

June 12, 2015

Dear Licensee:

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

2. If the Unit is not required under our rules to have an EEO recruitment program due to the nature 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 are required only to provide a list of the Unit's full-time employees, each noted by job title, 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)-(d) below regarding brokers and brokered stations for instructions for situations in which the applicable employment unit has fewer than five full-time employees.

3. **Audit Data Requested.** If the Unit employs five or more full-time employees (and all units, for Question 3(e)), provide the following information, including an explanation regarding any requested information that you are unable to provide:

(a) Copies of the Unit's two most recent EEO public file reports, described in Section 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 on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the unit does not have its own website, but its corporate site contains a link to a site pertaining to the unit, then the unit's most recent EEO public file report must be linked to either the unit's site or the general corporate site, pursuant to 47 C.F.R. § 2080(c)(6).

(b) For each Unit 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 Section 73.2080(c)(5)(iii). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in Section 73.2080(c)(1)(ii).

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

(d) Documentation of Unit recruitment initiatives described in Section 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 such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

(e) Disclose any pending or resolved complaints involving the Station 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 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 all complaints must be reported, regardless of their status or disposition.

(f) In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with Section 73.2080(c)(3), from the first day of the Station's current license term (or the date the licensee became the owner, if after that 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 to address any problems found as a result of such analysis.

(h) In accordance with Section 73.2080(c)(4), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe 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.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 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. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be

provided. 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.

(j) Among items we do not need in your response to this letter are copies of applicants' resumes, your company training manuals, posters, employee handbooks, or corporate guidebooks. If you believe any of the information in various corporate manuals or posters are relevant to any part of this audit letter, you may summarize what is in them. If you believe this letter requires you to provide an unusually burdensome volume of documentation, you may contact us prior to the response deadline to discuss possible ways of condensing your response.

#### **4. Time Brokerage.**

(a) **Licensee of 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 and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to Question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must respond to Question 4(b) below. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 3 above, and also forward the letter to the broker so the broker may respond to Question 4(b) below.

(b) **Broker receiving audit letter from brokered station licensee.** If you are the broker of a station, and the station you are brokering receives an audit letter, the licensee of the brokered station must forward the audit letter to you. You should respond to the audit letter concerning EEO information relating only to your own full-time employees at the brokered station. *See* Section 73.2080(f)(3).

(c) **Broker receiving audit letter directly from Commission.** If you are a broker, but the target station in this audit letter is a station licensed to you, you must submit information requested herein for the EEO program at your station (or employment unit). If you maintain EEO data for a station you are brokering with that for your own station that is the target of this audit letter, and lack the ability to separate the information, you must include in your response the information requested herein pertaining to **your** full-time employees at the station(s) you broker. *See* Section 73.2080(f)(3).

(d) **Broker described under 4(b) or 4(c) above.** If your full-time employees at the station you are brokering, combined with your full-time employees at your owned station(s), total fewer than five, however, you need only respond to this letter by the deadline described below by submitting a list of your 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) above.

**5. Procedures.** Direct your response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, DC 20554. The response must be received by the Commission by July 27, 2015. You need only submit your original response; no copies are needed. You should direct your response to the above address, *not* the office of the FCC Secretary. The Secretary does not process responses to EEO audit letters. If you file your response in person and wish to have the filing date-stamped, personnel at the

security desk in the 12<sup>th</sup> Street lobby of the FCC headquarters building can date-stamp the filing. The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. (See Section 1.16.) The response may be in the form of a CD or other electronic medium, as long as the certification provided refers to the material submitted and is on paper with an original signature. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; *see also* 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Extensions of time must be requested in writing (or sent by e-mail to [lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov)) and will be granted only upon a showing of extraordinary circumstances. Unless and until the EEO Staff grants such a request the original deadline remains in effect. Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with Section 73.2080(g).

