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July 7, 2023

EEO Staff
Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Attn: Ms. Elizabeth E. Goldin

**RE: NBC Telemundo License LLC
WCAU, Philadelphia, PA (Facility ID No. 63153)
WWSI, Mount Laurel, NJ (Facility ID No. 23142)
Response to FCC EEO Random Audit Letter**

Dear Ms. Goldin:

NBC Telemundo License LLC, licensee of stations WCAU, Philadelphia, Pennsylvania, and WWSI, Mount Laurel, New Jersey (the "Stations"), hereby respond to the above-referenced EEO audit letter (the "Audit Request"), which was issued on April 24, 2023. The Stations, which are owned and operated affiliates of the NBC and Telemundo television networks, are the only stations comprising the employment unit (the "Unit"). The Audit Request directs the licensees to provide information pertaining to the Unit's compliance with the Commission's EEO rules during the time period covered by the Unit's two most recent EEO annual public file reports. The Unit's responses to the specific directives in the Audit Request are set forth below.¹

i) Copies of the Unit's two most recent EEO Public File Reports, described in section 73.2080(c)(6).

¹ This response is timely submitted pursuant to an extension of time to and including July 7, 2023, granted by the Enforcement Bureau.

The Unit is required to file its EEO public file report annually on April 1. Enclosed are copies of the reports for 2022 and 2023.² Collectively, these reports address employment activities of the Unit from April 1, 2021 – March 31, 2023 (the “Reporting Period”). See Exhibit 1 (April 1, 2021 – March 31, 2022); Exhibit 2 (April 1, 2022 – March 31, 2023).

- ii) **For each station in the Unit that maintains a website, the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit’s most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).**

NBCUniversal policy requires its owned and operated stations to comply with all Commission requirements, including the posting of required material on station websites and in online public inspection files. The Unit’s EEO public file reports are available in each station’s online public inspection file maintained by the Commission. See <https://publicfiles.fcc.gov/tv-profile/wcau/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/2cf9d65f-68cc-e622-58a9-5887bc407051/> and <https://publicfiles.fcc.gov/tv-profile/wysi/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/118e08b9-2201-a7ae-2580-8a9359afa8d1/>. In lieu of posting EEO public file reports on station websites, each station website includes a hyperlink to the EEO public file reports uploaded to each station’s online public inspection file. See <https://www.nbcphiladelphia.com/wcau-employment-information/> and <https://www.telemundo62.com/wysi-informacion-de-empleos/>.

- iii) **For each of the Unit’s full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), the date of hire as required by section 73.2080(c)(5)(vi) as well as 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 the burden of responding to this audit, if a job notice was sent to multiple sources, the Unit may include in its response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other recruitment sources) that has notified the Unit that it wants to be notified of the Unit’s job openings, as described in section 73.2080(c)(1)(ii).**

² Both of the Unit’s EEO reports were amended in July 2023.

The Unit, which is part of the NBCUniversal Local (“NBCU Local”) division of NBCUniversal, is committed to equal opportunity in employment, including broad outreach when full-time job vacancies occur. Pursuant to internal corporate policies, as informed by the Commission’s rules, all NBCU Local employment units list full-time vacancies on the NBC-specific employment website <http://www.nbcunicareers.com> (the “Career Site”). The Career Site, which is available to any interested party without a password and which offers a convenient search feature, identifies full-time opportunities at NBCU Local and other NBCUniversal divisions. All NBCU Local station websites include a hyperlink to the Career Site.

The Unit had 47 vacancies for full-time positions during the Reporting Period. The dates of hire for each vacancy are documented in the enclosed copies of the EEO public file reports. See Exhibits 1 and 2. Notices for each vacancy were posted on the Career Site and copies of those announcements are attached as Exhibit 3.

Moreover, broad outreach about the availability of full-time job vacancies at the Unit is furthered by the republication of all positions posted on the Career Site by numerous third-party online general audience job boards, including commonly used sites like LinkedIn, AboutJobs, Indeed, and ZipRecruiter. Additionally, NBCUniversal partners with Direct Employers, which disseminates Career Site postings to additional online job boards targeted to reach diversity-focused, military veteran, disabled, and federal government job seekers. Lastly, when the Unit has difficult-to-fill openings for certain job categories, it will send notices to additional sources such as www.tvjobs.com, to further amplify the availability of the openings. Documentation concerning some of these notices are attached as Exhibit 4. A full list of recruitment sources developed by the Unit, is attached hereto as Exhibit 5.

- iv) As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all the Unit’s full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.**

See Exhibits 1 and 2, which documents the total number of interviewees and the referral source for each interviewee for all full-time vacancies filled during the Reporting Period.

