

SCIARRINO & SHUBERT, PLLC
BROADCAST & MEDIA LEGAL SERVICES

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Investigations and Hearings Division
Enforcement Bureau
Federal Communications Commission 445 12th Street, SW
Washington, DC 20554

Attn: Elizabeth E. Goldin, Assistant Chief

Re: EEO Audit Response
KRVX-FM, Wimbledon, ND
FCC ID No. 164198

Dear Ms. Goldin:

I3G Media, Inc. ("Licensee"), licensee of radio station KRVX-FM, Wimbledon, ND, FCC ID No. 164198 (the "Station") hereby responds to the Commission's March 22, 2024 EEO Audit Letter (the "Audit Letter"). The Licensee provides the following information in response to the Audit Letter:

1. The Station is part of a Station Employment Unit ("SEU") which, during the period covered by the Audit Letter, included the following additional stations:

KDDR, Oakes, ND, FIN: 60499
KOVC, Valley City, ND, FIN: 60497
KQDJ-FM, Valley City, ND, FIN: 60498
KQDJ, Jamestown, ND, FIN: 68626
KXGT, Carrington, ND, FIN: 68625
KRVX, Wimbledon, ND, FIN: 164198
KYNU, Jamestown, ND, FIN: 68627,
KDAK, Carrington, ND, FIN: 68632
(together the "SEU Stations")

2. The Station's most recent license renewal was granted on March 22, 2021. The Station employs the following 15 full-time employees:

Title	Hours/Week
Sales Executive #1	40
Sales Executive #2	40
Sales Executive #3	40
Sales Executive #4	40
Administration & Sales Executive #1	40
Programming #1	40
Programming #2	40
Programming #3	40
Programming #4	40
Programming #5	40
Programming #6	40
Programming #7	40
General Manager & Sales Executive #1	40
General Manager & Sales Executive #2	40
Traffic Manager & Sales Executive #1	40

3. In response to question 2(b)(i) of the Audit Letter, the Licensee’s Annual EEO Public File Report for the period from December 1, 2022 through November 30, 2023 is attached hereto as Exhibit 1. The Licensee’s Annual EEO Public File Report for the period from December 1, 2021 through November 30, 2022 is attached hereto as Exhibit 2.
4. In response to question 2(b)(ii) of the Audit Letter, the SEU Stations share a website that has an “EEO” link on its homepage to most recent (2023) Annual EEO Public File Report for each station. The reports are found at the following address:
<https://www.newsdakota.com/online-public-file/>
5. In response to Question 2(b)(iii), the dates of hire for each of the five positions filled during the period covered by the 2022-2023 EEO Public File Report, along with dated copies of one sample of the vacancy advertisements bulletins, letters, faxes, emails or other communications announcing the positions, are reported in Exhibit 3 hereto. Exhibit 3 also includes a statement regarding compliance with section 73.2080(c)(5)(iii). For a complete list of resources, please see Exhibit 1. In response to Question 2(b)(iv), the total number of interviewees for each vacancy and the referral source for each interviewee is reflected in the 2022-2023 EEO Report attached at Exhibit 1.
6. In response to Question 2(b)(iii), the dates of hire for each of the five positions filled during the period covered by the 2021-2022 EEO Public File Report, along with dated copies of one sample of the vacancy advertisements bulletins, letters, faxes, emails or other communications announcing the positions, are reported in Exhibit 4 hereto. Exhibit 4 also includes a statement regarding compliance with section 73.2080(c)(5)(iii). For a complete list of resources, please see Exhibit 2. In response to Question 2(b)(iv), the total number of interviewees for each vacancy and the referral source for each interviewee is reflected in the 2021-2022 EEO Report attached at Exhibit 2.
7. In response to Question 2(b)(v), dated documentation of the SEU’s recruitment initiatives during the period covered by the 2022-2023 EEO Public File Report is attached hereto as Exhibit 5. Dated documentation of the SEU’s recruitment initiatives during the period covered by the 2021-2022 EEO Public File Report is attached hereto as Exhibit 6. The Annual EEO Public File Reports indicate which SEU personnel attended the recruitment initiatives detailed therein for the relevant period. The SEU employs a total of 15 full-time employees and the SEU Stations are located in a “small market”; no SEU station serves any metropolitan area with a population of 250,000 or more. Therefore, the SEU was required to perform two initiatives within a two-year period.
8. In response to Question 2(b)(vi), there are no pending or resolved complaints against the Station or any station in the SEU during the current license term alleging unlawful discrimination in employment practices of the SEU on the basis of race, color, religion, national origin or sex.

