



Federal Communications Commission
Washington, D.C. 20554

March 23, 2009

Dear Licensee:

1. In accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity ("EEO") rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 of the Commission's rules is enclosed for your reference.)
2. If the Unit is not required under our rules to have an EEO recruitment program due to the size of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you must provide only a list of the Unit's full-time employees, noted by job title and the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a) and (b) below regarding brokers and brokered stations, for instructions in situations in which the applicable employment unit has fewer than five full-time employees.
3. **Audit Data Requested.** If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation regarding any requested information that you are unable to provide:
 - (a) The Unit's two most recent EEO public file reports, described in 47 C.F.R. § 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 included on or linked to each of these websites, in violation of that subsection, indicate each station involved and provide an explanation of why the report is not so posted or linked. In accordance with 47 C.F.R. § 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report.
 - (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 47 C.F.R. § 73.2080(c)(5)(iii). Include 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 47 C.F.R. § 73.2080(c)(1)(ii).
 - (c) In accordance with 47 C.F.R. § 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.
 - (d) Documentation demonstrating performance of Unit recruitment initiatives described in 47 C.F.R. § 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 the stations included in the Unit operate 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 47 C.F.R. §§ 73.2080(c)(2) and (e)(3).

(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body 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 complainant and other persons involved; (3) the date of the complaint's filing; (4) the court or agency before which it is pending or 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.

(f) In accordance with 47 C.F.R. § 73.2080(b), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with 47 C.F.R. § 73.2080(c)(3), for the period from March 10, 2003 (or from the first day of the Station's current license term, 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 address any problems found as a result of such analysis.

(h) In accordance with 47 C.F.R. § 73.2080(c)(4), for the period from March 10, 2003 (or from the first day of the Station's current license term, 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, and 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.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in 47 C.F.R. § 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 maintained. No other records would be required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain all records for such hires and complete the initiatives required under 47 C.F.R. § 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

4. Time Brokerage.

(a) **Brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must also respond to Question 4(b) below.

(b) **Brokers.** The broker of any Unit station referenced above must supply the Commission with the information requested herein regarding **the broker's** full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. *See* 47 C.F.R. § 73.2080(f)(3). If your employees at your own station(s), combined with your employees at the station(s) you are brokering, total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to Question 3(e) above

5. **Procedures.** All responses must be filed with the Commission by May 4, 2009. Extensions of time will be granted only upon a showing of extraordinary circumstances. The response must be in the form of a statement signed by an officer, partner or other principal of the Station licensee or broker or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. Send the response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, DC 20554. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; *see also* 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is also punishable by sanctions in accordance with 47 C.F.R. § 73.2080(g).

6. In accordance with 47 C.F.R. § 73.3526(e)(10) (for commercial stations) and 47 C.F.R. § 73.3527(e)(11) (for noncommercial educational stations), copies of which are also enclosed, you are required to place a copy of this letter and your response in the public inspection file of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

7. If our EEO random audits sent in 2007 or 2008 included the Station, or if the Station's most recent license renewal application was granted, by final order, within the past 18 months, you may not have to provide a response to this letter. If you believe that the Station falls within one of these categories, before responding to this letter, please so state in an e-mail, providing the specifics of the audit or renewal, sent to the undersigned at lewis.pulley@fcc.gov. Upon receipt of this information, we will advise you if a response is necessary under the circumstances. Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosures



April 29, 2009

VIA HAND DELIVERY

Mr. Lewis Pulley
Assistant Chief, Policy Division
Media Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Dear Mr. Pulley:

This letter, together with attached Exhibits 1 through 32, serves as the response by WSIL-TV, Inc. (the "Licensee"), licensee of WSIL-TV, Harrisburg, Illinois, to the Media Bureau's request for audit data relating to the station's EEO program dated March 23, 2009.

WSIL-TV is part of the employment unit comprised of the following commonly owned television stations (the "Employment Unit" or the "Unit"):

- WSIL-TV, Harrisburg, Illinois (Facility Id: 73999)
- KPOB-TV, Poplar Bluff, Missouri (Facility Id: 73998)

The stations in the Employment Unit are owned by the Licensee and operate in and serve primarily the Paducah-Cape Girardeau-Harrisburg-Mt. Vernon Designated Market Area.

The responses to the relevant audit data requests are set forth below, and the required documentation is provided in the attached Exhibits.

* * * * *

***Audit Data Requested 3(a).** [Provide] [t]he Unit's two most recent EEO public file reports, described in 47 C.F.R. § 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 included on or linked to each of these websites, in violation of that*

subsection, indicate each station involved and provide an explanation of why the report is not so posted or linked. In accordance with 47 C.F.R. § 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report.

Response: The Employment Unit's two most recent EEO Public File Reports covering August 1, 2006, through July 31, 2007, and August 1, 2007, through July 31, 2008, are attached as Exhibits 1 and 2, respectively. As noted on each report, the 2006-2007 and 2007-2008 reports were amended in April 2009 when, in the course of reviewing the Employment Unit's materials and documents in preparing the instant response, a few minor errors and omissions were discovered and corrected. With respect to 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 Employment Unit's knowledge, is true and correct.

