



Florida West Coast Public Broadcasting Inc.
1300 North Boulevard
Tampa, FL 33607

May 6, 2024

To the Online Public Files of the stations in the Employment Unit

Re: WEDU, Tampa, FL
Facility ID No. 21808
EEO Audit Response

Florida West Coast Public Broadcasting Inc., licensee of Digital TV broadcast station WEDU, Tampa, Florida, hereby responds to the letter dated March 22, 2024, from Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau. This response provides information relating to the licensee’s employment unit (the “Unit”), which includes the following stations:

WEDQ, Tampa, FL, Facility ID No. 69338

The following are our responses to the questions in part 2(b) of the audit letter.

(i) Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).

The 2021–2022 Annual EEO Public File Report for the period from October 1, 2021 – September 30, 2022, is attached as **Exhibit 1**. The 2022–2023 Annual EEO Public File Report for the period from October 1, 2022 – September 30, 2023 is attached as **Exhibit 2**.

(ii) For each station in the Unit that maintains a website, the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit’s most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).

The most recent annual EEO Public File Report is linked on the following websites:

CALL SIGN	DOMAIN
WEDU	www.wedu.org
WEDQ	www.wedu.org

(iii) For each of the Unit’s full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), the date of hire as required by

Section 73.2080(c)(5)(vi) as well as 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 the burden of responding to this audit, if a job notice was sent to multiple sources, the Unit may include in its response: (1) documentation showing one such notice was sent, (2) a list of the additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other recruitment sources) that has notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).

The Unit hired twenty-eight (28) full-time employees during the period under review. For documentation, see **Exhibit 3**. Notice to all additional sources not referenced in **Exhibit 3** were retained, as required by section 73.2080(c)(5)(iii).

Full Time Position Filled By Job Title and Date Filled	Recruitment Source that Referred the Person Hired	Number of Persons Interviewed
Donor Services Associate ¹ 10/4/2021	The Reserves Network	10
Associate Director of Marketing 11/30/2021	WEDU Internal Referrals	6 (2 Persons Hired)
Broadcast Engineer 1/10/2022	SBE.org	6 (2 Persons Hired)
Donor Services Associate 1/11/2022	WEDU Internal Posting/Referrals	5
Human Resource Administrator 1/24/2022	Indeed.com	5
PR/Email Marketing Coordinator 1/31/2022	LinkedIn	6
Staff Accountant 2/23/2022	Warren Averett Staffing	3

¹ Please see **Exhibits 1 and 2** for a complete list of recruitment sources.

Sr. Staff Accountant 3/21/2022	Warren Averett Staffing	3
Marketing Assistant 3/7/2022	The Reserves Network	5
Director of Education 3/7/2022	PBS.org	3
Digital Media Manager 4/4/2022	Creative Circle	4
Staff Accountant 4/26/2022	Warren Averett Staffing	5
Digital Specialist 6/21/2022	Creative Circle	7
Multimedia Producer 6/21/2022	Indeed.com	4
Education Coordinator 8/1/2022	JazzHR	8
Switchboard Admin 8/9/2022	Indeed.com	3
HR Administrator 8/23/2022	8/23/2022	4
Content Coordinator 8/23/2022	Indeed.com	5
Programming Traffic Coordinator 9/6/2022	Indeed.com	4

Associate Director of Marketing 10/24/2022	WEDU.org website	5
Producer 2/13/2023	WEDU Internal Posting/Referrals	6
Communications Coordinator 3/27/2023	LinkedIn	6
Content Services Coordinator 7/17/2023	Indeed.com	3
Receptionist/Donor Services Assoc 7/31/2023	WEDU.org website	3
Video Content Creator 8/22/2023	WEDU.org website	5
Producer 9/12/2023	Indeed.com	3

(iv) As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.

Total Number of Persons Interviewed for the Unit's twenty-eight full-time vacancies: **127** (See tables above for a breakdown per vacancy.

Recruitment Sources Referring Interviewees	Number of Persons Interviewed that the Source Referred
WEDU Internal posting, bulletin bds, Referrals	11
WEDU.org Website	21
The Reserves Network	8
Indeed.com	39
SBE.org	5

LinkedIn	15
Warren-Averett Staffing	11
PBS.org	1
creativecircle.com	9
JazzHR	7
TOTAL	127

(v) Dated documentation demonstrating performance of the Unit's recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit's total number of full-time employees and state whether the population of the market in which any of the Unit's stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission's rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth, sixth and eighth anniversaries of that date). If the Unit performed more than the required amount in its response, i.e., two or four points worth. If any documentation provided appears inadequate, e.g., it is not dated or does not clearly prove the Unit's participation, the Commission may ask for additional verification.

