

STEPHENS MEDIA GROUP WATERTOWN, LLC

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Tulsa, OK 74137

(918) 492-2660

*Via Upload to WFRY-FM Online Public Inspection File,
EEO Audits, Investigations, and Complaints Subfolder*

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WFRY-FM, Watertown, NY
Fac. Id. 71094
Licensee: Stephens Media Group Watertown, LLC
FRN: 0017400458

Response to March 21, 2022 EEO Audit Public Notice

Dear EEO Staff:

In order to satisfy the EEO audit public notice released March 21, 2022, Stephens Media Group Watertown, LLC ("WFRY-FM") hereby uploads this response to the Online Public Inspection File ("OPIF") for station WFRY-FM, Watertown, NY, Fac. Id. 71094. This response will follow the outline in the audit request which begins with the number 2.

2. Audit Data Requested.

2(b)(i). WFRY-FM is within the station employment unit ("SEU") that includes co-owned WCIZ-FM, Watertown, NY (Fac. Id. 153), WTNY-AM, Watertown, NY (Fac. Id. 154), and WNER-AM, Watertown, NY, (Fac. Id. 71093). The SEU employs five or more full-time employees. Copies of the Unit's two most recent EEO Public File Reports, described in 47 CFR § 73.2080(c)(6) are attached hereto at Exhibit A.

2(b)(ii). The licensee maintains websites for the SEU stations as follows:

Call Sign	Website address	Latest EEO online
WFRY-FM	https://froggy97.com/	https://publicfiles.fcc.gov/fm-profile/WFRY-FM/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/0b1c5c8a-67f2-8dc4-2487-d215b1871426
WCIZ-FM	https://z93.fm/	https://publicfiles.fcc.gov/fm-profile/WCIZ-FM/equal-

		employment-opportunity-records/additional-documents/eo-public-file-reports/d6d64cdb-4e2f-840b-5286-aa84713dd73f
WTNY-AM	No Station Website – Parent entity: https://smgok.com/	https://publicfiles.fcc.gov/am-profile/WTNY/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/44c6f14e-b55a-1f6c-499f-e22a7ddfc9b3
WNER-AM	No Station Website – Parent entity: https://smgok.com/	https://publicfiles.fcc.gov/am-profile/WNER/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/1b797b5a-3d1a-7c3c-7692-ecdc2a8c7c61

2(b)(iii)-(iv). The SEU filled three full-time positions during the during the period covered by the EEO Public File Reports attached pursuant to 2(b)(ii) above. The number and source of the interviewees for each filled vacancy is specified below:

Position	Date Filled	No. of Interviewees	Referral Source for Interviewees
Account Executive	11/01/2020	2 1	-NY Employment Office -Indeed
Account Executive	11/30/2020	2	-Walk-in/Station Website/Radio
Account Executive (Sales)	09/01/2021	3 3	-Radio Ads/Station Website -Indeed

The dated copies of all advertisements, bulletins, letters, faxes, e-mails or other communications announcing the vacancy, as described in section 73.2080(c)(5)(iii), are attached at Exhibit B.

2(b)(v). Dated documentation 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 are attached at Exhibit C, along with other requested information.

2(b)(vi). Licensee had no complaints, pending or resolved, involving the Unit filed during the Unit's current license term(s) before anybody 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.

2(b)(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)), the following describes 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: General Manager, Edward Kruetter aka Jay Donovan manages the day-to-day operations of the

sales and on-air team. He conducts interviews with potential candidates for sales and on-air positions. He is responsible for local initiatives and job postings at the local level. Human Resources Manager, Steve Dennis and Executive Assistant to Owner Gena Mitchell, work with corporate office to ensure EEO policies and practices are met as well as any state or local requirements for hiring. They both assist with job postings and hiring initiatives. Secondary Interviews for Sales Candidates are conducted by Kerry Knight, National Digital Sales Manager and David Stephens, CEO/Owner. Secondary Interviews for On-Air/Production Candidates are completed by Bob Thornton, SVP of Programming and Technology.

2(b)(viii). In accordance with section 73.2080(c)(3), during the Unit's current license term(s), the following is 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: General Manager, Edward Kruetter aka Jay Donovan manages the day-to-day operations of the sales and on-air team. He conducts interviews with potential candidates for sales and on-air positions. He is responsible for local initiatives and job postings at the local level. Human Resources Manager, Steve Dennis and Executive Assistant to Owner, Gena Mitchell works with corporate office to ensure EEO policies and practices are met as well as any state or local requirements for hiring. They both assist with job postings and hiring initiatives.

2(b)(ix). As required by section 73.2080(c)(4), during the Unit's current license term(s), the following is 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: Human Resources Manager, Steve Dennis periodically reviews pay, benefits, and hiring practices to ensure they provide equal opportunity and are not having a discriminatory effect. The Unit does not have a union agreement.

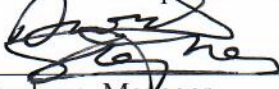
3. Time Brokerage—Licensee of brokered station(s) receives audit letter. Not applicable.

4. Time Brokerage—Broker receives audit letter. Not applicable.

The SEU representative contact is Gena Mitchell. She may be reached at the following email address: gena.mitchell@smgnational.com. On any correspondence, please also copy the SEU's FCC Counsel, Joseph Chautin, at jchautin@hardycarey.com.

I declare under penalty of perjury that the foregoing information is accurate and complete to the best of my knowledge and belief.

Stephens Media Group Watertown, LLC:



David Stephens, Manager

cc: Joseph Chautin, III, Esq.

Exhibit A

Exhibit B

Exhibit C

Dated documentation 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 is attached. SEU personnel involved in each recruitment initiative are as shown below:

Menu Option Event	Personnel Involved
14 – Preventing Sexual Harassment for Managers & Employees	Steve Dennis – HR Manager Jay Donovan (Edward Kruetter) – General Manager
9- Sales Mentorship Program	Jay Donovan (Edward Kruetter) – General Manager David Stephens – Owner Kerry Knight – National Digital Sales Manager

Total SEU Full-Time Employees: **9**

Under 73.2080(c)(2), the SEU is only required to perform two menu options every two years because it has fewer than 10 full time employees and is also located in a “smaller market” with a population of fewer than 250,000.¹ The SEU completed 3.25 menu options during the 2020-22 period under review.

¹ In 2021, the Watertown-Ft. Drum MSA had a population of approximate 116,295. Source: [FRED](#) Economic Data).