The Employment Unit's most recent EEO Public File Report is posted online at the following WSIL-TV website address: http://65.161.205.131/2008_EEO_Report.pdf (linked from http://www.wsiltv.com/p/job_openings.php). KPOB-TV is not required to and does not have a website.

The date of each full-time hire listed in each Public File Report is provided in the table below.

POSITION FILLED	DATE FILLED
Reporter/Producer	October 30, 2006
Photographer/Reporter	December 18, 2006
Director ¹	May 28, 2007
News Producer	May 14, 2007
News Producer	June 18, 2007
Photographer	June 25, 2007
Account Executive	August 20, 2006
Engineer	September 6, 2006

¹ The Director position was originally recruited as a part-time Weekend News Director position. Following widespread recruitment using the Unit's routine recruitment sources, John Savage filled the part-time position in January 2007. Mr. Savage was later promoted to full-time Director on May 28, 2007, as reported above and in the 2006-2007 Public File Report.

POSITION FILLED	DATE FILLED
Reporter	August 8, 2007
Reporter	August 27, 2007
Reporter	September 12, 2007
Producer	October 1, 2007
Producer	November 1, 2007
Editor	November 5, 2007
Master Control	November 26, 2007
Director	March 17, 2008
Editor	March 31, 2008
Photojournalist	May 12, 2008
Producer	May 22, 2008
Photojournalist	June 2, 2008
Master Control	June 3, 2008
Receptionist	June 23, 2008

* * * * *

Audit Data Requested 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, [provide] dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in 47 C.F.R. § 73.2080(c)(5)(iii). Include 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 47 C.F.R. § 73.2080(c)(1)(ii).

Response: The Employment Unit filled 22 full-time vacancies during the applicable period. For each job opening, the Employment Unit has attached (as Exhibits 3 through 22) all available copies of advertisements, bulletins, letters, faxes, e-mails, or

other communications announcing job openings and all available documentation that such communications were sent to recruitment sources used by the Employment Unit.

Below is the list of recruitment sources used by the Employment Unit for job openings during the periods covered by the Public File Reports. No recruitment sources have requested notification of job vacancies from the Employment Unit. Where an asterisk (“*”) appears next to the recruitment source, that source was added to the recruitment list during the 2007-2008 reporting period.

RECRUITMENT SOURCE	ADDRESS
Illinois Broadcasters Association	Brandi Coffey 200 Missouri Ave Carterville, IL 62918 618/985-5555 (tel) 618/985-6070 (fax) www.ilba.org
Illinois Department of Employment Security (IDES)	Robert Barron 8195 Express Dr. Marion, IL 62959 618/985-6835 (tel) 618/993-5871 (fax) Robert.barron@illinois.gov
John A. Logan College	Judy Korando 700 Logan College Rd Carterville, IL 62918 618/985-3741, ext. 8424 (tel) 618/985-6610 (fax) Judy.korando@jal.cc.il.us
Murray State	Donna PO Box 9 Murray, KY 42071 270/809-3802 (tel) 270/809-3516 (fax)
NPPA Region 5	Mike Borland 1485 Merchant Dr. Algonquin, IL 60102 847/842-2434 (tel) micaelb@mchsi.com

RECRUITMENT SOURCE	ADDRESS
Rend Lake College	Craig K. 468 N Ken Gray Pkwy Ina, IL 62846 618/437-5321 (tel) 618/437-5403 (fax) craigk@rlc.edu
Southeast Missouri State University	One University Plaza Cape Girardeau, MO 63701 573/651-2583 (tel) careerlinkages@semo.edu
Shawnee Community College	Leslie Weldon Rt. 1 Box 53 Ullin, IL 62992 800-481-2242 (tel) 618/634-3352 (fax) lesliec@shawneecc.edu
Southern Illinois University-Carbondale	Sandy Foster Carbondale, IL 62901 618/453-2391 (tel) 618/453-1924 (fax) postjobs@siu.edu
Southeast Illinois College	Catherine Packard 3575 College Dr. Harrisburg, IL 62946 618/252-5400 (tel) Catherine.packard@sic.edu
University of Evansville	Gene 1800 Lincoln Ave. Evansville, IN 47722 812/479-2663 (tel) 812/479-2156 (fax) career@evansville.edu
Southern Illinois University-Carbondale	Michael Whitney Carbondale, IL 62901 618/453-2391 (tel) jobs@siu.edu

