



March 31, 2014

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MAR 31 2014

Mr. Lewis C. Pulley  
Assistant Chief  
Policy Division, Media Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Federal Communications Commission  
Bureau / Office

Re: KAEF-TV (8263) -- Response to 2014 Audit Inquiry

Dear Mr. Pulley:

Bluestone License Holdings Inc. ("Bluestone"), licensee of television station KAEF-TV (8263), Arcata, CA ("KAEF" or the "Station"), hereby responds to your letter of February 18, 2014 regarding the employment unit's random selection for an audit of its EEO program. Bluestone is a wholly-owned subsidiary of Bonten Media Group, Inc. ("Bonten"). The employment unit includes KRCR-TV (8291), Redding, CA, which also is licensed to Bluestone (together with KAEF, the "Employment Unit" or the "Stations")

The responses below, which are provided in the order of the requests in Section 3 of your letter, were prepared under the supervision of Mr. Andrew Stewart, Vice President and General Manager of California Broadcasting, Inc., in conjunction with Shannon House, the Stations' Controller who serves as the employment unit's EEO officer, and the responses have been generally reviewed by me as Chairman and CEO of Bonten.

- 3(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)."**

The license renewal filing anniversary date for the Stations is August 1, and, thus, Exhibit A attaches the EEO Public File Report for the periods August 1, 2011 through July 31, 2012 and August 1, 2012 through July 31, 2013. KRCR's website is located at <http://www.krcrtv.com/>. KAEF shares a website with KRCR, and its landing page is located at <http://www.krcrtv.com/kaef>. The Unit's EEO Public File Report is accessible online at <http://www.krcrtv.com/blob/view/-/21299838/data/1/-/12svqfo/-/EEO-Notice.pdf>. Exhibit A provides the date of each full-time hire during the pertinent period.

- 3(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)."**

During the two-year reporting period covered by the two most recent EEO Public File Reports, the Stations hired 29 full-time employees. Exhibit B includes a cover sheet for each of those openings which identifies the position, the number of interviewees for each opening and the referral source for each interviewee and hiree. Each job vacancy cover sheet is followed by (1) a copy of the Hiring Approval Form that contains the job description that was contemporaneously prepared and disseminated; (2) the associated job vacancy form that was contemporaneously prepared and lists all sources to which such description was sent (the unit maintained this documentation in lieu of copies of each notice sent out, although it will revise its procedures to maintain all such records going forward); and (3) copies of additional documentation, including letters, faxes, e-mails, advertisements and other communications or records reflecting announcements of the open position, retained by the Unit. No recruitment sources have notified the Employment Unit that they want to be notified of job openings in accordance with Section 73.2020(c)(1)(ii). As described in Exhibit A, the Unit widely disseminated notice of every job vacancy filled during the applicable reporting periods.

- 3(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.”**

Exhibit B indicates the number of interviewees and referral source for each interviewee for each vacancy.

- 3(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.”**

Exhibit C includes cover sheets noting four supplemental outreach initiatives undertaken by the Employment Unit between July 31, 2011 and July 31, 2013, and identifying the personnel involved to the extent that information is not reflected in accompanying documentation. Each cover sheet is followed by documentation that reflects the date, personnel involved, and performance of each initiative. A summary of the additional initiatives undertaken by the Employment Unit is also included.

The Stations currently have 70 full-time employees. The Stations are not located in a “smaller market,” as defined in Section 73.2080 of the FCC’s rules, and the Employment Unit is therefore required to perform four supplemental initiatives over the course of the two-year period covered by these reports.

- 3(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.”**

Since the start of the current license term which commenced March 23, 2007, the Stations have not received or resolved any such complaint.

- 3(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.”**

Mr. Stewart, General Manager of the Stations, has overall responsibility for all the Stations’ Equal Employment Opportunity (“EEO”) efforts, including compliance with equal employment opportunity obligations through the Unit’s EEO Policy. Ms. House, the Stations’ Controller who serves as the EEO officer, is responsible for the administration and implementation of the EEO Policy and related programs at the Stations. In addition, it is the responsibility of all persons making decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination to ensure that the Stations’ EEO Policy and related programs are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, age, gender, marital status, disability, matriculation or political affiliation.

The Stations inform employees and job applicants of the EEO Policy and related programs in the following primary ways:

- The Stations’ employment application form contains a notice informing prospective employees that discrimination because of race, color, creed, religion, national origin, gender, sexual preference, marital status, disability or age is prohibited and that they may notify the appropriate local, state, or federal agency, or FCC if they believe their rights have been violated.
- The General Manager periodically attends a management training session at which the EEO Policy and related programs are explained to them and the utmost importance of the Policy is emphasized.

- All new employees receive a copy of the Unit's EEO Policy. In addition, they are given a copy of Bonten's Handbook, which contains a summary of the Unit's EEO Policy.

**3(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."**

The Stations utilize the following principal measures to analyze the effectiveness of the Recruitment Program so that any identified problems can be addressed and corrected:

- Periodic comparison of the Stations' referral sources to those used by other Bonten stations and by other stations in the employment unit's market.
- During the annual preparation of the EEO Public File Report, the Employment Unit solicits feedback and comments from the personnel who have substantial responsibility in making hiring decisions regarding the effectiveness of referral sources and suggestions for improvements to the recruitment program.
- A job vacancy report is prepared for each available position that summarizes the recruitment process, including sources notified of the vacancy, applicants, interviewees, and the source from which such applicants and interviewees learned of the vacancy. The hiring manager must complete the form and submit it to the General Manager for review and signature. The unit will ensure that in addition to completing job vacancy reports, the hiring manager also will retain copies of each job vacancy notice that is sent out.

**3(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."**

The Stations review employment practices in the following primary ways to ensure that they provide equal opportunity and do not have a discriminatory effect:

- The Unit relies on the wage salary surveys in the county. These resources are continually reviewed for a number of reasons, one of which is to ensure that the

Stations' employment practices provide equal opportunity and do not have a discriminatory effect.

- The job vacancy forms described above are utilized for each job opening, including those that may be filled by promotions or transfers. As above, the hiring manager must complete the form and submit it to both the station business manager and general manager for review and signature. Included in that review is a consideration of whether the promotion or transfer was consistent with Stations' EEO Policy. Mr. Stewart and Ms. House then review the recruitment process and the final hiring decision to ensure that it complies with the corporate process and the EEO rules and regulations.
- Each department manager (News Director, Chief Engineer, etc.) is responsible for ongoing efforts to assure fair pay, benefits and employment practices. The Employment Unit reviews compensation and awards raises based on merit rather than seniority. The Employment Unit adheres to all state and federal laws and regulations to ensure that compliance with minimum wage and hours restrictions.

The Stations do not have an agreement with any labor union.

- 3(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."**

This request is not applicable.

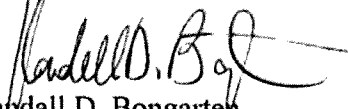
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Mr. Lewis Pulley  
March 31, 2014  
Page 7

If you have any questions about the materials provided, please do not hesitate to contact me.

I certify that the statements in the foregoing Response Letter are true, correct and complete to the best of my knowledge and belief, and are made in good faith.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Randall D. Bongarten", with a long horizontal flourish extending to the right.

Randall D. Bongarten  
Chairman & CEO, Bonten  
Bonten Media Group, Inc.

Attachments (Exhibits A-C)