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April 5, 2013

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

Re: WSBK-TV, Boston, Massachusetts

To Whom It May Concern:

This is in response to the Equal Employment Opportunity program audit letter (“Letter”) for WSBK-TV, Boston, Massachusetts (“WSBK”) dated February 26, 2013. WSBK is combined in the EEO Public File Report with WBZ-TV, Boston, Massachusetts. Information for both stations is provided herein, except where otherwise specified.

Paragraph 3(a) of the Letter requires copies of WSBK’s two most recent EEO Public File Reports. Copies of the reports dated December 1, 2010 – November 30, 2011 and December 1, 2011 – November 30, 2012 are attached as Exhibit A. WSBK’s website is located at <http://boston.cbslocal.com/> and the most recent EEO report is available by clicking on the EEO Public File link on the website at WSBK-TV 2011 - 2012 EEO Report. The dates of hire are listed after the reports.

Paragraph 3(b) of the Letter requires, for the periods of December 1, 2010 – November 30, 2011 and December 1, 2011 – November 30, 2012, dated copies of all advertisements, bulletins, letters, faxes, emails and other communications announcing positions. Attached as Exhibit B are the 2010 – 2011 and 2011 – 2012 job postings. Two separate documents are provided for most of the 2010 – 2011 positions. The first is the internal requisition form, which includes the job title and job description. The second document indicates the internal CBS job websites to which each position was posted. Due to changes in station personnel, a third document is not included for all the job postings (it is attached to some). That document is the postings of the 2010 – 2011 jobs to Kenexa/Brassring Network. WSBK uses these networks to post its open positions on the America’s Job Exchange and Diversity Partner Network component websites, including

AJE Disability Exchange and African American Hires¹. For the 2011 – 2012 job postings, all three documents are included.

Paragraph 3(c) of the Letter requires a list of the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the periods of December 1, 2010 – November 30, 2011 and December 1, 2011 – November 30, 2012. Attached as Exhibit C are interview logs for the period from December 1, 2010 – November 30, 2011 and December 1, 2011 – November 30, 2012, which include, among other data, a listing of the position interviewed for, the number of people interviewed and the referral source.

Pursuant to 47 C.F.R. §§73.2080(c)(2) and (e)(3), as WBZ/WSBK had 209 full-time employees as of November 30, 2010, and Boston, Massachusetts' population is over 250,000, WSBK is required to perform four initiatives during each two-year period. Paragraph 3(d) of the Letter requires "documentation demonstrating performance of recruitment initiatives" during the periods of December 1, 2010 – November 30, 2011 and December 1, 2011 – November 30, 2012. Attached as Exhibit D are additional copies of Section 8 of the EEO Public File Reports dated December 1, 2010 – November 30, 2011 and December 1, 2011 – November 30, 2012, which list all the supplemental recruitment measures done by WSBK.

Pending and resolved employment-related complaints against WSBK, as sought in Paragraph 3(e) of the Letter are attached as Exhibit E. While WSBK is part of an employment unit with WBZ, Exhibit E only lists those claims that are specific to WSBK.

In response to Paragraph 3(f) of the Letter, overall responsibility for WSBK's Affirmative Action Plan rests with its President & General Manager, who ensures that the plan complies with all applicable laws, orders and regulations, including but not limited to Executive Order 11246 and its progeny. Line and upper management share responsibility for the plan, including but not limited to assisting in auditing plan progress, including identifying problem areas, formulating solutions, and establishing appropriate goals. Attached as Exhibit F are December 28, 2010, February 7, 2012 and February 25, 2013 memos from Leslie Moonves, Chief Executive Officer of CBS Corporation, reminding all employees of, among other things, the importance of EEO². Pursuant to the 2012 CBS Corporation Business Conduct Statement ("CBS BCS") CBS expects "all managers, directors and supervisory personnel to make a personal commitment to practice and enforce the principles of our equal employment opportunity policy." (CBS BCS at page 10, online at CBS Business Conduct Statement.) The 2010 CBS Corporation Business Conduct Statement, which was also in effect during the periods specified by the Letter, included the same requirement (2010 CBS Business Conduct Statement at page 9). The policy is posted

¹ Additionally, the last position on the 2010 – 2011 EEO Report is listed as a National Sales Manager for WSBK. That position was actually a Local Sales Manager at WSBK.

² The February 25, 2013 memo was issued after the period set forth in the Letter, but is included for the record.

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on bulletin boards accessible to employees and applicants and the EEO policy is covered as part of new hire orientation. Copies of the BCS pages referenced above are also included in Exhibit F.

Paragraph 3(g) of the Letter seeks information on WSBK's efforts to analyze the effectiveness of its EEO recruitment program and address any deficiencies found. Each year, WSBK prepares an annual Affirmative Action Plan and, as part of that plan, analyzes its employment statistics. The station also analyzes all employment actions including hires, promotions and terminations. The station constantly strives to broaden its outreach efforts in order to increase the level of diversity in applicant pools. EEO issues are discussed once a month, on average, at the department head meetings held by WSBK's General Manager. Station Departments Areas that are underperforming under the Affirmative Action Plan are worked with to bring up that Department's performance. Additionally, on an annual basis, WSBK analyzes its employment statistics compared to its Affirmative Action Plan targets.

Paragraph 3(h) of the Letter requests a description of WSBK's efforts to periodically analyze its attempts to review various elements to ensure that they are not discriminatory and that they provide equal opportunity, including, among others, pay, benefits and seniority practices. Information on WSBK's coordination with unions on EEO policy matters is also requested. As noted above, WSBK annually prepares an Affirmative Action Plan and analyzes its employment statistics. This plan assesses WSBK's actions in the above elements, identifies deficiencies and provides remedies.

The IBEW is the only union at WSBK. There are two others at WBZ only (SAG-AFTRA and the DGA, in addition to the IBEW). These unions all support WSBK's (and WBZ's) EEO policies.

The Declaration of Mark Lund, President and General Manager of WSBK, is attached hereto and made a part hereof.

Please contact the undersigned if you have any further questions.

Very truly yours,



Andrew J. Siegel

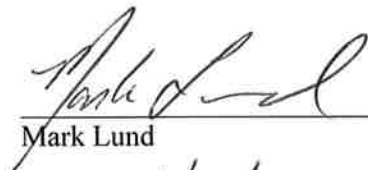
cc: Mark Lund, President/General Manager, WSBK-TV
WSBK-TV Public File

AJS:iag
Attachments
#86831

DECLARATION OF MARK LUND

Mark Lund, under penalty of perjury, deposes and states:

1. I am President and General Manager of WSBK-TV.
2. I have reviewed the attached response to the Federal Communications Commission Random EEO Audit Letter ("Audit Letter Response") being submitted herewith, based on information supplied by Anthony Capozzi, Acting Controller, WSBK, and Mark Engstrom, Senior Vice President, Assistant General Counsel, Labor Relations, CBS Broadcasting Inc..
3. To the best of my knowledge, information and belief, all the information contained in this Audit Letter Response is true and correct.



Mark Lund
Dated: 4/4/13_____