RECRUITMENT SOURCE	ADDRESS
TVJobs.com	Mark Holloway P.O. Box 4116 Oceanside, CA 92052 760/754-8177 (tel) 760/754-2115 (fax) jobs@tvjobs.com
Rick Gevers	Rick Gevers PO Box 577 Zionsville, IN 46077-0577 317/769-7900 (tel) rick@rickgevers.com
Medialine	Staff PO Box 51909 Pacific Grove, CA 93950 800/237-8073 (tel) www.medialine.com
B-Roll	Kevin Johnson 1623 D St. NE Washington, DC 20002 202/486-8842 (tel) www.b-roll.net
Illinois News Broadcasters	Bob Roberts 1 University Circle Macomb, IL 61455 www.inba.net borowmaq@aol.com
The Southern	Doris Harrison PO Box 2108 Carbondale, IL 62901 618/351-5003 (tel) Doris.harrison@thesouthern.com
WSIL-TV Website	http://www.wsilTV.com/p/job_openings.php
Word of Mouth Referral	Various
Internship Program	WSIL-TV/KPOB-TV

RECRUITMENT SOURCE	ADDRESS
Internal Job Posting	Various WSIL-TV/KPOB-TV Posting Locations
Employee Referral	Various
Unsolicited Applicant	Various
Resume on File	Various
Talent Agent*	Various
University of Illinois*	Lynn Holley 715 S. Wright St. MC-383 Champaign, IL 217/244-1497 (tel) www.comm.uiuc.edu/spike
RTNDA Conference*	Las Vegas, NV April 16, 2008 Attended by News Director Mike Snuffer

The recruitment source list and the exhibits attached illustrate that for the period covered by the audit, the Employment Unit had a regular practice of widely disseminating notification of job vacancies through educational institutions, websites, and unaffiliated broadcasting- and non-broadcasting-related organizations. However, the Licensee has been unable to locate complete copies of all of its vacancy announcements. During the period covered by the Public File Reports, the Employment Unit distributed vacancy notifications primarily via e-mail, and electronic and hard copies of e-mails were not retained in every instance. Notifications were sent, under the General Manager's supervision, by an administrative assistant. For each vacancy, unless otherwise noted, the administrative assistant sent a single e-mail message to a group of about 10 routine recruitment source contacts and a separate e-mail message to the Illinois Association of Broadcasters. The administrative assistant deleted her sent items from her local machine on a periodic basis during the relevant time period, and the Unit did not (and does not) retain employee e-mail on a company server; therefore, electronic copies of the e-mail notification messages as sent are not accessible.

In one instance, the Unit promoted a part-time Associate Producer, Jill Kilgore, to the full-time Producer position filled on May 22, 2008, without sending notification to all of the Unit's routinely used recruitment sources. However, the Unit did distribute vacancy notifications to three external sources, including attendees at an industry conference, and posted the position on the Station's website. To the extent that these vacancy notifications were not sufficiently widespread, the Unit conducted widespread

recruitment for the part-time Associate Producer position Ms. Kilgore filled on September 17, 2007; because the hiring of Ms. Kilgore into the Producer position was an internal promotion, additional widespread recruitment at the full-time level was not required. Documents demonstrating recruitment for the part-time vacancy are included in Exhibit 19.

In another instance, the Unit promoted a part-time Associate Producer, Robin Cox, to the full-time Editor position filled on March 31, 2008. Although the Unit conducted widespread recruitment using the Unit's routine recruitment sources for the Editor position, the Unit does not have available copies of the Editor job posting or vacancy notifications sent to various recruitment sources. However, the Unit conducted widespread recruitment for the Associate Producer position Ms. Cox filled on October 15, 2007; because the hiring of Ms. Cox into the Editor position was an internal promotion, additional widespread recruitment at the full-time level was not required. Documents demonstrating recruitment for the part-time vacancy are included in Exhibit 17.

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Audit Data Requested 3(c). In accordance with 47 C.F.R. § 73.2080(c)(5)(v), [provide] 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 appear in the table below. Where an asterisk ("*") appears next to the position filled, the position was filled by promoting a part-time employee from within the Employment Unit. In each case, including the positions marked with an asterisk and unless otherwise discussed herein, the Unit conducted full recruitment for the full-time position.

POSITION FILLED (DATE FILLED)	NUMBER OF INTERVIEWEES	REFERRAL SOURCES FOR INTERVIEWEES
Reporter/Producer* (October 30, 2006)	3	TVJobs.com (1) Medialine (1) In-House Promotion (1)
Photographer/Reporter* (December 18, 2006)	3	WSIL-TV Website (1) In-House Promotion (1) Internal Job Posting (1)
Director* (May 28, 2007)	1	In-House Promotion (1)

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 April 28, 2009, was 71. WSIL-TV is located in the Harrisburg, Illinois, Micropolitan Statistical Area, which, according to 2000 census data, has 26,733 people. KPOB-TV is located in the Poplar Bluff, Missouri, Micropolitan Statistical Area, which, according to 2000 census data, has 40,867 people. Collectively, the population of the Employment Unit's market is fewer than 250,000 people. By the Employment Unit's calculation, it is required to perform two (2) initiatives in each applicable two-year period.²

