

Northern Christian Radio, Inc.

P.O. Box 695

Gaylord, Michigan 49734

April 9, 2018

Mr. Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau/EEO Staff
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Response to Broadcast EEO Audit Letter
WPHN(FM), Gaylord, Michigan (Facility ID No. 49536)**

Dear Mr. Pulley:

Northern Christian Radio, Inc. ("NCR"), licensee of, among other stations, WPHN(FM), Gaylord, Michigan (Facility ID No. 49536) ("WPHN"), herein responds to the Commission's audit letter dated February 26, 2018, regarding the random EEO audit of WPHN's employment unit (the "Unit"), of which WPHN is the sole broadcast station. NCR is a religious broadcaster that applies a religious qualification to *all* of its full-time hires and current employees.

(a) EEO Public File Report, Websites, and Dates of Hire

The Unit did not have five or more full-time employees until the addition of a fifth full-time employee in January 2018. Accordingly, to date, the Unit has not been required to prepare annual EEO Public File Reports, and does not need to file such a report until June 2018 pursuant to Section 73.2080(c)(6) of the Commission's rules.

WPHN's website is: <https://promisefm.com/>. As stated above, to date, the Unit has not been required to prepare an EEO Public File Report because the Unit fewer than five employees until January 2018. The Unit's June 2018 EEO Public File Report will be posted to the WPHN's website pursuant to the requirements of Section 73.2080(c)(6).

The Unit did not maintain records of each full-time hire until the hiring of the Unit's fifth full-time employee, the Assistant Program Director, in January 2018. Accordingly, pursuant to Section 73.2080(c)(5)(vi), NCR hereby provides the required information regarding the hiring of its Assistant Program Director in **Exhibit A** attached hereto.

(b) Full-Time Position Announcements

The Unit did not maintain records of each full-time hire until the hiring of the Unit's fifth full-time employee, the Assistant Program Director, in January 2018. Accordingly, pursuant to

Northern Christian Radio, Inc.
Response to Broadcast EEO Audit Letter
WPHN(FM), Gaylord, Michigan (Facility ID No. 49536)
April 9, 2018

Section 73.20280(c)(5)(iii) of the Commission's rules, documentation of the announcements and notices for the Unit's Assistant Program Director position is attached hereto in **Exhibit B**.

(c) Interviewees

The Unit did not maintain records of each full-time hire until the hiring of the Unit's fifth full-time employee, Assistant Program Director, in January 2018. Accordingly, pursuant to Section 73.2080(c)(v)(5) of the Commission's rules, information regarding the number of interviewees and the referral sources for the interviewees for the Unit's Assistant Program Director position is attached hereto in **Exhibit B**.

(d) Recruitment Initiatives

As a religious broadcaster that applies a religious qualification of *all* of its full-time hires, NCR is not required to engage in or keep records of recruitment initiatives as otherwise required by Section 73.2080(c)(2) of the Commission's rules.

(e) Complaints

There are no pending or resolved complaints involving the Unit.

(f) Management EEO Responsibilities

The General Manager ("GM") of the Unit – in consultation with NCR's board – is responsible on a day-to-day basis for ensuring that EEO policies are enforced in all Unit hiring and recruitment practices pursuant to Section 73.2080(b) of the Commission's rules. With the assistance of other Unit personnel, the GM handles the EEO recordkeeping, including maintaining the all required EEO information, and will be responsible for preparing the Unit's annual EEO Public File Reports beginning in June 2018.

As of the hiring of the Unit's fifth full-time employee in January 2018, NCR has implemented a policy of requiring all applicants to complete applications which state that NCR is an Equal Opportunity Employer. Furthermore, NCR has implemented a policy of noting on all of its advertisements for full-time vacancies that it is an Equal Opportunity Employer. Although it is a religious broadcaster that applies a religious qualification to all of its job vacancies, NCR recruits applicants without regard to race, color, national origin, or gender among those who are qualified based on their religious belief or affiliation pursuant to Section 73.2080(a).

