



May 2, 2008

EEO Staff, Policy Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

RE: Georgia Public Telecommunications  
Commission (GPTC) EEO Audit Response

To Whom It May Concern:

Attached is GPTC's response to the Commission's request dated April 2, 2008, for information related to GPTC's EEO Program. Information was requested for one noncommercial educational station licensed to the Georgia Public Telecommunications Commission: WXGA-TV/Waycross, Georgia.

If you have questions or need additional information, please feel free to contact Mel Jones at (404) 685-2637.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy G. Hall", is written over the typed name and title.

Nancy G. Hall  
Executive Director

Attachments

cc: Ms. Maureen Jeffreys, Arnold & Porter, LLP  
Mr. Mel Jones, Human Resources Director, GPTC

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**2008 EEO AUDIT RESPONSE**  
**GEORGIA PUBLIC TELECOMMUNICATIONS COMMISSION (GPTC)**  
**WXGA-TV/Waycross, Georgia**

- 1. In accordance with the provisions of 47 C.F.R. § 73.2080(f) (4) of the Commission's Equal Employment Opportunity (EEO) rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 is enclosed for your reference.)**

WXGA-TV, Waycross, Georgia was randomly selected for this audit. Because each of the stations licensed to the GPTC, with the exception of WMUM (FM) and WMUM-TV, has less than five full-time employees, GPTC Headquarters Office handles all recruitment and EEO compliance activities for the station and reports EEO activities for this "combined" Employment Unit.<sup>1</sup>

GPTC notes that, in 2007, three of its stations within the same Employment Unit, WUNV(FM), Albany, WABW-TV, Pelham, and WJSP-FM, Warm Springs, were randomly selected for audits of their EEO programs. On March 9, 2007, GPTC responded to these audits request. Upon review of its response, the Commission concluded that no further action was needed regarding GPTC's EEO. Since there have been no material changes in GPTC EEO practices since it submitted its 2007 response, the Commission should conclude in this audit that GPTC continues to comply with the Commission's EEO rules.

- 2. If the Unit is not required under our rules to have an EEO recruitment program due to the size of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you must provide only a list of the Unit's full-time employees, noted by job title and the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a) and (b) below regarding brokers and brokered stations, for instructions in situation in which the applicable employment unit has fewer than five full-time employees.**

As explained above, GPTC is required to have an EEO recruitment program. This audit response provides information on GPTC's EEO program for GPTC's Headquarters Employment Unit that covers all stations, except WMUM-TV and WMUM(FM)

- 3. Audit Data Requested. If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation for any information you are unable to provide:**

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<sup>1</sup> WMUM (FM) and WMUM-TV constitute a separate Employment Unit for EEO purposes.

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- (a) **The Unit's two most recent EEO public file reports, described in 47 C.F.R. § 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 or linked to on any of these websites, in violation of 47 C.F.R. § 73.2080(c)(6), provide an explanation of why the report is not so posted or linked.**

GPTC's website address is [www.gpb.org](http://www.gpb.org). The EEO Public Inspection File (Combined) Reports for 2006 and 2007 are attached.

Attachment # 1: EEO Public Inspection File (Combined) Report - 2006

Attachment # 2: EEO Public Inspection File (Combined) Report - 2007

- (b) **For each 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 § 73.2080(c)(5)(iii). Include copies of job announcements sent to any organizations (identified separately from other sources) that have notified the Unit that they want to be notified of Unit job openings, as described in § 73.2080(c)(1)(ii).**

Attachment # 3: Recruitment Resource Bank (12/01/05 – 12/01/06)

Attachment # 4: Recruitment Resource Bank (12/01/06 – 12/01/07)

Attachment # 5: Advertisements, Bulletins, Letters, Faxes and Emails  
Announcing Positions

- (c) **In accordance with § 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the period covered by the above EEO public file reports.**

Attachment # 6: Interviewees for Vacancies (12/01/05 – 12/01/06)

Attachment # 7: Interviewees for Vacancies (12/01/06 – 12/01/07)

- (d) **Documentation demonstrating performance of recruitment initiatives described in 47 C.F.R. § 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 recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which the stations in the Unit is 250,000 or more. Based upon these two factors, as explained in 47 C.F.R. §§ 73.2080(c)(2) and (e)(3), determine and state whether the Unit is required to perform two or four initiatives in a two-year period, pursuant to 47 C.F.R. §§ 73.2080(e)(3).**

