

March 28, 2019

EEO Staff, Policy Division  
Media Bureau  
KMOZ-FM Online Public File

Re: KMOZ-FM, Grand Junction, CO (Fac. ID # 39464)  
EEO Audit Response

MBC Grand Broadcasting, INC. (“MBC Grand”), licensee of FM broadcast station KMOZ-FM, Grand Junction, CO, hereby responds to the letter dated February 14, 2019, from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau. This response provides information relating to the licensee’s employment unit (the “Unit”) out of which the following stations are operated:

KMOZ-FM, Grand Junction, CO, Facility ID No. 39464  
KGLN(AM), Glenwood Springs, CO, Facility ID No. 12373  
KKVT(FM), Grand Junction, CO, Facility ID No. 81556  
KMGJ(FM), Grand Junction, CO, Facility ID No. 47115  
KNAM(AM), Silt, CO, Facility ID No. 160492  
KNZZ(AM), Grand Junction, CO, Facility ID No. 39465  
KSTR-FM, Montrose, CO, Facility ID No. 21629  
KTMM(AM), Grand Junction, CO, Facility ID No. 47151

The following are MBC Grand’s responses to the questions in part 3 of the audit letter.

*(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).*

The 2018 Annual EEO Public File Report, attached as Exhibit 1, covers the period from December 1, 2017, through November 30, 2018. The 2017 Annual EEO Public File Report, for the period starting December 1, 2016, through November 30, 2017, is attached as Exhibit 2.<sup>1</sup>

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<sup>1</sup> The Annual EEO Report for year 2017 was amended after a review by counsel as part of preparing this response.

The most recent annual EEO Public File Report is linked to the station’s website at <https://www.themoose923.com/>. It can be found by clicking the link labeled “About” located on the header of the home page. A direct link to download the most recent report is at: <https://media.socastsrcm.com/wordpress/wp-content/blogs.dir/815/files/2016/12/2018-Annual-EEO-Public-File-Report.pdf>. Other stations in the employment unit also posted the report on their websites.<sup>2</sup>

The Unit had 7 full-time hires during the two years under review:

- Account Executive – hired October 8, 2018
- Account Executive – hired August 30, 2018
- Account Executive – hired November 10, 2017
- Account Executive – hired September 22, 2017
- Sportscaster – hired August 21, 2017
- Account Executive – hired April 10, 2017
- Account Executive – hired March 6, 2017

*(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 Unit job openings, as described in Section 73.2080(c)(1)(ii).*

MBC Grand has retained copies of all notices sent to all sources used. MBC Grand has retained all the log sheets for each ad that aired. No organization requested to be notified of job openings. Documentation of communications about the positions are in the following exhibits:

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<sup>2</sup>

Station	Website
KKVT(FM)	<a href="https://www.thevault1007.com/">https://www.thevault1007.com/</a>
KMGJ(FM)	<a href="https://www.931magic.com/">https://www.931magic.com/</a>
KNZZ(AM)	<a href="https://www.1100knzz.com/">https://www.1100knzz.com/</a>
KSTR-FM	<a href="https://www.961kstr.com/">https://www.961kstr.com/</a>
KTMM(AM)	<a href="https://www.theteam1340.com/">https://www.theteam1340.com/</a>
KNAM(AM)	Simulcasts with KTMM and shares the same website
KGLN(AM)	No website

- Exhibit 3 – Account Executive (10/8/18)
  - Grand Junction Media, Inc.
  - ColoradoBroadcasters.org
  - CMU Career Center
  - MBC Grand Radio, website & on-air
  
- Exhibit 4 – Account Executive (8/30/18)
  - CMU Job Fair
  - Grand Junction Media, Inc.
  - Colorado Broadcasters.org
  - Mesa County Workforce Center
  - MBC Grand Radio, website & on-air
  
- Exhibit 5 – Account Executive (11/10/17)
  - ColoradoBroadcasters.org
  - The Nickel
  - Mesa County Workforce Center
  - CMU Career Center
  - MBC Grand Radio, website & on-air
  
- Exhibit 6 – Account Executive (9/22/17)
  - ZipRecruiter
  - ColoradoBroadcasters.org
  - The Nickel
  - Mesa County Workforce Center
  - CMU Career Center
  - MBC Grand Radio, website & on-air
  
- Exhibit 7 – Sportscaster (8/21/17)
  - AllAccess.com
  - ColoradoBroadcasters.org
  - MBC Grand Internship Program
  - Colorado Broadcaster’s Association’s Virtual Job Fair
  
- Exhibit 8 – Account Executive (4/10/17) & Account Executive (3/6/17)
  - CMU Job Fair
  - The CMU Job Fair had 60 participating employers and over 1000 attendees. The event was open to the public along with CMU students, alumni, staff and faculty. The success of the 2017 CMU Job Fair is discussed in the exhibit on outreach initiatives Exhibit 9.

