



blueberry
BROADCASTING

March 30, 2018

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

ATTN: Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

**Re: Response to EEO Audit Letter of February 26, 2018
Station WQSK (FM), Madison, Maine (Facility ID 28684)**

Dear Mr. Pulley

This letter is written on behalf of Blueberry Broadcasting, LLC (“Licensee”), licensee of FM Broadcast Station WQSK, Madison, Maine (Facility ID 28684), in response to the Commission’s letter dated February 26, 2018, requesting the Licensee to furnish data as part of an audit of its EEO program.

Station WQSK is part of an employment unit in the Augusta-Waterville, Maine market (a “smaller market” as defined by Section 73.2080 (e) (3) of the rules) which also includes the following five other radio stations of Licensee: WABK-FM, Gardiner, Maine (Facility ID 68297); WVQM (FM), Augusta, Maine (Facility ID 68660); WMCM (FM), Rockland, Maine (Facility ID 57301); WVOM (AM), Rockland, Maine (Facility ID 57300); and WQSS (FM), Camden, Maine (Facility ID 41104).

The responses to the Commission’s inquiries as set forth in its audit letter are as follows:

3. (a) **EEO Public File Reports.** Set forth as **Attachment 1** are the Licensee’s two most recent EEO Public File Reports for the applicable employment unit covering the periods from December 1, 2015 through November 30, 2016 (the “2016 EEO Public File Report”) and December 1, 2016 through November 30, 2017 (the “2017 EEO Public File Report”). These reports were timely placed in the WQSK public inspection file and timely posted on the WQSK website, www.kissfm.net, as well as the following websites of its sister stations: www.wvomfm.com; www.971thebear.com; www.big104fm.com; and www.wtosfm.com.

3. (b) Documentation of Communications Announcing Job Openings. As reported in Attachment 1, there were a total of one full-time hire in 2016 (on September 12, 2016) and one full-time hire in 2017 (on June 5, 2017). Set forth as Attachment 2 is a listing of the recruitment sources used by Licensee for each of these two full-time hires as well as advertisement copy for the positions; no organizations requested that the Licensee send it job opening notifications.

3. (c). Interviewee and Referral Source Information. For job hire position 1 (traffic manager) there was only one interviewee (an employee referral); and for job hire position 2(account executive), there was only one interviewee (Linked In).

3. (d). EEO Outreach Initiatives. As noted above, the WQSK employment unit is located in a smaller market (the Augusta-Waterville, Maine radio market) and, pursuant to Section 73.2080 (c) (2) of the rules is required to engage in two recruitment-training outreach initiatives during the period from December 1, 2015 through November 30, 2017 (the "Outreach Period"). Complete details of the Licensee's various EEO outreach initiatives during the Outreach Period are set forth in Attachment B to the respective 2016 and 2017 EEO Public File Reports, copies of which are set forth at Attachment 1. These outreach activities included, in part, (a) participation in four job fairs; (b) hosting four high school students in Licensee's internship/job shadow program (c) participation in numerous events sponsored by educational institutions involving the broadcast media, including events sponsored by New England School of Communications on the Husson University campus, high school career days, and the New England School of Communications Media Camp for high school students; (d) provision of EEO training to management personnel and (e) establishing a training and mentorship program for the advancement of Licensee's employees.

3. (e). Complaints Regarding Discrimination in Employment Practices. During the current license term, there have been no pending or resolved complaints involving WQSK or any of the other stations comprising its employment unit, alleging unlawful discrimination in the employment practices of the employment unit on the basis of race, color, religion, national origin or sex.

3. (f). EEO Enforcement Responsibility and Methods for Informing Employees and Job Applicants of EEO Policies and Program.

(1) EEO Implementation Responsibilities

The administration and enforcement of the Licensee's EEO policies and program is conducted by the Director of Programming and Operations (Jack O'Brien) who performs his duties and responsibilities under the supervision and direction of the Licensee's Chief Operating Officer (Bruce Biette). Both the Director of Programming and Operations and the Chief Operating Officer report to Licensee's Chief Executive Officer (Louis Vitali). All hiring for the employment unit is handled by or under the supervision of Licensee's Director of Programming and Operations and/or Chief Operating Officer, both of whom are located at and work from the employment unit. Accordingly, the employment unit's EEO implementation, performance and evaluation is under the direct administration and oversight of responsible management and corporate officials.

(2) Dissemination of EEO Policies and Program

The Licensee's EEO program and policies are set forth in the form of an EEO Program, a copy of which is set forth at **Attachment 3**. Licensee's employment unit is currently implementing the elements of the EEO Program and will continue to take the steps necessary to ensure that all elements are strictly adhered to at all times. The Licensee disseminates its EEO policies to employees and job applicants by the following means:

- The written EEO Program is posted in a area at the employment unit in view of station employees and job applicants. The EEO Program is available to existing employees and new hires.
- The employment unit posts appropriate EEO notices informing employees and job applicants of their equal employment opportunity rights, that Licensee is an equal employment opportunity employer, that discrimination because of race, color, religion, national origin, age or sex is prohibited and that they have the right to notify an appropriate local, State or Federal agency if they believe that they have been discriminated against.
- The Licensee's EEO policies are included in its employee handbook.
- An EEO notice appears on the Licensee's employment application.
- Licensee's Manager, President and Chief Executive Officer (Louis Vitali) received and reviews memoranda, notices and correspondence from Licensee's Washington, D.C. communications counsel and other sources regarding EEO rules and policies and, in turn, distributes appropriate memoranda and other communications dealing with EEO to Licensee's employment units.
- Meetings are conducted among employment unit personnel and other management level personnel as appropriate.

