

May 6, 2024

**VIA WDJT-DT ONLINE PUBLIC INSPECTION FILE**

Ms. Elizabeth E. Goldin  
Assistant Chief, Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

**Re: WDJT-DT, Milwaukee, WI (Fac. ID 71427), Response to 2024 Random Audit Request**

Dear Ms. Goldin:

WDJT-TV Limited Partnership, licensee of WDJT-DTV, Milwaukee, WI (Fac. ID 71427) (“WDJT” or the “Station”), hereby responds to your letter dated March 22, 2024, stating that the Station has been randomly selected for an EEO audit. The Station is commonly owned with and comprises the same employment unit as: WBME-CD, Milwaukee, WI (Fac. ID 71422) and WYTU-LD, Milwaukee, WI (Fac. ID 168618), both of which are licensed to Channel 41 and 63 Limited Partnership, and WMLW-TV, Racine, WI (Fac. ID 68545), licensed to TV-49, Inc. (together with WDJT, the “Stations” or the “Employment Unit”). All licensees are subsidiaries of Weigel Broadcasting Co.

These responses, which are provided in the order of the requests in Section 2 of your letter, were prepared under my general supervision with the assistance of Drew Nurczyk, Director of Human Resources at Weigel Broadcasting Co., who serves as the Employment Unit’s EEO Officer. As a parent company, Weigel Broadcasting Co. establishes basic EEO policies for its employment units and provides human resources and certain other administrative services to those employment units.

**2(b)(i) “Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).”**

The Employment Unit’s two most recent EEO Public File Reports, covering the periods from August 1, 2021 through July 31, 2022, and August 1, 2022 through July 31, 2023, are attached hereto as Exhibit A.

**2(b)(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)."**

The Employment Unit shares a website, which includes hyperlinks to the Stations' most recent EEO public file report:

For WDJT: <https://www.cbs58.com/>

For WBME and WMLW: <https://cbs58.com/wmlw>

**2(b)(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).<sup>1</sup> 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)."**

Exhibit B, attached hereto, lists each of the full-time positions filled during the period covered by Employment Unit's two most recent EEO Public File Reports with the date of hire as required by section 73.2080(c)(5)(vi). The job notice for all but one full-time position was sent to multiple sources. Thus, Exhibit B contains documentation showing one such notice was sent, and Exhibit A contains a list of additional sources to which the notice was distributed. The Employment Unit has retained all notices to all additional sources used to announce the vacancies, as required by section 73.2080(c)(5)(iii).

No organization has notified the Employment Unit that it wants to be notified of the Employment Unit's job openings.

**2(b)(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."**

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<sup>1</sup> For on-air announcements that aired multiple times to advertise the position, you may send a traffic log summary documenting the timeframe during which the announcements aired (in lieu of the log in its entirety). The log showing all air dates and times may be required for additional verification, but the Unit need not provide with its initial response.

Exhibit B lists the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Employment Unit's full-time vacancies filled during the period covered by the two most recent EEO Public File Reports.

**2(b)(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 section 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."**

Each of the two EEO Public File Reports attached as Exhibit A provides a listing of the supplemental outreach initiatives undertaken by the Employment Unit during the reporting period. Exhibit C includes coversheets describing activities sufficient to constitute four or more points worth of initiatives under 73.2080(c)(2), identifies personnel involved to the extent that that information is not reflected in the accompanying documentation and contains dated documentation demonstrating performance of the Employment Unit's recruitment initiatives described in section 73.2080(c)(2) during the period covered by the two most recent EEO Public File Reports.

As of July 31, 2023, the Employment Unit had 159 full-time employees, and the population of the Milwaukee metropolitan area exceeds 250,000 persons. Therefore, consistent with section 73.2080(c)(2), the Employment Unit is required to perform four points worth of initiative activities within a two year period.

**2(b)(vi) "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 gender. 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 Employment Unit’s current license term, no such complaints have been filed involving the unit.

**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)), 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.”**

Martin Varghese, Vice President Human Resources, is responsible for the administration of the Employment Unit’s EEO Program and ensuring that the Employment Unit provides equal employment opportunity in all employment decisions. In addition, the Employment Unit’s EEO Officer, Mr. Nurczyk, works with Mr. Varghese and Cori Haugh, Director of Human Resources, to ensure that the Employment Unit effectively implements its recruitment and related programs as an equal opportunity employer. It is also the responsibility of all persons making employment decision with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that the Employment Unit’s policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, age, sex or other protect categories. The Employment Unit ensures a positive application and vigorous enforcement of its EEO policies and reviews and controls managerial and supervisory performance in the administration of the EEO policies.

The Employment Unit includes its EEO policy on every job posting for all full-time openings. Upon hire, all Employment Unit employees receive a copy, and acknowledge receipt, of the Employment Unit’s EEO policy and procedures and its Harassment-Free Workplace Policy. Additionally, all Employment Unit employees are required to complete an annual training on preventing workplace harassment.

**2(b)(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.”**

The Employment Unit’s EEO Officer, Mr. Nurczyk, along with Mr. Varghese and Ms. Haugh, periodically analyze the effectiveness of the Employment Unit’s EEO recruitment program with regard to recruiting from a broad pool of candidates, sourcing applicants, screening candidates, selecting interviewees, and onboarding new hires. In addition, the Employment Unit’s EEO program is assessed on an annual basis in the course of preparing the Employment Unit’s Annual EEO Public File Report.

**2(b)(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.”**

It is the policy of the Employment Unit to continually review its job structure and employment practices and maintain positive measures necessary to ensure genuine equality of opportunity at all levels. As a part of implementing this policy, the Employment Unit periodically reviews seniority practices to ensure such practices are nondiscriminatory, examines rates of pay and fringe benefits for employees having the same duties and eliminate any inequalities, and ensures that promotions to positions of greater responsibility were made in a nondiscriminatory manner. On an individual employee level, each employee participates in an annual performance review with their direct supervisor, which evaluate and measure employee performance. The Employment Unit then evaluates compensation decisions and makes adjustments as appropriate.

The Employment Unit does not have any union agreements.

**2(b)(x) “If your entity is a religious broadcaster and any of the Unit’s full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. No other records are required for those hires. If five or more fulltime positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.”**

The Employment Unit is not a religious broadcaster and thus this request is not applicable.

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Please direct any questions to the undersigned.

I certify under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M Varghese', with a long horizontal flourish extending to the right.

Martin Varghese  
Vice President of Human Resources  
Weigel Broadcasting Co.  
mvarghese@wciu.com

Executed on: May 6, 2024  
Chicago, Illinois