# **Federal Communications Commission**

FCC MB - CDBS Electronic Filing Account number: 424246

Description: EEO MID TERM REPORT FOR WRSA Application Reference Number: 20180228AAN Successfully filed at Feb 28 2018 4:03PM

Based on the information supplied, no fee is required.

Menu Logout

Federal Commun Washington, D.C.		mission	Appro 3060-0922 (Sep	oved by OMB tember 2002)		7	
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City HUNTSVILLE				State AL	e or Country (if foreig	n address)	Zip Code 35802 -
Telephone Numb 2568859797	er (include a	rea code)	400/4600	E-M	ail Address (if availat	ole)	
FCC Registration 0006595557	n Number		Facility ID Numbe 47907	r			Call Sign WRSA-FM
TYPE OF BRO	ADCAST	1	Broadcast Station		Noncommercial Bro	adcast Statio	n
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WRSA-FM	47907		FMCTV		LY POND, AL	,	s • No
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SEND NOTICES AND COMMUNICATIONS TO THE FOLLOWING NAMED PERSON AT THE ADDRESS INDICATED BELOW:

Name	Commission of the second commission of the sec		Street Address
LARRY PERRY			11464 SAGA LANE SUITE 400
City	State	Zip Code	Telephone Number
KNOXVILLE	TN	37931-2819	8659278474

#### **FILING INSTRUCTIONS**

Broadcast station licensees are required to afford equal employment opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, national origin, religion, and sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, a television station employment unit that employs five or more full-time station employees must file a full and complete Broadcast Mid-Term Report. If a television station employment unit employs fewer than five full-time employees, only the first two pages of this report need be filed [through Section I and the Certification].

A copy of this Mid-Term Report must be kept in the station's public file. Failure to meet these requirements may result in sanctions or remedies. These requirements are contained in 47 C.F.R. Section 73.2080 and are authorized by the Communications Act of 1934, as amended.

Consider as "full-time" employees all those permanently working 30 or more hours a week.

#### Section I

Does your station employment unit employ fewer than five full-time employees, if television, or fewer than eleven full-time employees, if radio?

C Yes © No

If yes, you do not have to file this form with the FCC. However, you have the option to complete the certification below, return the form to the FCC, and place a copy in your station(s) public file. You do not have to complete the rest of this form. If your station employment unit employs five or more full-time employees, if television, or eleven or more full-time employees, if radio, you must complete all of this form and follow all instructions.

### CERTIFICATION

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed	Name of Respondent
	NATHAN CHOLEVIK
Title	Telephone No. ( include area code)
GENERAL MANAGER	2568859797
Date	
2/28/2018	

#### GENERAL POLICY

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

# Section II

#### RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

#### Name: NATHAN CHOLEVIK

Title: GENERAL MANAGER

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

#### Section III

#### MID-TERM REPORT

Television station employment units with five or more full-time employees and radio station employment units with more than ten full-time employees filing in the middle of the license term must attach a copy of each of the two most recent EEO public file reports (the reports from this year and last year). Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.

[Exhibit 1]

# FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

We have estimated that each response to this collection of information will average 30 minutes. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0922), Washington, D.C. 20554. We will also accept your comments via the Internet if you send them to PRA@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0922.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

#### **Exhibits**

Exhibit 1

Description: EXHIBIT 1

SEE ATTACHED EEO REPORTS

#### Attachment 1

Description

WRSA-FM EEO Reports

Federal Communications Co	ommission			Approved by OMB	FOR FCC USE ONLY	Manager Committee Committe	erenen i i i i i i i i i i i i i i i i i i
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(То	be filed with br	oadcast licen	se renewal application)	:	D370 - 2010112	ZAAE	
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Legal Name of the Lic NCA, INC.	ensee						
Mailing Address 8402 MEMORIAL PA	PRWAV SOLL	LIT					
City	IRRWAL BOO.		and the second s		State or Country	(if foreign address)	Zip Code
HUNTSVILLE					AL		35802 -
Telephone Number (in 2568859797	clude area code)	•			E-Mail Address	(if available)	
2300039171	<del>12. a makababa da a</del>		Facility ID Number 47907				Call Sign WRSA-FM
TYPE OF BROADC	AST	Commercia	Broadcast Station		Noncommercial Bro	oadcast Station	
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(if applicable)		C TV			C Educational TV		
		C Low Por	ver TV				
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Application Purpose						The second secon	
New Program Rep	oort						
C Amendment to Pr	ogram Report						
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[Stations Locations]							
			Stati	on List			
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Call Sign	Facility ID Nun	iber	Type (check applicable box)	((	Location City/State)	Time Brokerage (check applica	
WRSA-FM	47907		C AM & FM C TV	HOLI	Y POND, AL	← Yes ←	No
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City KNOXVILLE	- 1	State FN	Zip Code 37931-2819	Telephone Num 8659278474	ber		
	The second secon		FILING INS	TRUCTIONS	PORTION PROVIDE AND AN ANALYSIS AND ANALYSIS ANALYSIS AND ANALYSIS ANA	*	
Broadcast station licens and related benefits on t	ees are required the basis of race	to afford equ	ual employment opportun	ity to all qualifie ex. See 47 C.F.R	d persons and to refi Section 73,2080. P	ain from discriminating	g in employment ments, a license