3. (g). Analysis of EEO Recruitment Program. During the two year period from December 1, 2015 through November 30, 2017 covered by the Licensee's 2016 and 2017 EEO Public File Reports, there were only two full-time job hires for which referrals were provided by the following sources: an employee referral (1); and Linked In (1). Since there have been only two full-time hires over a two year period, Licensee believes that there is an insufficient basis for evaluating its recruitment sources at this time; as additional job openings occur, however, the effectiveness of Licensee's recruitment sources will be evaluated and the list of recruitment sources will be modified and/or expanded as deemed necessary to achieve sufficient numbers of referrals. To date, however, Licensee is satisfied with the overall results of its EEO recruitment program.

3. (h). Analysis of Unit Practices to Ensure Equal Opportunity and Nondiscrimination. The employment unit is subject to the policies and practices set forth below. In connection with the areas covered below, the employment unit:

Pay/Overtime/Benefits

- Examines rates of pay and fringe benefits for employees with the same duties in order to ensure that there are no inequities based upon race or sex discrimination.
- Provides the opportunity to perform overtime work on a basis that does not discriminate against employees.

Seniority Practices

- Reviews seniority practices to ensure that such practices are nondiscriminatory.

Promotions

- Undertakes to offer promotions in a nondiscriminatory fashion to positions of greater responsibility.
- Instructs those who make decisions on placement and promotion that employees are to be considered without discrimination.
- Disseminates promotion policies to employees by posting or otherwise making such policies known to employees.
- Inquires into interests in skills of lower paid employees with respect to higher paid positions and provides assistance, counseling and/or training to enable employees with interest and potential to qualify for such positions.
- Disseminates information regarding training programs and affords the opportunity for employees to participate.
- Posts jobs at the employment unit so that existing employees will be aware of opportunities of promotion.

Selection Techniques

- Engages in screening and, to the extent used, testing procedures on a basis that is applied fairly, consistently and in a neutral manner.
- Conducts reference checks, if used, on a basis that is fair, consistent and at the same stage of the hiring process.
- Conducts periodic reviews of employee folders.
- Reviews screening procedures and selection process used by persons with hiring responsibilities to ensure that qualified persons are not being excluded during the initial stage..


There are no union agreements at this employment unit.

A copy of this response to the Commission's audit letter, as well as the audit letter itself, will be placed in the WQSK online public inspection file.

The party signing below hereby declares, under penalty of perjury, that the facts and information included in this response and related attachments are true and correct to the best of my knowledge and belief.

Respectfully submitted

BLUEBERRY BROADCASTING, LLC

By: 
Louis Vitali, Manager, President and CEO

Telephone: (207) 967-8094

Email: louis@marinertower.com

ATTACHMENT 1

2016 – 2017 EEO PUBLIC FILE REPORTS

WABK-FM, WTQX-FM, WQSK-FM, WVQM-FM, WMCM-FM, WQSS-FM, WVOM-AM,
WTOS-FM

125 Community Drive, Ste. 201
Augusta, Maine 04330
207-623-9000

EEO Public File Report
December 1, 2015 – November 30, 2016
Blueberry Broadcasting LLC is an Equal Opportunity Employer

Full Time Job Vacancies/Interviewee Data

Position	Job Title	Date Filled	Total # of People Interviewed	Source which Referred Interviewee	No. of Interviewees Per Source	Hiree Referral Source
1	Traffic Manager	9/12/16	1	Number 21 from Attachment A- All listed in attachment A were notified of the opening.	1	Number 21 from Attachment A- All listed in Attachment A were notified of the opening.

Total number of interviewees for all full time positions: 1

There is attached hereto a list of the recruitment sources utilized by the station and total number of number of interviewees referred by each recruitment source. (Attachment A)

There is also attached hereto a narrative description of the station's Supplement EEO Outreach Activities (Attachment B).

Notice: Organizations that regularly distribute information about employment opportunities to job seekers or refer job seekers to employers may request Blueberry Broadcasting LLC to provide them with information about full-time openings at the station. Such requests must include the organization's name, mailing address, e-mail address if applicable, telephone number and contact person, and identify the category or categories of job openings for which it requests

notices. Requests should be directed to Jack O'Brien 125 Community Drive, Suite 201, Augusta, ME 04330. Blueberry Broadcasting LLC is an Equal Opportunity Employer.

