



the
**Chickasaw
Nation**

DEPARTMENT OF COMMERCE

2020 LONNIE ABBOTT BOULEVARD : ADA, OK 74820 : (580) 421-9500

Bill Anoatubby
Governor

Jefferson Keel
Lt. Governor

April 6, 2018

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

Re: KADA(AM), Ada, Oklahoma (FIN 33259)

This letter responds to the an EEO Audit Letter dated February 26, 2018 from the FCC's Media Bureau to The Chickasaw Nation ("Licensee"), the licensee of KADA(AM), Ada, Oklahoma. KADA(AM) has been randomly selected for an audit. KADA(AM) together with KADA-FM, Ada, Oklahoma, KYKC(FM), Byng, Oklahoma, KTLS-FM, Holdenville, Oklahoma, and KXFC(FM) Coalgate, Oklahoma form a single employment unit within the Ada, Oklahoma market ("Unit"). The Licensee is a federally recognized Sovereign Indian Tribe., and although we are a minority owned company, the Chickasaw Nation believes in a diversified work force.

The following responses provide information for the entire employment Unit, including KADA(AM). Provided below and in the attached materials is KADA(AM)'s response to the FCC audit letter.

3. Audit Data Requested.

(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).**



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Attached as Exhibit 1 are copies of the Licensee's two most recent EEO public file reports.¹ For the purpose of this response, the relevant audit period is from February 1, 2015, through January 31, 2017.

The following is a list of Unit websites"

- KADA-FM www.kadaradio.net
- KYKC www.kykc.net
- KTLS www.bossm.net
- KXFC www.xfactorradio.net
- KADA(AM) – currently being developed

(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). However, to reduce your burden of responding to this audit, if you have sent a job notice to multiple sources, you may send us only one copy of each such notice, along with a list of the sources to which you have sent the notice. In addition, indicate in your response whether you retain copies of all notices sent to all sources used, as required by Section 73.2080(c)(5)(iii). For on-air ads that aired multiple times, you may send us one log sheet indicating when the ad aired and tell us the other times it aired instead of providing multiple log sheets. Also, tell us whether you have retained all the log sheets for each time the ad aired. We may ask for them for verification, but you need not provide them at this time. Include, however, 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).

There have been no full-time hires during the audit period.

(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.

There have been no full time hires during the audit period.

¹ The two public file reports that are being requested by the Commission "straddle" two different 2-year EEO cycles. With Oklahoma renewals due in February of 2013, Licensee was/is required to conduct 2 initiatives in 2013-2015 and 2015-2017.



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(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). If you have performed more than four initiatives, you may provide documentation for only four and summarize the rest instead of providing documentation for all of them. If we believe any of the initiatives you have documented are inadequate, we may ask for more information, but documentation for four is all we need at this time.

The Unit has a total of 8 full-time employees as of the date of this response. As a result, pursuant to Sections 73.2080(c)(2) and (e)(3) of the Commission's rules, the Unit is required to perform two initiatives within a two-year period. The Unit engaged in a number of recruitment initiatives in its Audit Period:

- On September 8, 2016, Licensee hosted a job fair at the Chickasaw Nation Community Center. The job fair included Ada area employers from a wide variety of industries. Craig Stonecipher of the Licensee participated at the job fair by hosting a youth oriented event where students were given the opportunity to learn and engage in the radio industry.
- In January through March 2016 and 2017, Licensee established an internship program designed to assist members of the community to acquire skills needed for broadcast employment. Roger Harris, Craig Stonecipher and Pete Roper all participated in the training provided in the internship program. The internship program provided and ECU student with intensive training in all areas of station operation including, sales, programming, on-air and EEO outreach.

Included at Exhibit 2 in this response is documentation that demonstrates the Unit's performance of the recruitment initiatives set forth above. Licensee is owned by a minority organization, and licensee goes to great lengths to recruit minorities, especially Native American Tribal members. The Unit as a whole does provide employees many recruitment opportunities as the EEO reports showcase. A summary of the additional recruiting opportunities is set forth on Exhibit 3.



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(e) Disclose any pending or resolved complaints involving the Station filed during the Station's current license term before anybody 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.

There have been no complaints alleging unlawful discrimination in the employment practices of the Unit.

