



March 20, 2020

Via Upload to WKOW Online Public File

Mr. Lewis Pulley
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Mr. Pulley:

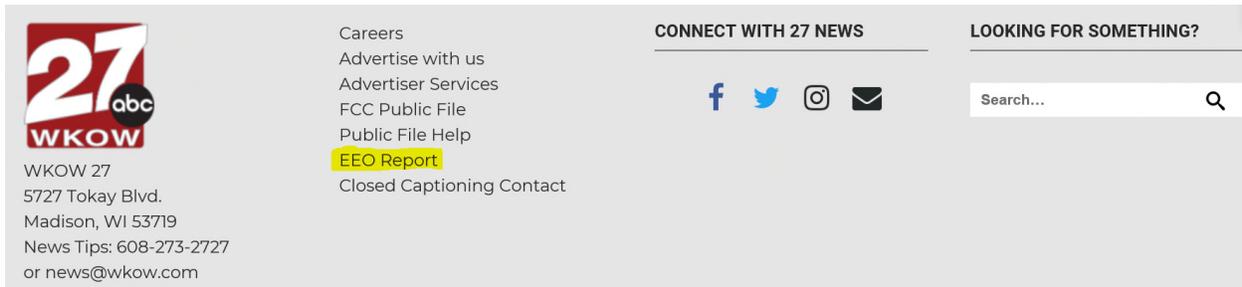
This letter, together with attached Exhibits 1 through 42, serves as the response by WKOW License, LLC (the “Licensee”), licensee of WKOW(TV), Madison, WI (“WKOW” or the “Station”), Facility ID 64545, to the Enforcement Bureau’s February 6, 2020, request for audit data relating to the station employment unit’s EEO program. WKOW is the only station in the Employment Unit (the “Employment Unit” or “Unit”). The Station operates in the Madison Nielsen Designated Market Area. The Licensee is a subsidiary of WKOW Television, Inc., which is itself a subsidiary of corporate parent Quincy Media, Inc. (“QMI” or the “corporate parent”).

At all times during the period covered by this audit, the Employment Unit has used the commercially available Broadcast1Source software and tools to organize and track the data required by the Commission’s EEO rule. The responses to the relevant audit data requests are set forth below, and the required documentation is provided in the attached exhibits.

Audit Data Request 3(a). *Copies of the Unit’s two most recent EEO public file reports, described in Section 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit’s most recent EEO public file report is not posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, as required by Section 73.2080(c)(6). In accordance with Section 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report provided. If the Unit does not have its own website, but its corporate site contains a link to a site pertaining to the Unit, then the Unit’s most recent EEO public file report must be linked to either the Unit’s site or the general corporate site, pursuant to Section 73.2080(c)(6).*

Response: The Employment Unit’s EEO Public File Reports covering August 1, 2017-July 31, 2018 and August 1, 2018-July 31, 2019 are attached as Exhibits 1 and 2, respectively. With respect to any inconsistencies between the information provided in the Employment Unit’s EEO Public File Reports and the instant response, the information contained herein shall control and, to the best of the Licensee’s knowledge, is true and correct.

WKOW’s most recent EEO Public File Report is posted to the Station’s website www.wkow.com. The report is accessible to website visitors at the bottom of the WKOW.com homepage, as highlighted in yellow below:



The EEO Report link points directly to the Unit’s report in the FCC Online Public Inspection File. The direct link URL is: <https://publicfiles.fcc.gov/api/manager/download/c09c3ae6-5ee6-86c8-b822-c03234aa3c6b/b504b9fb-6d1c-46de-aec6-e204f0f5ddf7.pdf>.

The following is a list of all positions filled by the Station during the period covered by this audit and the date on which that position was filled. The following list tracks the order the positions appear in the Station’s Public File Reports, and the corresponding exhibit number we have assigned to them for this response is included for convenience.

POSITION FILLED	DATE OF HIRE	RESPONSE EXHIBIT NO.
Weekend Sports Anchor/Multimedia Journalist	8/7/2017	3
Account Executive (2 positions)	9/12/2017 10/2/2017	4
Senior Executive Producer	8/28/2017	5
Weekend AM Anchor/Producer/Multimedia Journalist	11/26/2017	6
Graphic Artist	8/21/2017	7
Photojournalist	10/18/2017	8
Content Producer	11/27/2017	9
Political Anchor/Reporter	12/27/2017	10
Photojournalist (2 positions)	12/18/2017 11/15/2017	11
Local Sales Assistant	12/11/2017	12