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

No	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1	Blueberry Broadcasting Radio Stations	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	0
2	NAACP	www.naacpportland.org	PO Box 3631 Portland, ME 04104	207.253.5074	0
3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Ben Haskell haskellb@nescom.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College Career Services	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	AWC National Headquarters		3337 Duke Street Alexandria, VA 22314	703.370.7436 Fax 703.370.7437	0
11	Colby College	Shauna Hirshfield	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC 20006	202.496.1992	0
13	National Assoc. Of Black College Broadcasters	hcrmail@aol.com or lojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Minority Media & Telecommunications Council	info@mmtconline.org	3636 16 th St. NW, Suite B-366 Washington, DC 20010	202.332.0500	0
16	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0

17	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300 Portland, ME 04104	207.780.4141	0
18	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
19	University of New England	jnevers@unc.edu	11 Hills Beach Road Biddeford, ME 04005-9599	207.602.2503	0
20	Blucherry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
21	Employee Referral	Mark White	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 103	1
22	Outside Referral	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207-623-9000 Ext 112	0
23	Career Center	Michael Shirley	98 North Ave. Suite 20 Skowhegan, ME 04976	207-474-4950	0
24	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, Maine 04401	207-561-4001	0

* Asterisk denotes recruitment sources which requested job notification announcements

WABK-FM, WTQX-FM, WQSK-FM, WVQM-FM, WMCM-FM, WQSS-FM, WVOM-AM,
WTOS-FM
125 Community Drive, Ste. 201
Augusta, Maine 04330

EEO Public File Report
December 1, 2015 – November 30, 2016

Statement of Supplemental EEO Outreach Activities:

a) Initiative : Participation in a Job Fair

On May 18, 2016, Blueberry Broadcasting LLC participated in the 19th Annual Spring Career Fair at the Cross Insurance Center. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by a Blueberry Broadcasting Operations Manager and the Director of Programming & Operations. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

On October 25, 2016 Blueberry Broadcasting LLC participated in the 19th Annual Fall Career Fair at the Cross Insurance Center. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by a Blueberry Broadcasting Operations Manager and the Director of Programming & Operations. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

b) Initiative: Participation in a Program Sponsored by Educational Institutions:

Maranacook High School Guidance Counselors referred a student to our job shadow program. On April 4, 2016 a student was provided the opportunity to visit our business, to learn first hand what our employees experience day to day in their careers. He was able to observe activities, ask prepared questions and gain a better understanding of what employees do on a daily basis. He experienced all aspects of our facilities: On-Air, Production and Sales.

On April 12, 2016, Blueberry Broadcasting LLC hosted a high school student as part of a school mandated job shadow program. The student was exposed to the sales side of the business with a Senior Account Executive and Blueberry Broadcasting's Director of Sales. He toured the studios and spent time discussing the production efforts with one of our Production/Creative Directors. The student was also tutored by one of our Program Directors. They all detailed their daily routine on a day-to-day basis.

On August 2, 2016 a Blueberry Broadcasting Operations Manager hosted 15 high school students who attended the New England School of Communications Media Camp. All students were interested in a possible future broadcasting position. The Blueberry properties and brands were discussed. They discussed how Blueberry Broadcasting has combined signals to create regional brands. They were given a tour of the studios.

On November 7, 2016 Blueberry Broadcasting Director of Programming & Operations and the Bangor Employment Unit Operations Manager spoke to a class at the New England School of Communications on the Husson University campus. The primary focus of the discussion was a stations "Public File" and its contents. They went through a detailed breakdown of each section with real life examples. They also discussed the upcoming Broadcast Public Inspection File process and explained that full compliance for all markets outside the Top 50 will begin online on March 1, 2018.

- c) Initiative: Provision of training to management level personnel as to methods of ensuring equal employment opportunities and preventing discrimination.

On November 3, 2016, Blueberry Broadcasting conducted a training session to management level personnel who have substantial responsibility in the making of hiring decisions. This session also included disseminating information regarding all vacancies, recruitment sources, internal record keeping, applications, interviewees and referral sources. This training session was attended by the VP/COO, Director of Sales & the Director of Programming & Operations.

- d) Initiative: Establishment of training programs and mentoring programs designed to enable station personnel to acquire skills that could qualify them for higher level positions.

Blueberry Broadcasting LLC established training and mentoring programs for the staff. Both programs enable an employee to acquire skills that could qualify them for a higher level position within the organization. The program is individualized and the training and mentoring is designed to fit the needs and desires of the employee and is on-going.

- e) Initiative: Participation in other activities (Menu option # 16)

Blueberry Broadcasting LLC airs fifteen second public service announcements for community organizations to further the goal of disseminating information as to employment opportunities. These announcements air a minimum of once per day on all Blueberry Broadcasting stations.