During the period of time covered by the two most recent EEO Public File Reports, the Employment Unit engaged in the following recruitment initiatives described under Section 73.2080(c)(2) and has attached, as Exhibits 23 through 30, documentation demonstrating performance of the following recruitment initiatives:

Employee Training Program (47 C.F.R. § 73.2080(c)(2)(viii)) Exhibit 23	
<i>Activity</i>	<i>Personnel Involved</i>
Associate Producer Program 9 associate producers during 2006-2007	Mike Snuffer, News Director
Associate Producer Program 11 associate producers during 2007-2008	Mike Snuffer, News Director

² The Employment Unit's renewal applications were due and filed in August 2005. Thus, the period covered by this response represents the final year of the two-year period that commenced August 1, 2005, and ended July 31, 2007, and the first year of the two-year period that commenced August 1, 2007, and will end July 31, 2009.

Internship Program (47 C.F.R. § 73.2080(c)(2)(v)) Exhibit 24	
<i>Activity</i>	<i>Personnel Involved</i>
Internship Program 5 students during 2006-2007	Mike Snuffer, News Director Jim Rasor, Chief Meteorologist Ron Hamberg, Production Manager David Cisco, Sales Manager
Internship Program 10 students during 2007-2008	Mike Snuffer, News Director Ron Hamberg, Production Manager Pat Victoria, Chief Engineer

Educational Institution Program (47 C.F.R. § 73.2080(c)(2)(x)) Exhibit 25	
<i>Activity</i>	<i>Personnel Involved</i>
CVE Program 2 students during 2006-2007	Bonnie Wheeler, News Operations
CVE Program 1 student during 2007-2008	Bonnie Wheeler, News Operations

Educational Institution Program (47 C.F.R. § 73.2080(c)(2)(x)) Exhibit 26	
<i>Activity</i>	<i>Personnel Involved</i>
Extern Program 3 students during 2007-2008	Steve Wheeler, General Manager

POSITION FILLED (DATE FILLED)	NUMBER OF INTERVIEWEES	REFERRAL SOURCES FOR INTERVIEWEES
News Producers (2) (May 14, 2007) (June 18, 2007)	5	SIU-Carbondale (2) TVJobs.com (1) The Southern (1) WSIL-TV Website (1)
Photographer* (June 25, 2007)	1	In-House Promotion (1)
Account Executive (August 20, 2006)	6	The Southern (4) WSIL-TV Website (2)
Engineer (September 6, 2006)	12	The Southern (6) WSIL-TV Website (6)
Reporter (August 8, 2007)	3	TVJobs.com (1) Medialine (1) Employee Referral (1)
Reporter (2) (August 27, 2007)* (September 12, 2007)	5	TVJobs.com (2) Medialine (2) Internal Job Posting (1)
Producer* (October 1, 2007)	2	Internal Job Posting (2)
Producer (November 1, 2007)	1	Employee Referral (1)
Editor* (November 5, 2007)	2	The Southern (1) WSIL-TV Website (1)
Master Control (November 26, 2007)	1	WSIL-TV Website (1)
Director* (March 17, 2008)	1	Internal Job Posting (1)
Editor* (March 31, 2008)	2	WSIL-TV Website (1) Internal Job Posting (1)

POSITION FILLED (DATE FILLED)	NUMBER OF INTERVIEWEES	REFERRAL SOURCES FOR INTERVIEWEES
Photojournalist* (May 12, 2008)	2	WSIL-TV Website (1) Internal Job Posting (1)
Producer* (May 22, 2008)	3	Internal Job Posting (1) RTNDA Conference (2)
Photojournalist (June 2, 2008)	4	TVJobs.com (1) Medialine (1) WSIL-TV Website (1) Employee Referral (1)
Master Control (June 3, 2008)	1	Employee Referral (1)
Receptionist (June 23, 2008)	2	IDES (1) WSIL-TV Website (1)

In the course of preparing the instant response, the Licensee discovered some minor discrepancies in its recruitment records concerning certain sources that referred internal interviewees for particular positions (News Producer filled October 1, 2007, News Producer filled November 1, 2007, Director filled March 17, 2008, Editor filled March 31, 2008, Photojournalist filled May 12, 2008, and Producer filled May 22, 2008). For example, a part-time WSIL-TV employee who interviewed for a full-time Producer position may have been referred by the WSIL-TV website, an internal job posting, an internal promotion, or some combination of these three sources. After further investigation of these six hires, the Licensee believes that the table above and the attached Public File Reports include the correct data regarding the recruitment sources for these positions.

