



Federal Communications Commission  
Washington, D.C. 20554

April 25, 2013

John M. Moen  
General Manager  
Star Radio Group  
616 Amelia Street  
Fredericksburg, Virginia 22401

Re: WFLS-FM, Fredericksburg, Virginia (Facility ID# 65641)  
WNTX(AM), Fredericksburg, Virginia (Facility ID# 65640)  
WVBX (FM), Spotsylvania, Virginia (Facility ID# 22484)  
WWUZ(FM), Bowling Green, Virginia (Facility ID# 55174)

Dear Mr. Moen:

We have completed our review of the response of The Free Lance-Star Publishing Company of Fredericksburg, Virginia, licensee of the above-referenced radio stations, to the February 16, 2012 random audit letter sent to it in accordance with the provisions of Section 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules. As a result of our review, we find that no further action is required. In accordance with Section 73.2526(e)(10) of the Commission's rules for commercial stations or Section 73.3527(e)(11), for non-commercial stations, the stations must place copies of this letter, our February 16 audit letter, and their response in each public inspection file. They must maintain these materials in the file until the grant, by final order, of the next renewal application of the license for the station to which the file relates.

Should you have any questions concerning this matter, you may call the EEO staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink that reads "Lewis C. Pulley".

Lewis C. Pulley  
Assistant Chief, Policy Division  
Media Bureau



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

~~News Media Information 202 / 418-0500~~

DA 12-243

Released: February 17, 2012

Internet: <http://www.fcc.gov>

## FCC COMMENCES 2012 EEO AUDITS

On February 16, 2012, the Federal Communications Commission mailed the first of its Equal Employment Opportunity (EEO) audit letters for 2012 to randomly selected radio and television stations. In accordance with the provisions of Sections 73.2080(f)(4) and 76.77(d) of the Commission's EEO rules, the FCC annually audits the EEO programs of randomly selected broadcast licensees and multi-channel video programming distributors (MVPDs). Each year, approximately five percent of all radio and television stations and MVPDs are selected for these EEO audits.

TTY: 1-888-835-5322

Attached are a list of the radio and television stations to which the audit letters were sent, as well as the text of the February 16, 2012 audit letter. The list and the letter can also be viewed by accessing the Media Bureau's current EEO headline page on the FCC website at <http://www.fcc.gov/encyclopedia/equal-employment-opportunity-2012-headlines>.

### For stations that have a website and five or more full-time employees:

We remind you that you must post your most recent EEO public file report on your website by the deadline by which it must be placed in the public file, in accordance with 47 C.F.R. § 73.2080(c)(6). This will be examined as part of the audit. Failure to post the required report on a station website is a violation of the EEO Rule and subject to sanctions, including a forfeiture. Please also note that if your station or employment unit does not have its own website, but its corporate site contains a link to a site pertaining to the station or unit, then the station or unit's most recent EEO public file report must be linked to either the station or unit's site or the general corporate site, pursuant to 47 C.F.R. § 73.2080(c)(6).

News Media Contact: Janice Wise at 202-418-8165

Media Bureau Contact: Lewis Pulley at 202-418-1450

Federal Communications  
Commission  
Washington, D.C. 20554

February 16, 2012



Dear Licensee:

1. In accordance with 47 C.F.R. § 73.2080(f)(4) of the Commission's rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its Equal Employment Opportunity ("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 nature 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 are required only to provide a list of the Unit's full-time employees, each noted by job title, 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)-(d) below regarding brokers and brokered stations for instructions for 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 (and all units, for Question 3(e)), provide the following information in your response to this letter, including an explanation regarding any requested information that you are unable to provide:

(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 included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, 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 47 C.F.R. § 2080(c)(6).

(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). 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 Section 73.2080(c)(1)(ii).

(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.

(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).

(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 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.

(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.

(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.

(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.

(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.

#### 4. Time Brokerage.

(a) **Licensee of 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 respond to Question 4(b) below. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 3 above, and also forward the letter to the broker so the broker may respond to Question 4(b) below.

(b) **Broker receiving audit letter from brokered station licensee.** If you are the broker of a station, and the station you are brokering receives an audit letter, the licensee of the brokered station must forward the audit letter to you. You should respond to the audit letter concerning EEO information relating only to your own full-time employees at the brokered station. *See* Section 73.2080(f)(3).

(c) **Broker receiving audit letter directly from Commission.** If you are a broker, but the target station in this audit letter is a station licensed to you, you must submit information requested herein for the EEO program at your station (or employment unit). If you maintain EEO data for a station you are brokering with that for your own station that is the target of this audit letter, and lack the ability to separate the information, you must include in your response the information requested herein pertaining to **your** full-time employees at the station(s) you broker. *See* Section 73.2080(f)(3).

(d) **Broker described under 4(b) or 4(c) above.** If your full-time employees at the station you are brokering, combined with your full-time employees at your owned station(s), total fewer than five, however, you need only respond to this letter by the deadline described below by submitting a list of your 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.** Direct your response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12<sup>th</sup> Street, S.W., Washington, DC 20554. The response must be received by the Commission by March 27, 2012. You need only submit your original response; no copies are needed. The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. (*See* Section 1.16.) The response may be in the form of a CD or other electronic medium, as long as the certification provided refers to the material submitted and is on paper with an original signature. 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).