WABK-FM, WQSK-FM, WVQM-FM, WMCM-FM, WQSS-FM, WVOM-AM, WTOS-FM

125 Community Drive, Ste. 201
Augusta, Maine 04330
207-623-9000

EEO Public File Report
December 1, 2016 – November 30, 2017
Blueberry Broadcasting LLC is an Equal Opportunity Employer

Full Time Job Vacancies/Interviewee Data

Position	Job Title	Date Filled	Total # of People Interviewed	Source which Referred Interviewee	No. of Interviewees Per Source	Hiree Referral Source
1.	Account Executive	6/5/17	1	Number 25 from Attachment A- All listed were notified of the opening	1 # 25	Number 25 from Attachment A- All listed were notified of the opening

Total number of interviewees for all full time positions: 1

There is attached hereto a list of the recruitment sources utilized by the station and total number of number of interviewees referred by each recruitment source. (Attachment A)

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There is also attached hereto a narrative description of the station's Supplement EEO Outreach Activities (Attachment B).

Notice: Organizations that regularly distribute information about employment opportunities to job seekers or refer job seekers to employers may request Blueberry Broadcasting LLC to provide them with information about full-time openings at the station. Such requests must include the organization's name, mailing address, e-mail address if applicable, telephone number and contact person, and identify the category or categories of job openings for which it requests notices. Requests should be directed to Jack O'Brien 125 Community Drive, Suite 201, Augusta, ME 04330. Blueberry Broadcasting LLC is an Equal Opportunity Employer.

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

No	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1	Blueberry Broadcasting Radio Stations	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	0
2	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, Maine 04401	207-561-4001	0
3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Ben Haskell haskellb@nescom.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College Career Services	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	AWC National Headquarters		3337 Duke Street Alexandria, VA 22314	703.370.7436 Fax 703.370.7437	0
11	Colby College	Shauna Hirshfield	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media	info@iwmf.org	1625 K Street NW, Suite 1275	202.496.1992	0

	Foundation		Washington, DC 20006		
13	National Assoc. Of Black College Broadcasters	hcrmail@aol.com or lojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Minority Media & Telecommunications Council	info@mmtconline.org	3636 16 th St. NW, Suite B-366 Washington, DC 20010	202.332.0500	0
16	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0
17	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300 Portland, ME 04104	207.780.4141	0
18	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
19	University of New England	jnevers@une.edu	11 Hills Beach Road Biddeford, ME 04005- 9599	207.602.2503	0
20	Blueberry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
21	Employee Referral	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 103	0
22	Outside Referral	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207-623-9000 Ext 112	0
24	Central Maine Help Wanted Online services	Bruce Biette	125 Community Drive Suite 201 Augusta, ME 04330	207-623-900 ext. 102	0
25	Linked In (online)	Marilyn Quinn	15 Payne Ave., Rockland, ME 04841	207-594-9400	1

* Asterisk denotes recruitment sources which requested job notification announcements

Attachment B

**WABK-FM, WQSK-FM, WVQM-FM, WMCM-FM, WQSS-FM, WVOM-AM, WTOS-FM
125 Community Drive, Ste. 201
Augusta, Maine 04330**

**EEO Public File Report
December 1, 2016 – November 30, 2017**

Statement of Supplemental EEO Outreach Activities:

a) Initiative : Participation in a Job Fair

On May 23, 2017, Blueberry Broadcasting LLC participated in the 20th Annual Spring Career Fair at the Cross Insurance Center. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by the Director of Programming & Operations. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

On October 26, 2017 Blueberry Broadcasting LLC participated in the 20th Annual Fall Career Fair at the Cross Insurance Center. Our participation was to help educate attendees on job opportunities in broadcasting and with Blueberry Broadcasting's two employment units. The fair was attended by a Blueberry Broadcasting Operations Manager and the Director of Programming & Operations. We also promoted the Career Fair with a three hour live broadcast on WBFB/WBFE/WMCM.

b) Initiative: Participation in a Program Sponsored by Educational Institutions:

Lincoln Academy School Guidance Counselors referred a student to our job shadow program. On January 23, 2017 the student was provided the opportunity to visit our business, to learn first hand what our employees experience day to day in their careers. He was able to observe activities, ask prepared questions and gain a better understanding of what employees do on a daily basis. He experienced all aspects of our facilities: On-Air, Production and Sales.

On March 6, 2017 Blueberry Broadcasting LLC hosted a senior student from Penquis Valley High School as part of our job shadow program. The student sat in on several morning shows and asked many questions. The student also took notes based on what she saw and heard. The student will be attending New England School of Communications in the fall. Her major will be "Radio Broadcasting" and she also has an interest in the school's Audio Engineering department.

On March 17, 2017 a Blueberry Broadcasting LLC personality spoke to a class of journalism students at New England School of Communications / Husson University, about radio broadcasting in general, his job description as it relates to Blueberry Broadcasting and the radio industry in general. He spoke about the different ways we incorporate aspects of journalism in a live-broadcast setting with a brief history of how radio journalism has changed in the internet age. Following the discussion, there was a Q&A with the students.

On April 5, 2017 Blueberry Broadcasting hosted a high school student as part of a career step up day. The student's primary interest is News/Talk radio. The student sat in with the local talk morning show. Before and after the broadcast, the student was able to ask questions about what topics and news stories the hosts choose to cover on their show and why. He was given a brief description of how a talk show books and schedules guests. The student also sat in with our Operations Manager for a detailed description of the technical aspects of the operation.

