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March 28, 2017

By Hand Delivery

EEO Staff, Policy Division
Media Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554
Attn: Lewis Pulley

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MAR 28 2017

**Federal Communications Commission
Bureau / Office**

Re: **WFGX Licensee, LLC**
Response to February 2017 EEO Audit
WFGX(TV), Fort Walton Beach, FL (Facility ID 6554)

Dear Mr. Pulley,

The attached materials are submitted on behalf of WFGX Licensee, LLC, licensee of WFGX(TV), Fort Walton Beach, FL, in response to your EEO Audit Letter, dated February 8, 2017.

Please contact the undersigned if you have any questions concerning this matter.

Respectfully submitted,

Jessica T. Nyman

Attachments

Response of WFGX Licensee, LLC to February 8, 2017 Letter

WFGX Licensee, LLC ("Licensee"), the licensee of WFGX(TV), Fort Walton Beach, FL (FAC ID 6554), hereby responds to the February 8, 2017 Letter (the "February 8 Letter") from Lewis C. Pulley, Assistant Chief, Policy Division, Media Bureau, Federal Communications Commission. The February 8 Letter states that the station employment unit ("SEU") for WFGX(TV) has been selected for an audit of its EEO program. WFGX(TV) and WEAR-TV, Pensacola, FL (FAC ID 71363) constitute an SEU.¹

Question 3(a)

The WFGX(TV) website address is: <http://www.wfgxtv.com/>. The WEAR-TV website address is: <http://www.weartv.com/>. The SEU's most recent EEO public file report is properly linked to on both websites. A copy of the SEU's two most recent EEO public file reports are attached as Exhibit 1.

Question 3(b)

The responsive materials are attached as Exhibit 2. Copies of all notices sent to all sources used have been retained pursuant to Section 73.2080(c)(5)(iii) of the Commission's Rules. Log sheets for on-air advertisements have also been maintained.

Question 3(c)

The number of interviewees for each vacancy and the referral source for each interviewee are included with the two EEO Public File Reports at Exhibit 1.

Question 3(d)

The SEU employs 100 full-time employees and is located in a market with more than 250,000 people. Therefore, the SEU must perform four recruitment initiatives during each two

¹ The SEU provides sales and certain back office services to Deerfield Media (Mobile) Licensee, LLC stations WPMI-TV, Mobile, AL (FAC ID 11906) and WJTC(TV), Pensacola, FL (FAC ID 41210).

year period. The SEU's EEO recruitment initiatives are described in the attached EEO Public File Reports and supporting documentation is included as Exhibit 3.

Question 3(e)

There were no EEO complaints filed during the SEU's current license term.

Question 3(f)

Each level of management is responsible for adhering to the following EEO policy of its parent company, Sinclair Broadcast Group, Inc.:

- All managers within the TV stations are held accountable to ensure that they adhere to the FCC's EEO rule and policies as well as all nondiscrimination laws.
- It is the station's responsibility to inform all employees and employee organizations (where applicable) of our EEO Policy and enlist cooperation from our employees to ensure our hiring practices meet EEO standards.
- All stations must communicate with community sources and enlist assistance in recruiting for all vacancies.
- It is the responsibility of all managers to exclude any and all forms of prejudice or discrimination in hiring practices.
- It is the responsibility of all station management to continuously review job structure and employment practices to ensure equality of opportunity.

In order to adhere to the policy mentioned above, the SEU follows a Three (3) Prong Outreach System to ensure that the SEU recruits for all full-time vacancies, notifies any and all community groups and organizations that request job vacancy information, and performs additional recruiting activities from a menu of options.

Outreach Prong 1 – Recruitment for Full-Time Vacancies

It is the obligation of the SEU to recruit for full-time vacancies and ensure a "wide-dissemination" of information concerning each job vacancy. This is achieved by utilizing a variety of recruitment sources designed to achieve broad outreach and target all segments of the broadcast community's population, e.g., trade schools, junior colleges, colleges and universities,

minority and women's groups and organizations, community organizations, area unemployment facilities, and other groups or organizations that assist in job placement. All vacancies are posted to the corporate website with an employment link found on each station's website.

The SEU also maintains a mailing list of organizations that have requested to receive all job vacancy information. The SEU promotes openings to as many sources as possible, actively pursues additional sources that target women and minorities, and attends local job fairs.

Outreach Prong 2 – Notification to Community Groups

The SEU makes a great effort to make certain that all job vacancies are sent to those organizations requesting information. The SEU notifies the community on how to receive notice of vacancies by utilizing tools such as on-air spots.

Outreach Prong 3 – Menu Option Initiatives

The SEU chooses at least four (4) options from the following menu to widely disseminate information to the community and ensure broad outreach. The underlined options indicate the utilized mechanisms the station chose to inform employees and job applicants of its EEO policies and programs.

- Attend Four (4) Job Fairs
- Host Two (2) Job Fairs
- Co-sponsor Community Job Fair with Minority Focus
- Develop Internship Program
- Participate in Four (4) Educational Events
- Sponsor at least Two (2) Community Information Events to Educate Public on Broadcasting Careers
- Alternative Internet Programs beyond Posting of Jobs
- Participate in Four (4) Community Events
- Develop Scholarship Program
- Develop Training Program to Foster Promotability
- Mentoring Program for Station Employees
- Post Upper-level Jobs in Trade Publications and Minority-Focused Publications
- Train Management on EEO and Discrimination Issues

Question 3(g)

The SEU keeps a list of all full-time vacancies each year, by job title, as well as a list of all organizations sent information on job vacancies. Dated copies of advertisements, letters, faxes, and e-mails announcing job vacancies are also maintained. Furthermore, each year a report is created for and placed into each station's public file and posted to each station's website on the anniversary date of the filing of the stations' license renewal application. The SEU is also utilizing the Silkroad Recruiting Applicant Tracking System to track how applicants hear of any job openings. The system also allows for the SEU to maintain recruitment reports as well as EEO statistics.

Question 3(h)

It is the policy of the SEU that employment decisions will be based on such factors as merit, qualifications, competence, and the needs of the SEU. Employment practices are not influenced or affected by virtue of the applicant's or employee's race, color, creed, religion, sex, national origin, age, disability, handicap, or any other characteristic protected by law.

The SEU puts forth the following efforts to ensure that there is equal opportunity within employment practices and no discriminatory effects:

- Formal performance reviews are conducted annually to provide both department heads and all employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. At this time, all employees are reviewed for merit increases and pay adjustments.
- The SEU follows an annual budget established by the corporate headquarters. Pay scales are determined prior to the selection process.
- All employees are subject to a probation period of ninety (90) days. This is an opportunity for new employees to become familiar with the company and their job.
- Department transfers and promotions are strongly encouraged. Therefore, the SEU employs an Internal Application Program to inform employees of openings and to

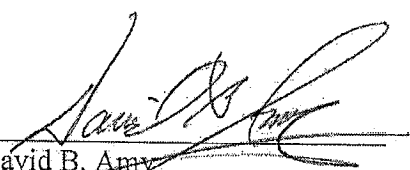
identify qualified and interested applicants who might not otherwise be known to the hiring manager. Generally, all employees must have at least one year of service and have performed competently in their current position for at least one year prior to applying for another position.

Question 3(i)

The Licensee is not a religious broadcaster.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 27th day of March, 2017.



David B. Amy
Senior Manager of WFGX Licensee, LLC