POSITION FILLED	DATE OF HIRE	RESPONSE EXHIBIT NO.
Newscast Director/Video Editor	6/11/2018	13
Weekday Evening Meteorologist	3/5/2018	14
Producer/Reporter	2/12/2018	15
Weekend AM Meteorologist	3/26/2018	16
Marketing Writer/Producer	2/12/2018	17
Weekday Morning Anchor	4/9/2018	18
Topical Writer/Producer	2/26/2018	19
Multimedia Journalist (2 positions)	6/8/2018 6/4/2018	20
Photojournalist (2 positions)	5/14/2018 4/23/2018	21
Weekday Evening Co-Anchor	4/16/2018	22
Content Manager	7/16/2018	23
Assignment Editor	6/5/2018	24
Weekday Morning Anchor	5/31/2018	25
Weekend Morning Anchor/Producer/Multimedia Journalist	7/9/2018	26
Senior Executive Producer	9/24/2018	27
Account Executive (3 positions)	8/20/2018 8/20/2018 8/13/2018	28
Social Content Producer/Desk Editor	12/31/2018	29
Newscast Director/Video Editor	3/6/2019	30
Producer/Reporter	3/1/2019	31
Account Executive (3 positions)	5/6/2019 6/25/2019 7/29/2019	32
Host/Producer	6/3/2019	33
Reporter/Multimedia Journalist	6/24/2019	34
Multimedia Graphic Artist	4/8/2019	35
Topical Writer/Producer	4/22/2019	36
Photojournalist (2 positions)	5/28/2019 4/28/2019	37
Master Control Operator	6/11/2019	38

Audit Data Request 3(b). For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, 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 your burden of responding to this audit, if you have sent a job notice to multiple

sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, copies of all job announcements sent to any organization (identified separately from other 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).

Response: WKOW filled 45 full-time vacancies during the applicable period. For each job opening filled, the Station has attached (as Exhibits 3 through 38) copies of records demonstrating that notifications announcing job openings were sent to recruitment sources used by the Station. For each of the job openings listed in response to Audit Data Request 3(a), the attached documentation begins with a report produced by Broadcast1Source¹ showing job notification details, including a detailed job description, the list of recruitment sources notified of the vacancy, and the date the notification was sent. The documentation also includes a report showing the date and time that email or fax notification (as opposed to mail or other non-automated means) of the job opening was sent to recruitment sources notified by fax or email. Additionally, available documentation of non-automated, manual postings is also included. The exhibits attached illustrate that for the period covered by the audit, the Employment Unit had a regular practice of sending vacancy notifications to a wide variety of sources, which, in the aggregate, were reasonably calculated to reach the Station's entire community.

The vast majority of the Unit's recruitment sources are notified of vacancies by email at the email address reflected in the reports submitted with the exhibits; one or two sources are sent notifications by fax through Broadcast1Source. Additionally, a small handful of recruitment sources are notified "manually," outside Broadcast1Source through means such as bulletin board postings, direct website postings, and occasionally paid advertisements (e.g., Spots N Dots). WKOW generally retains electronic copies of its manual postings, i.e., those that are not automatically emailed or faxed by Broadcast1Source; however, in a few instances, the Unit did not keep copies of the manual postings but did retain records showing the sources were notified in each case. Please note none of these "manually" notified sources has requested job vacancy notifications. WKOW is advised that Broadcast1Source does not retain "copies" of automatic emails distributed to recruitment sources that may be printed, but the system instead produces reports that provide the date of emails to recruitment sources. Records of automatic notifications

¹ Several years ago, the Station transitioned its system of tracking and managing the documentation of EEO compliance to a software platform developed by Broadcast1Source. This transition was made company-wide by the Station's corporate parent, in an effort to enhance the ability of each of QMI's station employment units to ensure compliance with the Commission's EEO policies and regulations. Broadcast1Source (www.broadcast1source.com) is a well-known software platform that allows hiring managers to disseminate job postings to recruitment sources with one "click" and to automatically collect documentation of that notification. Most of the documentation in Exhibits 3-38 was generated by the Station using the Broadcast1Source menu of tools and reports.

sent through Broadcast1Source have been consistently maintained by the Unit for the relevant period and are provided in the attached exhibits.

The Employment Unit had three recruitment sources during the relevant two-year period that requested full-time job vacancy notifications. These recruitment sources are listed below:

- Illinois Center for Broadcasting
- LSU School of Mass Communication
- NAACP Beloit Branch #3251

The email summary report for each full-time position filled shows that these three sources were notified of every full-time job vacancy during the relevant period, with two exceptions described below; these two positions were likewise not widely recruited for using the Unit's recruitment source list for the reasons stated below.

- Weekday Evening Co-Anchor filled 4/16/2018. The Unit filled the Weekday Evening Co-Anchor position through confidential recruitment rather than its routine widespread recruitment. Local evening news is, of course, highly competitive. Prior to the Weekday Evening Co-Anchor hire in April 2018, Station management determined there was an immediate need to replace WKOW's incumbent co-anchor with new talent. The matter was sensitive and confidential because another employee was already filling that role and was, at the time, unaware of the upcoming change. The Unit considered the situation an "exigent circumstance," for which widespread recruitment was not possible.
- Weekday Morning Anchor filled 5/31/2018. The Weekday Morning Anchor position was posted internally and filled by a current full-time employee of the Station. As such, widespread recruitment was not required for this position.

