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December 12, 2023

UPLOADED TO WNDD(FM), WNDN(FM), WYND-FM and WOGK(FM)
ONLINE PUBLIC INSPECTION FILES

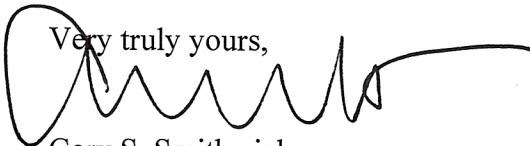
Elizabeth E. Goldin, Esquire
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: WNDD(FM), Alachua, FL
Facility I.D. No. 737
Response to EEO Audit Data Request

Dear Ms Goldin:

Uploaded to the Online Public Inspection Files of WNDD(FM), Alachua (Fac. ID No. 737); WNDN(FM), Chiefland (Fac. ID. No. 72201); WYND-FM, Silver Springs (Fac. ID No. 1099); and WOGK(FM), Ocala (Fac. ID 49962); all Florida, on behalf of Saga South Communications, LLC, licensee of WNDD, is the licensee's response to your letter dated October 30, 2023, in connection with WNDD's random selection for an audit of its Equal Employment Opportunity program. Due to its size, documentation supporting this response is being uploaded in a separate file.

If there are any questions, please communicate with the undersigned.

Very truly yours,


Gary S. Smithwick
Counsel for
Saga South Communications, LLC

GSS/sls/Attachments

DECLARATION OF HOWARD TUURI EEO AUDIT RESPONSE

Howard Tuuri, under penalty of perjury, declares as follows:

I am a Vice President of Saga South Communications, LLC ("Saga"), licensee of commercial radio station WNDD(AM), FCC Facility ID No. 737, Alachua, Florida. This responds to the Commission's Equal Employment Opportunity ("EEO") Audit Letter (the "Letter") dated October 30, 2023. The Letter was sent in accordance with Section 47 CFR 73.2080(f)(4) of the EEO Rules as WNDD was randomly selected for an audit of its EEO program. WNDD operates in combination with three other commonly owned stations in the Ocala/Gainesville, Florida, radio market: WNDN(FM), Chiefland, Florida; WYND-FM, Silver Springs, Florida, and WOGK(FM), Ocala, Florida. As WNDD, WNDN, WYND-FM and WOGK are part of the same Station Employment Unit ("Unit"), this response covers hiring for all four stations.

I am General Manager of the stations in the Unit. Consequently, we are submitting for your review the EEO policies and procedures for the Unit. Saga does business as the North Central Florida Media. That "dba" is sometimes referred to in the attached documents.

Audit Data Requested

Section 2 (b) (i): Copies of the Unit's two most recent EEO Public File Reports (2020 and 2021) are attached as **Attachment 1**.¹

Section 2 (b) (ii): The Unit's stations internet web addresses are:

WNDD:	www.windfm.com
WNDN:	www.windfm.com
WYND-FM:	www.windfm.com
WOGK:	www.937kcountr.com

Please note that programming on WNDD, WNDN and WYND-FM is simulcast which is why they share a website. The stations are also sometimes referred to collectively in the documents as "WIND-FM."

Links to the EEO public filed reports are displayed at the bottom of both home pages along with links to the Unit's online public inspection file and FCC applications.

Section 2 (b) (iii): All materials related to the hiring of the five (5) full-time positions filled during the period covered by the EEO Public File Reports are attached.

¹ Pages 2 and 3 of the EEO Public File Reports carry an erroneous heading (e.g., "For the Period 10/1/2020-9/30/2021") and Appendices 1, 2 and 3 also carry an erroneous heading ("For the Period 10/1/2019-9/30/2020"); however, the data reported reflects the correct dates of the activities, vacancies, recruitment and referral sources.

Several of these postings share documents including our EEO outreach list. If the event was online, this is noted on the document.

Section 2 (b) (iv):

To fill two of the three 2021-2022 open positions, seven people were interviewed. They were referred by the following sources: sagacom.com and announcements broadcast on the Unit's stations. The third position, Sales Coordinator, was not filled during the period ending September 30, 2022, but was filled in 2023.

To fill the three 2022-2023 open positions seventy (70) people were interviewed. They were referred by the following sources: Allaccess.com job bank and our radio stations.

Section 2 (b) (v): A copy of the North Central Florida Media Group recruitment initiatives is attached. As General Manager, I was involved with the posting, recruiting, and hiring of each position. In 2021-2022 there were 20 (at maximum employment) full time employees and in 2022-2023 there were 22 (at maximum employment) full time employees. The population of the Ocala-Gainesville, Florida, radio market in 2022 and 2023 was 648,400. EEO guidelines require four initiative activities within the two-year period. We were only able to participate in one Job Fair during the period. We have reached out to the College of Central Florida in order to increase the number of participations. Verification is attached. Other initiatives in which the Unit participated included Mega Job Fair, February 23, 2023 from 3:00pm – 7:00pm at the College of Central Florida Klein Conference Center. 3001 SW College Road, Ocala, FL 34474.

Section 2 (b) (vi): None

Section 2 (b) (vii): Station staff members including the General Manager and Sales Manager interviewed applicants or spoke at various job fairs. All department heads: General Manager, Operations Manager, Chief Engineer, Promotions Manager as well as the Traffic Manager have been involved with the interns at the station to highlight jobs in the broadcast industry.

As General Manager, I am the Unit official with overall responsibility for equal employment opportunity at the Unit, although Rebecca Wallace (Program Director for the WYND-FM tripplecast); Bob Forster (Program Director for WOGK); Lisa Varner (Sales Manager); and Holly Kreienbrink (Business Manager) are responsible for EEO compliance. Through individual instruction and group discussions regarding diversity in the workplace, EEO compliance is learned and shared.

Section 2 (b) (viii): During the hiring process, officials of the Unit review the sources of applicants to measure each source for its effectiveness. Based on the responses, the Unit adds additional sites or outlets to maximize visibility to the varied constituencies. We actively promote on the station websites, All Access and the parent company's website (www.sagacommunications.com). We have added websites to post job openings, such as Allaccess.com, and we have stopped using websites such as Indeed.com when we received far too many unqualified applications.

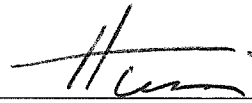
Section 2 (b) (ix): The Unit disseminates the Unit's EEO program to job applicants and employees by posting jobs openings on Unit station websites. There is no established seniority directive except for the length of vacation time earned, and this is done on a nondiscriminatory basis. We annually examine rates of pay and benefits for employees having the same duties to make certain there are no inequities based upon race, national origin, color, religion, or sex. We utilize media for recruitment purposes in a manner that does not indicate either explicitly or implicitly, any preference for one race, national origin, color, religion, or sex over another. We ensure that promotions of greater responsibility are made in a nondiscriminatory manner by selection of the best qualified person for the position posted and avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, or sex.

Section 2 (b) (x): This does not apply as Saga is not a religious broadcaster.

Section 3: Does not apply to this Unit.

Section 4: Does not apply to this Unit.

Executed this 11~~th~~ day of December 2023.



Howard Tuuri, Vice President