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9. In response to Question 2(b)(vii), the Licensee's President is primarily responsible for day-to-day EEO compliance by the SEU during the Station's current license term. She oversees implementation of the Licensee's EEO program and ensures appropriate record-keeping and documentation related to job openings, as well as managing ongoing education about EEO rules and procedures among SEU employees. Job applicants are notified of the SEU's EEO policies in connection with the Licensee's job listings (on-air and online), in EEO-specific on-air announcements and on the company's website. The SEU's EEO policies are detailed in the employee handbook for all existing employees, which is read and signed by each employee.
10. In response to Question 2(b)(viii), during the current license term, the EEO recruitment program is the subject of an annual meeting of the entire full-time staff. At this annual meeting, the staff reviews the EEO requirements, and discusses any changes from previous years. In such a forum, management and employees have the ability to offer feedback concerning the EEO recruitment program to ensure that it is effective, and to discuss any problems that may have arisen. Employees of the Licensee have the ability to ask questions and receive clarification about the company's EEO program. In late 2021, Licensee worked with outside counsel to review EEO policies and documentation processes to ensure compliance. All employees are trained on employment policy changes at the annual meeting.
11. In response to Question 2(b)(ix), during the current license term, Licensee engages in ongoing internal discussions to analyze its procedures for examining pay, benefits and seniority practices, promotions and selection techniques and tests. These issues are evaluated periodically by management-level personnel to ensure that they provide equal opportunity and do not have a discriminatory effect, and also to ensure Licensee is competitive as an employer in the market. For example, over the past two years, Licensee has raised salaries, and continued to match 401K contributions employer contribution toward health insurance. The President has revised paid time off policies, added life insurance, and provided training opportunities. Licensee engages in informal mentorship practices including weekly meetings across all stations in the SEU that encourage and facilitate training between marketing, engineering, and sales. Employees are informed of and trained on matters in other departments such as sales, software services, and promotions. Licensee pays for employees to attend educational and networking conferences including the North Dakota-Minnesota-South Dakota Broadcasting Convention, RAB Conference, and provides Rumble training in sales. Licensee uses these opportunities to learn about and develop new employment practices and stay abreast of the changes in the industry and market, in addition to providing continuing education to employees. The Licensee does not have any union agreements.
12. In response to Question 2(b)(x), the Licensee is not a religious broadcaster, and, therefore Question 2(b)(x) is not applicable.
13. In response to Sections 3 and 4 of the Audit Letter, the Station is not a brokered station and, therefore, the questions concerning time brokerage are not applicable.

14. Pursuant to Sections 5(a) and (e) of the Audit letter and Section 73.3526(e)(10) of the Commission's Rules, copies of the Audit Letter and this response have been uploaded to the SEU Stations' FCC online public inspection files.
15. Pursuant to Section 5(d) of the Audit Letter, a certification as to the accuracy and completeness of this response made by an officer or principal of the Licensee is attached hereto as Exhibit 7.

Should you have further questions regarding this matter, inquiries concerning this response may be made via email to Tallie Colville, President of Licensee, at talliecolville@gmail.com, or to the undersigned Megan Davis at megan@sciarrinolaw.com.

Sincerely,

/s/ Dawn M. Sciarrino

Dawn M. Sciarrino

Megan L. Davis