The Employment Unit did not distribute vacancy notifications through on-air advertisements on WKOW during the relevant period. The Unit's annual Public File Reports and Broadcast1Source recruitment sources would seem to indicate the use of WKOW on-air advertisements for nearly all positions. However, the reference actually indicates the routine and consistent airing of a general EEO announcement regarding the Unit's status as an EEO employer and an invitation to local organizations to receive vacancy notifications and refer qualified candidates. These on-air spots are not vacancy-specific. WKOW has copies of logs for these advertisements should further information be needed.

Please note that Exhibits 4 and 37 reflect recruitment notifications sent more than once. In these cases, the Licensee sought additional qualified candidates so refreshed the recruitment.

Please also note that in the course of preparing the instant response, the Unit discovered a technical error with notification to the recruitment source University of Wisconsin-Oshkosh (UW-Oshkosh) listed in the attached annual EEO Public File Reports. Due to a technical,

platform error with the entry of this source years ago, the recruitment source was believed to be automatically notified via Broadcast1Source, but in fact it was not. Employment Unit personnel, in cooperation with Broadcast1Source technical staff, have recently confirmed the recruitment source's email address and re-entered the data so that notification will be sent going forward. Notably, UW-Oshkosh has never requested vacancy notifications. Broadcast1Source documentation included with exhibits 3 through 38 exclude notifications to UW-Oshkosh.

Audit Data Request 3(c). *In accordance with Section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.*

Response: The total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the applicable period are as follows (again, these positions are listed in the order in which they appear in the Public File Reports):

POSITION FILLED	DATE OF HIRE	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Weekend Sports Anchor/Multimedia Journalist	8/7/2017	5	Current Employee (1) TVJobs.com (2) Employee Referral (1) Corporate Parent (1)
Account Executive (2 positions)	9/12/2017 10/2/2017	4	Indeed.com (2) Sister Station ² (1) WKOW.com (1)
Senior Executive Producer	8/28/2017	9	WKOW.com (2) Rick Gevers & Associates (6) Corporate Parent (1)
Weekend AM Anchor/Producer/Multimedia Journalist	11/26/2017	15	Corporate Parent (3) Current Employee (2) Employee Referral (2) Linked In (1) WKOW.com (4) TVJobs.com (3)
Graphic Artist	8/21/2017	2	WKOW.com (1) Indeed.com (1)
Photojournalist	10/18/2017	6	WKOW.com (2) Indeed.com (1) Current Employee (1) TVJobs.com (2)
Content Producer	11/27/2017	2	Employee Referral (1) TVJobs.com (1)

² QMI owns broadcast stations in a number of markets and encourages stations to share job vacancy notifications with each other. The term "Sister Station" refers to a commonly-owned QMI station in a different market.

POSITION FILLED	DATE OF HIRE	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Political Anchor/Reporter	12/27/2017	3	WKOW.com (1) Employee Referral (1) Other (1)
Photojournalist (2 positions)	12/18/2017 11/15/2017	5	WKOW.com (3) Word of Mouth Referral (1) TVJobs.com (1)
Local Sales Assistant	12/11/2017	2	Indeed.com (2)
Newscast Director/Video Editor	6/11/2018	4	WKOW.com (3) Linked In (1)
Weekday Evening Meteorologist	3/5/2018	7	Sister Station (1) Current Employee (1) Corporate Parent (1) WKOW.com (2) TVJobs.com (1) Facebook (1)
Producer/Reporter	2/12/2018	2	WKOW.com (1) Sister Station (1)
Weekend AM Meteorologist	3/26/2018	2	WKOW.com (1) Winning Broadcasting Agency Referral (1)
Marketing Writer/Producer	2/12/2018	1	Current Employee (1)
Weekday Morning Anchor	4/9/2018	6	Current Employee (2) Agency Referral (1) WKOW.com (2) Sister Station (1)
Topical Writer/Producer	2/26/2018	4	Indeed.com (2) WKOW.com (2)
Multimedia Journalist (2 positions)	6/8/2018 6/4/2018	13	WKOW.com (6) Employee Referral (7)
Photojournalist (2 positions)	5/14/2018 4/23/2018	5	WKOW.com (5)
Weekday Evening Co-Anchor	4/16/2018	1	Self-Referral (1)
Content Manager	7/16/2018	2	WKOW.com (1) Current Employee (1)
Assignment Editor	6/5/2018	3	WKOW.com (3)
Weekday Morning Anchor	5/31/2018	1	Current Employee (1)
Weekend Morning Anchor/Producer/Multimedia Journalist	7/9/2018	4	Current Employee (1) WKOW.com (2) Corporate Parent (1)
Senior Executive Producer	9/24/2018	7	WKOW.com (3) Employee Referral (1) Rick Gevers & Associates (3)