(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.

As an initial matter, the Unit provides equal employment opportunities to all qualified individuals without regard to race, color, religion, national origin, marital status, sex, age, or disability in all personnel actions, including recruitment, evaluation, selection, compensation, training, promotion, and terminations. As a Federally recognized Sovereign Indian tribe, the Unit complies with applicable Federal laws concerning employment matters.

The General Manager for the stations oversees all employees of the Unit, and the General Manager in conjunction with the Human Resources Department of the parent company oversees the implementation of all Human Resources matters. The General Manager is responsible for the implementation of the Unit's EEO policies. The General Manager in conjunction with the companies Human resources department are involved in all aspects of hiring, terminating and any disciplinary actions needed to ensure EEO compliance. All employees are aware of the EEO hiring policies so that they can conduct interviews properly and manage staff to ensure compliance with the FCC's EEO rules. Employees are responsible for bringing any EEO-related issues or questions to the attention of the General Manager for review, clarification, and/or escalation.



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The Unit informs employees and job applicants of its EEO policies and program in various ways. The Unit reviews its EEO policies and program with new hires. The Unit posts information about EEO in their break room and each station website links to the Unit's annual EEO public file reports. All job postings within the Unit indicate that Licensee is an equal opportunity employer.

(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 Unit proactively contacts its recruitment sources to keep contact information updated and to confirm that they wish to continue receiving notices of full-time vacancies. The Unit also airs a significant advertising schedule on all stations every month of the year promoting the Licensees desire to recruit and maintain a diverse work force, and to promote its compliance with the FCC's EEO program. The General Manager meets with Unit management periodically to discuss and review the EEO program to ensure that the Unit's outreach efforts are effective and in compliance with the EEO rules. At these review sessions, personnel assess the effectiveness of those outreach efforts and discuss ways to adjust or improve the program. There have been few instances in which to assess the effectiveness in the past few years due to the fact that there have not been any job openings. In addition, the Unit will discuss any changes in EEO rules or policy that have been brought to its attention. As a result of this periodic review, the Unit is kept abreast of any changes in the FCC's rules or corporate policy regarding EEO. Based on its continuous exchange of information, the Unit will make any adjustments necessary to ensure full compliance with EEO rules and policies.

(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.



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The Unit, in conjunction with the Licensee, the Chickasaw Nation, undertakes every effort to ensure that the Unit's pay, benefits, and selection techniques provide equal employment opportunities. The Unit is mandated by the Licensee, the Chickasaw Nation, to measure performance of existing employees yearly, and to provide one-step pay increases to all employees, and to ensure that equal opportunities are being provided and that all decision making is predicated on a qualification basis. Regarding benefits, all employees are offered the same benefits package that includes medical coverage, paid sick leave and vacation, short term and long term Medical leave, Maternity Leave, Individual Development Plan bonuses, quarterly incentive plans, time and time and half overtime, Holiday pay and a 401(k) retirement savings account option with a 5% company match incentive.

The Unit does not have any union members or agreements.

- (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.

The Unit is not a religious broadcaster and is not subject to religious affiliation qualifications.

The Time Brokerage questions are not applicable to this Unit.

I certify that the statements provided in this audit report are complete and accurate to the best of my knowledge, information and belief.



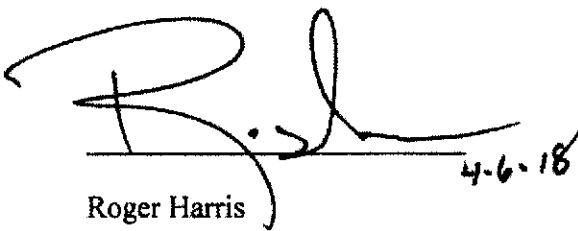
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4-6-18