renewal applicant whose station employment unit employs five or more full-time station employees must file a report of its activities to ensure equal employment opportunity. If a station employment unit employs fewer than five full-time employees, no equal employment opportunity program

#### **GENERAL POLICY**

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

#### SECTION II.

#### RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

NAME	TITLE
Nathan Cholevik	General Manager

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

#### SECTION III.

#### MID-TERM REPORT

Television station employment units with five or more full-time employees and radio station employment units with more than ten full-time employees filing in the middle of the license term must attach a copy of each of the two most recent EEO public file reports (the reports from this year and last year). Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.

#### EXHIBIT I

# FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

We have estimated that each response to this collection of information will average 30 minutes. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission. AMD-PERM, Paperwork Reduction Project (3060-0922), Washington, D.C. 20554. We will also accept your comments via the Internet if you send them to PRA@fcc gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0922.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.I., 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507

information need be filed. If a station employment unit is filing a combined report, a copy of the report must be filed with cach station's renewal application.

A copy of this report must be kept in the station's public file. These actions are required to obtain license renewal. Failure to meet these requirements may result in sanctions or license renewal being delayed or denied. These requirements are contained in 47 C.F.R. Section 73.2080 and are authorized by the Communications Act of 1934, as amended.

DISCRIMINATION COMPLAINTS. Have any pending or resolved complaints been filed during this license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the station(s)?

If so, provide a brief description of the complaint(s), including the persons involved, the date of the filing, the court or agency, the file number (if any), and the disposition or current status of the matter.

[Exhibit 1]

Does your station employment unit employ fewer than five full-time employees?

C Yes & No

Consider as "full-time" employees all those permanently working 30 or more hours a week.

If your station employment unit employs fewer than five full-time employees, complete the certification below, return the form to the FCC, and place a copy in your station(s) public file. You do not have to complete the rest of this form. If your station employment unit employs five or more full-time employees, you must complete all of this form and follow all instructions.

#### CERTIFICATION.

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed	Name of Respondent PENELOPE NIELSEN
Title PRESIDENT	Telephone No. (include area code) 2568859797
Date 11/22/2016	

The purpose of this document is to provide broadcast licensees, the FCC, and the public with information about whether the station is meeting equal employment opportunity requirements.

# **GENERAL POLICY**

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

# RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

Name: PENELOPE NIELSEN	Title: PRESIDENT
	HIME: FRESIDENT
Sample of the sa	

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

I. EEO PUBLIC FILE REPORT	The state of the s
Attach as an exhibit one copy of each of the EEO public file reports from the previous two years. Stations are required	to [Exhibit 2]
place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.	Tipologo and the state of the s
II. NARRATIVE STATEMENT	[Exhibit 3]
Provide a statement in an exhibit which demonstrates how the station achieved broad and inclusive outreach during the	e two-

# FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Instite or a court or adjudicative body when (a) the FCC; or (a) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treastry Funnical Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may discuss the information to these agencies through the matching of computer records when authorized. We have estimated that each response to this collection of information will average 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintains required that each response to this collection of information will average 5 hours on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission. AMD-PERM. Paperwork Reduction Project (3000)-0113, Washington, D. C. 30554. We will also accept your comments of the internet if you send them to jboley@fcc gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, F.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

#### Exhibits

Exhibit 2

Description: EXHIBIT 2

COPIES OF RECENT EEO REPORTS ARE ATTACHED.

#### Attachment 2

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Exhibit 3

Description: EXHIBIT 3

MADE ONE FULL TIME POSITION HIRE. WE MOVED ALLEN MOORE TO FULL TIME TRAFFIC REPORTER DOING MORNING AND AFTERNOON TRAFFIC. WE HIRED A NEW AFTERNOON DRIVE HOST/PRODUCTION DIRECTOR (ONE PERSON BOTH TITLES).