POSITION FILLED	DATE OF HIRE	NUMBER OF INTERVIEWEES	REFERRAL SOURCE FOR INTERVIEWEES
Account Executive (3 positions)	8/20/2018 8/20/2018 8/13/2018	9	Word of Mouth Referral (3) Outside Recruiter (2) Employee Referral (2) WKOW.com (1) Job Fair (1)
Social Content Producer/Desktop Editor	12/31/2018	7	WKOW.com (2) Employee Referral (1) Corporate Parent (2) Univ. of Wisconsin-Madison (1) Current Employee (1)
Newscast Director/Video Editor	3/6/2019	6	WKOW.com (2) TVJobs.com (1) Employee Referral (1) Wisconsin Broadcasters Assoc. (2)
Producer/Reporter	3/1/2019	3	Current Intern (1) WKOW.com (1) Corporate Parent (1)
Account Executive (3 positions)	5/6/2019 6/25/2019 7/29/2019	16	Employee Referral (1) Indeed.com (14) Recruiter (1)
Host/Producer	6/3/2019	4	TVJobs.com (1) Univ. of Missouri-Columbia (1) Employee Referral (1) Other (1)
Reporter/Multimedia Journalist	6/24/2019	5	WKOW.com (1) Corporate Parent (3) Employee Referral (1)
Multimedia Graphic Artist	4/8/2019	2	Internal Candidate (2)
Topical Writer/Producer	4/22/2019	4	Indeed.com (3) Internal Candidate (1)
Photojournalist (2 positions)	5/28/2019 4/28/2019	3	MediaGigNow.com (1) Internal Candidate (1) Employee Referral (1)
Master Control Operator	6/11/2019	3	WKOW.com (3)

The Employment Unit has retained additional records related to the interviewees reflected in the table above and is able to provide documentation should it be needed.

Audit Data Request 3(d). Documentation of Unit recruitment initiatives described in Section 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which any station included in the Unit operates is 250,000 or more. Based upon these two factors, determine and

state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to Sections 73.2080(c)(2) and (e)(3). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

Response: The total number of full-time employees of the Employment Unit varies over time. The total number of full-time employees in the Employment Unit as of March 6, 2020, was approximately 78. WKOW’s Designated Market Area is Madison, which is located in the Madison, WI Metropolitan Statistical Area, which has a population greater than 250,000 people. Thus, the Employment Unit is required to perform four (4) initiatives in each applicable two-year period. As detailed in the EEO Public File Reports in Exhibits 1 and 2, WKOW met and exceeded the requirements of the FCC’s EEO rule in this regard for the two-year period ending July 31, 2019.

The Station has attached, as Exhibits 39 and 42, documentation demonstrating performance of the following recruitment initiatives during the period of time covered by this audit:

Participation in Job Fairs (47 C.F.R. § 73.2080(c)(2)(i)) Exhibit 39	
<i>Activity</i>	<i>Personnel Involved</i>
Wisconsin Broadcasters Association Job/Career Fair at 2018 Winter Conference, January 31, 2018 (Madison, WI)	Anna Engelhart, Station Manager Bonnie Beer, Admin. & Human Resources Manager Jill Genter, Promotions & Marketing Manager
Wisconsin Broadcasters Association Job/Career Fair at 2018 Summer Conference, June 20, 2018 (Milwaukee, WI)	Bonnie Beer, Admin. & Human Resources Manager
Wisconsin Broadcasters Association Job/Career Fair at 2019 Winter Conference, January 30, 2019 (Madison, WI)	Anna Engelhart, Station Manager
Wisconsin Broadcasters Association Job/Career Fair at 2019 Summer Conference, June 12, 2019 (Elkhart Lake, WI)	Anna Engelhart, Station Manager Bonnie Beer, Admin. & Human Resources Manager

Internship Programs (47 C.F.R. § 73.2080(c)(2)(v)) Exhibit 40	
<i>Activity</i>	<i>Personnel Involved</i>
2017-2018 “Quinternship.” The Station hosted 8 interns in the News Department.	Ed Reams, News Director
2018-2019 “Quinternship.” The Station hosted 6 interns in the News Department.	Ed Reams, News Director

Scholarship Programs (47 C.F.R. § 73.2080(c)(2)(vii)) Exhibit 41	
<i>Activity</i>	<i>Personnel Involved</i>
Wisconsin Broadcasters Association Foundation Scholarship Program, 2018-2019	Bonnie Beer, Admin. & Human Resources Manager

EEO Training to Management (47 C.F.R. § 73.2080(c)(2)(xiv)) Exhibit 42	
<i>Activity</i>	<i>Personnel Involved</i>
EEO Seminar: Avoiding Discrimination in Employment Terminations, January 31, 2018 (Madison, WI)	Anna Engelhart, Station Manager Ed Reams, News Director Bonnie Beer, Admin. & Human Resources Manager Jill Genter, Promotions & Marketing Manager
EEO Seminar: Effective Strategies to Address Legal Issues and Prevent Unlawful Discrimination During the Employment Relationship, January 30, 2019 (Madison, WI)	Anna Engelhart, Station Manager

The Employment Unit has also conducted additional outreach activities in the applicable period and is able to provide documentation should it be needed.

Audit Data Request 3(e). *Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody 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 sex. 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 all complaints must be reported, regardless of their status or disposition.*

Response: There have been no such complaints during the applicable time period.

