

---

---

# MIDWEST COMMUNICATIONS, INC.

*And Affiliates*

---

---

I, Peter Tanz, President of Midwest Communications, Inc., licensee, ("Company") provide the following statement in response to the FCC's EEO audit letter dated March 22, 2024, and directed to station WPBG-FM Radio, licensed to Peoria, IL (Facility ID 42114).

1. WPBG-FM Radio is part of a Station Employment Unit ('SEU') comprised additionally of co-owned stations WIRL-AM Facility ID 13040, WMBD-AM Facility ID 42119, WSWT-FM Facility ID 13041 also licensed to Peoria, IL; WKZF-FM Facility ID 43877 licensed to Morton, IL; WXCL-FM Facility ID 33879 licensed to Pekin, IL.

2. **Audit Data Requested.** The information requested in this audit covers the period beginning August 1, 2021 through July 31, 2023. The following paragraphs are labeled to correspond with the individual items outlined in Section 3 of the audit letter and its subparagraphs.

Questions concerning the following statement should be addressed to Vice President/Human Resources, Esther Gillis at [esther.gillis@mwcradio.com](mailto:esther.gillis@mwcradio.com).

- (a) N/A
  - (b) **(i) (ii)** The Annual EEO Public File reports as described in 47 C.F.R.73.2080(c)(6) covering the time period beginning August 1, 2021 to and including July 31, 2023 are attached as Exhibit 1 and Exhibit 2. The Annual EEO Public File Report is on the following websites:  
[www.1027superhits.com](http://www.1027superhits.com) (WPBG-HD2)      [www.wmbdradio.com](http://www.wmbdradio.com)  
[www.kz1023.com](http://www.kz1023.com) (WKZF)      [www.mix1069.com](http://www.mix1069.com) (WSWT)  
[www.1049thewolf.com](http://www.1049thewolf.com) (WXCL)      [www.933thedrive.com](http://www.933thedrive.com) (WPBG)  
[www.freedom959.net](http://www.freedom959.net) (WPBG-HD3/WIRL)
  - (b) **(iii)** Per Exhibit 1, Appendix 1 covering the period August 1, 2021 to and including July 31, 2022, nine (9) full-time (at least 30 hours per week) job vacancies were filled. Per Exhibit 2, Appendix 1 covering the period August 1, 2022 to and including July 31, 2023, four (4) full time job vacancies were filled. The FCC's current audit letter advises that when an identical vacancy notice is sent to multiple recruitment sources, it is adequate to provide a single copy of the notice annotated with a list of each source that received the notice. See Exhibit 3. Confirming notices to sources used to announce the vacancy were retained as required by the rules. The EU uses a number of recruitment sources to fill each full time vacancy and the existing documentation supports our recruitment efforts. Where on-air ads were utilized, one log sheet indicating when the ad aired along with information on all other times it aired are retained, again as required by the rules.
  - (b) **(iv)** In accordance with Section 73.2080(c)(5)(v), for the period August 1, 2021 to and including July 31, 2023, the total number of interviewees for each vacancy and the referral source for each interviewee are indicated in Exhibit 1, Appendix 1 and Exhibit 2, Appendix 1 respectively.
  - (b) **(v)** Appendix 2 of Exhibit 1 covering the period August 1, 2021 to and including July 31, 2022, indicates the Unit's Recruitment Initiatives for that period. Appendix 2 of Exhibit 2 covering the period August 1, 2022 to and including July 31, 2023 indicates the Unit's Recruitment Initiatives for that period. Documentation of Recruitment Initiatives during the periods August 1, 2021 through July 31, 2022 and August 1, 2022 through July 31, 2023 are attached as Exhibit 4.
- 
-

---

---

# MIDWEST COMMUNICATIONS, INC.

*And Affiliates*

---

---

(v) This SEU had thirty-one (31) full-time employees during the period August 1, 2021 to and including July 31, 2022. The SEU had thirty-five (35) full-time employees during the period August 1, 2022 to and including July 31, 2023. The population in the market in which the stations operate is greater than 250,000 and as such is required to perform and has performed more than four recruitment initiatives pursuant to Sections 73.2080(c)(2) and (e)(3) in a two year period.

(b) (vi) The SEU had no pending or resolved complaints filed during the period August 1 to and including July 31, 2023 before any body having competent jurisdiction under Federal, state, territorial or local law involving unlawful discrimination in the SEU employment practices on the basis of race, color, religion, national origin or sex.

(b) (vii) In accordance with 73.2080(b), the EEO Officer, the Vice President/Human of Resources, [esther.gillis@mwcradio.com](mailto:esther.gillis@mwcradio.com), is responsible for the administration and implementation of our Equal Employment Opportunity Program. The EEO coordinator for the SEU is the Office Manager or Business Manager. The EEO coordinator is charged with the responsibility of following up on paperwork and monitoring the SEU on a day-to-day basis to ensure that our EEO Program is being followed. All management involved in making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and terminations of employees have received training and will continue to receive training on a continuing basis to ensure that our policies and programs are adhered to and that no person is discriminated against because of race, color, religion, age, disability, sex (including sexual orientation or gender identity), national origin or genetic information.

(vii) Appropriate notices have been posted on a bulletin board in a high traffic area informing employees and applicants that the stations practice Equal Opportunity Employment and of their right to notify an appropriate local, state or Federal agency if they believe they have been victims of discrimination. Additionally, our employment applications contain a notice informing prospective employees that discrimination because of race, color, religion, age, disability, sex (including sexual orientation or gender identity) national origin or genetic information is prohibited, and if they believe they have been victims of discrimination, they may notify the appropriate state, local or Federal agency. All job postings issued by the Unit to outside sources and posted on our websites indicate that we are an Equal Opportunity Employer. Our Employee Personnel Handbook also contains an Equal Employment Opportunity/Harassment Policy and Complaint Procedure section. All employees are required to sign this policy separate of the Acknowledgement of Receipt of Employee Personnel Handbook sheet.

(b) (viii) In accordance with 73.2080(c) (4), to ensure that we are achieving wide dissemination, we air announcements encouraging organizations that can refer job seekers to contact us. We also have posted the announcement encouraging organizations that can refer job seekers on all station websites. As a part of our training program, we advise management level employees who have hiring/termination duties to be aware and cultivate recruitment sources and also to interview from a wide a variety of sources. We continue to review our recruitment sources on a regular basis and update to include new sources as we learn of them to ensure continued broad dissemination.

---

---

---

---

# MIDWEST COMMUNICATIONS, INC.

---

---

*And Affiliates*

---

---

- (b) (ix) SEU management is expected to review a quarterly report outlining pay rates for equality by position and by department. The Vice President/Human Resources and EEO Officer regularly reviews salary reports pertinent to the market to determine fair pay practices for the positions involved. Employment benefits are reviewed on an annual basis to determine if they are being distributed equitably. Job vacancies within the Company are posted, as appropriate, on prominent bulletin boards with information on how to apply for the position. Management level personnel are advised to meet with individual staff members at a minimum on an annual basis to evaluate performance and discuss their career goals and to further encourage and make staff aware of the potential to move into management positions within our Company. The SEU utilizes a uniform employment application when hiring with the appropriate notice regarding discrimination and whom to notify if they feel they've been discriminated against. A uniform personality profile is also utilized. Specific steps are followed in the interview and hiring process to ensure equal opportunity employment. Trade unions are not represented at the SEU.
3. This station employment unit has no time brokerage agreements.

I swear under penalty of perjury that the foregoing statement is true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Peter Tanz, President  
Midwest Communications, Inc.

\_\_\_\_\_(Date)

---

---