On August 1, 2017 two tour groups of 15 students (total 30) from New England School of Communications (NESCOM) visited Blueberry Broadcasting studios. They were hosted by two morning show personalities. Among the topics discussed were the various formats for the stations owned by Blueberry Broadcasting and their locations, a summary of jobs performed along with associated duties and responsibilities, a brief history of how radio has changed over the years, how to deliver a message via radio that is capable of impacting listeners, the differences between commercials and public service announcements and how radio can deliver a message more effectively than print or television. Each group was given a thorough tour of the building and studios following a discussion and question and answer period. Media Camp is an annual event staged by NESCOM to show students the various occupations available and offer them an up-close look at what those occupations consist of. These are students interested in pursuing post high-school education at New England School of Communications.

c) Initiative: Provision of training to management level personnel as to methods of ensuring equal employment opportunities and preventing discrimination.

On November 7, 2017, Blueberry Broadcasting conducted a training session to management level personnel who have substantial responsibility in the making of hiring decisions. This session also included disseminating information regarding all vacancies, recruitment sources, internal record keeping, applications, interviewees and referral sources. This training session was attended by the VP/COO, Director of Sales, Local Sales Manager & the Director of Programming & Operations.

d) Initiative: Establishment of training programs and mentoring programs designed to enable station personnel to acquire skills that could qualify them for higher level positions.

Blueberry Broadcasting LLC established training and mentoring programs for the staff. Both programs enable an employee to acquire skills that could qualify them for a higher level position within the organization. The program is individualized and the training and mentoring is designed to fit the needs and desires of the employee and is on-going.

e) Initiative: Participation in other activities (Menu option # 16)

Blueberry Broadcasting LLC airs fifteen second public service announcements for community organizations to further the goal of disseminating information as to employment opportunities. These announcements air a minimum of once per day on all Blueberry Broadcasting stations.

ATTACHMENT 2

DOCUMENTATION REGARDING CONTACTS WITH OR USE OF
RECRUITMENT SOURCES ON A POSITION BY POSITION BASIS

[SEPARATELY PREPARE THIS FORM FOR EVERY JOB VACANCY - FOR INTERNAL STATION USE ONLY]

JOB VACANCY MASTER RECORD-KEEPING FORM

- 1. Job Title: Truck Driver
- 2. Vacancy Date: 8/26/16
- 3. Hire Date: 9/12/16
- 4. Hire Name: LEIGH ARD
- 5. Referral Source(s) of Hire: EMPLOYEE REFERRAL #21
- 6. Total Number of Interviews: 1

7. Recruitment Sources Notified of Job Vacancy	Source Contact Person	Source Address	Source Phone Number	Number of Interviews Referred by Source	Did Source Request Notification Pursuant to Prom. 2.1 (a)-(m)
<u>1-25</u>	<u>see attached</u>	<u>Keith Spawald</u>	<u>9/12/16</u>		

NOTE: THIS FORM WILL BE USED IN THE PREPARATION OF YOUR ANNUAL EEO PUBLIC FILE REPORT, HOWEVER IT SHOULD NOT BE PLACED IN THE STATION'S PUBLIC INSPECTION FILE. IT SHOULD BE RETAINED UNTIL AFTER THE GRANT OF THE STATION'S RENEWAL APPLICATION FOR INTERNAL EEO RECORD-KEEPING PURPOSES ONLY. ATTACH ADDITIONAL RECRUITMENT SOURCES AS NECESSARY.

#18 WAS ELIMINATED FROM LIST

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

No	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1	Blueberry Broadcasting Radio Stations	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	0
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3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Ben Haskell haskellb@nescum.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
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8	National Association of Broadcasters	nab@nah.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College Career Services	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	AWC National Headquarters		3337 Duke Street Alexandria, VA 22314	703.370.7436 Fax 703.370.7437	0
11	Colby College	Shauna Hirshfield	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC 20006	202.496.1992	0
13	National Assoc. Of Black College Broadcasters	hermail@aol.com or tojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Minority Media & Telecommunications Council	info@mmtconline.org	3636 16 th St. NW, Suite B-366 Washington, DC 20010	202.332.0500	0
16	Saint Joseph's College of Maine	Prof. William Yates	278 White's Bridge Rd. Standish, ME 04084	207.893.7914	0

17	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300 Portland, ME 04104	207.780.4141	0
18	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
19	University of New England	jnevers@unc.edu	11 Hills Beach Road Biddeford, ME 04005-9599	207.602.2503	0
20	Blueberry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
21	Employee Referral	Mark White	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 103	1*
22	Outside Referral	Bruce Biette	125 Community Drive, Suite 201 Augusta, ME 04330	207-623-9000 Ext 112	0
23	Curcer Center	Michael Shirley	98 North Ave. Suite 20 Skowhegan, ME 04976	207-474-4950	0
24	Eastern Maine Development Corporation	Angela Oechslic	45 Oak St. Suite 4 Bangor, Maine 04401	207-561-4001	0
25	<i>Contract Maine Helpdesk online service</i>	<i>Bruce Biette</i>	<i>125 Community Drive Suite 201 Augusta ME 04330</i>	<i>207-623-9000 Ext 102</i>	