Total Number of Full-Time Employees: 55

Florida West Coast Public Broadcasting employs more than 10 full-time individuals in the Unit and operates in a market where the population is 250,000 or more. Accordingly, the Unit is required to participate in four recruitment initiatives over a two-year period.

Participation in other activities (station tours) 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. See **Exhibit 4** for related documentation.

Stations Tours

Date	Group Attending	Total Persons
4/12/2022	International Journalist Tour	6 journalists and 2 interpreters from Latvia (State Dept.)
5/19/2022	Broward Elementary morning TV Crew	6 students and 2 adults
6/3/2022	Essrig Elementary morning TV Crew	12 students and 4 adults
6/15/2022	International Journalist Tour	5 journalists and 2 liaisons from India
6/17/2022	Boy Scout Troop 3892	10 students and 2 adults working on their Journalism Merit badge
9/19/2022	International Journalist Tour Middle East	16 journalists and 4 chaperones

12/22/2022	International Journalist Tour & Discussion	15 journalists and 4 interpreters form various countries (State Dept.)
12/22/2022	Sullivan Partnership School	27 students and 4 adults, Education presentation in Studio 2 with Content recording a B roll of event
April 2023	International Journalist Tour & Discussion,	25 journalists and 4 interpreters form various countries (State Dept.).
April 2023	April 2023, Tampa Palms Elementary; Morning TV Crew	10 students, 2 adults
April 2023	Romanian Delegation Visitors	10 journalists and 4 interpreters
May 2023	International Journalist Tour & Discussion	10 journalists and 4 interpreters form various countries (State Dept.).
July 2023	Career Focus	2 students Summer program
July 2023	Freedom Village	22 adults, Senior Community
July 2023	General Interest	4 students and 1 adult, Education Dept.
August 2023	International Journalist Tour & Discussion	17 journalists and 4 interpreters form various countries (State Dept.)
August 2023	2 separate tours, MacDill AFT Home School students	26 students and 4 adults

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

Term	Intern Type	Documentation
Summer/Fall 2023	Production Intern, Junior, Digital TV & Multimedia, Hillsborough Community College	<u>Exhibit 5</u>
Summer/Fall 2023	Production Intern, Sophomore, Digital TV & Multimedia, Hillsborough Community College	<u>Exhibit 5</u>
Summer/Fall 2023	Production Intern, Junior, Digital TV & Multimedia, Hillsborough Community College	<u>Exhibit 5</u>
Fall 2023	Corporate Work Study Program Production/Education intern, Freshman. Cristo Rey Tampa-Salesian High School, Tampa FL	<u>Exhibit 5</u>

*Participation in job banks, Internet programs, and other programs designed to promote outreach generally (i.e., that are not primarily directed to providing notification of specific job vacancies). See **Exhibits 1 and 2** for a complete list of outreach initiatives; see also **Exhibit 6** for related documentation.*

(vi) Any pending or resolved complaints involving the Unit filed during the Unit's current license term(s) 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 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 the Unit must report all complaints, regardless of their status or disposition.

None.

(vii) In accordance with section 73.2080(b), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.

The Director of Human Resources is responsible for implementation and administration of the stations' EEO policies at the Unit. EEO policy implementation is reviewed annually during the budget process by the licensee's President and Chief Operating Officer as well as periodically throughout the year during meetings with Unit management.

All printed, online and on-air radio advertisements for full-time employment include "Equal Opportunity Employer." The licensee's employment application states that it is an "Equal Opportunity Employer" and its Employee Handbook reaffirms this commitment.

The Unit's complete EEO policy is included in the Employee Handbook. See **Exhibit 7, p. 2** for more details. All employees are required to acknowledge that they have read the Handbook and to sign a form that they have read and understood it.

(viii) In accordance with section 73.2080(c)(3), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period), a description of 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.

The Unit's management team meets throughout the year to discuss any openings that may be on the horizon or that are currently open and discusses its recruitment efforts and to ensure compliance. The Director of Human Resources is aware of all full-time recruitment efforts that occur for openings and reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives. In addition, the Unit has its communications counsel review its Annual EEO Public File Report each year. Counsel provides suggestions for improvement to the recruitment program if necessary.

(ix) As required by section 73.2080(c)(4), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period), a description of 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.

Market comparisons are done annually to ensure WEDU/WEDQ pay and benefits are comparable to market value and that employees are being compensated fairly.

A review of benefits is done each year prior to October renewal to ensure best coverage and rates for staff.


All job openings are posted internally, and promotions are done based on job knowledge, experience and employee performance.

The Unit does not have any union agreements.

(x) If your entity is a religious broadcaster and any of the Unit's full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. 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 based on information provided by the Director of Human Resources and the Chief Operations Officer.


Shirley Risen
Chief Financial Officer
Florida West Coast Public Broadcasting Inc.

Attachments: Exhibits 1 – 7