

DECLARATION OF STEVEN HALLSTROM

I, Steven Hallstrom, hereby declare as follows:

1. I am President and Managing Partner of Bakken Beacon Media LLC (“Bakken”), which is party to a local marketing agreement with Forum Communications Company (“Forum”), licensee of WDAY(AM), Fargo, North Dakota (Fac. ID No. 22126) (the “Brokered Station”). The Brokered Station is part of a station employment unit based in Fargo, North Dakota that, in addition to the Brokered Station, also includes WDAZ-TV, Devil’s Lake, North Dakota (Fac. ID No. 22124) and WDAY-TV, Fargo, North Dakota (Fac. ID No. 22129). WDAZ-TV was selected to respond to the February 25, 2021 letter of Elizabeth E. Goldin, Assistant Chief, Investigations and Hearings Division of the Federal Communication Commission’s (“FCC”) Enforcement Bureau, concerning a random audit of EEO compliance (the “EEO Audit Letter”).¹ Pursuant to paragraph 3(b) of the EEO Audit Letter, Bakken must respond regarding its own full-time employees at the Brokered Station.

According to 47 C.F.R. § 73.2080(f)(3), relevant recruitment activity must be included on the EEO Public File Report belonging to Bakken station(s) that are either in the same market as or geographically closest to the Brokered Station. In this case, recruitment activity conducted on behalf of Bakken employees at the Brokered Station is reported on the EEO Public File Reports for the station employment unit that, in addition to employees at WDAY(AM), consists of WZFG, Dilworth, Minnesota (Fac. ID No. 135930) and KTGO(AM), Tioga, North Dakota (Fac. ID No. 67183) (the “Bakken SEU”).

The local marketing agreement between Forum and Bakken was effective beginning November 9, 2020. Thus, this audit response applies only to the 2020 reporting period, specifically, December 1, 2019-November 30, 2020 (the “2020 Reporting Period”).

2. As the term is defined in the FCC’s broadcast EEO rule, 47 C.F.R. § 73.2080(e)(1), and in response to Question 2(b) of the EEO Audit Letter, Bakken employs a total of 20 full-time employees at the Bakken SEU. With respect to the Brokered Station specifically, Bakken employs three full-time employees working on behalf of the Brokered Station. The job titles and number of hours each is regularly assigned to work per week are as follows:

| Job Title | Hours Per Week |
|---------------|----------------|
| Show Host | 40 |
| Show Producer | 40 |
| Operator | 40 |

¹ Bakken received an extension until June 10, 2021 to respond to the EEO Audit Letter.

In addition, all of our stations are located in markets with populations less than 250,000. Thus, the Bakken SEU must perform at least two points worth of recruitment initiative activity during each two-year period as measured from the date the stations in the SEU are required to file license renewal applications.

3. In response to Question 2(b)(i) of the EEO Audit Letter, Bakken states that the website for WDAY(AM) is wdayradionow.com. A link to the Bakken SEU's most recent EEO Public File Report is provided on the WDAY(AM) website. The 2020 EEO Public File Report for the Bakken SEU is attached hereto.

4. In response to Questions 2(b)(ii)-(iv) of the EEO Audit Letter, Bakken affirms that it did not hire any full-time employees for, or conduct any recruitment initiatives on behalf of, the Brokered Station during the 2020 Reporting Period. As a result, no data or documentation as requested by the EEO Audit Letter concerning full-time hiring or recruitment initiative activity at the Brokered Station is included with this submission.

5. In response to Question 2(b)(v) of the EEO Audit Letter, Bakken affirms that it is not aware of any pending or resolved discrimination complaints filed against its employees working on behalf of the Brokered Station.