Roger Harris

General Manager

Roger.Harris@chicksaw.net

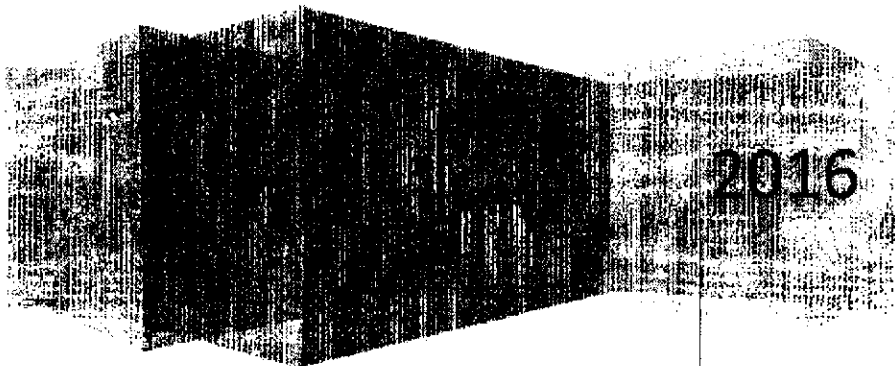
Exhibit 1

Chickasaw Nation

SCORE EEO Public File Report

KADA AM/FM-KYKC-KTLS-KXFC

Roger Harris



[CLICK HERE FOR THE EEO PUBLIC FILE REPORT](#)

Score Broadcasting CEO Public File Report

KADA, KYKC, KTLS, KXFC EEO Public File Report

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080c(6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station's Employment Unit that is comprised of the following stations: KADA-AM, KADA-FM, KYKC, KTLS, and KXFC and is required to be placed in the public inspection files of these stations, and posted on their websites, if they have websites.

The information contained in this Report covers the time period beginning January 1, 2014 to and including December 31, 2015.

The FCC's 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station's Employment Unit during the Applicable Period;
2. For each vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.208c(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
3. The recruitment source that referred the hire for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies, and
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080c(2) of the FCC rules

SCORE

Annual EEO Public File Report

For the period beginning 1/1/2016 and ending 12/31/2016

This report is not required if unit has fewer than five full-time employees

This report consists of:

Part 1	Station Information
Part 2	Recruitment sources/interviewees for each full-time vacancy
Part 3	Recruitment initiatives

Prepared: Roger Harris

Signature:

Title: General Manager

Date: January 4, 2017

Telephone: 580-332-1212

This report, which usually covers the prior 12-month period, is to be placed in each station's public file and web site (if applicable) every year on the anniversary of the due date of the station's renewal application. The initial reporting period is from March 30, 2003, to the station's renewal filing deadline.

Part 1

This report covers the following employment unit:

Call Sign	AM/FM	Facility ID#	Community of License	State	MA
KADN	AM	33256	Ada	OK	No
KADA	FM	33498	Ada	OK	No
KYKC	FM	9941	Byrg	OK	No
KTLS	FM	28053	Holdenville	OK	No
KXFC	FM	52533	Coalgate	OK	No

Attached is information concerning the recruitment efforts undertaken by the employment unit to fill the full-time vacancies during the period covered by this report.

A total of 0 full-time vacancies were filled by the employment unit.

A total number of 0 persons were interviewed for all the full-time vacancies.

Part 2

Annual Public File Report

This report covers full time (30 hours per week or more) for the period of January 1 2014 to December 31, 2015:

- 1) Employment Unit: SCORE Broadcasting
- 2) Unit Members:

KADA-AM	Ada, OK
KADA-FM	Ada, OK
KYKC-FM	Byng, OK
KTLS-FM	Holdenville, OK
KXKC-FM	Coalgate, OK

- 3) CEO Contact Information:
Score Broadcasting/Chickasaw Nation
PO Box 609
Ada, OK 74810
(580) 332-1212
Fax: (580) 332-0148
e-Mail: score@csbcsn.net
Contact person: Roger Harris

- 4) List of all full-time job vacancies filled from employment unit during this period:

<u>Job Title</u>	<u>Recruitment Source</u>
None	None

SCORE

Part 3

Supplemental Recruitment Initiatives

Activity: Annual Job Fair

Date: January 8th, 2016
Host: The Chickasaw Nation
Participating Personnel: Roger Harris

Description and scope of station participation: Worked in conjunction with Chickasaw Nation Human Resources Department to encourage applying with all businesses owned by the Chickasaw Nation.

Activity: EEO seminar

Date: March 27, 2016
Host: Oklahoma Association of Broadcasters
Participant: Roger Harris

Attended class conducted on EEO as part of the annual State convention of the Oklahoma Association of Broadcasters in Oklahoma City.

