mississippi Attorney General representative attorney, (5) review of interview plan prior to beginning the interview process, and (6) mandatory attendance to the Mississippi State Personnel Board's Basic Supervisory Course. All supervisors are informed of the EEO Policy by Human Resources prior to beginning the hiring process for vacant positions. For every application that is received by the agency, the race, sex and age are excluded from the application. Each applicant is initially reviewed with the supervisor having no knowledge as to the gender, race or age of the applicant. All applicants are interviewed by a diverse group of employees – labeled the "interview panel." It is the supervisor's responsibility to work with the Human Resources Department to draft the interview questions. Once the recruitment process has produced a candidate for employment, all hiring decisions receive final approval by the Executive Director.

Item # 2(b)(viii). Efforts to analyze the Unit's EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

MAET regularly reviews its EEO Program with the goal of adapting and improving its procedures and results. The Mississippi State Personnel Board and MAET maintain a blind recruitment process, which provides no demographic data during the application process. One of MAET's methods of analyzing the effectiveness of its EEO recruitment program involves analyzing demographics with respect to hires and promotions. MAET also seeks to regularly improve its EEO efforts through ongoing training, consultation with the Attorney General's Office for the State of Mississippi and continued legal education of executive staff in the area of employment law through educational opportunities provided by the State Personnel Board and other professional sources.

Item # 2(b)(ix). Efforts to periodically analyze measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal

WMAE-TV EEO Audit Response

opportunity and do not have a discriminatory effect:

MAET is an agency of the State of Mississippi. As such, its hiring practices, classification and compensation reviews, benefit provision, performance review policy and other procedures are largely controlled by the Mississippi State Personnel Board (MSPB) and the Mississippi Department of Finance and Administration (DFA). The MSPB and DFA, with the authority of the state legislature, establishes classification, pay, benefits, seniority practices, promotions practices, and selection techniques, all of which are designed to provide equal employment opportunity to applicants and employees. MAET is able to exercise some discretion within the policies set forth by the MSPB, in areas such as promotions, selection techniques, and supplemental insurance benefits. Often, promotions occur as a result of an open and competitive process whereby the selected candidate is a current employee who proves to be the most qualified candidate for the position. The only positions not subject to the approval of the MSPB are non-state service positions, which are typically executive level management positions. MAET believes that its promotion decisions have demonstrated that its efforts to ensure and promote an equal opportunity workplace are effective.

MAET's selection techniques include advertising vacancies through the MSPB NeoGov system, which provides a blind recruitment process, and the use of interview panels. Each panel formed for the purpose of interviewing potential candidates must be diverse in race and gender and ideally includes a member from outside of the division in which the open position resides (besides the Human Resources Director). MAET believes that a diverse interview panel is effective for identifying candidates with broad interests and strong interpersonal skills, along with experience related to the vacancy. Once the recruitment period in the MSPB system is complete, a blind list of applicants and their applications are created and available for review by the agency. All applications go through the Human Resources Department where they are reviewed for qualifications and then forwarded to the supervisor without any identifying EEO related information attached. The supervisor further screens the applications for any job specific experience and then the candidates with the most qualified experience are contacted to be interviewed. Once this recruitment process produces a qualified candidate and the candidate is approved by the agency's Executive Director, the recommended candidate must be approved by the MSPB in order to be hired.


MAET also occasionally requires writing and/or production assignments as part of the interview process (typically limited to positions in its News and Communications departments). These assignments are conducted to determine the writing, editing, and reporting abilities of the candidates. These assignments serve merely as additional criteria by which to judge the candidates' overall abilities and aptitude. Also, on most Television/Production positions, MAET requests the candidate submit their portfolio or demo reel in order to determine their level and quality of experience, in accordance with standard industry practice for production.

Items # 2(b)(x), 3 and 4 are not applicable.

WMAE-TV EEO Audit Response

Mississippi Authority for Educational Television, through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,
MISSISSIPPI AUTHORITY FOR EDUCATIONAL
TELEVISION

By: 

Print Name: Anna Neel

Title: Chief Operating Officer

Date: 12/11/2023