* Asterisk denotes recruitment sources which requested job notification announcements

8/26/14

BLUEBERRY BROADCASTING

TRAFFIC – HELP WANTED

:30 SECOND SCRIPT

BLUEBERRY BROADCASTING, PARENT COMPANY OF THIS STATION, HAS AN OPENING IN OUR TRAFFIC DEPARTMENT. THOSE ARE THE FOLKS THAT SCHEDULE THE PROGRAMMING AND COMMERCIAL CONTENT THAT YOU HEAR ON THE RADIO. THIS POSITION IS LOCATED IN OUR AUGUSTA OFFICE. THE PERSON WE ARE LOOKING FOR WILL HAVE GREAT COMPUTER SKILLS, PROBLEM SOLVING ABILITY, AN EVEN DISPOSITION AND MUST BE GOOD WORKING ON RIGID DEADLINES. WE OFFER A COMPETITIVE SALARY AND BENEFITS PACKAGE INCLUDING 401-K. IF YOU THINK YOU COULD BE THE PERSON WE ARE LOOKING FOR, EMAIL YOUR RESUME TO JOBS@BLUEBERRYBROADCASTING.COM. BLUEBERRY BROADCASTING IS AN EQUAL OPPORTUNITY EMPLOYER.

Blueberry Broadcasting
 PO Box 3059
 Kennebunkport, ME 04046

Order #: 667-00177
 Description: TRAFFIC POSITION
 Date Entered: 8/29/2016
 P.O.#:
 Salesperson: BIETTE, BRUCE
 Invoice Frequency: Billed at end of Media/EOS (Invoice will NOT be printed)

BBC PROMOS

On-Air Schedule

Start Date	End Date	Station	Scheduled Time/Event	Repeats	Length	Qty	Rate	Total	M	Tu	W	Th	F	Sa	Su
1 8/29/2016	8/31/2016	WABK/WBAK/V	06:00:00 to 22:00:00	Weekly	:30	20	0.00	0.00	4	8	8	8	8	8	8
2 8/29/2016	8/31/2016	WTOS/WTUX-F	06:00:00 to 22:00:00	Weekly	:30	20	0.00	0.00	4	8	8	8	8	8	8
3 9/1/2016	9/5/2016	WABK/WBAK/V	06:00:00 to 22:00:00	Weekly	1:00	40	0.00	0.00	8	8	8	8	8	8	8
4 9/1/2016	9/5/2016	WTOS/WTUX-F	06:00:00 to 22:00:00	Weekly	1:00	40	0.00	0.00	8	8	8	8	8	8	8

Order Start Date: 8/29/2016 Order End Date: 9/5/2016 Spots: 120 Total Charges: \$0.00

This station does not discriminate in the sale of advertising time, and will accept no advertising which is placed with an intent to discriminate on the basis of race or ethnicity. Advertiser hereby certifies that it is not buying broadcasting air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, national origin, or ancestry.

Projected Media Month/End-Of-Schedule Billing Totals for BBC PROMOS / 667-00177 :

	<u>Spot Count</u>	<u>Net Billing</u>
September 2016	120	\$0.00
Total:	120	\$0.00

Confirmed & Accepted for Blueberry Broadcasting By:

Accepted for BBC PROMOS By:


 Please Sign and Return One Copy

Post a Job

Maximize Applicants:

- Below** Consider additional products to increase response.
- Next screen** Approve or change these current settings:
Job Category: Other - Consider replacing "Other" with a category matching this job.
Workplace Location: Augusta, ME

- 1 Job Details
- 2 Posting Scheduled
- 3 Maximize Applicants / Finalize Posting

Blueberry Broadcasting
 18 seconds from now

Apply Now!

Immediate Opening - Radio Industry

Traffic Department Position

Blueberry Broadcasting, parent company of WABK, WTOS and fourteen other radio stations in Maine, has an immediate opening in our traffic department. Those are the folks that schedule the programming and commercial content that you hear on the radio. This position is located in our Augusta office. The person we are looking for will have great computer skills, problem solving ability, an even disposition and must be good working on rigid deadlines. We offer a competitive salary and benefits package including 401-K. If you think you could be the person we are looking for, email your resume to jobs@blueberrybroadcasting.com. Blueberry Broadcasting is an equal opportunity employer.