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Audit Data Requested 3(d). *[Provide] [d]ocumentation demonstrating performance of Unit recruitment initiatives described in 47 C.F.R. § 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 the stations included in the Unit operate 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 47 C.F.R. §§ 73.2080(c)(2) and (e)(3).*

Educational Institution Program (47 C.F.R. § 73.2080(c)(2)(x)) Exhibit 27	
<i>Activity</i>	<i>Personnel Involved</i>
Job Shadowing Program 1 student during 2006-2007	Mike Snuffer, News Director
Job Shadowing Program 1 student during 2007-2008	Eric Mittan, Editor Mike Snuffer, News Director

Educational Institution Event (47 C.F.R. § 73.2080(c)(2)(x)) Exhibit 28	
<i>Activity</i>	<i>Personnel Involved</i>
Rend Lake College Career Fair March 2007	Mark Kiesling, Anchor Hayley Stewart, Reporter

Participation in Job Fairs (47 C.F.R. § 73.2080(c)(2)(i)) Exhibit 29	
<i>Activity</i>	<i>Personnel Involved</i>
RTNDA Job Fair Las Vegas, NV April 16, 2008	Mike Snuffer, News Director

Participation in Other Outreach (47 C.F.R. § 73.2080(c)(2)(xvi)) Exhibit 30	
<i>Activity</i>	<i>Personnel Involved</i>
Station Tours 27 tours during 2006-2007	Bethany Tanner, Programming
Station Tours 29 tours during 2007-2008	Bethany Tanner, Programming

* * * * *

Audit Data Requested 3(e). Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before any body 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 complainant and other persons involved; (3) the date of the complaint's filing; (4) the court or agency before which it is pending or 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: None.

* * * * *

Audit Data Requested 3(f). In accordance with 47 C.F.R. § 73.2080(b), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

Response: The Employment Unit is divided into five departments: News (approximately 40 staff), Sales (6 staff), Engineering (9 staff), Production (11 staff), and General and Administration ("G & A," 5 staff). Each department staff member reports to his or her respective department head: the News Director, Sales Manager, Chief Engineer, or Production Manager (collectively, the "Department Heads"). G & A staff and the Department Heads report directly to the General Manager. The Department Heads are responsible for ensuring that EEO policies are enforced in their respective

departments, and the General Manager ensures that EEO policies are enforced with respect to G & A staff, the Department Heads, and throughout the Unit.³

The General Manager and News Director hold a weekly meeting with a corporate news Vice President and senior news staff. Any subject related to Unit operations may be addressed at these meetings, and staffing and employment issues are frequently discussed. The subject of widespread recruitment, communicating EEO policies to station employees, and provision of internal training are also discussed periodically and on an as-needed basis during these weekly meetings.

The News Director meets daily with key news staff and is available at any time on an ad hoc basis to any member of the News department. The daily meetings are primarily editorial in nature; however, the News Director communicates the Unit's EEO policies periodically and on an as-needed basis during these daily meetings.

The Sales, Engineering, Production, and G & A departments are smaller in number than the News department and, therefore, meet on a less routine basis. However, the Department Heads of the Sales, Engineering, Production, and G & A departments communicate EEO policies to their respective staff on an as-needed basis.

In addition to meetings and in-person communication from station management, Unit applicants and employees are also informed about EEO policies through written materials. Most job vacancy announcements carry a notice that the Station is an equal opportunity employer, and Station job applications include the following notice: "This station is an Equal Opportunity Employer. Discrimination based on a person's race, color, religion, national origin or sex is prohibited. If you feel you have been discriminated against you may contact the appropriate Federal, State or local agency." A copy of the Station's job application is attached as Exhibit 31. Additionally, federal laws regarding Equal Employment Opportunities are prominently posted near the WSIL-TV's news room in an area that is accessible to all employees.

The General Manager and the Department Heads also ensure EEO program and policy enforcement by actively engaging in the recruitment and hiring process. When a vacancy opens within the Unit, the relevant department head discusses with the General Manager the job responsibilities and the qualifications required to fill the position. The General Manager also discusses with the department head the need to post and advertise the position widely and the non-discrimination requirement. Vacancy notifications are distributed to the Unit's recruitment sources as directed by the General Manager. Together, the General Manager and the relevant department head screen job candidates.

³ It should be noted that, outside of the News department, the vast majority of the Unit's employees have been employed in the same position for a number of years. Due to the longevity of so many of the Unit's employees, the process of recruiting, hiring, and promoting is infrequent in departments other than News.

Finally, the General Manager, the Department Heads, and staff members participate in the Employment Unit's various outreach initiatives. The General Manager and the Department Heads generally decide together what outreach initiatives to conduct and which station personnel will participate.

* * * * *

Audit Data Requested 3(g). In accordance with 47 C.F.R. § 73.2080(c)(3), for the period from March 10, 2003 (or from the first day of the Station's current license term, 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 address any problems found as a result of such analysis.

Response: The Employment Unit continually monitors and analyzes its EEO recruitment program. The General Manager and the Department Heads informally but routinely and on an ongoing basis discuss recruiting initiatives, the quantity and quality of candidates applying for vacancies, and potential recruiting sources that would allow the Employment Unit to better reach the community.