Extensions of time must be requested in writing (or sent by e-mail to [lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov)) and will be granted only upon a showing of extraordinary circumstances. Unless and until the EEO Staff grants such a request the original deadline remains in effect. Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with Section 73.2080(g).

6. In accordance with Sections 73.3526(e)(10) (for commercial stations ) and 73.3527(e) (11) (for noncommercial educational stations), copies of which are enclosed, you must 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 2010 or 2011 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 respond to this letter. If the Station falls within one of these categories, before responding, please tell us the dates of public file reports included in an audit response or the date of the Station's renewal, in an e-mail sent to [lewis.pulley@fcc.gov](mailto:lewis.pulley@fcc.gov). We will then advise you if a response is necessary. Should you have any questions, 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

FEBRUARY 2012 RADIO AUDIT

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
KOZE-FM	FM	137	LEWISTON	ID	4-K RADIO, INC.
KRFY	FM	172591	PONDERAY	ID	ACADEMY OF NORTHWEST WRITERS AND PUBLISHERS
KTUB	AM	69557	CENTERVILLE	UT	ADELANTE MEDIA OF UTAH LICENSE LLC
KSKA	FM	805	ANCHORAGE	AK	ALASKA PUBLIC TELECOM., INC.
KTIL-FM	FM	164182	BAY CITY	OR	ALEXANDRA COMMUNICATIONS, INC.
WBMK	FM	91590	MOREHEAD	KY	AMERICAN FAMILY ASSOCIATION
KAKA	FM	81549	SALINA	KS	AMERICAN FAMILY ASSOCIATION
KHTY	AM	40868	BAKERSFIELD	CA	AMFM RADIO LICENSES, L.L.C.
KFNC	FM	52407	BEAUMONT	TX	AR LICENSING, LLC, DEBTOR-IN-POSSESSION
WUNO	AM	54476	SAN JUAN	PR	ARSO RADIO CORPORATION
WIVA-FM	FM	2876	AGUADILLA	PR	ARSO RADIO CORPORATION
WXEX	AM	53386	EXETER	NH	ARUBA CAPITAL HOLDINGS, LLC
WBWC	FM	3638	BEREA	OH	BALDWIN-WALLACE COLLEGE
WBEY-FM	FM	27438	CRISFIELD	MD	BAY BROADCASTING, INC.
KIKV-FM	FM	4336	SAUK CENTRE	MN	BDI BROADCASTING, INC.
KBCS	FM	4627	BELLEVUE	WA	BELLEVUE COLLEGE
KKZY	FM	77087	BEMIDJI	MN	BG BROADCASTING INC.
WEKZ	AM	25131	MONROE	WI	BIG RADIO
WFGW	AM	5972	BLACK MOUNTAIN	NC	BLUE RIDGE BROADCASTING CORP.
WTOS-FM	FM	46352	SKOWHEGAN	ME	BLUEBERRY BROADCASTING, LLC
KVJY	AM	64629	PHARR	TX	BMP RGV LICENSE COMPANY, L.P.
WMTH	FM	6050	PARK RIDGE	IL	BOARD OF EDUCATION, MAINE TWP. #207
KUAR	FM	4296	LITTLE ROCK	AR	BOARD OF TRUSTEES OF THE UNIVERSITY OF ARKANSAS
KSIV	AM	6499	CLAYTON	MO	BOTT COMMUNICATIONS, INC.
WEBJ	AM	19823	BREWTON	AL	BREWTON BROADCASTING, INC.
WVTS	AM	2682	CHARLESTON	WV	BRISTOL BROADCASTING COMPANY, INC.
WAEZ	FM	54601	GREENEVILLE	TN	BRISTOL BROADCASTING COMPANY, INC.
KOXE	FM	7320	BROWNWOOD	TX	BROWN COUNTY BROADCASTING CO.
KLLY	FM	7709	OILDALE	CA	BUCKLEY BROADCASTING OF CALIFORNIA, LLC
WKAD	FM	87890	HARRIETTA	MI	CADILLAC BROADCASTING, LLC
KAAN-FM	FM	31005	BETHANY	MO	CAMERON/BETHANY LICENSE CO, LLC
KAZX	FM	76749	KIRTLAND	NM	CAPSTAR TX LLC
WJDX-FM	FM	6482	KOSCIUSKO	MS	CAPSTAR TX LLC
KVUU	FM	35868	PUEBLO	CO	CAPSTAR TX LLC
KEZA	FM	12702	FAYETTEVILLE	AR	CAPSTAR TX LLC
WUBT	FM	34387	RUSSELLVILLE	KY	CAPSTAR TX LLC
KGOT	FM	12515	ANCHORAGE	AK	CAPSTAR TX LLC
WDCG	FM	53597	DURHAM	NC	CAPSTAR TX LLC
WBJZ	FM	34905	BERLIN	WI	CAXAMBAS CORPORATION
KBFP	AM	28846	BAKERSFIELD	CA	CC LICENSES, LLC
WFOR	AM	54612	HATTIESBURG	MS	CC LICENSES, LLC
WSTH-FM	FM	60763	ALEXANDER CITY	AL	CC LICENSES, LLC
WODC	FM	52042	ASHVILLE	OH	CC LICENSES, LLC
WCDO-FM	FM	9686	SIDNEY	NY	CDO BROADCASTING, INC.
WUAW	FM	9842	ERWIN	NC	CENTRAL CAROLINA COMMUNITY COLLEGE
KQVI-FM	FM	174444	CEDAR LAKE	TX	CENTRO CRISTIANO DE VIDA ETERNA