Central Maine Help Wanted

(ME)

Purchased

 Show Additional Regions

-  Display this Job Posting on VeteransHelpWanted.com \$50.00
-  Enhance this Job Posting \$15.00

<input type="checkbox"/>  Display as a Top Job	\$50 x 1  weeks
<input type="checkbox"/>  Job Blast - Email this posting to 2,867 potential applicants.	\$370.00
<input type="checkbox"/>  Job Boost Drive additional applicants to this job posting. Get exposure on Indeed, Google, Facebook and many other sites! Boost this job with just a click and we'll do all the work!	\$200.00
Total for Additional Products	\$0.00
Use Promo Code	

Continue 

Purchases are subject to [TERMS OF USE](#) and [REFUND POLICY](#)

[SEPARATELY PREPARE THIS FORM FOR EVERY JOB VACANCY - FOR INTERNAL STATION USE ONLY]

JOB VACANCY MASTER RECORD-KEEPING FORM

- 1. Job Title: Account Executive
- 2. Vacancy Date: May 8, 2017
- 3. Hire Date: June 5, 2017
- 4. Hire Name: Farrell McHorter
- 5. Referral Source(s) of Hire: #25 Linkels Inc
- 6. Total Number of Interviews: 1

7. Recruitment Sources Notified of Job Vacancy	Source Contact Person	Source Address	Source Phone Number	Number of Interviews Referred by Source	Did Source Request Notification Pursuant to Prong 2? (Yes/No)
<u>2-20-23 & 24</u>					<u>0</u>
<u>See Attached</u>					<u>0</u>
<u>#25 Linkels Inc</u>					<u>1</u>

NOTE: THIS FORM WILL BE USED IN THE PREPARATION OF YOUR ANNUAL EEO PUBLIC FILE REPORT. HOWEVER IT SHOULD NOT BE PLACED IN THE STATION'S PUBLIC INSPECTION FILE. IT SHOULD BE RETAINED UNTIL AFTER THE GRANT OF THE STATION'S RENEWAL APPLICATION FOR INTERNAL EEO RECORD-KEEPING PURPOSES ONLY. ATTACH ADDITIONAL RECRUITMENT SOURCES AS NECESSARY.

Attachment A

List of Recruitment Sources and Total Number Interviewees Referred By Each Recruitment Source

No.	Source	Contact	Address	Telephone	Total No. of Interviewees Referred
1	Blueberry Broadcasting Radio Stations	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 ext. 112	0
2	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, ME 04401	207-561-4001	0
3	Urban League		88 Warren Street Roxbury, MA 02119	617.442.4519	0
4	Maine Association of Broadcasters	Suzanne Goucher Suzanne@mab.org	69 Sewall Street Suite 2 Augusta, ME 04330	207.623.3870	0
5	New England School of Communications	Ben Haskell haskellb@nescom.edu	One College Circle Bangor, ME 04401	207.941.7176 Fax 207.947.3987	0
6	Husson University		One College Circle Bangor, ME 04401	207.941.7000 Fax 207.947.3987	0
7	The University of Maine Orono Campus	Patty Counihan jeankatz@maine.edu	5748 Memorial Union Orono, ME 04469-5748	207.581.1359 Fax 207.581.3003	0
8	National Association of Broadcasters	nab@nab.org	1771 N Street NW Washington, DC 20036	202.429.5300	0
9	Thomas College	Rich Grant	180 West River Rd. Waterville, ME 04901	207.859.1204	0
10	AWC National Headquarters		3337 Duke Street Alexandria, VA 22314	703.370.7436 Fax 703.370.7437	0
11	Colby College	Shauna Hirshfield sahirshf@colby.edu	4140 Mayflower Hill Waterville, ME 04901-8841	207-859-4140	0
12	International Women's Media Foundation	info@iwmf.org	1625 K Street NW, Suite 1275 Washington, DC 20006	202.496.1992	0
13	National Assoc. Of Black College Broadcasters	bcmail@aol.com or lojelks@aol.com	PO Box 3191 Atlanta, GA 30302	404.523.6136 Fax 404.523.5467	0
14	Society for Human Resource Management		1800 Duke St. Alexandria, VA 22314	800.283.7476	0
15	Minority Media & Telecommunications Council	info@mmtconline.org	3636 16 th St. NW, Suite B-366 Washington, DC 20010	202.332.0500	0

17	University of Southern Maine	Stephanie Towns stowns@usm.maine.edu	PO Box 9300 Portland, ME 04104	207.780.4141	0
18	Southern Maine Community College	Don Woodward	2 Fort Road So. Portland, ME 04106	207.741.5500	0
19	University of New England	jnevers@une.edu	11 Hills Beach Road Biddeford, ME 04005-9599	207.602.2503	0
20	Blueberry Broadcasting Web Sites	Jack O'Brien	125 Community Drive, Suite 201 Augusta, ME 04330	207.623.9000 Ext. 112	0
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22	Outside Referral	Mark White	125 Community Drive, Ste. 201 Augusta, ME 04330	207.623.9000 Ext. 103	0
23	Career Center	Michael Shirley	98 North Ave. Suite 20 Skowhegan, ME 04976	207.474.4950	0
24	Eastern Maine Development Corporation	Angela Oechsle	45 Oak St. Suite 4 Bangor, ME 04401	207-561-4001	0
25	Linked In	Marilyn Quinn	Rockland office		0

* Asterisk denotes recruitment sources which requested job notification announcements



blueberry
BROADCASTING

Job Title: Account Executive

Job Description: Do you build relationships with customers that extend beyond business? Do you see yourself as creative, someone able to come up with innovative ideas? Are you the type of person that gets what you want and then wants more? Are you trustworthy? Do you find it difficult to turn your work off? EMAIL YOUR RESUME NOW!