6. In response to Question 2(b)(vi) of the EEO Audit Letter, I, Steven Hallstrom, President and Managing Partner, along with Dustin Moore, Operations Manager, are responsible for EEO compliance at the Bakken SEU. Bakken has disseminated copies of the "EEO Basics Binder," a comprehensive manual on FCC EEO compliance authored by communications counsel, to station personnel. The "EEO Basics Binder" includes advice on how stations are to engage in broad recruitment for job vacancies and undertake recruitment initiatives. It also provides sample forms for collecting and maintaining the necessary recruitment records. In addition, EEO compliance is addressed in the employee handbook distributed to all new hires, and Mr. Moore regularly participates in webinars offered by the state broadcaster's association. Mr. Moore also routinely reads FCC news releases for information concerning EEO compliance and provides updates to me as necessary. The Bakken SEU's compliance efforts include identifying efforts to afford equal employment opportunities to employees through statements in job applications and posted in conspicuous areas within the workplace. The Bakken SEU also works with counsel, including communications counsel, as appropriate to ensure compliance.

7. In response to Question 2(b)(vii) of the EEO Audit Letter, Bakken affirms that it understands that it must periodically analyze the effectiveness of its EEO recruitment program by reviewing the productivity of sources on its recruitment list and the outcome of its recruitment initiatives. In particular, we assess our recruitment program on an annual basis and look for new recruitment sources via industry trade publications and interactions with local businesses, such as at "Business After Hours" events hosted by the local Chamber of Commerce. "Business After Hours" brings together local businesses and media outlets to network and "talk shop." Members of the community also attend and can learn about job opportunities at our stations. In addition to these efforts, we analyze the productivity of our recruitment initiatives. For example, in the past we have not had success at recruiting qualified candidates at local job fairs and consequently we have shifted to other efforts including (in non-COVID times) internships.

8. In response to Question 2(b)(viii) of the EEO Audit Letter, Bakken strives to comply with all federal, state and/or local laws regarding pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that it provides equal opportunity and does not discriminate against employees or applicants.

Dated: June 7, 2021

A handwritten signature in black ink, appearing to read 'Steven Hallstrom', written over a horizontal line.

Steven Hallstrom

KTGO(AM), WZFG(AM), and Employees of WDAY(AM)¹
EEO Public File Report
December 1, 2019 - November 30, 2020²

I. FULL-TIME POSITION VACANCY LIST

| Job Title | RS Contacted to Fill Vacancy | RS that Referred Hiree |
|--------------------|-------------------------------------|-------------------------------|
| Sales Executive | 5-8, 11-13, 15, 17, 18, 23 | 8 |
| Sports Director | 3, 5-7, 10, 12-15, 17, 18, 22, 24 | 10 |
| Office Coordinator | 7, 8, 12, 13, 15-17 | 7 |
| News Director | 5, 6, 12, 15-18, 22, 24, 25 | 5 |
| News Reporter | 5-8, 13, 15, 17, 18, 21, 22, 24, 25 | 25 |
| Sales Associate | 7, 8, 13, 14 | 13 |

¹ Effective November 9, 2020, Bakken Beacon Media LLC entered into a local marketing agreement to provide programming and certain services to WDAY(AM).

² This Report was revised in June 2021 to address reporting and formatting issues.

KTGO(AM), WZFG(AM), and Employees of WDAY(AM)
EEO Public File Report
December 1, 2019 - November 30, 2020

II. MASTER RECRUITMENT SOURCE LIST

| RS No. | RS Information | RS Entitled to Vacancy Notification? | No. of Interviewees Referred by RS Over Reporting Period |
|---------------|---|---|---|
| 1. | North Dakota State University Career Center 306 Ceres Hall NDSU Dept. 5280 PO Box 6050 Fargo, ND 58102 701-231-7111 www.ndsu.edu/career/ | No | 0 |
| 2. | Concordia College Career Center Concordia College Academy 101 901 8th St S Moorhead MN 56562 218-299-3020 career@cord.edu | No | 0 |
| 3. | Minnesota-State-University Moorhead Career Center 1104 7th Ave South Moorhead, MN 56563 1-800-593-7246 www.Mnstate.edu/career | No | 0 |
| 4. | The Forum 101 5th Street North Fargo, ND 58102 701-235-7311 classifieds@forumcomm.com , www.inforum.com | No | 0 |
| 5. | All Access www.allaccess.com | No | 3 |
| 6. | TV and Radio Jobs http://tvandradiojobs.com/ | No | 1 |
| 7. | Employee Referral | No | 5 |
| 8. | Non-Employee Referral | No | 4 |
| 9. | Former Employee Re-Hire | No | 0 |
| 10. | Internal Promotion/Transfer | No | 1 |
| 11. | On-Air Announcement (KTGO(AM)) | No | 0 |
| 12. | On-Air Announcement (WZFG(AM)) | No | 3 |