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
WBMI	FM	29288	WEST BRANCH	MI	CF BROADCASTING, LLC
KCME	FM	10791	MANITOU SPRINGS	CO	CHEYENNE MOUNTAIN PUBLIC BROADCAST HOUSE, INC
KRAF	FM	176870	FORT STOCKTON	TX	CHRISTIAN TELEVISION RADIO MINISTRY
WCKY	AM	51722	CINCINNATI	OH	CITICASTERS LICENSES, INC.
WDUZ	AM	25119	GREEN BAY	WI	CITICASTERS LICENSES, INC.
WKTJ-FM	FM	22323	FARMINGTON	ME	CLEARWATER COMMUNICATIONS, INC.
KCDC	FM	166049	LA VERKIN	UT	COCHISE BROADCASTING LLC
WCRX	FM	12424	CHICAGO	IL	COLUMBIA COLLEGE
KPBR	FM	173704	POPLAR BLUFF	MO	COMMUNITY BROADCASTING, INC.
WAYO	FM	91618	BENTON HARBOR	MI	CORNERSTONE UNIVERSITY
WJLY	FM	78719	RAMSEY	IL	COUNTRYSIDE BROADCASTING
KSOK-FM	FM	31893	WINFIELD	KS	COWLEY COUNTY BROADCASTING, INC.
WDBO-FM	FM	23443	ORLANDO	FL	COX RADIO, INC.
KWTR	FM	48649	LAKEVIEW	OR	CRYSTAL CLEAR BROADCASTING COMPANY, INC.
WJWF	AM	54534	COLUMBUS	MS	CUMULUS LICENSING LLC
KACL	FM	15967	BISMARCK	ND	CUMULUS LICENSING LLC
WMPI	FM	14957	SCOTTSBURG	IN	D.R. RICE BROADCASTING, INC.
WNYN-FM	FM	165997	WHITEFIELD	NH	DEVON BROADCASTING COMPANY, INC.
KDCR	FM	17314	SIOUX CENTER	IA	DORDT COLLEGE, INC.
KKTY-FM	FM	88501	GLENDO	WY	DOUGLAS BROADCASTING, INC.
KWHF	FM	51923	HARRISBURG	AR	EAST ARKANSAS BROADCASTERS OF JONESBORO, LLC
WTUK	FM	18281	HARLAN	KY	EASTERN BROADCASTING COMPANY
KAMS	FM	51107	MAMMOTH SPRING	AR	E-COMMUNICATIONS, LLC
KURQ	FM	54364	GROVER BEACH	CA	EDB SLO LICENSE LLC
WWKB	AM	34383	BUFFALO	NY	ENTERCOM BUFFALO LICENSE, LLC
KALC	FM	59601	DENVER	CO	ENTERCOM DENVER LICENSE, LLC
KKFD-FM	FM	23037	FAIRFIELD	IA	FAIRFIELD LICENSE CO, LLC
WYRV	AM	9709	CEDAR BLUFF	VA	FAITH COMMUNICATIONS, INC.
WRQT	FM	36208	LA CROSSE	WI	FAMILY RADIO, INC.
WDCT	AM	20668	FAIRFAX	VA	FAMILY RADIO, LTD.
KEAR	AM	1082	SAN FRANCISCO	CA	FAMILY STATIONS, INC.
KEAR-FM	FM	20746	SACRAMENTO	CA	FAMILY STATIONS, INC.
WYEZ	FM	34901	MURRELLS INLET	SC	FIDELITY BROADCASTING CORPORATION
KREJ	FM	21791	MEDICINE LODGE	KS	FLORIDA PUBLIC RADIO, INC.
KMHI	AM	72657	MOUNTAIN HOME	ID	FM IDAHO CO., LLC
WFEX	FM	52399	PETERBOROUGH	NH	FNX BROADCASTING OF NEW HAMPSHIRE LLC
KYRV	FM	83321	CONCORDIA	MO	FULL SMILE INC
KCMM	FM	87888	BELGRADE	MT	GALLATIN VALLEY WITNESS INC
WLRV	AM	29514	LEBANON	VA	GARY W. WARD BROADCASTING CORPORATION
WORC	AM	15858	WORCESTER	MA	GOIS BROADCASTING LLC
WLVS-FM	FM	87463	CLIFTON	TN	GOLD COAST BROADCASTING CO.
WDOG	AM	24621	BARNWELL	SC	GOOD RADIO BROADCASTING CORP.
WGCS	FM	24663	GOSHEN	IN	GOSHEN COLLEGE BROADCASTING CORPORATION
WJWK	AM	4339	SEAFORD	DE	GREAT SCOTT BROADCASTING
KOHR	FM	89342	SHERIDAN	WY	HI-LINE RADIO FELLOWSHIP, INC
WMEV-FM	FM	63711	MARION	VA	HOLSTON VALLEY BROADCASTING CORPORATION
WKWH	FM	172896	LIBERTY	IN	HOOSIER PUBLIC RADIO CORPORATION
WDFH	FM	71711	OSSINING	NY	HUDSON VALLEY COMMUNITY RADIO, INC.
KORR	FM	28256	AMERICAN FALLS	ID	IDAHO WIRELESS CORPORATION