WE RECRUITED BY POSTING POSITION ON ALLACCESS.COM, ALABAMA BROADCASTER ASSOCIATION, AND OUT TO LOCAL COLLEGES/UNIVERSITIES. WE ALSO ATTENDED A JOB FAIR ON REDSTONE ARSENAL IN HUNTSVILLE, AL.

1 FULL TIME HIRE AFTERNOON DRIVE HOST/PRODUCTION DIRECTOR HIRED JULY 2016 THIS INDIVIDUAL HEARD ABOUT THE POSITION AND CAME INTO THE STATION.

Attachment 3

Federal Communications Commission  Approved by OMB Washington, D.C. 20554  Approved by OMB 3060-0113 (March 2003)			FOR PCC USE ONLY			
		PCC 396				
C	PPORTUNITY	QUAL EMPLOYME PROGRAM REPO cast license renewal applic	RT	FOR COMMISSION FOR END BOOK STATE NO BOOK STATE NO BOOK STATE STAT		
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City HUNTSVILLI				te or Country ( ress)	if foreign	Zip Code 35802 -
Telephone Nu 2568859797	mber (include area o	code)	E-N	Mail Address (i	if available)	
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Name	The Management of the State of		Street Address	mamama
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City KNOXVILLE	State T'N	Zip Code 37931-2819	Telephone Number 8659278474	
		FILING IN	NSTRUCTIONS	4 to 4 days - 100 d com - 100 d
discriminating in employn Section 73,2080. Pursuant more full-time station employnent unit employs filed. If a station employmapplication.	nent and related to these required doyces must file fewer than five ent unit is filing	I benefits on the bas ements, a license re e a report of its acti full-time employee g a combined report	loyment opportunity to all qualified persons and to refrain is of race, color, national origin, religion, and sex. See 47 enewal applicant whose station employment unit employs fivities to ensure equal employment opportunity. If a station is, no equal employment opportunity program information of the copy of the report must be filed with each station's renewal.	C.F.R. five or i need be ewal
meet these requirements m	ay result in san	ctions or license rea	These actions are required to obtain license renewal. Fail newal being delayed or denied. These requirements are conunications Act of 1934, as amended.	lure to ontained
DISCRIMINATION COM license term before any bo law, alleging unlawful disc	dy having com	petent jurisdiction u	esolved complaints been filed during this C Yes No moder federal, state, territorial or local etices of the station(s)?	
If so, provide a brief descr the file number (if any), an	ription of the co	mplaint(s), includir on or current status (	ng the persons involved, the date of the filing, the court or of the matter.	agency
Exhibit 1]				
Does your station employn	ent unit emplo	y fewer than five ful	Il-time employees? C Yes 6 No	
Consider as "full-time" em	ployees all tho	se permanently wor	king 30 or more hours a week.	
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ERTIFICATION.				
his report must be certifie	d, as follows:			
By licensee, if an individe. By a partner, if a partner. By an officer, if a corpor By an attorney of the lice	ship (general pation or an asse	ociation; or	partnership); y or absence from the United States of the licensee.	
WILLFUL PALSE STATEMEN ND/OR REVOCATION OF ANY	TS ON THIS FORM STATION LICEN.	SE OR CONSTRUCTION	IY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1 N PERMIT (U.S. CODE, FITLE 47, SECTION 312(±)(1)), AND/OR PORFI .E 47, SECTION 563)	1001). EITURE
certify to the best of my	knowledge, int	ormation and belie	ef, all statements contained in this report are true and	
gned		erre e de la companya	Name of Respondent PENELOPE NIELSEN	
tle		and the experience of the second of the seco	Telephone No (include area code)	

2568559797

PRESIDENT

Date 04/01/2013 The purpose of this document is to provide broadcast licensees, the FCC, and the public with information about whether the station is meeting equal employment opportunity requirements.

#### GENERAL POLICY

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

#### RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

# Name: PENELOPE NIELSEN Title: PRESIDENT

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

LEEO PUBLIC FUE REPORT  Attach as an exhibit one copy of each of the EEO public file reports from the previous two years.  Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.	[Exhibit 2]
II. NARRATIVE STATEMENT Provide a statement in an exhibit which demonstrates how the station achieved broad and inclusive outreach during the two-year period prior to filing this application. Stations that have experienced difficulties in their outreach efforts should explain.	[Exhibit 3]

# FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. We have estimated that each response to this collection of information will average 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Papernvork Reduction Project (3060-0113), Washington, D. C. 20554. We will also accept your comments with the Internet if you send them to jboley@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, S.U.S.C. 552a(c)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

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#### Exhibit 2

Description: PREVIOUS EEO EPORT

A COPY OF THE LAST EEO REPORT IS FILED HEREWITH, NOTE THAT SINCE THE LAST REPORT WE HAVE CHANGED MANY FROM INDEPENDENT CONTRACTORS TO STATION EMPLOYEES, THUS, THIS REPORT.

