







80's, 90's and Today

March 29, 2018

EEO Staff

Policy Division - Media Bureau

Federal Communications Commission

445 12th Street, S.W.

Washington DC 20554

Re: <u>EEO Audit Response for KGGF (FM), Fredonia, KS (Facility ID No. 34461)</u>

Dear Sir or Madam:

This letter is in response to the EEO audit letter dated *February 20, 2018* which was received by Radio Station KGGF (FM), Fredonia, Kansas (the "Station" or "KGGF").

Audit Data Requested (Paragraph 3 of the Audit Letter):

- a. SEK Media, LLC ("SEK Media") is the Licensee of Radio Station KGGF (FM), KGGF (AM) in Coffeyville, KS, KUSN (FM) Dearing, KS, and KQQF (FM), in Coffeyville, KS. The combination of these four stations in the Coffeyville area comprises the one employment "unit" and this unit has over ten full-time employees. Attached hereto as Exhibit 1 are the 2016-2017 and 2017-2018 EEO Reports. These EEO Reports are available online at www.KGGFradio.com.
- b. The EEO Reports provides the reader with information regarding the hiring of individuals for the Station and the "unit". During 2016-2017, four full-time individuals were hired and during the 2017-

306 West 8th Street

Coffeyville, Kansas 67337

Phone: 620-251- 3800

www.KGGFradio.com | radio@kggfradio.com

2018 period, four full-time individuals were hired by SEK Media. The advertisements for these positions were done "on-air announcements"; Newspaper Ads, unit Web-Sites; University Recruitment contacts and internal SEK Media Employee Referrals. Positions sought were Account Executives (Sales); On-Air Positions; and Programming. Attached hereto as Exhibit 2 is a reprehensive sample of SEK Media's employment position process and advertising.

c. As reported in the 2016-2017 EEO Report, SEK Media interviewed Fourteen potential employees. The referral sources used by SEK Media were word of mouth – 4 on-air announcement/media – 3; Oklahoma Association of Broadcasters Career Fair – 3 Chamber websites -1; Indeed – 1; All Access- 1; and returning interview – 1.

As of the 2017-2018 EEO Report, SEK Media interviewed eighteen potential employees. The referral sources used by SEK Media were SEK Media Employee Referral – 1; Word of Mouth -1, on-air announcement – 6; KAB Job Bank- 1, Educational Institution -3, AllAccess.com – 2, STAA Website-2, Chamber of Commerce -1 and KGGFradio.com web-site – 1.

- d. SEK Media LLC is very sensitive to the needs and opportunities in its community and as such has primarily focused on local internship programs with the local high schools and colleges. Specifically, each year SEK Media takes a student intern from the Field Kindley High School Coffeyville, Kansas. SEK Media has also hires an intern from Coffeyville Community College to do the play by play for our High School Football Game of the Week. Many of these students go on to become full or part-time employees of the Station past their intern periods. SEK Media has also participated in Career Fairs at Coffeyville Field Kindley High School and Oklahoma Association of Broadcasters. During this period, SEK Media also sent Station representatives to EEO and Management Seminars at the Kansas Association of Broadcasters, Oklahoma Association of Broadcasters, National Association of Broadcasters convention in Las Vegas and the Radio Shows in Atlanta and Austin.
- There are no actions pending or resolved during the Station's current license period.
- f. Although over the years, SEK Media has had a few occasions where an unannounced position has been filled by walk-ins, the policy of SEK Media is to: 1) advertise over the air; 2) Send out a job notification to our email list (Exhibit 2); 3) post positions on our website; 4) advertise in local newspapers; and 5) look to the local high school and colleges. 6) Post jobs on various online job boards (All Access, STAA, etc.) All hiring decisions are made by John Leonard, General Manager of SEK Media

LLC. SEK Media LLC's website (<u>www.KGGFradio.com</u>) clearly states that SEK Media is an Equal Opportunity Employer.

- g. SEK Media always seeks to improve its EEO recruitment program. The best way it has found to do so is by sending staff members to yearly EEO seminars presented by the Kansas Association of Broadcasters and Oklahoma Association of Broadcasters Seminars. These programs have assisted in planning programming. SEK Media's Management has also attended the National Association of Broadcasters Radio Shows whereby management has attended programs which discuss issues of importance, including EEO matters. Further, SEK Media has continually worked with local high schools and college educators to develop long term intern programs in which it hopes that the students will stay in the communications field (and to be possibly hired by the SEK Media in the future in non-intern positions).
- h. SEK Media is an equal opportunity employer. Ownership and Management of SEK Media have sought to keep up with employment rules and regulations and one way it has done so is to be a member of the KAB and OAB. These organizations have been helpful with all aspects of broadcast operations, including employment law. SEK Media does not have any union agreements.

i. Not applicable.