The General Manager also works directly with the Department Heads to prepare and review the annual Public File Reports, and the Department Heads actively participate in the recruitment and interview process to ensure compliance with the Employment Unit's EEO program. The assistant to the General Manager, at the General Manager's direction, continually maintains and reviews the recruitment source list; for example, in an effort to reach additional qualified candidates, new sources were added to the Unit's recruitment source list for the 2007-2008 reporting period. Moreover, the Unit actively reaches out to the community to identify new recruitment sources and potential candidates for employment, as is demonstrated by the statement and e-mail link on the Unit's website that invites organizations wishing to receive information on job vacancies to contact the Unit.⁴ A copy of the Unit's "Job Openings" web page is attached as Exhibit 32.

* * * * *

Audit Data Requested 3(h). In accordance with 47 C.F.R. § 73.2080(c)(4), for the period from March 10, 2003 (or from the first day of the Station's current license term, 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, and 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.

⁴ The e-mail link on the WSIL-TV "Job Openings" web page is to an e-mail address for the assistant to the General Manager.

Response: *Compensation and Benefit Levels.* The Employment Unit's compensation levels are reviewed on an annual basis during budget preparation by the General Manager and Station ownership to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect.

Pay raises, at any point during the year, are recommended by Department Heads and approved by the General Manager. However, there are no formal policies with respect to increases in compensation. Most increases are based on employees taking on greater responsibility within the Unit. The General Manager and the Department Heads routinely discuss the requirement that compensation levels must not have a discriminatory effect.

All full-time employees of the Unit receive benefits. Employee benefits are reviewed periodically by the General Manager, the corporate Comptroller, and the corporate President. The group periodically assesses benefit levels to ensure they do not have a discriminatory effect.

Seniority Practices and Promotions. The Unit has no formal policies related to seniority except that employees receive three weeks of vacation after they reach five years of employment with the Unit. The Unit is not a unionized workplace, and there are no union agreements in place.

With the exception of the News department, the vast majority of the Unit's employees have been employed at the Station for many years. Therefore, promotions in departments other than News are rare.

The Unit routinely promotes part-time News department employees to full-time status when full-time positions open. These promotions are based on the merit and skills of the particular employee. In keeping with the FCC's EEO rules, the Unit recruits widely for Associate Producer part-time positions in the News department, using the same recruitment sources and policies that it does for full-time positions. As is described in the documentation provided in Exhibit 23, candidates for Associate Producer positions frequently have little or no broadcast training. Unit personnel train each Associate Producer over a period of weeks and/or months—if the Associate Producer has demonstrated the required expertise and a position is open, the Associate Producer may apply for and be promoted to full-time employment. The Associate Producer program, therefore, makes broadcast employment open to a wide range of relatively inexperienced candidates and provides the opportunity to receive broadcast training and gain full-time broadcast employment (either at the Unit or elsewhere).

Selection Techniques. After providing notification of job vacancies to the community, the employment selection process is based upon the experience, qualifications, and talents of the candidates. There is no test given in connection with employment. The General Manager and Department Heads consult on each selection.

* * * * *

The remaining audit data requested is not applicable. The Licensee is not a religious broadcaster, and the stations in the Employment Unit are not brokered stations.

The Employment Unit is placing a copy of this letter and the attached Exhibits in its Public Inspection Files.

* * * * *

If you have any questions regarding this response or need any further information, please call our attorneys Mark Prak or Elizabeth Spainhour at (919) 839-0300.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Steve Wheeler".

Steve Wheeler
General Manager, WSIL-TV, Inc.
Licensee of WSIL-TV

**Response of WSIL-TV, Inc.
to March 23, 2009 EEO Audit Letter**

EXHIBIT LIST

Exhibit 1	EEO Public File Report (8/1/06-7/31/07)
Exhibit 2	EEO Public File Report (8/1/07-7/31/08)
Exhibit 3	Copies of advertisements or other communications announcing job vacancy for the Reporter/Producer position (filled 10/30/2006).
Exhibit 4	Copies of advertisements or other communications announcing job vacancy for the Photographer/Reporter position (filled 12/18/2006).
Exhibit 5	Copies of advertisements or other communications announcing job vacancy for the Director position (filled 5/28/2007).
Exhibit 6	Copies of advertisements or other communications announcing job vacancy for the two News Producer positions (filled 5/14/2007 and 6/18/2007).
Exhibit 7	Copies of advertisements or other communications announcing job vacancy for the Photographer position (filled 6/25/2007).
Exhibit 8	Copies of advertisements or other communications announcing job vacancy for the Account Executive position (filled 8/20/2007).
Exhibit 9	Copies of advertisements or other communications announcing job vacancy for the Engineer position (filled 9/6/2006).
Exhibit 10	Copies of advertisements or other communications announcing job vacancy for the Reporter position (filled 8/8/2007).
Exhibit 11	Copies of advertisements or other communications announcing job vacancy for the two Reporter positions (filled 8/27/2007 and 9/12/2007).