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
KIHH	AM	160910	EUREKA	CA	IHR EDUCATIONAL BROADCASTING
KICP	FM	164102	PATTERSON	IA	IOWA STATE UNIVERSITY OF SCIENCE AND TECHNOLOGY
WMPL	AM	13868	HANCOCK	MI	J & J BROADCASTING, INC.
WMJL	AM	31435	MARION	KY	JOEMERS PRODUCTIONS, INC.
KKLE	AM	31892	WINFIELD	KS	JOHNSON ENTERPRISES, INC
WJBW	AM	32963	JUPITER	FL	JUPITER PLANET RADIO, LLC
KBCT	FM	33975	WACO	TX	KENNELWOOD BROADCASTING COMPANY, INC.
WKHR	FM	34028	BAINBRIDGE	OH	KENSTON LOCAL SCHOOL DISTRICT
KGY-FM	FM	34485	MCCLEARY	WA	KGY, INC.
KKCK	FM	35127	MARSHALL	MN	KMHL BROADCASTING COMPANY
KYKM	FM	67287	YOAKUM	TX	KREMLING ENTERPRISES, INC.
KRXT	FM	35572	ROCKDALE	TX	KRXT, INC.
WELX	FM	29219	ISABELA	PR	LA EQUIS BROADCASTING CORP.
WDUX	AM	36245	WAUPACA	WI	LAIRD BROADCASTING COMPANY, INC.
KCVX	FM	92246	SALEM	MO	LAKE AREA EDUCATIONAL BROADCASTING FOUNDATION
KPGE	AM	36349	PAGE	AZ	LAKE POWELL COMMUNICATIONS, INC.
WVBG-FM	FM	162298	REDWOOD	MS	LENSI RADIO, LLC
KIOE	FM	177194	UTULEI VILLAGE	AS	LEONE CHURCH OF CHRIST
KLRB	FM	93276	STUART	OK	LIGHTHOUSE OF PRAYER, INC.
KJLU	FM	37556	JEFFERSON CITY	MO	LINCOLN UNIVERSITY OF MISSOURI
KOME-FM	FM	165950	MERIDIAN	TX	LKCM RADIO GROUP, LP
WSVA	AM	39493	HARRISONBURG	VA	M. BELMONT VERSTANDIG, INC.
WLXV	FM	39539	CADILLAC	MI	MACDONALD GARBER BROADCASTING, INC
WTMB	FM	30305	TOMAH	WI	MAGNUM RADIO, INC.
KNRO	AM	87171	REDDING	CA	MAPLETON LICENSE OF REDDING, LLC
KSEY-FM	FM	71535	SEYMOUR	TX	MARK V. AULABAUGH
KGGR	AM	8099	DALLAS	TX	MBC OF TEXAS-KGGR, LNC
KATR-FM	FM	48397	WRAY	CO	MEDIA LOGIC, LLC
WSLQ	FM	41112	ROANOKE	VA	MEL WHEELER, INC.
KAKX	FM	41164	MENDOCINO	CA	MENDOCINO UNIFIED SCHOOL DISTRICT
WMAB-FM	FM	43212	MISSISSIPPI STATE	MS	MISSISSIPPI AUTHORITY FOR EDUCATIONAL TV
KUKU	AM	50348	WILLOW SPRINGS	MO	MISSOURI OZARKS RADIO NETWORK, INC.
KWMW	FM	39522	MALJAMAR	NM	MTD, INC.
WXLF	FM	17801	HARTFORD	VT	NASSAU BROADCASTING III, L.L.C. DEBTOR-IN-POSSESSION
WEQR	FM	57610	WALNUT CREEK	NC	NEW AGE COMMUNICATIONS, INC.
WQSL	FM	28171	JACKSONVILLE	NC	NM LICENSING LLC
WGER	FM	20384	SAGINAW	MI	NM LICENSING LLC
WXNC	AM	57451	MONROE	NC	NORSAN CONSULTING AND MANAGEMENT, INC.
WJOJ	FM	88667	RUST TOWNSHIP	MI	NORTHLAND COMMUNITY BROADCASTERS
WNYE	FM	3539	NEW YORK	NY	NYC DEPT. OF INFO TECHNOLOGY & TELECOMMUNICATIONS
KYRK	FM	40798	TAFT	TX	PACIFIC BROADCASTING OF MISSOURI, LLC
KXRZ	FM	6651	ALEXANDRIA	MN	PARADIS BROADCASTING OF ALEXANDRIA, INC.
KPZE-FM	FM	77842	CARLSBAD	NM	PECOS VALLEY BROADCASTING COMPANY
WDTK	AM	68641	DETROIT	MI	PENNSYLVANIA MEDIA ASSOCIATES, INC.
WКСR	AM	53874	PULASKI	TN	PULASKI BROADCASTING, INC.
WAOL	FM	56226	RIPLEY	OH	QUEEN CITIES BROADCASTING LLC
KVNI	AM	49245	COEUR D'ALENE	ID	QUEENB RADIO, INC.
WWLS	AM	22190	MOORE	OK	RADIO LICENSE HOLDING CBC, LLC
WIBR	AM	61275	BATON ROUGE	LA	RADIO LICENSE HOLDING CBC, LLC