- v) Dated documentation demonstrating performance of the Unit’s recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit’s total number of full-time employees and state whether the population of the market in which any of the Unit’s stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission’s rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal**

applications and the second, fourth, sixth and eighth anniversaries of that date). If the Unit performed more than the required number of initiative activities, it may provide documentation for only the required amount in its response, i.e., two or four points worth. If any documentation provided appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask for additional verification.

The Unit is committed to diversity and equal employment opportunity and recognizes that employing people with broad experiences enriches our organization and brings significant value to the workplace. To reach these goals, the Unit conducts broad and extensive recruitment outreach and works to attract qualified candidates from diverse backgrounds. During the Reporting Period the Unit, in a market with a population greater than 250,000, employed between 238 – 257 full-time employees. Accordingly, the Unit has undertaken at least four recruitment initiatives during the Reporting Period, as detailed below:

Job Fairs: Pursuant to Section 73.2080(c)(2)(i), the Unit participated in a number of job fairs during the Reporting Period to tap into top talent and inform prospects of various opportunities within the Unit and other NBCU Local stations. Personnel representing the Unit attended at least four job fairs during the Reporting Period, including, but not limited to: the National Association of Black Journalists Conference from August 3 – 5, 2022, and the Temple University Klein College of Media and Communication Career Fairs on October 20, 2021, February 18, 2022, and March 24, 2023. Documentation concerning the Unit's participation is attached as Exhibit 6.

EEO Training: Pursuant to Section 73.2080(c)(2)(xiv), the Unit's parent company, NBCUniversal, provides its employees with trainings on methods to ensure equal employment opportunities and to prevent employee harassment and discrimination. *Respect in the Workplace* is a training course provided on an annual basis which outlines the company's policies regarding the prevention of harassment and discrimination in the workplace. All station employees, including management, are required to complete this course. In 2021, NBCUniversal added an additional mandatory training, *Diversity, Equity & Inclusion*, which focuses on NBCUniversal's commitment to diversity and inclusion and its expectations of all employees. Documentation concerning offerings of these trainings is attached hereto as Exhibit 7.

Internship Program: Pursuant to Section 73.2080(c)(2)(v), the Unit hosts a paid internship program designed to assist members of the community to acquire skills needed for employment in the broadcast industry. The goal of the Unit's internship program is to connect with college students across the country and recruit talented and diverse candidates. The program provides opportunities for a positive learning experience where students can bridge the gap between classroom learning and the real world of the broadcast industry. The Unit's internship program is offered each year and hosts between 10 to 11 interns per semester. Documentation concerning the internship program is attached as Exhibit 8.

Scholarship Program: Pursuant to Section 73.2080(c)(2)(vii), the Unit participates in the Emma Bowen Foundation for Minority Interests in Media scholarship program. Founded in 1989, the program aims to diversify the media industry by providing hands-on employment experiences for minority youth who are interested in the broadcast industry. During the program, students are selected on a rolling basis and commit to participating either in their last two years or for a full four years of college. The students are also paid for their work. In 2021, the Unit donated \$3,500 in scholarship funds to the foundation which went to supporting other Emma Bowen participants. During the Reporting Period, the Unit sponsored one Emma Bowen student—Nia Pope. Documentation concerning this program is attached as Exhibit 9.

- vi) **Disclose any pending or resolved complaints involving the Unit filed during the Unit’s current license term(s) 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 the Unit must report all complaints, regardless of their status or disposition.**

During the preceding license term³, the Unit has been the subject of the following pending or resolved discrimination complaints:

- Nicole Combs-Tinsley v. NBC10 Philadelphia: Complaint of discrimination based on race and sex filed with U.S. Equal Employment Opportunity Commission, Philadelphia District Office on March 2, 2022 (Case No.17F-2022060773). Status: Case dismissed 8/15/2022.

- vii) **In accordance with section 73.2080(b), during the Unit’s current license term(s) (or since acquisition of the Unit (if during that period)), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.**

The Unit’s Vice President of Human Resources is responsible for ensuring proper communication and analysis of the Unit’s EEO efforts. The Vice President of Human Resources communicates the program and reviews progress with the department heads and general managers for the Unit. All job postings contain the Equal Opportunity Employer statement. All

³ The preceding license term covers the period since the grant of the last renewal application on December 31, 2018. See BRC DT-20150401AEC and BRC DT-20150202ACF.

employees are required to take harassment and discrimination prevention training upon employment.

The Vice President of Human Resources also oversees equal opportunity and Diversity and Inclusion initiatives for employees. To ensure effective implementation of Diversity and Inclusion initiatives, the Vice President of Human Resources has the authority, resources, and support of and access to the Unit's senior operational executives.