Sincerely,

SEK Media, LLC

Kaleb D. Potter, Member

Kaleb@kggfradio.com | (620) 251-3800

cc: Public Inspection File

3-29-18

EXhIbIt

Annual EEO Public File Report KGGF-KUSN-KQQF-KGGF

The purpose of the EEO Public File Report ("Annual EEO Report") is to comply with Section 73.2080(c)(6) of the FCC's Equal Employment Rules. This Annual EEO Report summarizes the relevant hiring and EEO outreach conducted by the Station Employment Unit that is comprised of the following stations: KGGF 690-Coffeyville, Kansas and KQQF- Coffeyville, Kansas, KUSN-Dearing, Kansas and KGGF 104.1-Fredonia, Kansas, and is required to be placed in the public inspection files of these stations, and posted on their websites.

The information contained in this Annual EEO Report covers the time period beginning February 1, 2016 to and including January 31, 2017 (the "Applicable Period"). Consistent with the FCC's Rules, this Annual EEO Report contains the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period:

2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy, including any such sources that have asked to receive information from the station(s) about any new job openings, which are separately identified;

3. The recruitment source that referred the Hiree for each full-time vacancy filled during the Applicable Period:

4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and

5. A list and brief description of the community outreach activities, not directly related to the opening of job positions, undertaken by the station(s) during the Applicable Period.

The following sections provide the required information, and summarize the station(s) EEO efforts during the Applicable Period. This Annual Report was placed in each station's public inspection file on February 1, 2017 and posted on the stations' website, in accordance with the FCC's EEO Rules.

For the purposes of This Report, a vacancy was deemed "filled" not when the offer was extended but when the hiree accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person, over the telephone or by e-mail.

Section 1 to Annual EEO Public File Report — Full-time Job Openings Filled During the Period from February 1, 2016 to January 31, 2017 Station(s) comprising Station Employment Unit: KGGF KUSN KQQF KGGF

Morning News KGGF	
4/18/16 5 of 19	Media/Referral
Account Executive (hired 2) 6/30/16 9/15/16 4 of 10	Referral Chamber Website
KGGF Morning 1/4/17 5 of 17	Career Fair

Total Number of People Interviewed for All Job Positions: __14___

Section 2 to

Annual EEO Public File Report – Recruitment Sources During the Period from February 1, 2016 to January 31, 2017 Station(s) comprising Station Employment Unit: KGGF KUSN KQQF KGGF Proposed contacts, when needed:

	Recruitment Source (Name, Address, Telephone Number, Contact Person)	Total Number of Interviewees This Source Provided This Period	Full-time Positions for Which
1.	Word of Mouth	4 word of mouth	This Source Unilized
2.	KGGF KUSN KQQF KGGF On Air Ads,	3 media	All Positions
Media	John Leonard, 306 W 8th Street. Coffeyville, KS 67337 620-251-3800 john@kggfradio.com	э шеша	All Positions
	Examiner Enterprise, Classifieds, 4125 NE Nowata Rd, Bartlesville, OK 74006 FAX: 336-3111		AJI Positions
	Good News, Classifieds, 124 North State, Caney, KS 67333 FAX: 620-879-2264		All Positions
	Coffeyville Journal, PO Box 849, Coffeyville, KS 67337 FAX: 620-251-3300		All Positions
	Caney Chronicle, Rudy/Classifieds, 202 W. 4th, Caney, KS 67333 FAX: 620-879-2855		All Positions
	Sunrise Reporter, Amity Hollenbaugh, 1200 SE Frank Phillips Blvd. Bartlesville, OK 74003 918-336-1001 amity@bartlesvilleradio.com FAX: 918-336-6939		All Positions
3.	Job Fair: OAB	3 OAB Career Fair	All Positions
4. websites	Bartlesville Chamber of Commerce, 201 SW Keeler, Bartlesville, OK 74003 918-336- 8708 reception@bartlesville.com	1 Chamber website	All Positions
	Website: Oklahoma Association of Broadcasters, Nancy Struby, www.oabok.org		All Positions
	Website: Bartlesville Radio, Dorea Potter		All Positions
	Website: Kansas Association of Broadcasters		All Positions
	Indeed.com	1 Indeed	All Positions
	AllAccess.com	1 All Access	All Positions
5.	Internships/Return Employee/Promotion	1 Return/ Current	All Positions
6.	Walk ins		All Positions
7.	Organizations - see attached list	· ·	All Positions