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
WSHK	FM	4380	KITTERY	ME	RADIO LICENSE HOLDING CBC, LLC
WSKZ	FM	54525	CHATTANOOGA	TN	RADIO LICENSE HOLDING CBC, LLC
WTLC	AM	51433	INDIANAPOLIS	IN	RADIO ONE OF INDIANA, LLC
KRBD	FM	54928	KETCHIKAN	AK	RAINBIRD COMMUNITY BROADCASTING CORP
KOZB	FM	16777	LIVINGSTON	MT	REIER BROADCASTING COMPANY, INC.
KBRF	AM	21400	FERGUS FALLS	MN	RESULT RADIO, INC.
KCVT	FM	56244	SILVER LAKE	KS	RICHARD P. BOTT, II
KQRN	FM	35503	MITCHELL	SD	RIVERFRONT BROADCASTING LLC
KCRX	AM	57700	ROSWELL	NM	ROSENDO CASAREZ, JR.
WCUZ	FM	57416	BEAR LAKE	MI	ROY E. HENDERSON
WCAA	FM	71343	WILLACOOCHEE	GA	RTG RADIO, LLC, DEBTOR-IN-POSSESSION
KOKX	AM	58264	KEOKUK	IA	RUSSELL WITHERS, JR.
WSNI	FM	9795	KEENE	NH	SAGA COMMUNICATIONS OF NEW ENGLAND, LLC
WROL	AM	9139	BOSTON	MA	SALEM MEDIA GROUP, LLC
KCSM	FM	58913	SAN MATEO	CA	SAN MATEO COUNTY COMMUNITY COLLEGE DISTRICT
WJOC	AM	31861	CHATTANOOGA	TN	SARAH MARGARETT FRYAR
WSGA	FM	64428	HINESVILLE	GA	SCOTT SAVAGE, RECEIVER
WYSZ	FM	60276	MAUMEE	OH	SIDE BY SIDE, INC.
KUTT	FM	60291	FAIRBURY	NE	SIEBERT COMMUNICATIONS, INC.
KAML	AM	17322	KENEDY-KARNES CITY	TX	SIGA BROADCASTING CORP.
WELW	AM	26221	WILLOUGHBY	OH	SPIRIT BROADCASTING CORP
WHHI	FM	63056	HIGHLAND	WI	STATE OF WISCONSIN - EDUCATIONAL COMMUNICATIONS BC
WQZY	FM	62474	DUBLIN	GA	STATE RADIO LICENSE, INC.
KBNW	AM	160749	BEND	OR	SUMMIT BROADCASTING GROUP, LLC
KINO	AM	63925	WINSLOW	AZ	SUNFLOWER COMMUNICATIONS, INC.
WRQM	FM	49158	ROCKY MOUNT	NC	THE BOARD OF TRUSTEES OF THE U. OF NC AT CHAPEL HILL
WATY	FM	83543	FOLKSTON	GA	THE FOUNDATION FOR PUBLIC BROADCASTING IN GEORGIA,
WFLS-FM	FM	65641	FREDERICKSBURG	VA	THE FREE LANCE-STAR PUBLISHING CO. OF FREDERICKSBUR
WMGL	FM	61592	RAVENEL	SC	THE LAST BASTION STATION TRUST, LLC, AS TRUSTEE
WQHH	FM	41819	DEWITT	MI	THE MACDONALD BROADCASTING COMPANY
WMBW	FM	66021	CHATTANOOGA	TN	THE MOODY BIBLE INSTITUTE OF CHICAGO
KMWY	FM	122126	JACKSON	WY	THE MOODY BIBLE INSTITUTE OF CHICAGO
WCFM	FM	66277	WILLIAMSTOWN	MA	THE PRESIDENT & TRUSTEES OF WILLIAMS COLLEGE
WCAL	FM	63559	CALIFORNIA	PA	THE STUDENT ASSOCIATION, INC.
KTLZ	FM	90681	CUERO	TX	THE WORSHIP CENTER OF KINGSVILLE
WAQE	AM	55338	RICE LAKE	WI	TKC, INC.
KBYO-FM	FM	68796	FARMERVILLE	LA	UNION BROADCASTING CO., INC.
WUML	FM	69410	LOWELL	MA	UNIVERSITY OF MASSACHUSETTS, LOWELL
WPTS-FM	FM	68946	PITTSBURGH	PA	UNIVERSITY OF PITTSBURGH COMMONWEALTH SYSTEM
WZNO	FM	29512	PICKENS	MS	URBAN RADIO II, L.L.C. DEBTOR-IN-POSSESSION
WIMX	FM	7730	GIBSONBURG	OH	URBAN RADIO LICENSES, LLC
WMSR-FM	FM	50128	COLLINWOOD	TN	URBAN RADIO LICENSES, LLC
WWPR	AM	60587	BRADENTON	FL	VIDIFY MEDIA, INC.
WAGY	AM	70700	FOREST CITY	NC	WAGY, INC.
KTXO	FM	164215	GOLDSMITH	TX	WEST TEXAS BROADCASTING, LLC
KMXW	FM	48683	SPARKS	NV	WILKS LICENSE COMPANY-RENO LLC
KPRT-FM	FM	165985	KIRTLAND	NM	WILKINSON ROAD BROADCASTING CO., LLC
WAAW	FM	4094	WILLISTON	SC	WILKINSON, LLC
WYPM	FM	49384	CHAMBERSBURG	PA	WILKINSON, INC.

