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# TRIBUNE

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May 1, 2009

## VIA FEDERAL EXPRESS

EEO Staff, Policy Division  
Media Bureau, Federal Communications Commission  
The Portals -- 445 Twelfth St., S.W.  
Washington, D.C. 20554

Re: WTTK(TV), Kokomo, IN  
April 2009 Equal Employment Opportunity ("EEO") Audit

To the EEO Staff:

On behalf of Tribune Broadcast Holdings, Inc., licensee of Station WTTK(TV), Kokomo, Indiana, enclosed herewith please find its response to the EEO audit letter from Lewis C. Pulley, Assistant Chief, Policy Division of the Media Bureau of the Federal Communications Commission dated March 23, 2009 (the "Audit Letter"). This response is accompanied by a declaration signed by David P. Eldersveld, Secretary of Tribune Broadcast Holdings, Inc.

WTTK(TV) is a satellite station of Station WTTV(TV), Bloomington, Indiana (which is also licensed to Tribune Broadcast Holdings, Inc.). WTTK(TV) and WTTV(TV) are part of a single station employment unit comprised of commonly-owned stations WTTV(TV), WTTK and WXIN(TV), Indianapolis, Indiana (licensed to Tribune Television Company), that share all employees. Tribune Broadcasting Company is the 100% owner and indirect corporate parent of both Tribune Broadcast Holdings, Inc. and Tribune Television Company. Accordingly, the enclosed materials provide information pertaining to the employment activities undertaken on behalf of all three stations.

Please direct any questions regarding this matter to this office.

Respectfully submitted,



Elisabeth M. Washburn  
Enclosures

## Officer Certification

I, David P. Eldersveld, am the secretary of Tribune Broadcasting Holdings, Inc., licensee of Stations WTTK(TV), Kokomo, Indiana and WTTV(TV), Bloomington, Indiana; and the secretary of Tribune Television Company, licensee of Station WXIN(TV), Indianapolis, Indiana. I understand that willful false statements are punishable by fine and/or imprisonment (U.S. Code, Title 18, Section 1001), and/or revocation of any station license or construction permit (U.S. Code, Title 47, Section 312(a)(1)), and/or forfeiture (U.S. Code, Title 47, Section 503). I certify that to the best of my knowledge, information and belief, all information contained herein is true and correct.



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David P. Eldersveld, Secretary  
Tribune Broadcast Holdings, Inc.

Dated: May 1, 2009

## STATEMENT

This responds to the EEO Audit Letter from Lewis C. Pulley, Assistant Chief, Policy Division of the Media Bureau of the Federal Communications Commission dated March 23, 2009 (the "Audit Letter"), addressed to Tribune Broadcast Holdings, Inc., licensee of Station WTTK(TV), Kokomo, Indiana. WTTK(TV) is a satellite station of Station WTTV(TV), Bloomington, Indiana (which is also licensed to Tribune Broadcast Holdings, Inc.), and both are part of a single station employment unit comprised of WTTV(TV), WTTK(TV) and WXIN(TV), Indianapolis, Indiana (licensed to Tribune Television Company), that share all employees.<sup>1</sup> For ease of reference, the three-station employment unit will be referenced herein as "Station." Tribune Broadcasting Company is the 100% owner and indirect corporate parent of both Tribune Broadcast Holdings, Inc. and Tribune Television Company. This response provides information about practices and undertakings by the Station as well as those by the Station's corporate parents, Tribune Broadcasting Company ("TBC") and Tribune Company ("Tribune").

1. EEO Public File Reports. Attachment 1 contains the Station's two most recent EEO Public File Reports, dated April 1, 2008 and April 1, 2009. Each Public File Report includes a list of referral sources and identifies sources that have specifically requested to receive job posting information with an asterisk ("\*"). The 2009 EEO Public File Report is also available on WXIN(TV)'s website (at [www.fox59.com](http://www.fox59.com)) and WTTV(TV)'s website (at [www.indianas4.com](http://www.indianas4.com)). WTTK(TV) does not maintain its own website independent of the WTTV(TV) website.