*(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.*

- Total number of persons interviewed for Account Executive (10/8/18) – 3
- Sources referring persons interviewed:
  - CMU Job Fair – 1
  - CBA Virtual Job Fair – 1
  - Station website – 1
  
- Total number of persons interviewed for Account Executive (8/30/18) – 4
- Sources referring persons interviewed:
  - CMU Job Fair – 2
  - On-air advertisements – 2
  
- Total number of persons interviewed for Account Executive (11/10/17) – 4
- Sources referring persons interviewed:
  - On-air advertisements – 2
  - Station website – 2
  
- Total number of persons interviewed for Account Executive (9/22/17) – 3
- Sources referring persons interviewed:
  - On-air advertisements – 2
  - Station website – 1
  
- Total number of persons interviewed for Sportscaster (8/21/17)– 2
- Sources referring persons interviewed:
  - MBC Grand Internship Program – 2
  
- Total number of persons interviewed for Account Executive (4/10/17) & Account Executive (3/6/17) – 6
- Sources referring persons interviewed:
  - CMU Job Fair – 6

*(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.*

Total full-time employees: 32

Small Market Exemption: The stations in the Unit are licensed to communities located in Western Colorado. Of the communities of license served by the Unit, only Grand Junction is listed as a Metropolitan Statistical Area<sup>3</sup> (“MSA”), which consists of Mesa County. The Grand Junction MSA had a 2010 Census population of 146,723.<sup>4</sup> The other communities of license are in counties outside of all metropolitan areas defined by OMB.<sup>5</sup>

Thus, the Unit is located in a small market that needs to perform two initiatives over a two-year period pursuant to Rule 73.2080(c)(2) and (e)(3).

During the two years under review, the stations were involved in the following initiatives:

Co-sponsored at least one job fair with organizations in the business and professional community whose membership includes substantial participation of women and minorities.

March 1, 2018 and March 2, 2017 – the Unit co-sponsored the Career Connections Fair hosted by Colorado Mesa University and located at the University Center Meyer Ballroom. The job fair is promoted and sponsored by MBC Grand. The General Manager, Operations Manager, Promotions Director, and Program Manager attended the job fair both years to represent the Unit. Supporting documentation is provided in Exhibit 9.

Established an internship program designed to assist members of the community to acquire skills needed for broadcast employment.

In 2018 and 2017, the Unit maintained an internship program with training on live sports broadcasts, on-air shows, equipment operations, and news broadcasts. This on-going internship program is designed and overseen by the Operations and Sports Station Managers. The Unit had two interns in 2018 that each averaged five hours per week and one intern in 2017 that averaged 15 hours per week. Supporting documentation is provided in Exhibit 10.

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<sup>3</sup> See “Revised Delineations of Metropolitan Statistical Areas, Micropolitan Statistical Areas, and Combined Statistical Areas, and Guidance on Uses of the Delineations of These Areas” (July 15, 2015) located at <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/bulletins/2015/15-01.pdf>.

<sup>4</sup> See “Population Change for Metropolitan and Micropolitan Statistical Areas in the United States and Puerto Rico: 2000 to 2010” (September 2011) located at <https://www2.census.gov/programs-surveys/decennial/tables/cph/cph-t/cph-t-2/cph-t-2.xls>.

<sup>5</sup> The Unit’s communities of license are located in the following counties with the listed populations:

<b>Community of License</b>	<b>County</b>	<b>Population</b>
Grand Junction, CO	Mesa	146,723
Glenwood Springs, CO	Garfield	56,389
Montrose, CO	Montrose	41,278
Silt, CO	Garfield	56,389

Go to <https://www.census.gov/quickfacts/fact/table/US/PST045217> and search on county names and 2010 census.

Participated in job banks, Internet programs, and other programs designed to promote outreach generally.

In 2017, the Unit participated in the Colorado Broadcaster's Association's Virtual Job Fair from August 14-18. In 2018, participated in the Colorado Broadcaster's Association's Virtual Job Fair several times throughout the year, January 22-26, May 14-18, August 6-10, and October 8-12. The Virtual Job Fair is designed to show broadcasting opportunities all over the state. Supporting documentation is provided in Exhibit 11.

*(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.*

No complaints have been filed against the station during their current license term. No such complaints are pending.

*(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.*

MBC Grand provides ongoing training to management level personnel, with hiring authority, on methods of ensuring equal employment opportunity to prevent discrimination in the workplace. The group reviews all procedures and documentation and recommendations on improving the licensee's EEO compliance are not only welcomed but encouraged.

Upon notification of an opening from the General Manager or Operations Manager, MBC Grand's Business Manager/HR Compliance Officer will create a Candidate Opening File. The recruitment sources are then notified and announcements are placed. Interviews are then set from the available applicants with the appropriate manager. A candidate may be interviewed for a second time by an expanded panel comprised of employees and supervisors. A selection is then made. Documentation is then retained by MBC Grand's HR Compliance Officer.

MBC Grand's Personnel Policy Manual and employment application form also includes a statement describing EEO and Non-Discrimination Policies. In addition, the MBC Grand has posters and statements of employee rights and non-discrimination policies.

*(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.*

Because the Unit is small, the General Manager is aware of all recruitment efforts that occur for openings in the Unit. The General Manager then reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives. Under the supervision of the General Manager, the HR Compliance Officer also reviews the effectiveness of the program during her preparation of the Annual EEO Public File Reports for the stations.

Each year, when the Annual EEO Public File Report has been drafted, MBC Grand's FCC counsel reviews and evaluates MBC Grand's report and recommends changes to the General Manager and the HR Compliance Officer to the extent needed. Counsel's recommendations are then implemented for future openings and recruitment initiatives.

*(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.*

Senior management at MBC Grand meets each year at budget time to analyze pay levels for each position within each department. During that time, senior management evaluates compensation and benefits to ensure all employees regardless of race, color, religion, national origin or sex have equal opportunities for and access to any pay increase, promotions or job openings internally. Each year MBC Grand compares employment statistics of the radio industry with the Unit to check for competitiveness in the market.

There are no union contracts or union employees within the Unit.

*(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in Section 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be provided. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under Section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.*

The licensee is not a religious broadcaster.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Respectfully submitted,

**MBC Grand Broadcasting, Inc.**

A handwritten signature in black ink, appearing to read "David Hinson", written over a horizontal line.

David Hinson  
President

GSB:10082451.2