Activity: EEO class

Activity: Lecturing to Mass Media Students

Date: April and September, 2016
Host: East Central University
Participating Personnel: Roger Harris

Description and scope of station participation: Spoke in person to two different radio and advertising classes at local university and encouraged application process.

Activity: Station Tour

Date: September 3, 2015
Host: SCORE Broadcasting and Craig Stone
Participating Personnel: Craig Stone

Description and scope of station participation: Conducted tour of all five radio stations for local boy scout troop and parents.

Activity: On-Air Recruitment

Date: Every day of the year
Host: SCORE Broadcasting Radio Group

Description and scope of station participation: 60 commercials per month per station to encourage applicants and drive interested parties to stations' web sites to apply and develop a pool of applicants.

Activity: Internship with ECU Mass Comm major

Date: January-March 2016

Host: SECURE Broadcasting Radio Group

Description and scope of participation - Provided ECU student with intensive training program in all areas of station operation, including sales, programming, on-air, and EEO outreach.

Activity: Letter to minority organizations

Date: January, 2016

Description: Sent recruitment letters to over 35 minority organizations to encourage job applications with our company.

Activity: Job Fair participation/sponsorship

Date: September 8, 2016

Host: Chickasaw Community Center

Participant: Craig Stoneripher

Participated in a youth oriented event where students were given the opportunity to learn and engage in the radio industry

Activity: School group Tour

Date: November 16, 2016

Participant: Roger Harris Craig Stoneripher

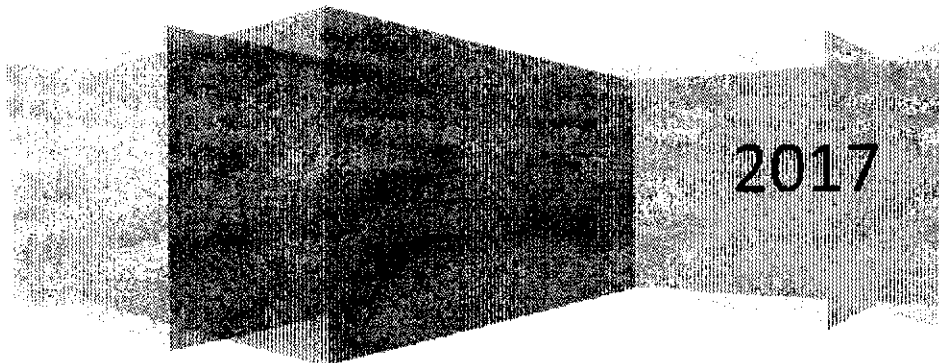
Description - Two hour tour of the radio facilities with emphasis on EEO commitments and job applicants from minorities.

Chickasaw Nation

SCORE EEO Public File Report

KADA AM/FM-KYKC-KTLS-KXFC

Roger Harris



[CLICK HERE FOR THE EEO PUBLIC FILE REPORT](#)

Score Broadcasting EEO Public File Report

KADA, KYKC, KTLS, KXFC EEO Public File Report

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080(c)(6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of the following stations: KADA-AM, KADA-FM, KYKC, KTLS, and KXFC and is required to be placed in the public inspection files of these stations, and posted on their websites, if they have websites.

The information contained in this Report covers the time period beginning January 1, 2017 to and including December 31, 2017..

The FCC's 2002 EEO Rule requires that this Report contain the following information:

1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
2. For each vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to non-discrimination pursuant to Section 73.2080(1)(ii) of the new EEO Rules, which should be separately identified), identified by name, address, contact person and telephone number;
3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies, and
5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(2) of the FCC rules.

SCCRF

Annual EEO Public File Report

For the period beginning 1/1/2017 and ending 12/31/2017*

This report is not required if unit has fewer than five full-time employees

This report consists of:

Part 1	Station Information
Part 2	Recruitment sources/interviewees for each full-time vacancy
Part 3	Recruitment Initiatives

Prepared: Roger Harris

Signature:

Title: General Manager

Date: January 22, 2018

Telephone: 580 332-1212

* This report, which usually covers the prior 12-month period, is to be placed in each station's public file and website (if applicable) every year on the anniversary of the due date of the station's renewal application. The filing reporting period is from March 10, 2003, as the station's renewal filing deadline.