Audit Data Request 3(f). *In accordance with Section 73.2080(b), from the first day of the Station's current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.*

Response: *Enforcement of EEO Policies.* It is the Employment Unit's policy to provide equal employment opportunities to all qualified individuals without regard to their race, color, religion, national origin, sex, age, sexual preference, marital status, handicap, or veteran status in all personnel actions, including recruitment, evaluation, selection, promotion, compensation, discipline, training, and termination. The Unit seeks to promote the realization of equal employment opportunity through a positive, continuing program designed to ensure the realization of each opportunity. To that end, all relevant human resource decision-makers are responsible for, and engage in, fulfilling the Employment Unit's EEO policies as described in this response.

Management at the Station and parent company QMI have taken steps to provide an environment which promotes accountability at the Station for the Employment Unit's EEO policies on a continuing basis. First, when an individual becomes a hiring manager (whether through internal promotion or external hire), the Corporate HR Director provides a three-hour training session on myriad aspects of employment practices, including hiring, recruiting, performance reviews, non-discrimination, harassment, FMLA, FLSA, and other relevant practices. All WKOW personnel with responsibility for hiring, supervising, or evaluating employees have been duly trained to be able to identify relevant employment-related issues. In addition, a "Do's and Don't's" of interviewing practices is routinely distributed to Station staff involved in the hiring process, to ensure that hiring criteria focus on job qualifications and avoid potentially discriminatory practices. The Corporate HR Director has periodically and repeatedly

recommended that relevant Station personnel attend and participate in state broadcaster association EEO seminars; indeed, Station personnel have participated in such seminars as described above and demonstrated in Exhibit 42. Moreover, periodic, albeit less formal, training and continued implementation occurs when Station personnel discuss, either among themselves or with QMI or other co-owned station personnel, recruitment, outreach activities, and various personnel matters. For example, the General Manager, Station Manager, and Department Heads use a portion of their meetings, when necessary, to reinforce EEO policies and EEO program issues, including issues related to the hiring process.

The Station has four levels of management to ensure enforcement of Employment Unit EEO policies: a Vice President/General Manager, Station Manager, Department Heads, and station EEO Coordinator. Each level of management has significant input into the hiring, training, disciplining, terminating, and daily supervision of Station employees, although the station EEO Coordinator level is generally more administrative in nature. It is the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training, and termination of employees to ensure adherence to the Employment Unit's policies and program. Above the station level, the corporate parent's executives and officers—with a particular emphasis on the Corporate HR Director—also serve to facilitate the successful maintenance of the Unit's EEO program.

The Station has used a hiring protocol that is designed to ensure the Unit widely disseminates vacancy notifications and maintains records consistent with the Commission's EEO rule. In fact, WKOW began using the widely-available Broadcast1Source platform and tools on October 1, 2009, in an effort to better manage and make more efficient the Station's EEO program. The Unit periodically discusses its use of and the efficacy of Broadcast1Source with the corporate parent executives in an effort to evaluate the extent to which the Broadcast1Source platform remains a useful compliance tool for the Station, in furtherance of the Commission's EEO rule.

When a position opens, the Department Head notifies the General Manager, Station Manager, and station EEO Coordinator of the opening and discusses the job responsibilities, the qualifications required, and the recruiting sources to be used to fill the position. The Department Head is responsible for preparing a job opening notification that describes the responsibilities of the position, job requirements, application deadline, and contact information. The Department Head submits the job description to the station EEO Coordinator for review and processing. The station EEO Coordinator is responsible for distributing the job opening announcement to appropriate referral sources via email or Internet posting and internal posting, as well. The Unit uses Broadcast1Source as its principal vehicle for dissemination of vacancy notices. Because some recruitment sources require manual posting that cannot be automated through the use of the Broadcast1Source platform, the station EEO Coordinator not only uses Broadcast1Source to notify appropriate recruitment sources of the vacancy but also manually distributes or posts the vacancy with any recruitment sources that require use of a manual posting process.

The Department Head is responsible for review of applications and resumes and is also responsible for evaluating the quality of the candidates. Once a pool of candidates is identified, the Department Head conducts an initial round of interviews. For some positions, when multiple

qualified candidates who have become “finalists” for a position have been identified, the Unit makes use of a commercially available assessment tool offered by a firm called Profiles International to help the Station distinguish between and among the finalist candidates. In situations where the Unit uses the assessment tool, the Unit also consults with a third-party employment consultant from Goranson Consulting (located in Erie, Colorado) to ensure that the Station’s use of the assessment tool is appropriate, normalized, and non-discriminatory.

For WKOW’s outreach initiatives, members of the Unit’s staff have established a number of relationships with various schools and colleges and other organizations within the community to expand the Station’s outreach initiatives.

Unit’s Efforts to Inform Employees and Applicants of EEO Policies and Program. The Employment Unit maintains a handbook, most recently updated in January 2019, containing the Employment Unit’s EEO Policy, which states as follows:

Equal Employment Opportunity Policy

The company is an equal opportunity employer and conducts all practices relating to recruitment, hiring, promoting, discipline, and all of the terms and conditions of employment in a manner which does not unlawfully discriminate on the basis of race, color, religion, sex, age, sexual orientation, national origin, disability, or any other legally protected status under federal, state or local law.