6. In accordance with Sections 73.3526(e)(10) (for commercial stations ) and 73.3527(e)(11) (for noncommercial educational stations), copies of which are enclosed, you must place a copy of this letter and your response in the public inspection file of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

7. If our EEO random audits sent on June 26, 2013, or any time in 2014 or 2015 included the Station, or if the Station's most recent license renewal application was granted, by final order, within the past 18 months, you may not have to respond to this letter. If the Station falls within one of these categories, before responding, please tell us the dates of public file reports included in an audit response or the date of the Station's renewal, in an e-mail sent to [lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov). We will then advise you if a response is necessary. Should you have any questions, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley  
Assistant Chief, Policy Division  
Media Bureau

Enclosures

ALPHA LICENSEE, LLC	KXTG	AM	948	PORTLAND	OR
AMERICAN FAMILY ASSOCIATION	KEEA	FM	122026	ABERDEEN	SD
AMERICAN FAMILY ASSOCIATION	KKNL	FM	122329	VALENTINE	NE
AMERICAN FAMILY ASSOCIATION	KMLL	FM	122340	MARYSVILLE	KS
AMERICAN FAMILY ASSOCIATION	WBIE	FM	89691	DELPHOS	OH
AMERICAN FAMILY ASSOCIATION	WQSG	FM	89248	LAFAYETTE	IN
CALVARY CHAPEL AURORA	KXGR	FM	89401	LOVELAND	CO
CALVARY CHAPEL OF RUSSELL	WYVL	FM	89403	YOUNGSVILLE	PA
CALVARY CHAPEL OF TWIN FALLS, INC.	WUJC	FM	122209	ST. MARKS	FL
CAROLINA MEDIA GROUP, INC.	WBBB	FM	889	RALEIGH	NC
CAUSE PLUS MARKETING, LLC	WWOW	AM	13724	CONNEAUT	OH
CAZENOVIA COLLEGE	WITC	FM	9430	CAZENOVIA	NY
CB RADIO, INC.	WBEJ	AM	9431	ELIZABETHTON	TN
CCR-MONTROSE IV, LLC	KSNM	FM	89280	RIDGWAY	CO
CHRISTIAN LIFE COMMUNICATIONS, INC.	WCLQ	FM	11060	WAUSAU	WI
CHRISTIAN LISTENING NETWORK, INC.	WCLN-FM	FM	11066	CLINTON	NC
CHRISTIAN RADIO FELLOWSHIP, INC.	WAFT	FM	11091	VALDOSTA	GA