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
WLOH	AM	73217	LANCASTER	OH	WLOH RADIO COMPANY
KFMC-FM	FM	73657	FAIRMONT	MN	WOODWARD BROADCASTING, INC.
WGRW	FM	79043	ANNISTON	AL	WORD WORKS, INC.
WYGR	AM	74248	WYOMING	MI	WYGR, LLC
KUYO	AM	11003	EVANSVILLE	WY	WYOMING CHRISTIAN BROADCASTING COMPANY

FEBRUARY 2012 TV AUDIT

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
KACV-TV	DT	1236	AMARILLO	TX	AMARILLO JUNIOR COLLEGE DISTRICT
KPPX-TV	DT	26655	TOLLESON	AZ	AMERICA 51, L.P.
WNUV	DT	7933	BALTIMORE	MD	BALTIMORE (WNUV-TV) LICENSEE, INC.
KGBT-TV	DT	34457	HARLINGEN	TX	BARRINGTON HARLINGEN LICENSE LLC
KIDY	DT	58560	SAN ANGELO	TX	BAYOU CITY BROADCASTING, LLC
WAWD	DT	54938	FORT WALTON BEACH	FL	BEACH TV PROPERTIES, INC.
WVUT	DT	4329	VINCENNES	IN	BOARD OF TRUSTEES FOR THE VINCENNES UNIV.
K46HZ-D	LD	6535	BONNERS FERRY	ID	BOUNDARY COUNTY TV TRANSLATOR DIST.
WBXI-CA	CA	70416	INDIANAPOLIS	IN	CBS OPERATIONS INC.
KRHD-CD	DC	68538	BRYAN	TX	CENTEX TELEVISION LIMITED PARTNERSHIP
KWYP-DT	DT	10032	LARAMIE	WY	CENTRAL WYOMING COLLEGE
KTXL	DT	10205	SACRAMENTO	CA	CHANNEL 40, INC., DEBTOR-IN-POSSESSION
WLCN-CD	DC	55203	CHARLESTON	SC	CHRISTIAN TELEVISION NETWORK OF SOUTH CAROLINA, INC.
KSNB-TV	DT	21161	SUPERIOR	NE	COLINS BROADCASTING CORPORATION
KENW	DT	18338	PORTALES	NM	EASTERN NEW MEXICO UNIVERSITY
WRBW	DT	54940	ORLANDO	FL	FOX TELEVISION STATIONS, INC.
WUTB	DT	60552	BALTIMORE	MD	FOX TELEVISION STATIONS, INC.
KTXH	DT	51569	HOUSTON	TX	FOX TELEVISION STATIONS, INC.
KGPT-CA	CA	35255	WICHITA	KS	GREAT PLAINS TELEVISION NETWORK, L.L.C.
KMOH-TV	DT	24753	KINGMAN	AZ	HERO LICENSECO LLC
KFWD	DT	29015	FORT WORTH	TX	HIC BROADCAST, INC.
WVIZ	DT	18753	CLEVELAND	OH	IDEASTREAM
WBPX-TV	DT	7692	BOSTON	MA	ION MEDIA BOSTON LICENSE, INC.
KAAL	DT	18285	AUSTIN	MN	KAAL-TV, LLC
KCTS-TV	DT	33749	SEATTLE	WA	KCTS TELEVISION
WKMJ-TV	DT	34195	LOUISVILLE	KY	KENTUCKY AUTHORITY FOR EDUCATIONAL TV
KGW	DT	34874	PORTLAND	OR	KING BROADCASTING COMPANY
KMEX-DT	DT	35123	LOS ANGELES	CA	KMEX LICENSE PARTNERSHIP, G.P.
KOCB	DT	50170	OKLAHOMA CITY	OK	KOCB LICENSEE, LLC
KTVU	DT	35703	OAKLAND	CA	KTVU, LLC
WALA-TV	DT	4143	MOBILE	AL	LIN OF ALABAMA, LLC
WMEA-TV	DT	39656	BIDDEFORD	ME	MAINE PUBLIC BROADCASTING CORPORATION
W35AX	CA	41074	CLEVELAND	OH	MEDIA-COM TELEVISION, INC.
KMTW	DT	77063	HUTCHINSON	KS	MERCURY BROADCASTING COMPANY, INC.
KCIT	DT	33722	AMARILLO	TX	MISSION BROADCASTING, INC.
WMAH-TV	DT	43197	BILOXI	MS	MISSISSIPPI AUTHORITY FOR EDUCATIONAL TELEVISION
WDSI-TV	DT	71353	CHATTANOOGA	TN	NEW AGE MEDIA OF TENNESSEE LICENSE, LLC
WAGA-TV	DT	70689	ATLANTA	GA	NEW WORLD COMMUNICATIONS OF ATLANTA, INC.
WWTI	DT	16747	WATERTOWN	NY	NEWPORT TELEVISION LICENSE LLC
WPTY-TV	DT	11907	MEMPHIS	TN	NEWPORT TELEVISION LICENSE LLC
WTVF	DT	36504	NASHVILLE	TN	NEWSCHANNEL 5 NETWORK, LLC
KNWA-TV	DT	29557	ROGERS	AR	NEXSTAR BROADCASTING, INC.
WNCE-CD	DC	450	GLENS FALLS	NY	NORTHERN BROADCASTING COMPANY, INC.
KIXE-TV	DT	47285	REDDING	CA	NORTHERN CALIFORNIA EDUCATIONAL TELEVISION ASSOCIATION, INC