The Handbook also contains the following passage, which refers to the QMI corporate parent EEO Coordinator³:

EEO COORDINATOR

To insure the enforcement of the company’s Equal Employment Opportunity Policy, the company has appointed the Director of Human Resources, Jena Schulz, as the EEO Coordinator. The EEO Coordinator will act as an omnibus person for employees who have equal employment problems and/or claims of harassment in the work place. If you believe that you are a victim of a form of discrimination or harassment, contact the EEO Coordinator at [REDACTED]. The EEO Coordinator will review each contact and respond to the employee regarding such contact as soon as practical. You may also contact your top-level manager if you wish to voice a complaint or problem. However, please avail yourself of the EEO Coordinator whenever you feel that you or another employee is the victim of discrimination or harassment.

³ The EEO Coordinator referred to in the QMI corporate policies is a different person than the *station* EEO Coordinator referred to elsewhere in this response. The corporate EEO Coordinator referred to in the policies is QMI’s Corporate HR Director, Jena Schulz. The station EEO Coordinator is an employee at WKOW, Bonnie Beer.

In addition, QMI has put in place an anti-harassment policy that reads as follows:

Anti-Harassment Policy

The company wishes to maintain a high-quality working environment for all our employees and to prevent offensive situations. As such, the company will not tolerate any form of harassment or intimidation because of race, color, religion, national origin, sex, disability, sexual orientation, age or any other classification protected by law.

Specifically, any form of sexual harassment violates company policy. Sexual harassment is defined as: Any unwelcome sexual advances, requests for sexual favors or any conduct of a sexual nature when: (1) submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment. The courts have determined that sexual harassment is a form of discrimination under Title VII of the U.S. Civil Rights Act of 1964, as amended in 1991. Employees must refrain from any and all conduct which could be interpreted as being harassing in nature, including, but not limited to: (1) unwelcome sexual advances, (2) requests for sexual acts or favors, and (3) other verbal or physical conduct of a harassing nature. Supervisors and managers who allow sexual harassment by others also violate the policy and are also subject to Corrective Action up to and including termination of employment.

The company takes an equally broad view with respect to defining and prohibiting harassment based upon any classification protected by law. In keeping with this policy, the company will not tolerate harassment for any reason by a manager, supervisor or employee of the company, client, intern, independent contractor or vendor.

The company prides itself on presenting a professional image, both to the public and within the organization. For that reason, practical jokes, horseplay, pranks, or uses of foul or offensive language will subject participants to Corrective Action that may include immediate termination of employment.

All employees are expected to behave in a professional and mature fashion. Courtesy toward your co-workers is expected. Displays of hostility or disruptions caused by workplace disagreements may be cause for Corrective Action.

If you feel you have been harassed in violation of this policy, you should report such incidents directly to your supervisor. You may also report such incidents to Jena Schulz, EEO Coordinator, at [REDACTED]. A complaint may be made orally or in writing. There will be no reprisal against you for any such report. The company will not retaliate against any employee for reporting or making a complaint of harassment or assisting in the investigation of a complaint.

The company will conduct a prompt investigation of any complaints or violations of this policy. Confidentiality cannot be promised, although each situation will be handled discreetly. In determining whether the alleged conduct constitutes prohibited harassment, the nature of the conduct, the totality of the circumstances and the context in which the alleged incident occurred will be investigated. The company considers harassment in violation of this policy to be a major offense that can result in the suspension, termination, or other appropriately severe reprimand of the offender. The complainant will be kept advised regarding the investigation and of the final determination.

The purpose of the anti-harassment policy is to establish prompt, thorough and effective procedures for responding to every complaint so that problems can be identified and remedied internally. However, an employee has the right to contact state and/or federal agencies (such as EEOC) about filing a formal complaint. Complaints filed with state and/or federal agencies must be filed within such agency's applicable time frame.

Employees should understand that this policy applies to each and every member and employee of the Company, including the Board of Directors, owners and management, all full-time, part-time and temporary employees, independent contractors and visitors.

The Employment Unit also maintains a bulletin board at the Station to provide employees with information about the Employment Unit's non-discrimination and EEO policies.

For job applicants, the Employment Unit generally includes on vacancy recruitment notices the following statement: "WKOW is an Equal Opportunity Employer" or "EOE."

The Unit's website homepage (www.WKOW.com) contains the link "Careers" at the bottom of the page relating to the Unit's employment opportunities. When a potential applicant clicks on the "Careers" hyperlink, he or she is taken to a listing of positions currently available at the Station and links titled "WKOW Application." (There is also a link to "Quincy Media Careers" where potential applicants can search and apply for jobs throughout the QMI family of properties.) The Application prominently includes the following language directed at potential applicants:

When completing, do not identify race, color, gender, age, national origin, citizenship, religion or provide any extraneous information.

* * *

The company will consider all applicants without discrimination on any basis prohibited by law and is an equal employment opportunity employer.