Attachment 2

# Description 2012 EEO REPORT

Exhibit 3

Description: EEO REPORT

WRSA-FM IS LICENSED TO OPERATE IN HOLLY POND, ALABAMA. AS OF THIS FILING WE HAVE A TOTAL OF 16 EMPLOYEES, 12 FULL TIME AND 4 PART TIME.

OUR STAFF IS VERY STABLE AND WE HAVE HAD ONLY 2 NEW HIRES IN THE LAST 3 YEARS. AS A PART OF THE SEARCH FOR THESE 2 NEW EMPLOYEES, WE ADVERTISED IN SEVERAL PLACES INCLUDING 'AD IN INSIDE RADIO', AND THE ALABAMA BROADCASTERS ASSOCIATION WEB SITE: THESE NEW HIRES WERE THE RESULT OF 11 INTERVIEWS. (ONE POSITION WAS THAT OF THE GENERAL SALES MANAGER AND THE OTHER A SALESPERSON.) BOTH HAVE SINCE LEFT AND THE GENERAL SALES MANAGER'S POSITION WAS FILLED INTERNALLY WITHOUT GOING OUT SIDE THE CURRENT STAFF AND THE SALESPERSON HAS NOT BEEN REPLACED DUE TO THE SOFT ECONOMY.

WHEN WE ADVERTISE, WE CLEARLY STATE THAT WE ARE AN EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER AND DO NOT DISCRIMINATE.

WRSA-FM HAS NOT RECENTLY BEEN INVOLVED IN LOCAL JOB FAIRS BECAUSE WE HAVE HAD NO OPENINGS. ONCE TEH ECONOMY REBOUNDS AND WE HIRE NEW EMPLOYEES WE WILL AGAIN PARTICIPATE IN LOCAL AND REGIONAL JOB FAIRS.

WE HAVE SEVERAL COLLEGES IN OUR AREA AND OFTEN USE SOME OF THEIR MEDIA STUDENTS AS INTERNS WORKING AT THE STATION. WE WILL CONTINUE TO PROMOTE THIS INTERNSHIP ACTIVITY ON A NON-DISCRIMINATORY BASIS AS TO RACE, NATIONAL ORIGIN, CREED, RELIGIOUS BELIEF, OR GENDER. WE ROUTINELY, ON AN ANNUAL BASIS, REVIEW OUR EMPLOYEES AS TO THEIR WORK AND ORGANIZATIONAL PRACTICES.

Attachment 3			
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REC 396  BROADCAST EQUAL EMPLOYMENT OPPORTUNITY PROGRAM REPORT (To be filed with broadcast license renewal application) Read INSTRUCTIONS Before Filling Out Form  Section 1  Legal Name of the Licensee NCA. INC. Mailing Address 8402 MEMORIAL PARKWAY SOUTH COWAS RADIO STATION  City HUNTSVILLE  Telephone Number (include area code) 2568859797  TYPE OF BROADCAST Commercial Broadcast Station (F. Radio C TY C Low Power TV C International  Application Purpose  C. New Program Report  Application and location of all stations included on this statement. List commonly owned stations that share one or manage to make that share an employee.  Station List  Station List  Station Stations  Station or a group of commenty owned stations included this form. For purpose of this form, a fair or upplayment and its brokering agreement. Includes stations, include his form. For purpose of this form, a fair or upplayment and its brokering agreement. The extent that Histores pursuant to a time brokering agreement on this report, responses or information provided in Sections I brough If show a fair in the consideration the licensee's EEO compliance efforts at brokering agreement. Includes on the table by the facility of the extent that Histories sections in through If show a fair in the consideration the licensee's EEO compliance efforts at brokered stations, as well as any other stations, includes the form. For purposes of this form, a fair one outplayment unit is a station or a group of commenty owned stations in an entitlement List commonly owned stations that share one of the fair that share at least one employee.  Station List  Station List		FFA Agreement A.C. Chammer Commence and the	The second section of the second section of the second sec		***************************************	Taman Same of Practication of		to a common motion of the contract of the cont	
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Exhibit 1]							
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Correct.	
Signed	Name of Respondent
	PENELOPE NIELSEN
	Telephone No. ( include area code)
	2568859797
2 The second sec	
Date 3/8/2012	
Section 1. Control of the Control of	As a Control of Subsection of Association of Associ

The purpose of this document is to provide broadcast licensees, the FCC, and the public with information about whether the station is meeting equal employment opportunity requirements.