Exhibit 12	Copies of advertisements or other communications announcing job vacancy for the Producer position (filled 10/1/2007).
Exhibit 13	Copies of advertisements or other communications announcing job vacancy for the Producer position (filled 11/1/2007).
Exhibit 14	Copies of advertisements or other communications announcing job vacancy for the Editor position (filled 11/5/2007).
Exhibit 15	Copies of advertisements or other communications announcing job vacancy for the Master Control position (filled 11/26/2007).
Exhibit 16	Copies of advertisements or other communications announcing job vacancy for the Director position (filled 3/17/2008).
Exhibit 17	Copies of advertisements or other communications announcing job vacancy for the Editor position (filled 3/31/2008).
Exhibit 18	Copies of advertisements or other communications announcing job vacancy for the Photojournalist position (filled 5/12/2008).
Exhibit 19	Copies of materials related to the Producer position (filled 5/22/2008).
Exhibit 20	Copies of advertisements or other communications announcing job vacancy for the Photojournalist position (filled 6/2/2008).
Exhibit 21	Copies of advertisements or other communications announcing job vacancy for the Master Control position (filled 6/3/2008).
Exhibit 22	Copies of advertisements or other communications announcing job vacancy for the Receptionist position (filled 6/23/2008).
Exhibit 23	Documentation demonstrating participation in a training program designed to enable station personnel to acquire skills that could qualify them

for higher level positions (Associate Producer Program).

- Exhibit 24 Documentation demonstrating establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment (Internship Program).
- Exhibit 25 Documentation demonstrating participation in events or programs sponsored by educational institutions relating to career opportunities in broadcasting (CVE Program).
- Exhibit 26 Documentation demonstrating participation in events or programs sponsored by educational institutions relating to career opportunities in broadcasting (Extern Program).
- Exhibit 27 Documentation demonstrating participation in events or programs sponsored by educational institutions relating to career opportunities in broadcasting (Job Shadowing Program).
- Exhibit 28 Documentation demonstrating participation in events or programs sponsored by educational institutions relating to career opportunities in broadcasting (Educational Institution Events).
- Exhibit 29 Documentation demonstrating participation in job fairs by Employment Unit personnel who have substantial responsibility in making hiring decisions.
- Exhibit 30 Documentation demonstrating participation in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.
- Exhibit 31 Copy of anti-discrimination statement on job application.
- Exhibit 32 Copy of "Job Openings" web page posted on the Unit's website.

Exhibit 1
(2007 EEO Public File Report)

WSIL-TV

Annual EEO Public File Report

Date: August 1, 2006-July 30, 2007

Amended as of 4/29/09

This EEO Public File Report is filed in compliance with Section 73.2080©(6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of WSIL-TV, Harrisburg, IL and KPOB-TV, Poplar Bluff, MO. WSIL-TV, an equal opportunity employer, is dedicated to providing broad outreach regarding job vacancies, and we seek the help of local organizations in referring qualified applicants. Organizations that wish to receive information about vacancies at the station should contact the Personnel Director at 618/985-2333. For purposes of the Report, a vacancy was deemed filled when the hiree reported for work. A person was deemed interviewed whether he or she was interviewed in person, over the phone, or via e-mail.

Section 1: Vacancy Information

Job Title	Date Hired	Number of Interviews	Recruitment Source of Hiree	Recruitment Source of Interviews	Recruitment Source
Reporter/Producer *	10/30/06	3	22	13;15;22	1-13;15;19;20;22
Photographer/Reporter *	12/18/06	3	22	20;22;24	1-13;15;20;22;24
Director *	5/28/07	1	22	22	1-12;15;20;22
News Producer	5/14/07	5	19	9;13;19;20	1-13;15;19;20
News Producer	6/18/07	(Same 5 above)	20	9;13;19;20	1-13;15;19;20
Photographer *	6/25/07	1	22	22	1-13;15;20;22
Account Executive	8/20/06	6	19	19;20	1-12;19;20
Engineer	9/6/06	12	20	19;20	1-12;19;20
*Full-Time Hires Promoted from Part-Time					