CITICASTERS LICENSES, INC.	WNIO	AM	13669	YOUNGSTOWN	OH
COFFEE COUNTY BROADCASTERS, INC.	WOKA-FM	FM	12203	DOUGLAS	GA
COLLEGE OF DU PAGE, DISTRICT 502	WDCB	FM	12281	GLEN ELLYN	IL
COLLEGE OF ST. FRANCIS	WCSF	FM	12283	JOLIET	IL
COLLEGE OF THE OZARKS	KCOZ	FM	12287	POINT LOOKOUT	MO
COLUMBIA CITY JOINT HIGH SCHOOL	WJHS	FM	12423	COLUMBIA CITY	IN
COMMUNICATIONS COUNSEL GROUP, INC.	WQII	AM	12712	SAN JUAN	PR
COMMUNITY BROADCASTING, INC.	KJCV-FM	FM	89276	COUNTRY CLUB	MO
COMMUNITY PUBLIC RADIO, INC.	WNEE	FM	122086	PATTERSON	GA
CONTINENTAL BROADCAST GROUP, LLC	WSYW	AM	13795	INDIANAPOLIS	IN
COOKEVILLE COMMUNICATIONS, LLC	WPTN	AM	13820	COOKEVILLE	TN
CORNERSTONE BROADCASTING, INC.	WYXI	AM	13931	ATHENS	TN
COSHOCTON BROADCASTING CO.	WTNS	AM	13981	COSHOCTON	OH
CREAL BROADCASTING, INC.	WKDO	AM	8993	LIBERTY	KY
CUMULUS LICENSING LLC	WLWI-FM	FM	12318	MONTGOMERY	AL
DAKOTA COMMUNICATIONS, LTD.	KJRV	FM	89615	WESSINGTON SPRINGS	SD
DANIEL S. STRATEMEYER	KZMA	FM	89496	NAYLOR	MO
DREAM WEAVER MARKETING, LLC	WJOT	AM	13538	WABASH	IN
EDGEWATER BROADCASTING INC.	WZXX	FM	89511	LAWRENCEBURG	TN
EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	KTMH	FM	89574	MONTROSE	CO
EDUCATIONAL COMMUNICATIONS OF COLORADO SPRINGS, INC.	KTPL	FM	12362	PUEBLO	CO
EDUCATIONAL MEDIA FOUNDATION	KAIP	FM	122025	WAPELLO	IA
EDUCATIONAL MEDIA FOUNDATION	KARU	FM	124883	CACHE	OK
EDUCATIONAL MEDIA FOUNDATION	KFLV	FM	89576	WILBER	NE
EDUCATIONAL MEDIA FOUNDATION	KLDV	FM	12354	MORRISON	CO
EDUCATIONAL MEDIA FOUNDATION	KLFV	FM	12341	GRAND JUNCTION	CO
EDUCATIONAL MEDIA FOUNDATION	KLKM	FM	89617	KALISPELL	MT
EDUCATIONAL MEDIA FOUNDATION	KLZV	FM	89509	BRUSH	CO
EDUCATIONAL MEDIA FOUNDATION	KRLR	FM	89623	SULPHUR	LA
EDUCATIONAL MEDIA FOUNDATION	WGNC	FM	122298	NASHVILLE	GA
EDUCATIONAL MEDIA FOUNDATION	WGSL	FM	11064	LOVES PARK	IL
EDUCATIONAL MEDIA FOUNDATION	WLRK	FM	122296	GREENVILLE	MS
EDUCATIONAL MEDIA FOUNDATION	WNKV	FM	89686	NORCO	LA
EUCHARIST RADIO, INC.	WEUC	FM	122810	MORGANFIELD	KY