Moreover, the Unit has an ongoing training program that relates directly to non-discrimination and anti-harassment. In 2017, QMI procured and implemented a new training video library including, among other topics, anti-harassment and non-discrimination educational materials. The videos are created to correspond with employee roles. This means training is specific to managers or to non-managerial employees. Further, managers view both targeted videos; viewing the training video specific to their role as manager and also in their role as employee. This provides managers with additional insight and familiarizes managers with the training being provided to the employees they supervise.

Employees with supervisory authority—i.e., managers—at each of QMI's stations (including the Employment Unit subject to this EEO audit) are required to watch the assigned series of anti-harassment and non-discrimination training materials and to successfully execute a quiz on each video which assesses whether the managers are familiar with the anti-harassment and non-discrimination concepts and policies. Managers must successfully complete the training modules annually and certificates of successful completion are added to each manager's personnel file.

In addition, all non-managerial employees must engage with a series of anti-harassment and non-discrimination video training modules that educate them with respect to the recognition of inappropriate (harassment and/or discrimination) behavior by supervisors and other employees and on the steps to take to report such behavior. Non-managerial employees must successfully complete the training modules annually and certificates of completion are added to each non-managerial employee's personnel file.

Finally, during the onboarding process for new employees, all new hires are required to engage with anti-harassment and non-discrimination training modules as part of the on-boarding process also completing the quizzes with results placed in the personnel file.

Thus, the video training module library is yet another tool that the Employment Unit uses to notify employees of all levels of how to recognize, respond to, and report discrimination and harassment issues that may arise in the workplace.

In the aggregate, then, the Unit educates, at numerous points and through various means, its employees and applicants about its non-discrimination and equal opportunity policies.

Audit Data Request 3(g). *In accordance with Section 73.2080(c)(3), from the first day of the Station’s current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe 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.*

Response: The Employment Unit consistently and periodically monitors and analyzes its EEO recruitment program. The station EEO Coordinator maintains and updates the recruitment source list, adding new sources and contact information as warranted and in consultation with the General Manager, Station Manager, and relevant Department Heads. The goal of the Unit’s recruitment process is two-fold: first, it is to provide notification to recruitment sources such that the outreach is reasonably calculated to reach the entire community; second, it is to provide notification to recruitment sources that are reasonably expected to result in reaching qualified applicants, particularly when a position requires a specialized skill-set, for example, graphic artist vacancies are more likely to result in a pool of qualified applicants when they are placed with graphic artist-specific resources—for such specialized positions, the Station evaluates the recruitment source list and attempts to identify and add “targeted” sources to the list as appropriate. Thus, recruitment outreach is discussed at the time of every full-time vacancy and is periodically reviewed with the Station’s FCC counsel (on at least an annual basis) to ensure compliance with the broad outreach requirements.

Moreover, communication that naturally occurs within the larger corporate “family” contributes to WKOW’s self-evaluation of its recruitment program. For example, when the Corporate HR Director receives a request from an organization to be added to the recruitment source list of one or more co-owned stations, she communicates among the station EEO Coordinators at all of the stations in the group. Similarly, the station EEO Coordinators at each of the commonly-owned stations communicate with each other about recruitment sources and job openings, and most of the station EEO Coordinators in the group, including WKOW’s station EEO Coordinator, attended a QMI-wide meeting in June 2018 that included a discussion of the Commission’s EEO requirements, including recruitment.

Audit Data Request 3(h). *In accordance with Section 73.2080(c)(4), from the first day of the Station’s current license term (or the date the licensee became the owner, if after that date) until the date of this letter, describe 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.*

Response: The Station's Vice President/General Manager and Station Manager work with the QMI corporate management team periodically to examine the Employment Unit's pay, benefits, seniority practices, promotions, and selection techniques and test. One focus of these efforts is to assure that such practices by the Stations provide equal employment opportunity and do not have a discriminatory effect.

Compensation and Benefit Levels. The Employment Unit's compensation levels for all employees are reviewed on at least an annual basis during budget preparation by the General Manager, Station Manager, and the Department Heads, in coordination with the corporate parent's officers and executives, to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. It is common for QMI to set a target percent for compensation increases for all applicable employees, which is then subject to variation—upwards or downwards—based on each employee's particular degree of growth, performance, exceptional efforts, and extraordinary circumstances. Any variations from the target percent increase proposed by WKOW's General Manager would be reviewed by the corporate parent's executives and President to ensure that non-discriminatory, meritorious, and fair decisions are being made. Compensation and benefits are also reviewed during annual employee evaluations for those employees who receive such evaluations. Compensation may be increased for myriad reasons, including merit, fairness, and to ensure that rates of pay are non-discriminatory. For positions that can be evaluated based on the local marketplace, such as sales assistants, administrative assistants, and other support positions, the Unit may consider the pay range in the local market area for a similar type position. For positions that are unique to the broadcast industry, such as news anchors, reporters, photographers, production personnel, and television management positions, the Employment Unit may assess compensation ranges by using resources from relevant industry sources.

Benefits are determined by the QMI management team, led by the President, Vice President, and Corporate HR Director, which team reviews the benefits plan on an annual and as-needed basis. All full-time employees, including union employees, are entitled to the same benefit package, including immediate eligibility for participation in the QMI Retirement Plan.