CALLSIGN	SERVICE	FACILITY ID	Community City	Community State	LICENSEE
KOIN	DT	35380	PORTLAND	OR	NVT PORTLAND LICENSEE, LLC
KDFI	DT	17037	DALLAS	TX	NW COMMUNICATIONS OF TEXAS, INC.
KSWT	DT	33639	YUMA	AZ	PAPPAS ARIZONA LICENSE LLC
WTGS	DT	27245	HARDEEVILLE	SC	PBC BROADCASTING OF SAVANNAH LICENSE, LLC
WCNY-TV	DT	53734	SYRACUSE	NY	PUBLIC BROADCASTING COUNCIL OF CENTRAL NEW YORK
WDNI-CD	DC	28199	INDIANAPOLIS	IN	RADIO ONE OF INDIANA, LLC
KFLA-LD	LD	28566	LOS ANGELES	CA	ROY WILLIAM MAYHUGH
KENV-DT	DT	63845	ELKO	NV	RUBY MOUNTAIN BROADCASTING COMPANY
KCSM-TV	DT	58912	SAN MATEO	CA	SAN MATEO COUNTY COMMUNITY COLLEGE DISTRICT
KYVV-TV	DT	55762	DEL RIO	TX	SATV10, LLC
WGSA	DT	69446	BAXLEY	GA	SOUTHERN TV CORPORATION
KVCT	DT	35846	VICTORIA	TX	SURTSEY MEDIA, LLC
KTFQ-DT	DT	57220	ALBUQUERQUE	NM	TELEFUTURA ALBUQUERQUE LLC
WUTF-DT	DT	60551	MARLBOROUGH	MA	TELEFUTURA BOSTON LLC
KFSF-DT	DT	51429	VALLEJO	CA	TELEFUTURA SAN FRANCISCO LLC
WAPA-TV	DT	52073	SAN JUAN	PR	TELEVICENTRO OF PUERTO RICO, LLC
KBFD-DT	DT	65395	HONOLULU	HI	THE ALLEN BROADCASTING CORP.
KSTW	DT	23428	TACOMA	WA	THE CW TELEVISION STATIONS INC
WTSF	DT	67798	ASHLAND	KY	TRI STATE FAMILY BROADCASTING, INC.
KTBW-TV	DT	67950	TACOMA	WA	TRINITY BROADCASTING OF WASHINGTON
KMPH-TV	DT	51488	VISALIA	CA	TTBG/KMPH LICENSE SUB, LLC
WUVP-DT	DT	60560	VINELAND	NJ	UNIVISION PHILADELPHIA LLC
KUTH-DT	DT	81451	PROVO	UT	UNIVISION SALT LAKE CITY LLC
KATN	DT	13813	FAIRBANKS	AK	VISION ALASKA II LLC
WVBT	DT	65387	VIRGINIA BEACH	VA	WAVY BROADCASTING, LLC
WBTW	DT	30826	CHARLOTTE	NC	WBTW LICENSE SUBSIDIARY, LLC
WCCT-TV	DT	14050	WATERBURY	CT	WCCT, INC., DEBTOR-IN-POSSESSION
WLBT	DT	68542	JACKSON	MS	WLBT LICENSE SUBSIDIARY, LLC
WSUR-DT	DT	19776	PONCE	PR	WLII/WSUR LICENSE PARTNERSHIP, G.P.
WOTV	DT	10212	BATTLE CREEK	MI	WOOD LICENSE COMPANY, LLC
WGBD-LD	LD	67885	GREEN BAY	WI	WORD OF GOD FELLOWSHIP, INC.
WTVH	DT	74151	SYRACUSE	NY	WTVH LICENSE, INC.

Received & Inspected

MAR 26 2012

FCC Mail Room

March 20, 2012

Lewis C. Pulley  
Assistant Chief, Policy Division  
Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington D.C. 20554

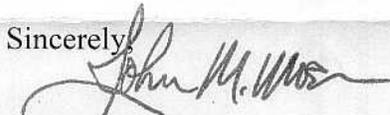
Dear Mr. Pulley:

Attached please find our Equal Opportunity Program as per your audit request. We have a dedicated Human Resource Employment Coordinator, Gayle Yanez, who is in charge of our EEO efforts to insure we seriously implement and execute the program. Gayle and I periodically review our outreach efforts and overall program to monitor its effectiveness and institute any changes or additions to further enhance our EEO program. I, personally, am involved in our on-going outreach efforts through the National Association of Broadcasters semi-annual Career Day in April and September at which we encourage applicants and assist them in effective ways to interview and apply for positions in the broadcast industry. I am also very involved in our internship program. In addition, we frequently remind our Department Managers, through our weekly meetings, the importance of our EEO policies and procedures when an opening or the need for recruitment occurs.

To the best of our knowledge, during the license renewal process, there have been no complaints. Attached is a copy of this cover letter. Please have it file stamped and sent back to me in the enclosed self addressed envelope.

Below is a summary addressing the Audit Data Requested.

Sincerely,



John M. Moen  
General Manager  
Star Radio Group  
616 Amelia Street  
Fredericksburg, VA 22401

3. **Audit Data Requested.** If the Unit employs five or more full-time employees (and all units, for Question 3(e)), provide the following information in your response to this letter, including an explanation regarding any requested information that you are unable to provide:

- (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 included on or linked to on each of these websites, indicate each station involved and provide an explanation of why the report is not so posted or linked, 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 47 C.F.R. § 2080(c)(6).