| RS No. | RS Information | RS Entitled to Vacancy Notification? | No. of Interviewees Referred by RS Over Reporting Period |
|---|---|---|---|
| 13. | Word-of-Mouth | No | 2 |
| 14. | Walk-in | No | 0 |
| 15. | ND Workforce Connection Job Service North Dakota PO Box 5507 Bismarck, ND 58506-5507 1-701-328-2825 www.jobsnd.com | No | 0 |
| 16. | MN Workforce 715 11th Street N, Suite 302, Moorhead, MN 56560-2086 218-287-5060 https://mn.gov/deed/business/finding-workers/ | No | 0 |
| 17. | Company Website Careers Link https://www.am1100theflag.com/ | No | 0 |
| 18. | Radio Online http://menu.radio-online.com/cgi-bin/rolmenu.exe/menu | No | 0 |
| 19. | Better Fargo Jobs http://betterfargojobs.com/ | No | 0 |
| 20. | Tioga Tribune 101 2nd St NE Tioga, ND 58852 701-965-6088 http://www.journaltrib.com/newspapers/tioga-tribune/ | No | 0 |
| 21. | Jobs HQ – Forum Communications 888-514-4473 http://www.jobshq.com | No | 0 |
| 22. | Facebook (WZFG(AM) page) https://www.facebook.com/pg/wzfgradio/jobs | No | 0 |
| 23. | Facebook (KTGO(AM) page) https://www.facebook.com/pg/theflagktgo/jobs/ | No | 0 |
| 24. | North Dakota Broadcasters Association https://www.ndba.org/files/broadcast-jobs/ | No | 0 |
| 25. | Indeed.com https://www.indeed.com/ | No | 4 |
| Total Interviews Over Reporting Period: | | | 23 |

KTGO(AM), WZFG(AM), and Employees of WDAY(AM)
EEO Public File Report
December 1, 2019 - November 30, 2020

III. OUTREACH INITIATIVES

| | TYPE OF OUTREACH INITIATIVE | DESCRIPTION OF ACTIVITY DURING REPORTING PERIOD |
|----|--|--|
| 1. | Participate in programs/events for or on behalf of educational institutions or community organizations | In August 2020, a community member participated in a job shadow at our stations to learn first-hand how our Saturday sports operation works. The community member gained a “behind the scene” perspective on our sports programming and had the opportunity to ask questions about careers in broadcasting. |
| 2. | Participate in programs/events for or on behalf of educational institutions or community organizations | <p>Bakken Beacon Media LLC regularly participates in station tours for area youth groups. Local elementary, middle and high schools are encouraged to bring a class in to shadow any aspect of our operations.</p> <p>During this reporting period, our station had a flagpole installed. On multiple occasions, school groups and cub scouts visited our facilities for a lesson in flag etiquette and to tour our studios for a behind the scenes look at a radio and digital media operation.</p> |
| 3. | Participate in programs/events for or on behalf of educational institutions or community organizations | Our SEU moderated and served as the exclusive broadcast partner for a community student success forum that took place on February 4, 2020 at Sheyenne High School in West Fargo. The forum highlighted positive choices students can make to assist them as they pursue careers, and students also had the opportunity to ask questions about careers in broadcasting. |