Attachment # 8: Recruitment Initiatives (12/01/05 – 12/01/06)

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Attachment # 9: Recruitment Initiatives (12/01/06 – 12/01/07)

- (e) **Disclose any pending or resolved complaints 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 complainant and other persons involved; (3) the date of complaint's filing; (4) the court or agency before which it is pending or 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.**

GPTC's television broadcast license term is April 1, 2005, through April 1, 2013. Although the complaint included in this audit was filed prior to April 1, 2005, its disposition falls within the Station's current license term.

Attachment # 10: Pending or Resolved Complaints

- (f) **In accordance with § 73.2080(b), from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.**

Each level of management is required to have a working knowledge of the EEO policies and practices within the organization. Managers at all levels are required to employ practices that ensure the work environment is free from any form of discrimination. All managers are required to receive diversity and equal opportunity training. Applicants are informed by including an EEO statement on every job announcement and applicant tracking data form. Additionally, GPTC does radio and television public service announcements stating that it is an Equal Employment Opportunity employer.

GPTC also provides an orientation presentation for all new hires that communicates GPTC's Equal Employment Opportunity guidelines for recruitment, advancement, and training.

Attachment # 11: Sections of GPTC Organizational Policy Manual (Recruitment, Selection and Affirmative Action); and Sections of GPTC New Employee Orientation PowerPoint Presentation (Recruitment and Equal Employment Opportunity)

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- (g) In accordance with § 73.2080(c)(3), from March 10, 2003 (or from the first day of the Station's current license term if after 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 address any problems found as a result of such analysis.**

GPTC makes every effort to monitor its recruitment efforts to ensure it reaches the vast demographics represented in its broadcast region. Each job applicant is asked to complete a demographic profile sheet which documents age, race, and gender. This data is used to analyze the effectiveness of efforts made to reach minority communities and organizations.

Each year GPTC prepares a workforce planning document which describes the demographic makeup of the organization. Areas where ethnic or gender minority groups are underrepresented are highlighted and reported in the gap analysis. When this data is reported, a plan to close the gap or increase the presence of underrepresented groups is developed and tracked.

- (h) In accordance with § 73.2080(c)(4), from March 10, 2003 (or from the first day of your current license term if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically 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, and 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.**

Compensation for staff is based on a validated salary and grade order for each job within the organization. This guide is in compliance with the guidelines of the Georgia Office of Planning and Budget, the Georgia Department of Audits and Accounts, and the Georgia State Personnel Administration. Each year GPTC is required to undergo a comprehensive financial audit which includes compensation practices. Guidelines for awarding salary increases, promotions, and the selection process are published in the GPTC Policy Manual.

All full-time employees accrue a minimum of 15 days paid vacation and sick leave each year. Full-time employees also receive 12 paid holidays per year.

Employee benefits are administered by the Georgia State Personnel Administration, the Employees' Retirement System of Georgia, and the Georgia Department of Community Health. All full-time employees are eligible to participate in the benefits program that includes optional participation in health and other insurance plans. Participation in the retirement program is not optional, and all full-time employees have an individual retirement account with the Employees' Retirement System of Georgia. Additionally, employees are offered optional retirement plans that include tax-sheltered annuities, and 457 and 401k Plans. Part-time employees participate in a Defined Contribution

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Retirement Plan and are eligible to participate in an optional 401k Plan. They are also offered health insurance plans through a private vendor.

GPTC does not have a union agreement with any organization.

- (i) **If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in §§ 73.2080(a), of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program.**

This does not apply to GPTC.

4. Time Brokerages.

- (a) **Brokered station(s). If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement in addition to responding to this letter to provide us a list of the Unit's full-time employees listed by job title (and number of hours assigned to work) and answer question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement.**

This does not apply to GPTC.

- (b) **Brokers. If you are the broker of any Unit station referenced above, you are required to supply the Commission with the information requested herein regarding your full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. See 47 C.F.R. § 73.2080(f) (3). If your employees at your own station(s) combined with your employees at the station(s) you are brokering total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to question 3(e).**

This does not apply to GPTC.