FAMILY WORSHIP CENTER CHURCH, INC.	WBMF	FM	89339	CRETE	IL
FLINT MEDIA, INC.	WBGE	FM	89183	BAINBRIDGE	GA
FLORIDA PUBLIC RADIO, INC.	WKFA	FM	89697	ST. CATHERINE	FL
FM RADIO LICENSES, LLC.	WOHI	AM	13710	EAST LIVERPOOL	OH
GEORGE S. FLINN, JR.	KBUD	FM	89397	SARDIS	MS
GHB OF WAXHAW, INC.	WTIX	AM	13555	CONCORD	NC
GRAND SLAM SPORTS, LLC	KFNS	AM	13505	WOOD RIVER	IL
INTERLOCHEN CENTER FOR THE ARTS	WIAB	FM	89513	MACKINAW CITY	MI
INTERLOCHEN CENTER FOR THE ARTS	WICA	FM	89497	TRAVERSE CITY	MI
J&B WCNZ/WVOI, LLC	WVOI	AM	13980	MARCO ISLAND	FL
JDC RADIO, INC.	KQIB	FM	89460	IDABEL	OK
JOMAST CORPORATION	KMZN	AM	31910	OSKALOOSA	IA
KASKASKIA BROADCASTING, INC.	WHOW	AM	13900	CLINTON	IL
KTLO, LLC	KBOD	FM	14066	GAINESVILLE	MO
KUTE, INC.	KPGS	FM	123206	PAGOSA SPRINGS	CO
L&L LICENSEE, LLC	WIRL	AM	13040	PEORIA	IL
MADISONVILLE CBC, INC.	WTTL	AM	13799	MADISONVILLE	KY
MAGIC BROADCASTING II, LLC	WPCF	AM	13012	PANAMA CITY BEACH	FL
MILES COLLEGE	WMWI	FM	122084	DEMOPOLIS	AL
MINDEN BROADCASTING, LLC	KASO	AM	13803	MINDEN	LA
NEW ENGLAND COMMUNICATIONS, INC.	WBXR	AM	8999	HAZEL GREEN	AL
NORTHLAND COMMUNITY BROADCASTERS	WSMF	FM	89277	MONROE	MI
NORTHWEST INDIANA PUBLIC BROADCASTING, INC.	WLPR-FM	FM	89212	LOWELL	IN
ONE CONNECTION MEDIA GROUP	WCVO	FM	11138	GAHANNA	OH
ONE CONNECTION MEDIA GROUP	WZNP	FM	89343	NEWARK	OH
PENFOLD COMMUNICATIONS, INC.	WKJA	FM	122205	BRUNSWICK	OH
PHARIS BROADCASTING, INC.	KHGG-FM	FM	12231	WALDRON	AR
POLLACK BROADCASTING CO.	KBOA-FM	FM	33673	PIGGOTT	AR
PRIORITY RADIO, INC.	WVBH	FM	89740	BEACH HAVEN WEST	NJ
PRITCHARD BROADCASTING CORPORATION	KHDK	FM	89613	NEW LONDON	IA
PUBLIC BROADCASTING OF COLORADO, INC.	KCFP	FM	12326	PUEBLO	CO
Q MEDIA GROUP, LLC	KLCH	FM	89398	LAKE CITY	MN
RADIO ADVANTAGE ONE, LLC	WABQ	AM	13685	PAINESVILLE	OH
RADIO LICENSE HOLDING CBC, LLC	WLAW	FM	89477	NEWAYGO	MI
RADIO ONE LICENSES, LLC	WPHI-FM	FM	12211	PENNSAUKEN	NJ
RAINBOW CITY MEDIA, LLC	WTDR	AM	13849	GADSDEN	AL
RED ROCK RADIO CORP.	KGHS	AM	12723	INTERNATIONAL FALLS	MN
RESURRECTION HOUSE MINISTRIES, INC.	WTLD	FM	89988	JESUP	GA
ROCKY MOUNTAIN PUBLIC BROADCASTING NETWORK, INC.	KVJZ	FM	89878	VAIL	CO
ROSE ANN MARX	KBON	FM	60867	MAMOU	LA
SCOTT COMMUNICATIONS, INC.	WJAM	AM	947	SELMA	AL
SIEBERT BROADCASTING, INC.	KWBE	AM	12950	BEATRICE	NE
SOUTH DAKOTA BOARD OF DIRECTORS FOR ED. TELECOMMUNICATIONS	KZSD-FM	FM	59466	MARTIN	SD
SOUTHEAST KANSAS INDEPENDENT LIVING RESOURCE CENTER, INC.	KLKC	AM	12832	PARSONS	KS
SOUTHEASTERN OHIO BROADCASTING SYSTEMS, INC.	WHIZ-FM	FM	11126	SOUTH ZANESVILLE	OH
SOVEREIGN COMMUNICATIONS, LLC	WYSS	FM	977	SAULT STE. MARIE	MI
STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BOARD	WSSU	FM	89432	SUPERIOR	WI
SUNRISE BROADCASTING, LLC	WAZO	FM	59480	SOUTHPORT	NC
TELESOUTH COMMUNICATIONS, INC.	WOEG	AM	13858	HAZLEHURST	MS
THE INNOVATION CENTER INC	WSDM	FM	122333	WADESVILLE	IN
THE POWER FOUNDATION	WILF	FM	89620	MONROEVILLE	AL

WESTERN INSPIRATIONAL BROADCASTERS, INC.  
WESTERN IOWA TECH COMMUNITY COLLEGE

KLMT	FM	89849	BILLINGS	MT
KOJI	FM	123310	OKOBOJI	IA