Section 3 to

- Annual EEO Public File Report Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken During the Period from February 1, 2016 to January 30, 2017 Station(s) comprising Station Employment Unit: KGGF KUSN KQQF KGGF
 - KGGF-AM/FM, KUSN-FM and KQQF-FM held a booth at the Oklahoma Association of Broadcasters Career Fair on March 31, 2016. Several students were given an opportunity to interview for positions and one student from Cameron University was hired as Assistant News Director later in the year.
 - 2. KGGF-AM/FM, KUSN-FM and KQQF-FM sponsored the SEK Home and Recreation Show on April 16, 2016 from 9am- 4pm at the Independence Community College-Campus West in Independence, Kansas. During this event this employment entity operated a booth where prospective employees could learn from our radio staff about various careers in broadcasting and specific opportunities within our radio group. In addition, employment applications were made available and distributed to interested persons. Station personnel that participated in this event included John Leonard, General Manager, Judi Alexander, Mike Kimmons and Janice Vineyard, Sales Representatives and News Director, Lance Allred.
 - 3. Station Owner participated in Bartlesville High School Advisory Committee where the principal gathers community leaders for brainstorming sessions on opportunities for students. As a result, Sports Director Evan Fahrbach talked to High School Seniors about opportunities in Sports Broadcasting.
 - 4. This employment entity co-sponsored and participated in s Career Day at Field Kindley High School in Coffeyville, Kansas on October 14, 2016 from 8:30am-2:00pm. At this event General Manager John Leonard spoke with students from 9th-12th grades about careers in radio broadcasting as well as both full time opportunities upon graduation and current part-time positions at the radio stations. In addition applications were made available to those students over the age of 15 that expressed an interest in employment. John Leonard, General Manager participated in this event.
 - 5. This employment entity participated in two internship programs during the period covered by this report. The first with Field Kindley High School in Coffeyville and the second with Coffeyville Community College in Coffeyville, Kansas. There was one student who participated in the internship program through Field Kindley High School. The student, Tanner Glenn had 50 minutes each school day at the radio stations from September 2016–January 2017. During his time at the radio stations the student received hands on training and experience in news gathering, writing and on-air news delivery. Although the student worked with numerous employees of the radio station, News Director, Debra Woodall was his staff supervisor. Although the intern was unpaid he did receive a grade and credit toward graduation through the high school's On The Job Training program.

One student also participated in the internship program through Coffeyville Community College at this employment entity. The student, Jared Sleppy worked 4–6 hour per week at the radio stations primarily receiving training and hand-on experience in sports broadcasting, including reporting and play-by-play announcing. In addition to credit this student-intern was paid for his hours at the radio stations.

6. www.kggfradio.com-Notice of current openings and internship program, ongoing, kept current by General Manager – John Leonard

	7.	Attended EEO Training at OAB in Tulsa, Oklahoma and NAB training in Las Vegas, NV. Station Owner attended employment training at KAB in Wichita, KS and Business Manager also attended overtime rules training at the Radio Convention in Nashville, TN.
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Annual EEO Public File Report KGGF-KUSN-KQQF-KGGF

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- 2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy, including any such sources that have asked to receive information from the station(s) about any new job openings, which are separately identified;
- 3. The recruitment source that referred the Hiree for each full-time vacancy filled during the Applicable Period;
- 4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
- 5. A list and brief description of the community outreach activities, not directly related to the opening of job positions, undertaken by the station(s) during the Applicable Period.

The following sections provide the required information, and summarize the station(s) EEO efforts during the Applicable Period. This Annual Report was placed in each station's public inspection file on February 1, 2018 and posted on the stations' website, in accordance with the FCC's EEO Rules.

For the purposes of This Report, a vacancy was deemed "filled" not when the offer was extended but when the hiree accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person, over the telephone or by e-mail.