For members of the labor unions, compensation and benefit levels, including increases, are negotiated by each respective union and included in the corresponding union agreement.

Seniority Practices and Promotions. Internal promotions are based upon the combination of available positions, internal applicant qualifications and interviews, performance appraisals, and discussions among the General Manager, Station Manager, and the relevant Department Head, all of whom have responsibilities for enforcing aspects of the Employment Unit's EEO policies. WKOW's routine practice—as encouraged by the Unit's corporate parent—is to give an interview to virtually every internal candidate who expresses an interest in a higher-level position. The Unit's (and QMI's) view is that it is important not only to *recognize* growth potential among existing employees but also to *facilitate and encourage* such growth. If a current employee applies and interviews for an open position but is ultimately not selected for it, WKOW managers discuss with the employee how she or he might be better prepared the next time a similar opportunity becomes available, what additional steps the employee might consider taking to burnish his or her qualifications and skills, and how the employee can work towards

meeting his or her career goals. In short, WKOW uses job vacancies at the station as an opportunity to provide concrete mentorship and guidance to current employees to foster their growth and help them realize their full potential.⁴

Selection Techniques. After providing notices of job vacancies to a wide and diverse array of educational institutions, professional and non-profit organizations, and Internet resources, the selection process is based upon the experience, qualifications, and talents of the candidates. The General Manager, Station Manager, and Department Head consult on each selection. As described above, the Employment Unit's policy is to perform and document EEO recruitment prior to making a formal offer of employment.

Union Cooperation. WKOW has two collective bargaining agreements with Local 715 IBEW. The collective bargaining agreements do not include EEO or other nondiscrimination provisions; instead, the WKOW employee handbook would and does govern such matters (see discussion above). In any event, the Station would cooperate fully with the respective union in the event a discrimination issue arose with respect to a covered union member.

The remaining audit data requested is not applicable because the Licensee is not a religious broadcaster, and WKOW is not brokered by another company.

WKOW is uploading a copy of this letter and the attached exhibits to the Station's online public inspection file.

If you have any questions regarding this response or need any further information, please call or email our attorney Elizabeth Spainhour at 919-839-0300 or espainhour@brookspierce.com.

Respectfully submitted,



Ralph M. Oakley, President of
WKOW License, LLC

⁴ In this regard, the Employment Unit effectively maintains, as an additional outreach activity, a mentoring program at the Stations. Although the Unit's efforts in this regard are regular, deliberate, consistent, and effective, the nature of these particular mentoring activities does not lend itself to "record keeping" in a meaningful fashion, which is why the Unit is not claiming "credit" for this activity in the response above to Audit Request 3(d).

WKOW
Response to February 6, 2020, EEO Audit Letter

EXHIBIT LIST

Exhibit 1	EEO Public File Report (August 1, 2017-July 31, 2018)
Exhibit 2	EEO Public File Report (August 1, 2018-July 31, 2019)
Exhibit 3	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekend Sports Anchor/Multimedia Journalist
Exhibit 4	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive
Exhibit 5	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Senior Executive Producer
Exhibit 6	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekend AM Anchor/Producer/Multimedia Journalist
Exhibit 7	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Graphic Artist
Exhibit 8	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Photojournalist
Exhibit 9	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Content Producer
Exhibit 10	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Political Anchor/Reporter
Exhibit 11	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Photojournalist
Exhibit 12	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Local Sales Assistant
Exhibit 13	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Newscast Director/Video Editor
Exhibit 14	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekday Evening Meteorologist
Exhibit 15	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer/Reporter
Exhibit 16	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekend AM Meteorologist
Exhibit 17	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Marketing Writer/Producer
Exhibit 18	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekday Morning Anchor
Exhibit 19	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Topical Writer/Producer
Exhibit 20	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Journalist
Exhibit 21	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Photojournalist

Exhibit 22	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekday Evening Co-Anchor
Exhibit 23	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Content Manager
Exhibit 24	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Assignment Editor
Exhibit 25	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekday Morning Anchor
Exhibit 26	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Weekday Morning Anchor/Producer/Multimedia Journalist
Exhibit 27	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Senior Executive Producer
Exhibit 28	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive
Exhibit 29	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Social Content Producer/Desk Editor
Exhibit 30	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Newscast Director/Video Editor
Exhibit 31	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Producer/Reporter
Exhibit 32	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Account Executive
Exhibit 33	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Host/Producer
Exhibit 34	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Reporter/Multimedia Journalist
Exhibit 35	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Multimedia Graphic Artist
Exhibit 36	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Topical Writer/Producer
Exhibit 37	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Photojournalist
Exhibit 38	Copies of Broadcast1Source documentation, advertisements, or other communications announcing job vacancy for the position of Master Control Operator
Exhibit 39	Copies of documentation of job fairs outreach activities
Exhibit 40	Copies of documentation of internship outreach activities
Exhibit 41	Copies of documentation of scholarship outreach activities
Exhibit 42	Copies of documentation of EEO training to management outreach activities