



June 27, 2012

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

Dear Sirs and Madams,

The following information and documents are being submitted in response to your request of June 7, 2012:

3. Audit Data Requested

- a. EEO Annual Public File Reports are included. Website Addresses: wbti.com, wsaq.com, wphm.com, whls.net.

Dates of hire:

**Period – 5/21/10 – 5/20/11**

1/27/11 – Danielle Palin – Digital Specialist

2/10/11 – Jeff McNamara – Sales Account Executive

**Period – 5/21/11 – 5/20/12**

10/10/11 – Jennifer Baker – Sales Account Executive

10/24/11 – K. Scott Shigley – Director of Sales

10/24/11 – Fay Fraser – WSAQ Air Talent

1/16/12 – Al Lewandowski – Sales Account Executive

4/4/12 – Aricka McCauley - WBTI Air Talent

- b. Job announcements are distributed in various ways – posting through the Broadcast Compliance Service, which is the central data bank for all organizations and individuals requesting to be notified (and includes the MI Works Talent Bank, a statewide employment assistance agency), advertisements on our radio stations and in print media, postings to the Michigan Assoc. of Broadcasters job bank (and NAB). Responses may be used for multiple openings, if applicable. See included information for distribution lists.

Liggett Communications, LLC  
808 Huron Ave., Port Huron, MI 48060  
810-982-9000 Phone  
810-987-9380 Fax

# Radio**1<sup>ST</sup>** **FIRST**

**PORT HURON**


WBTI-FM • WHLS-AM • WHLX-AM • WPHM-AM • WSAQ-FM

- c. See Annual EEO Public File Reports – Appendix 2, for recruitment source information as well as the information included in this package relative to each job opening.
- d. See Annual EEO Public File Reports – Appendix 3, for supplemental recruitment activities. As of May 31, 2012, we have 26 full-time employees. Our understanding is that because our market population is well below 250,000, we are required to perform two initiatives within the two-year period although we consistently exceed that requirement with annual career fairs, intern programs and other outreach activities.
- e. There are no pending or resolved complaints.
- f. Each Program Director (Unit Manager) is informed annually of EEO expectations and requirements (April, prior to EEO report due date) and the hiring procedure is reviewed with newly hired PD's. The Business Manager (Kim Hyde) coordinates all job postings and recruitment activities with the Program Directors. All job postings include an EEO statement and are disseminated through various ways dependent upon position requirements.
- g. In April of each year, the management team reviews the previous year's activities, results and plans for the coming year.
- h. In April of each year, the management team reviews the previous year's activities and discusses future plans. The Unit has no union contract.
- i. NA

#### 4. Time Brokerage – NA

If you have any questions or need further information, please contact either myself ([lsmith@radiofirst.net](mailto:lsmith@radiofirst.net)) or Kim Hyde ([khyde@radiofirst.net](mailto:khyde@radiofirst.net)).

Best regards,



Lawrence C. Smith  
Vice President/General Manager  
Liggett Communications LLC

Liggett Communications, LLC  
808 Huron Ave., Port Huron, MI 48060  
810-982-9000 Phone  
810-987-9380 Fax