2. Job-Specific Recruitment. Attachments 2 and 3 contain documentation supporting Station's job-specific recruitment activities for the periods covered by the 2008 and 2009 EEO Public File Reports (respectively), including: lists of vacancies filled during the applicable period and the referral sources used by Station as reported in the corresponding EEO Public File Reports, a table reporting interviewee source data for the positions filled (i.e., the number and referral source of candidates interviewed for each position<sup>2</sup>), and copies of job descriptions, e-mail communications, advertisements, website postings and job notices announcing each vacancy. The Station made 27 full-time hires in the period covered by the 2008 EEO Public File Report<sup>3</sup> and 32 full-time hires in the period covered by the 2009 EEO Public File Report. The Station conducted broad outreach for all full-time position vacancies during these two periods.

Station currently utilizes at least forty-five (45) external recruitment sources, twelve (12) of which have specifically requested to receive job vacancy information, and recruits for full- and part-time position vacancies as well as interns at the job fairs it attends. For each position that becomes available, the human resources manager consults with the appropriate hiring manager to develop the job description and a recruitment plan, which typically consists of identifying and targeting specific sources likely to attract qualified candidates for the open position (in addition to those that have specifically requested to receive job vacancy information). The human resources manager submits the job posting internally to the

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<sup>1</sup> 47 C.F.R. § 73.2080(e)(2).

<sup>2</sup> While preparing this response, the Station found incomplete interviewee data for 10 of the 26 full-time vacancies filled in the period covered by the 2008 EEO Public File Report. Specifically, it appears that hiring managers did not complete the standard interviewee data sheet that captured information about the applicants interviewed for the vacancy and the source that referred the applicant. We attribute this omission to a staffing transition that resulted in the Station operating without a human resources manager for a four-month period from mid-September through mid-December 2008.

<sup>3</sup> Three part-time positions (4--freelance assignment editor, 22--production assistant and 25--production assistant) were erroneously reported as full-time positions in 2008 EEO Public File Report. These part-time positions should not have appeared on the report. Accordingly, even though the Station conducted broad outreach for each of these positions, the Station has not included in this response, any job-specific recruitment information in connection with these positions in this response.

Tribune Company Recruitment Center, which posts the notices internally on the Tribune's corporate intranet and externally on Tribune's "CareerBuilder" website. Tribune's corporate intranet is accessible to all employees of Tribune and its business units, and Tribune encourages interested employees to pursue opportunities within the company at other business units. The CareerBuilder website enables station employers to reach potential applicants directly through both careerbuilder.com and an extensive network of affiliated websites including local and national newspapers, special interest websites and diversity focused websites, thereby significantly expanding the reach of an employer's recruitment efforts. The human resources manager also sends vacancy notices to all of the recruitment sources that have requested to receive such information (currently, 12 sources), and those sources identified in consultation with the hiring manager, as likely attract qualified applicants for the position. Station disseminates these notices via letters, e-mails, or by direct postings on referral source websites and copies are attached in Attachments 2 and 3.

### 3. Supplemental Recruitment Initiatives.

As of April 17, 2009, Station employed 166 full-time employees. More than 780,000 people live in the Indianapolis, Indiana designated market area. The Station conducts general outreach by participating in supplemental recruitment initiatives consistent with FCC requirements, typically earning in excess of two (2) credits each year. As demonstrated in the 2008 and 2009 EEO Public file Reports, Station has completed supplemental initiatives well in excess of the four required during each 2-year period under FCC rules. As described below, Station sponsors an internship program, a scholarship program and attends job fairs and career events. As requested in Section 3(d) of the Audit Letter, documents demonstrating these activities are included in Attachment 4.<sup>4</sup>

a. Internship Program: Station maintains an internship program offering unpaid internships for academic credit to college students interested in pursuing broadcast and communications careers. Station hosts between 20 and 25 student interns each year. Students may apply to intern in the department of their choice (creative services, engineering, news, public affairs, and sales) for a typical duration of one semester. Station promotes its internship program on its websites; at job fairs; at guest lectures and other speaking engagements at colleges, universities, high schools and community events; and through its relationships with college career counseling offices.

b. Scholarship: Station also financially supports and participates in the candidate selection process for the Indiana Broadcasters Foundation Scholarship Program. Specifically, Station donates \$1,000-\$2,000 each year to support the scholarship, and Station's human resources manager participates in the candidate evaluation and selection process.

c. Career Fairs: Station attends numerous career fairs sponsored by local colleges and universities, including Indiana University, Ball State University, Indiana University-Purdue University-Indianapolis ("IUPUI") and University of Indianapolis. Station also attends career fairs sponsored by the Indiana State Broadcasts Association, including its general job fairs conducted and its Indiana Black Expo. At these job fairs, Station personnel staff a booth, discuss broadcast and journalism career opportunities with attendees and actively recruit for open positions and internships. Some career fairs also offer the opportunity for attendees to have their resumes and/or reels critiqued.