The responsibility to assure that other managers are aware of all aspects of the implementation of Diversity and Inclusion initiatives is also assigned to the Vice President of Human Resources. General managers recognize their responsibility and accountability for EEO performance results, compliance with the company's Fair Employment Practices Policy and the requirements of Diversity and Inclusion initiatives. Responsibility for the implementation of the policies and practices relating to the compensation, recruitment, screening, upgrading, layoff and rehiring of employees is assigned to the Vice President of Human Resources in coordination with the legal department.

The Vice President of Human Resources is responsible for integrating the efforts of officers, other managers, and staff to achieve the following activities and processes:

1. Conduct or participate in in-depth analyses of the total employment process to determine whether and where impediments to equal employment opportunity exist.
2. Implement and audit an internal quarterly reporting system, and an internal annual review process, to evaluate the ongoing effectiveness of Diversity and Inclusion initiatives:
 - a. Monitor records of applicants, placements, transfers, promotions, and separations at all levels to ensure conformance with non-discrimination policy.
 - b. Facilitate a review of results by management.
 - c. Advise management of program effectiveness and submit recommendations for improvement, when warranted.
3. Ensure that operating units make every good faith effort to understand and to achieve Diversity and Inclusion goals and objectives.
4. Advise and encourage employees to participate in company-sponsored educational, training, recreational and social activities, or related programs.
5. Assure that counseling is made available to all employees. As appropriate, encourage employees to take part in company training activities and external educational programs. Encourage the use of the company's Tuition Reimbursement Program.

6. Work with the Human Resource representatives and hiring managers to assure that minorities and women are given equal opportunities for promotional consideration and career advancement.

The Vice President of Human Resources also has the following specific responsibilities:

1. Help management solve EEO problems as they may occur.
2. Serve as liaison between the business unit and enforcement agencies.
3. Keep management continuously informed of latest developments in the equal employment area.
4. Ensure by means of continuing efforts that:
 - a. Satisfactory progress is being made toward Diversity, Equity and Inclusion goals and objectives.
 - b. The technical requirements of federal EEO notices are complied with through the proper display of federal posters.
 - c. All other technical phases of compliance are adhered to.
5. Ensure management involvement with local minority organizations and community action groups as appropriate.

In addition, the Vice President of Human Resources meets formally with Unit management to review human resource matters. These matters include problem areas like compensation, and hiring, promotion and separation practices.

viii) In accordance with section 73.2080(c)(3), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of 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.

As noted above, the Unit reviews its EEO practices quarterly. The Unit reviews the source data to ensure utilization of a variety of mechanisms to reach a significant number of diverse potential candidates. All candidates are given consideration regardless of the source. In addition, the Unit includes notifications of vacancies to organizations, including, but not limited to, those who may submit completed Community Organization Request Forms.

ix) As required by section 73.2080(c)(4), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of 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.

In-depth analyses of the total employment process are performed periodically to determine whether and where impediments to equal employment opportunity exist. These analyses include an evaluation of the following:

- a) The work force by organizational unit and job group is analyzed to determine whether there are any problems of minority or female utilization or of minority or female distribution. Organizational units where minorities and/or females are underrepresented or concentrated, if any, are reported, and goals are established for each job group in which the rates of minority and/or female employment are less than would reasonably be expected. Appropriate action-oriented programs are identified and established to work toward goal attainment.
- b) Personnel activity, including applicant flow, hires, terminations, and promotions, is analyzed to determine whether there are gender, race, or ethnicity-based disparities and whether selection practices for hiring, promotions and terminations had a disparate impact on women or minorities.
- c) Selection, recruitment, referral, and other personnel procedures are reviewed to determine whether they result in disparities in the employment or advancement of minorities or women. The selection process is analyzed to ensure that there are no barriers to equal employment. The Human Resources staff is constantly on watch for possible non-supportive attitudes on the part of hiring managers. Examination of applicant flow data is conducted for each open position. Human Resources representatives monitor hiring, promotion, and other placement decisions to assure that the selections have been based on job-related criteria and also that no barriers to placement of minorities and females exist. Transfer and promotion practices are continuously monitored to identify any barriers to movement for minority and female employees.

g) Religious Broadcasting

These questions are not applicable to the Unit.

h) Items Not Requested

This question is not applicable.

i) Time Brokerage

These questions are not applicable to the Unit.

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Please contact the undersigned if you have any questions regarding the foregoing or need additional information.

Respectfully submitted,

NBC Telemundo License LLC

By: /s/

Angela Y. Ball
Assistant Secretary

DECLARATION OF ANGELA Y. BALL

I hereby declare, under penalty of perjury, that, to the best of my knowledge, information and belief, the foregoing is accurate and complete. Executed July 7, 2023.

/s/

Angela Y. Ball
Assistant Secretary
NBC Telemundo License LLC