*The Employment Unit's two most recent public file reports (2009-2010 and 2010-2011) are included in section one of the enclosed binder. In preparing and reviewing the materials for this audit response, it was discovered that in the 2009-10 EEO Public Report for the WYSK call letters were inadvertently omitted from posting. This was corrected in the 2010-11 posting.*

- *Radio station websites are as follows:  
WFLS-wfls.com  
The Vibe- 993thevibe.com  
Classic Rock- classicrock 969.com*
- *Dates of each full-time hire listed under listed tabs and below*

<b>Job Title</b>	<b>Date Filled:</b>	<b>Job Title</b>	<b>Date Filled:</b>
Radio Marketing Consultant	7/6/2009	Sales Assistant	5/13/2010
Creative Services Coordinator	9/11/09	Promotions Assistant/Events Coordinator	6/28/2010
Program Director	11/9/09	Radio Marketing Consultant	7/26/2010
Director of Sales	12/1/09	On-Air Personality	9/17/2010
Promotions and Events Coordinator	2/22/10	On-Air Personality	11/29/2010
Promotions and Events Director	3/7/10	Director of Sales	4/4/2011
		Radio Marketing Consultant	4/4/2011

(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). 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 Section 73.2080(c)(1)(ii).

- *For each full-time position listed above all dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position are under listed tabs*

(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

- *These are listed under listed tabs*

(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).

***Our station is required to perform four outreach initiatives during a two year period. These activities are listed under listed tabs. There are currently 31 full time and seven part time employees in the station group.***

***The Employment Unit has a regular practice of sending general outreach letters twice a year to organizations that may have an interest in sending job applicants to the Employment Unit. Through the spring of 2010, the Unit's practice was to retain a list of the addresses to whom those letters were sent. When the current HR Employment Coordinator took over the position in 2010, upon reviewing the EEO policies and procedures, she recommended retaining copies of the actual letters that were sent. All relevant records are included in the enclosed notebooks.***

(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 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 pending or resolved complaints involving our stations***

(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.

- *Each employee, upon hire, has initial training in EEO policies at orientation.*
- *The General Manager informs any managers/directors of the procedures required for recruiting for any open positions in each department during weekly management meetings. These procedures include but are not limited to informing the HR Employment Coordinator of any opening. The HR Employment Coordinator recruits for all full-time job vacancies using list of sources designed to widely distribute vacancy information. This includes local and national publications, as well as universities and internal postings. All vacancies are also sent to any organization which has requested this information including:*

*American Women in Radio and Television, Illinois Center for Broadcasting, National Association of Black College Broadcasters/Black College Radio and National Lesbian & Gay Journalism Association.*

- *As new policies/procedures are instituted all employees receive copies in writing and must sign an acknowledgement of receipt that they have read and understand the new policy/procedure. This acknowledgement of receipt is turned into the Human Resource Department and kept on file. In addition, the new policies/procedures are distributed in bi-weekly newsletters with employee paychecks and permanently posted on the employee intranet.*

(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.

- *The Human Resources Employment Coordinator received extensive EEO training from the previous Human Resources Employment Coordinator. In addition, the Human Resources Employment Coordinator served as the Human Resource Manager at her previous place of employment.*
- *The station monitors and analyzes its EEO recruitment program on a regular and ongoing basis. The Human Resources Employment Coordinator maintains the recruitment source list and adds new sources when they become available and/or when they request to be added to the station's vacancy notification mailing list. Department Heads and hiring managers actively participate in the recruitment and interviewing process to ensure compliance with the company's EEO program. The Human Resources Manager meets with all new managers who have any hiring responsibility to discuss EEO policies and procedures. The Human Resources Employment Coordinator ensures that, for every regular position that is posted, EEO policies and procedures are followed. The Human Resources Employment Coordinator regularly reminds all employees of the importance of broad outreach to potential job candidates, encourages them to speak to classes at schools and to community groups.*
- *The Human Resources Department recruits for all full-time job vacancies following procedures set forth by the NAB for EEO Compliance. Included in this list of those notified are those organizations, including organizations with substantial participation by women and minorities, who have requested notification of every full-time vacancy. This is done for every full-time opening. We use a list of sources designed to widely distribute vacancy information.*

(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

- *The Human Resources and Radio Departments use many outside sources 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. The station's compensation levels are reviewed on an annual basis during budget preparation by the General Manager, CFO, Business Manager and Department Heads to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. The compensation levels are also reviewed with corporate managers of the parent company and are compared to industry compensation reports. For pay comparisons we use consultants who provide market comparisons for each position; we review each position to see what industry standards are to be competitive with salaries and we evaluate employment history of salary for those individuals we interview and/or hire.*
- *Selection techniques include comparing work qualifications and work history to the knowledge, skills and abilities listed in our job descriptions. These job descriptions are evaluated on an ongoing basis. For employee benefits, our outside consultants use market comparisons to find the best overall benefit program for our employees. Department Heads and department managers periodically conduct written and verbal performance appraisals for each employee. Internal promotions are based upon the results of the performance appraisals and discussions between the General Manager, Human Resources Manager, and Department Heads, all of whom have responsibility for ensuring appropriate enforcement of the company's EEO program and policy. After providing notices of job vacancies to a wide and diverse array of education institutions, professional and non-profit organizations, and internet resources, the selection process is based upon the experience, qualifications, and talents of the candidates. The General Manager, Human Resources Manager, and appropriate hiring manager consult on each selection.*

*The Employment Unit does not have any union contracts.*

*Subsection (i) is not applicable as the Unit is not a religious broadcaster.*