



KUAM Pacific Telestations, LLC

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March 22, 2020

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, W.W.
Washington DC 20554

ATTENTION: Lewis C. Pulley, Assistant Chief, Policy Division

RE: Response to EEO Audit Letter dated February 6, 2020
Broadcast Station KUAM-TV, Facility ID No. 51233, Hagatna GU

Dear Mr. Pulley:

This letter responds to your letter of February 6, 2020, directed to, and requesting EEO audit data for, the employment unit that includes Broadcast Station KUAM-TV, Hagatna, Guam.

KUAM-TV is one of three broadcast stations owned and operated by Pacific Telestations, LLC ("Pacific"), comprising a discrete employment unit at Hagatna, Guam. Pacific also owns and operates Broadcast Station KUAM-FM, Facility ID No. 51236, and AM Broadcast Station KUAM, Facility ID No. 51238, both also licensed to Hagatna.

KUAM-TV serves the entire population of the Territory of Guam, estimated at 164,229 (2017). It is therefore located in a smaller market, for purposes of the EEO rule. An island in the Western Pacific Ocean, Guam is challenged by its distance from the states of the United States. It is located 3,800 miles west of Hawaii (8 hours by air), and more than 6,000 miles from the West Coast. Accordingly, it is evident that Pacific does not have access and exposure to the national broadcast employment pool that stateside broadcasters enjoy.

Nevertheless, Pacific serves a very diverse population. The racial and ethnic makeup of Guam's population is markedly different than that of the contiguous States. Estimates as of 2010 show this breakdown: Chamorro 37.3%, Filipino 26.3%, Caucasian 7.1%, Chuukese 7%, Korean 2.2%, other Pacific Islander 2%, other Asian 2%, Chinese 1.6%, Palauan 1.6%, Japanese 1.5%, Pohnpeian 1.4%, mixed 9.4%, other 0.6%.

With this background, the following information is provided in response to the numbered paragraphs of your letter.

3. (a)-(c) Attachments A and B are a copy of the two most recent EEO public file reports.

KUAM-TV has a website at <https://kuam.com>. A link labeled “EEO Report” directs the user to the Online Public Inspection File and the most recent EEO public file report.

The hire of each full-time employee listed in the two most recent EEO public file reports are as follows:

11/1/2017: News reporter.

This was a hire from another market of a person known to KUAM-TV from prior collaborations, whose contract was nearing its end. The position was offered to her not because of a hard vacancy but because her skills would be an asset to the station’s news coverage.

11/3/2017 and 1/8/2018: Media Consultant.

These were hires selected from on-air announcements on KUAM-FM. Attachment C is an example of the text used for the vacancy (as published on the Handshake.com website). Attachment D is an example of the insertion order.

6/1/2018: News Producer.

As with the news reporter hire of 11/1/2017, this hire was a person previously known to us whose availability KUAM-TV deemed to be an opportunity to strengthen its news staff in service to the community.

9/7/2018: News Producer.

This was a former employee who was re-hired.

10/30/2018: Promotions.

This was a former employee who was re-hired.

11/5/2018: Accountant.

Pacific suffered the unexpected and sudden passing of its accountant in October 2018. The company was in immediate need of filling the vacancy; the hire was referred by colleagues in the industry.

5/6/2019: News Reporter.

This was a referral from within the industry. As with the prior news reporter/producer and media consultant positions, the Handshake.com ad was used, Attachment C.

5/16/2019: Media Consultant.

This hire resulted from our recruitment at the University of Guam Job Fair. A copy of the certificate of participation is at Attachment E.

6/13/2019: News Reporter.

This vacancy was filled by an intern.

7/3/2019: News Reporter.

This vacancy was filled in response to a website posting. A copy of the posting, as listed on the LinkedIn website, is at Attachment F.

8/5/2019: Media Consultant.

This vacancy was filled in response to an announcement broadcast on KUAM-FM. See Attachments C and D.

No organization has notified Pacific that they want to be notified of job openings.

(d) As a smaller market operator, Pacific is required to perform two recruitment initiatives in a two-year period. Documentation demonstrating performance of several recruitment initiatives is attached:

1. Participation forms (3) for George Washington High School Career Day, January 29, 2018, Attachment G.
 2. Certification of participation for Francisco Baza Leon Guerrero Middle School Career Day, February 15, 2019, Attachment H.
 3. Certificate of participation for AsTumbo Middle School Career Day, March 22, 2019, Attachment I.
- (e) There are no pending or resolved complaints against the licensee alleging unlawful discrimination in Pacific's employment practices.
- (f) Since the licensee is located in a smaller market, it does not have a strictly-tiered management structure. CEO and General Manager Marie Calvo-Monge has overall responsibility for the enterprise and takes day-to-day responsibility for managing the Pacific stations. Her responsibilities include recruitment, interviewing, and hires. Pacific posts a notice to its employees that it is an equal opportunity employer. It includes that statement on its application form, and in its notices of employment opportunities in recruitment efforts.
- (g) Pacific analyzes its EEO recruitment program annually in connection with the preparation of its annual EEO local public file report, to ensure that it is effective, and to address any problems found as a result of such analysis. Pacific believes its program is effective and its analysis has not found any problems that need to be addressed.
- (h) Due to the size of the market, the station, and the staff, Pacific has no formal program or plan for pay, benefits, seniority practices, promotions, or selection techniques. The management and ownership of Pacific are confident that the management of the enterprise does not have a discriminatory effect. There is no union at the station.
- (i) Pacific is not a religious broadcaster.

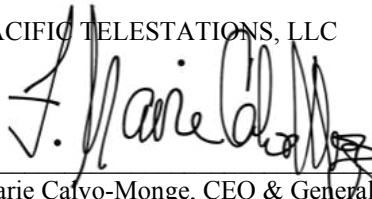
4. Pacific does not engage in time brokerage.

Pacific believes its efforts to achieve broad and inclusive outreach in its employment practices have been successful, as reflected in our employment profile. Of 44 full-time employees, 30 are male, 14 are female, by race/ethnicity:

Asian – 1
African American – 1
Caucasian – 3
Hispanic – 2
Pacific Islander – 37

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

PACIFIC TELESTATIONS, LLC



Marie Calvo-Monge, CEO & General Manager
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