(g) Recruitment Program Analysis

As of the hiring of the Unit's fifth full-time employee in January 2018, NCR has implemented a policy that when each time a full-time vacancy becomes available in the Unit, the GM – in consultation with NCR's management team – must evaluate the Unit's recruitment methods and outreach activities to determine the effectiveness of past efforts. The GM – in

Northern Christian Radio, Inc.
Response to Broadcast EEO Audit Letter
WPHN(FM), Gaylord, Michigan (Facility ID No. 49536)
April 9, 2018

consultation with NCR's management team – must also assess whether different strategies should be employed as required pursuant to Section 73.2080(c)(3) of the Commission's rules.

(h) Examination of Pay, Benefits, etc.

As of the hiring of the Unit's fifth full-time employee in January 2018. NCR has implemented a policy by which the GM – in consultation with NCR's board – must examine the pay, benefits, and seniority practices as they arise in regard to each Unit employee as required pursuant to Section 73.2080(c)(4)(iii) of the Commission's rules. The Unit has no agreements with unions.

(i) Religious Broadcasters

As discussed above, NCR is a religious broadcaster, and all of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the Commission's rules. Accordingly, NCR's responses herein regarding the Unit's EEO Program are limited to the responses required for religious broadcasters.

I, Pat Scott, Executive Director of Northern Christian Radio, Inc., declare under penalty of perjury that the foregoing information is true and correct.

Dated: April 9, 2018


Pat Scott

EXHIBIT A

Recruitment Information

Full-Time Vacancy Filled	Date Vacancy was Filled	Recruitment Sources Used	Recruitment Sources of the Hires
Assistant Program Director	January 22, 2018	www.HisAir.net cmbonline.org	www.HisAir.net cmbonline.org

In the future, NCR will use the following recruitment sources for announcing its full-time vacancies:

www.HisAir.net
cmbonline.org
On Air
Facebook
promisefm.com
Gaylord Herald-Times

Exhibit B

Assistant Program Director Position Recruitment Information

Northern Christian Radio/The Promise FM

Job Title: Assistant Program Director

Date Posted: 10/11/17

Locations Posted: www.HisAir.net
cmbonline.org

Job Posting: Attached

Applicants Responded: 7

Applicants Interviewed: Applicant 1 – 12/1/17, 12/13/17
Applicant 2 – 12/1/17
Applicant 3 – 12/1/17, 12/13/17
Applicant 4 – No interview/Withdrew
Applicant 5 – No interview/Withdrew
Applicant 6 – 12/1/17, 12/14/17
Applicant 7 – 12/1/17

Formal Offer Extended: 12/22/17

Offer Accepted: 12/25/17

Date of Hire: 1/22/18

Find Your Joy in Northern Michigan!

You can be part of changing a culture for Christ! We are looking for a new family member to join our happy little band – more than just a team – using the radio waves to see lives changed, families strengthened, and communities impacted for Christ in Northern Michigan and Ontario! This is a full-time position for an APD, directly assisting the Program Director in programming and on-air duties, hosting a live program, with some voice-tracking also a possibility. We do a lot of live, on-location broadcasting across our region, so a desire to get out, face-to-face with your listening family is a must! Social media presence is vital, so having some serious digital savvy is a definite plus! If you're looking for an opportunity to do small-market radio at its absolute best, willing to wear lots of hats in serving a region that is loving and generous, and getting to do every day that very thing that got us all into Christian radio to begin with, then this will be just what you're looking for! Solid salary and benefits, and you'll get to live life on the radio in one of God's most diverse and beautiful places, surrounded by parks, coastal communities, and of course – the Great Lakes!

To apply, please upload your air check, resume and cover letter (with an introduction of yourself), to fred@thepromisefm.com. Dropbox links are also acceptable.

No phone calls please. Minorities and women are encouraged to apply. EOE.