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<sup>4</sup> While preparing this response, the Station was unable to locate materials demonstrating its performance of supplemental initiatives for the period covered by the 2008 EEO Public File Report. Station believes this omission, resulted from the 4-month period in late 2008 between the departure of the Station's previous human resources manager and the hiring of the current human resources manager. Notwithstanding the omission of these materials, the Station was able to review hand-written notes, internal email correspondence and confirm with various department heads and participants, the activities reported therein.

c. **Other Community Outreach:** Station makes efforts to educate students of all ages, from elementary school through college, about career opportunities in broadcast journalism. Station managers and on-air talent are guest speakers in classrooms and at community events. Station creative services personnel participate in periodic high school minority career programs and serve as mentors/advisors to high school students interested in broadcast careers. Station personnel also participate in the annual High School Broadcasting Competition and Conference, sponsored by the Indiana Association of School Broadcasters. The human resources manager has developed a close relationship with the Kelly School of Business Career Office at IUPUI, and participate in mock interviews and panel discussions for students interested in broadcast or journalism careers, several times throughout the year.

4. **Pending or Resolved Complaints.** Since August 1, 2005, commencement of the Station's current license term, none of the three stations (WTTK(TV), WTTV(TV) and WXIN(TV)) has had any complaints filed before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in employment practices on the basis or race, color, religion, national origin or sex. Accordingly, there are no such pending or resolved complaints.

5. **Management EEO Responsibilities & Policy Dissemination.** Section 3(f) asks the Station to describe management level responsibilities pertaining to informing Station employees about and enforcing Station EEO policies. Attachment 5 contains excerpts from the Local Employee Handbook and from Tribune Company's Employee Handbook, describing the employment policies and procedures. Also attached is a copy of the Station Application for Employment form and the script for the EEO PSA that airs in a general rotation on each of the three stations.

Tribune and its business units believe in equal employment opportunities for all, regardless of race, color, religion, sex, national origin, age, disability or any other legally protected classification. The company's policy is to hire and promote the most qualified applicants and to comply with all federal, state and local equal employment opportunity laws. This policy governs employment and all the company's terms and conditions of employment, including but not limited to, policies and practices affecting recruitment, recruitment advertising, hiring, promotion, demotion, transfers, reclassification, selection for training, compensation, benefits, company-sponsored educational programs and any other aspects of employment. Tribune is also committed to providing its employees a professional work environment free from physical, psychological or verbal harassment, in keeping with the company's equal opportunity policy.

(a) The Audit Letter asks the station to describe the responsibilities of each level of management to ensure enforcement of EEO policies, and how it informs employees and applicants of its EEO policies. As employees, managers are aware of, trained in and held to the standards and policies described in the employee handbook. As managers, these individuals are also expected to have thorough knowledge of employment relations and personnel matters, as well as company policies to ensure that they can effectively manage their department and their employees.

As described previously, when there are position vacancies at Station, the department manager works with the human resources manager to review the staffing needs, define the duties of the position to be filled, develop an appropriate job description and craft a recruitment strategy. Station EEO policies are reinforced at every level of the recruitment process. Once a candidate is hired, it is the department manager's responsibility to ensure that the employment environment complies with company policies, and to manage any problems arising thereunder.



Station informs employees and job applicants of its EEO policies in a variety of ways. First, it is Tribune policy that all job postings, advertisements and position descriptions disseminated to any referral source include the statement: "Station is an equal opportunity employer" or communicate the statement through use of the term "EOE." In addition, the employment application form contains a statement indicating that the employer is an equal opportunity employer. There is an EEO statement on the careers section of Station's website, and the statement also appears on each EEO Public File Report (available on the website and in the local public inspection file). All three stations air an EEO public service announcement ("EEO PSA") indicating that the stations are equal opportunity employers and announcing the availability of job vacancy information. The EEO PSA runs in a general rotation in a variety of time periods on all three stations.

Station further disseminates its EEO policies by distributing the employee handbook to new hires, making relevant postings on bulletin boards at the Station, and through its employee orientation program, and a one-on-one training session with the Human Resources Manager which all new employees must attend on their first day of employment.