Job Category: Sales

Location: Rockland, Maine

Blueberry Broadcasting is seeking a Sales Representative for the Rockland, Maine office. We are looking for an energetic, creative, career oriented person to join our team of sales professionals. We need someone who is highly motivated to help other business people solve marketing problems and capitalize on sales opportunities. We desire a very positive person who has strong written and verbal skills, a sense of organization and has the personal drive to succeed.

Date Posted: 5/8/17

Send resume to:

jobs@blueberrybroadcasting.com



**Blueberry Broadcasting, LLC, 15 Payne Avenue, Rockland, ME 04841
(p)207.594.9400 (f)207.594.2234**

ATTACHMENT 3

EEO PROGRAM

EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM OF BLUEBERRY BROADCASTING, LLC

I. General Policy

It is our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin, age or gender in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is our policy to promote equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin, age or gender.

It is our policy to communicate our equal employment policy and employment needs to sources of qualified applicants, without regard to race, color, religion, national origin, age or gender, and to solicit their recruitment assistance on a continuing basis.

It is our policy to continually review our job structure and employment practices and maintain positive recruitment training, job design and other measures needed to ensure genuine equality of opportunity at all levels.

It is our policy to conduct a continuing program to exclude all unlawful forms of prejudice or discrimination based upon race, color, religion, national origin, age or gender from our personnel policies and practices and working conditions.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

II. Responsibility for Implementation

Bruce Biette, Chief Operating Officer, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, age or gender. It is our policy to ensure a positive application and vigorous enforcement of our policies and to review and control managerial and supervisory performance in the administration of our equal employment opportunity policies.

III. Policy Dissemination

It is our policy to disseminate our equal employment opportunity policies to job applicants, employees, and those with whom we regularly do business. To assure compliance with this requirement, we:

- 1) Post notices in our offices informing employees, and applicants for employment, of their equal employment opportunity rights, that we are an equal employment opportunity employer, that discrimination because of race, color, religion, national origin, age or gender is prohibited and that they have the right to notify an appropriate local, State or Federal agency, including the Equal Employment Opportunity Commission and Federal Communications Commission, if they believe they have been discriminated against;
- 2) Place a notice in bold type on our employment application informing prospective employees that discrimination because of race, color, religion, national origin, age or gender is prohibited and that they may notify an appropriate local, State or Federal agency, if they believe they have been discriminated against.

IV. Recruitment

It is our policy to conduct a meaningful program of recruitment involving broad outreach in recruitment to all qualified job candidates. To assure compliance with this requirement, we:

- 1) Widely disseminate information about each full-time job opening in our operation to recruitment sources for the purpose of obtaining referrals for the available position and otherwise comply with Federal Communications Commission requirements applicable to the recruitment/outreach process;
- 2) Communicate to recruitment sources that we are an equal employment opportunity employer;
- 3) Analyze our recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of our analysis.

V. Promotion and Advancement

It is our policy to offer promotions of employees in a nondiscriminatory fashion without regard to race, color, religion, national origin, age or gender to positions of greater responsibility. To assure compliance with this requirement, we:

- 1) Instruct those who make decisions on placement and promotion that all employees are to be considered without discrimination, and that there should be ongoing review to ensure compliance with this requirement;
- 2) Give all employees equal opportunity for positions which lead to higher positions. Inquire as to the interests and skills of lower paid employees with respect to any of the higher paid positions, followed by assistance, counseling and effective measures to enable employees with interest and potential to qualify themselves for such positions;

- 3) Provide opportunity to perform overtime work on a nondiscriminatory basis.

VI. Analysis of Equal Employment Opportunity Efforts

It is our policy to analyze the results of the measures undertaken by us to recruit, hire and promote individuals and to identify and evaluate any difficulties encountered in implementing our equal employment opportunity program with the goal of improving our program to the extent necessary. To assure compliance with this requirement, we periodically analyze measures taken to:

- 1) Disseminate the station's equal employment opportunity program to job applicants and employees;
- 2) Review seniority practices to ensure that such practices are nondiscriminatory;
- 3) Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, national origin, color, religion, age or gender discrimination;
- 4) Utilize media for recruitment purposes in a manner that will contain no indication, either explicit or implicit, of a preference for one race, national origin, color, religion, age or gender discrimination;
- 5) Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;
- 6) Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of race, national origin, color, religion, age or gender, and include an effective nondiscrimination clause in new or renegotiated union agreements; and
- 7) Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, religion, age or gender.
- 8) Encourage minority and female entrepreneurs/vendors to conduct business with all parts of our operation, including recruitment of a wide pool of qualified entrepreneurs/vendors from different sources.