Section 2: Recruitment Source Information

Source #	Source Name	Contact	Address	Phone	Fax	Email or Website	Requested Notification ?	Interviewees during this period
1	IL Broadcasters Association	Debbie David	300 N Pershing Energy, IL 62933	618/942-2139	N/A	ilba.org	No	0
2	IDES	Robert Barron	8195 Express Dr. Marion, IL 62959	618/985-6835	618/993-5871	Robert.barron@illinois.gov	No	0
3	John A Logan College	Judy Korando	700 Logan College Rd. Carterville, IL	618/985-3741 Ext. 8424	618/985-6610	Judy.korando@jal.cc.il.us	No	0
4	Murray State	None	PO Box 9 Murray, KY 42071	270/809-3802	270/809-3516		No	0
5	NPPA Region 5	Mike Borland	1485 Merchant Dr. Algonquin, IL 60102	847/842-2434	N/A	michaelb@mmchsi.com	No	0
6	Rend Lake College	Craig K.	468 N Ken Gray Pkway Ina, IL 62846	618/437-5321	618/437-5403	craigk@rlc.edu	No	0
7	SEMO	None	One University Plaza Cape Girardeau, MO	573/651-2583	N/A	careerlinkages@semo.edu	No	0
8	Shawnee Com. College	Candy Eastwood	Rt. 1 Box 53 Ullin, IL 62992	800-481-2242	618/634-3352	candy@shawneecollege.edu	No	0
9	SIU-Carbondale	Sandy Foster	Carbondale, IL 62901	618/453-2391	618/453-1924	postjobs@siu.edu	No	3
10	Southeast Illinois College	Catherine Packard	3575 College Dr. Harrisburg, IL 62946	618/252-5400	N/A	Catherine.packard@sic.edu	No	0
11	University of Evansville	Gene	1800 Lincoln Ave. Evansville, IN 47722	812/479-2663	812/479-2156	career@evansville.edu	No	0
12	SIU-Carbondale	Michael Whitney	Carbondale, IL 62901	618/453-2391	N/A	jobs@siu.edu	No	0
13	TVJobs.com	Mark Holloway		760/754-8177	N/A	jobs@tvjobs.com	No	2
14	Rick Gevers	Rick Gevers	PO Box 577 Zionsville, IN 46077-0577	317/769-7900		rick@rickgevers.com	No	0

15	Media Line	Ask for Staff	PO Box 51909 Pacific Grove, CA 93950	800-237-8073		Medialine.com	No	1
16	B-Roll (Photographers)	Kevin Johnson	1623 D St. NE Washington, DC 20002	202/486-8842		b-roll.net	No	0
17	Illinois News Broadcasters	Bob Roberts	1 University Circle Macomb, IL 61455			Inba.net borowmaq@aol.com	No	0
18	Collective Talent	Michael Billie		813/254-9695	813/254-9291	Collectivetalent.com	No	0
19	The Southern	Nathan Fowler				Nathan.fowler@thesouth hern.com	No	14
20	WSIL-TV Website					www.wsilTV.com	No	13
21	Word of Mouth Referral						No	0
22	In-House Promotion						No	4
23	Internship Prog						No	2
24	Internal Job Posting						No	2
25	Employee Referral						No	0
26	Unsolicited Applicant						No	1
27	Resume On File						No	0

Section 3: Longer-Term Recruitment Initiatives

Activity/Description	Date	Staff Participant	Partners	Initiative #
<p>Associate Producer Program – The associate producer program is designed to create part-time positions with low entry requirements and to then provide training that can qualify candidates for full-time positions here or elsewhere. Most AP's are students majoring in journalism, radio/television or communications. Some have previous professional experience but most do not. There is an ongoing effort to make these positions accessible to candidates with no professional or even educational background.</p> <p>During this period nine AP's were hired. Six of the nine were students in a television related major (journalism, radio/tv, communications). One of the nine had professional experience. Two of the nine had some education or experience in print journalism but none in broadcast.</p> <p>During this period three AP's were promoted into full-time positions at WSIL. Two of the three were first hired as AP's during this period. The third was initially hired last year.</p>	Ongoing	Mike Snuffer		8
<p>CVE Program – WSIL works with Carterville and Carbondale High Schools to accept high school students who attend school a half day and work a half day. The students are paid employees of WSIL. They receive high school credit and have a faculty advisor at the school. During this period WSIL hosted two students, both from Carbondale High School.</p>	Ongoing	Bonnie Wheeler	Carbondale High School Carterville High School	10

<p><u>Intern Program</u> – WSIL accepts interns who are receiving academic credit. Students work in their area of interest. They are not paid by WSIL. During this period WSIL hosted 5 interns. Three in news, two across multiple departments. Two were from Southern Illinois University, one from Benton High School, one from Harding College, and one from McKendree College.</p>	Ongoing	Mike Snuffer Jim Rasor Ron Hamberg David Cisco	Southern Illinois University Benton High School Harding College McKendree College	5
<p><u>Job Shadowing</u> – WSIL permits interested students, typically high school students, to job shadow a WSIL employee. This usually follows a request from a faculty advisor. During this period, WSIL had one job shadow on Feb 22 for a day from Eldorado High School.</p>	Ongoing		Eldorado High School	10
<p><u>Station Tours</u> – WSIL conducted 27 station tours for interested groups, some of which contain presentations on careers in broadcasting.</p>		Bethany Tanner		16
<p><u>Educational Events</u> - WSIL staff occasionally speak to interested schools or other groups regarding potential careers. During this period (in March 2007) WSIL anchor, Mark Kiesling delivered the keynote address to a career day event at Rend Lake College. WSIL reporter, Hayley Stewart conducted breakout sessions on careers in broadcasting at the event, which was open to Junior High School students in Jefferson County.</p>		Mark Kiesling Hayley Stewart	Rend Lake College	