Section 1 to

Annual EEO Public File Report – Full-time Job Openings Filled
During the Period from February 1, 2017 to January 31, 2018
Station(s) comprising Station Employment Unit: KGGF KUSN KQQF KGGF

Fulltime Positions Filled by Job Title and Date Filled and Number of Interviewees from All Sources for This Position	Recruitment Source of Hiree
Sales Account Executive 2/7/17 2 of 2	Parsons Chamber
Sports Director/News Assistant 4/17/17 7 of 35	Educational Institution
KUSN Production/Sports 11/13/17 7 of 42	Word of Mouth
Sales Account Executive 12/28/17 2 of 6	Media Advertisement

Total Number of People Interviewed for All Job Positions: __18____

Section 2 to

Annual EEO Public File Report – Recruitment Sources During the Period from February 1, 2017 to January 31, 2018 Station(s) comprising Station Employment Unit: KGGF KUSN KQQF KGGF Proposed contacts, when needed:

	Recruitment Source (Name, Address, Telephone Number, Contact Person)	Total Number of Interviewees This Source Provided This Period	Full-time Positions for Which This Source Utilized
1.	Word of Mouth	word of mouth	All Positions
2. Media	KGGF KUSN KQQF KGGF On Air Ads, John Leonard, 306 W 8th Street. Coffeyville, KS 67337 620-251-3800 john@kggfradio.com	6 Media	All Positions
	Examiner Enterprise, Classifieds, 4125 NE Nowata Rd, Bartlesville, OK 74006 FAX: 336-3111		All Positions
	Good News, Classifieds, 124 North State, Caney, KS 67333 FAX: 620-879-2264		All Positions
	Coffeyville Journal, PO Box 849, Coffeyville, KS 67337 FAX: 620-251-3300		All Positions
	Caney Chronicle, Rudy/Classifieds, 202 W. 4th, Caney, KS 67333 FAX: 620-879-2855		All Positions
	Sunrise Reporter, Amity Hollenbaugh, 1200 SE Frank Phillips Blvd. Bartlesville, OK 74003 918-336-1001 amity@bartlesvilleradio.com FAX: 918-336-6939		All Positions
3.	Job Fair: OAB	OAB Career Fair	All Positions
4. websites	Chamber of Commerce, Bartlesville/Parsons/Coffeyville/Independence	1 Chamber website	All Positions
	Website: Oklahoma Association of Broadcasters, Nancy Struby, www.oabok.org		All Positions
	Website: Bartlesville Radio, Dorea Potter www.bartlesvilleradio.com	1	All Positions
	Website: Kansas Association of Broadcasters	1	All Positions
	Indeed.com/STAA	3 STAA	All Positions
	AllAccess.com	2 All Access	All Positions
5.	Internships/Return Employee/Promotion	Return/ Current	All Positions
6.	Walk ins/ Current Employee	1 current employee	All Positions
7.	Organizations – see attached list	3 Education Instution	All Positions

- Annual EEO Public File Report Supplemental (Non-Vacancy Specific) Recruitment Activities
 Undertaken During the Period from February 1, 2017 to January 30, 2018
 Station(s) comprising Station Employment Unit: KGGF KUSN KOOF KGGF
 - KGGF-AM/FM, KUSN-FM and KQQF-FM held a booth at the Oklahoma Association of Broadcasters Career Fair on March 2017. Several students were given an opportunity to interview for positions.
 - KGGF-AM/FM, KUSN-FM and KQQF-FM sponsored the Inter-State Farm & Home Show, March 3-4, 2017 at Coffeyville Community college. Employment applications were made available and distributed to interested persons. Station personnel that participated in this event included John Leonard, General Manager, Judi Alexander, and Mike Kimmons Sales Representatives and from SEK Media, LLC – Kaleb Potter.
 - 3. Station Owner participated in Bartlesville High School Advisory Committee where the principal gathers community leaders for brainstorming sessions on opportunities for students. As a result, Sports Director Evan Fahrbach talked to High School Seniors about opportunities in Sports Broadcasting.
 - 4. This employment unit also participated in the 2017 Field Kindley High School Career Day on October 20, 2017. Representatives of the radio stations spoke to students in the 9th 12th grades about careers in radio and with our group. Employment applications were also passed out to interested students. The event lasted from 8:30am 12:30pm and staff members participating included John Leonard, Judi Alexander, Mike Kimmons and Angelia Decker.
 - 5. Two students participated in our stations on-going internship program in partnership with Coffeyville Community College. The students participating in the program received compensation for their hours working at the radio stations. Both students participated in sports broadcasting internships including play by play and color announcing for high school and community college football and basketball games. The two student participating were Jerred Sleppy from February March 2017 and Logan Mantz from September 2017 January 2018.
 - 6. www.kggfradio.com- Notice of current openings and internship program, ongoing, kept current by General Manager John Leonard
 - 7. Attended EEO Training at OAB in Tulsa, Oklahoma. Station Owner attended employment training at KAB in Manhattan, KS.

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