#### **GENERAL POLICY**

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

# RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

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[6.7] (27.7) A. (27.1) 18.7 (27.7)		
Name: TOM PANUCCI	TEN OF MENTER LT LAND COM	
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	Title: CEO/GENERAL MANAGER	
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It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

I. EEO PUBLIC FILE REPORT	l I
Attach as an exhibit one copy of each of the EEO public file reports from the previous two years. Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.	(Exhibit 2)
II. NARRATIVE STATEMENT  Provide a statement in an exhibit which demonstrates how the station achieved broad and inclusive outreach during the two-year period prior to filing this application. Stations that have experienced difficulties in their outreach efforts should explain.	[Exhibit 3]

# FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The ECC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the headfit requested is consistent with the public intenest. If we believe there may be a violation or potential violation of a ECC stands, regulation, rule or arter; your trackes may be referred to the bedend, state or local agency responsible for investigating, proceeding, coloning or implementing the statute, rule, regulation or index in certain cases, the information in vont request may be disclosed to the Department of history of a door or adjudicative body when tart the ECC, or (b) any concluyer of the ECC, or (c) the United States Government, is a party to a preciseding before the host or information in the interesting to stalling, all information provided in this form will be available for public inspection. If you once a past the debt to the federal government, any information company the max also be disclosed to the Department of Treasury Finant at Management Servey, either federal agencies and/or your conductor to offset your values authorized with the proposition of the regulation of the party of the regulation of th

THE FOREIGNING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1924, P.L. 93-579 DECEMBER 21, 1974, S.U.S.C. 352a(6)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507

#### Exhibits

Exhibit 2

Description: EEO REPORT

UNTIL RECENTLY THE WORKFORCE AT WRSA-FM HAVE BEEN INDEPENDENT CONTRACTORS AND THE FULL TIME EMPLOYEES NUMBERED LESS THAN 5. HOWEVER, THIS HAS NOW BEEN CHANGED AND THE INDEPENDENT CONTRACTORS FOR THE MOST PART HAVE BEEN MADE FULL TIME EMPLOYEES NUMBERING MORE THAN 5.

WE HAVE A VERY LOYAL STAFF AT WRSA-FM AND HAVE HIRED VERY FEW EMPLOYEES IN THE LAST 2 YEARS. WE HAVE HAD NO COMPLAINTS OR LETTERS CONCERNING ANY EEO ISSUES SINCE WE FIRST BEGAN BROADCASTING MANY YEARS AGO.

#### Attachment 2

Exhibit 3

Description: NARRATIVE STATEMENT

WRSA HAS MORE THAN 5 FULL TIME EMPLOYEES NOW DUE TO ACCOUNTING CHANGES. IN THE PAST MOST OF THE PEOPLE WHO WORKED FOR THE STATION WERE INDEPENDENT CONTRACTORS, BUT THESE INDEPENDENT CONTRACTORS HAVE NOW BEEN CHANGED TO FULL TIME EMPLOYEES, THUS THIS CHANGE IN THE EEO PROGRAM.

WRSA (#47907) IS AN EQUAL OPPORTUNITY EMPLOYER. THE STAFF IS LONG TERMED AND WE HAVE HAD VERY FEW CHANGES OF EMPLOYEES IN THE PAST SEVERAL YEARS. WHENEVER WE HIRE ANY NEW EMPLOYEE, WE ADVERTISE THE OPEN POSITION ON THE STATION AND ON OUR WEB SITE INCLUDING THE LANGUAGE OF THE EEO EMPLOYER. ALL CANDIDATES FOR JOBS WITH THE STATION ARE CONSIDERED BASED ON THEIR EXPERIENCE AND QUALIFICATIONS AS ANNOUNCED AND BROADCAST. WE DO NOT DISCRIMINATE FOR ANY REASON INCLUDING AGE, GENDER, RELIGIOUS PREFERENCES, ETC. WE DO MEET OCCASIONALLY WITH LOCAL EDUCATIONAL INSTITUTIONS TO TALK ABOUT BROADCASTING AND EMPLOYMENT OPPORTUNITIES ALTHOUGH WE HAVE NO FORMAL PROGRAM ASSOCIATED WITH THE LOCAL COLLEGES AND UNIVERSITIES. OCCASIONALLY WE WILL HAVE STUDENTS WORK WITH US AT THE STATION TO LEARN THE OPPORTUNITIES IN BROADCASTING.

Attachment 3