6. Analysis of EEO Recruitment Program. The Station analyzes its recruitment program annually in conjunction with the preparation of the annual EEO Public File Report. Station's human resources manager prepares the annual EEO Public File Report with the assistance of Tribune's in-house legal counsel. During this process Station reviews and analyzes recruitment efforts undertaken during the pertinent reporting period, reviews the scope and variety of sources used, the effectiveness of sources in referring qualified applicants and hires for various positions, evaluates the general public awareness of the availability of station job vacancy information, observes and reviews any trends in referrals or dissemination of job vacancy information, and reviews the cost versus benefits of various general recruitment initiatives undertaken by the Station.

Like other Tribune-owned stations, Station prepares applicant flow reports for each position filled. These reports are periodically audited by and TBC's Vice President of Human Resources. This audit typically this occurs on an annual basis, so that each Tribune-owned station's materials and activities are reviewed approximately once each year. These internal materials are comprised of a list of position vacancies during the pertinent period, the number of applicants interviewed for each such position, and an indication of each interviewee's gender and ethnicity. These reports facilitate ongoing evaluation and assessment of the Station's outreach efforts.

As a result of these activities, Station has added more minority and industry-specific recruitment sources to the station's referral source list. The Station increased communications to community organizations, informing them of the station's policy to distribute position vacancy information to those who request it; and as a result, the number of referral sources specifically requesting job information has increased. In addition, the Station has developed stronger relationships with IUPUI and other area universities (Purdue University, Miami of Ohio University, Ball State and Indiana University).

7. Periodic Analysis of Internal Practices. Section 3(h) of the Audit Letter asks Station to describe its efforts to analyze its measures 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. Station does not have a union agreement. Consistent with Tribune policies, where necessitated by the needs of the position or otherwise required under Federal Law or guidelines, a drug test or background check may be required prior to beginning employment. Where applicable, these requirements apply irrespective of a potential hire's race, gender and ethnicity.

Tribune and all of its business units endeavor to abide by the corporate equal employment opportunity policies in all aspects of employment; from recruitment and hiring, to promotion or demotion, to transfers and training. These broad policies are implemented at the business unit level on a non-discriminatory basis. In general, compensation rates are developed at the business unit in conjunction with Tribune corporate guidance; benefits are established and monitored at the corporate level, with implementation at each business unit. Tribune provides its employees a "Unified Benefits Plan" that offers all full-time employees a variety of benefits (including, for example, participation in a 401K retirement savings plans, a choice of health and dental coverage plans, supplemental life insurance, health care reimbursement accounts and the like). These benefits are offered to all full-time employees. Core health and welfare benefit plans are reviewed annually in advance of the annual fall "open enrollment" period. Changes are adopted at the corporate level and implemented at the business unit level.

Compensation rates are analyzed periodically, primarily at the corporate level. The Vice President of Human Resources for TBC conducts a periodic compensation survey to review salary levels of department heads across stations in the broadcast group. Relying on external compensation data sources such as the NAB Salary Survey, the Belo Compensation Survey and the Tower Perrin Compensation Survey, TBC evaluates the salaries of all broadcast group department heads, benchmarked based on factors such as the station's market size, annual revenues, and cost of living indices, to develop a recommended salary range for a particular position at a particular station in a particular market. Age, gender, ethnicity and other individual characteristics are not part of this analysis. Each station, then, evaluates its director-level salaries against the TBC recommendations and can make adjustments based on factors such as individual performance, experience and other relevant qualities. In addition, each station typically notifies the Vice President of Human Resources for TBC when there are department-head level openings. She, in turn, completes an individual market compensation analysis and comparison for the open position, with the purpose of recommending an appropriate salary range.

## **SCHEDULE OF ATTACHMENTS**

**Attachment 1: 2008 and 2009 EEO Public File Reports**

**Attachment 2: Communications Announcing 2008 Job Vacancies Filled**

- A. 2008 EEO Public File Report (w/ Referral Source List)**
- B. Compilation of Interviewee Data**
- C. Vacancy Notes and Outreach Communications**

**Attachment 3: Communications Announcing 2009 Job Vacancies Filled**

- A. 2009 EEO Public File Report (w/ Referral Source List)**
- B. Compilation of Interviewee Data**
- C. Vacancy Notes and Outreach Communications**

**Attachment 4: Supplemental Recruitment Initiatives Documentation**

**Attachment 5: Excerpts from Station Employee Handbook, Sample Application Form, EEO PSA Script**