Part 1

This report covers the following employment unit:

<u>Call Sign</u>	<u>AM/FM</u>	<u>Facility ID#</u>	<u>Community of License</u>	<u>State</u>	<u>LMA</u>
KAGA	AM	33259	Ada	OK	No
KADA	FM	33498	Ada	OK	No
KYKC	FM	9841	Byng	OK	No
KTLS	FM	28053	Holbrookville	OK	No
KXFC	FM	82533	Cookville	OK	No

Attached is information concerning the recruitment efforts undertaken by the employment unit to fill the full-time vacancies during the period covered by this report.

A total of 0 full-time vacancies were filled by the employment unit.

A total number of 0 persons were interviewed for all the full-time vacancies.

Part 2

Annual Public File Report

This report covers full time (30 hours per week or more) for the period of January 1 2017 to December 31, 2017:

1) Employment unit: SCORE Broadcasting

2) Unit Members:

KALM-TV	Ada, OK
KADA-FM	Ada, OK
KYKC-FM	Brng, OK
KTLS-FM	Holdenville, OK
KXFC-FM	Coalgate, OK

3) EEO Contact Information:

Score Broadcasting/Crickasaw Nation

PO Box 609

Ada, OK 74820

(580) 332-1212

Fax: (580) 332-0128

e-Mail: score@vablenet.org

Contact person: Roger Harris

4) List of all full-time job vacancies filled from employment unit during this period:

<u>Job Title</u>	<u>Recruitment Source</u>
None	None

SCORE

Part 3

Supplemental Recruitment Initiatives

Activity: Weekly on air recruitment commercials.

Date: Each Week-12 months per year

On-Air: All stations in Employment Unit

Description and scope:

Station(s) are roughly 50 commercials each month all year, to promote listeners to investigate the Chickasaw Nations web site to search for openings within the entire company. The commercials describe

The stations desire to recruit a broad diverse pool of applicants and that the stations are Equal Opportunity Employers.

Activity: Annual Job Fair

Date: February 8th, 2017

Host: The Chickasaw Nation

Participating Personnel: Roger Harris

Description and scope of station participation: Worked in conjunction with Chickasaw Nation Human Resources Department to encourage applying with all businesses owned by the Chickasaw Nation.

Activity: EEO seminar

Date: April 5, 2017

Host: Oklahoma Association of Broadcasters

Participant: Roger Harris

Attended class conducted on EEO as part of the annual State convention of the Oklahoma Association of Broadcasters in Oklahoma City.

Activity: EEO class

Activity: Lecturing to Mass Media Students

Date: April and September, 2017

Host: East Central University

Participating Personnel: Roger Harris

Description and scope of station participation: Spoke in person to two different radio and advertising classes at local university and encouraged application process.

Activity: Station Tour

Date: September 15, 2017
Host: SCORE Broadcasting and Craig Stone
Participating Personnel: Craig Stone

Description and scope of station participation: Conducted tour of all five radio stations for local boy scout troop and parents.

Activity: On-Air Recruitment

Date: Every day of the year
Host: SCORE Broadcasting Radio Group

Description and scope of station participation: 60 commercials per month per station to encourage applicants and drive interested parties to stations' web sites to apply and develop a pool of applicants.

Activity: Internship with ECU Mass Communications major

Date: January-March 2017
Host: SCORE Broadcasting Radio Group

Description and scope of participation: Provided ECU student with intensive training program in all areas of station operation, including sales, programming, on-air, and ECU outreach.

Activity: Letter to minority organizations

Date: March, 2017

Description: Sent recruitment letters to over 35 minority organizations to encourage job applications with our company.

Activity: Job Fair participation/sponsorship

Date: September 25, 2017
Host: Chickasaw Community Center

Participant: Craig Stonedapher

Participated in a youth-oriented event where students were given the opportunity to learn and engage in the radio industry.

Activity: School group Tour

Date: October, 2017

Participant: Roger Harris – Craig Stonedapher

Description: Two hour tour of the radio facilities with emphasis on EEO commitments and job applicants from minorities.

Exhibit 2

[illegible]

April 25, 2017

Dear Mr. Harris:

I would like to take this time to sincerely thank you, and all of the great and talented staff at SCORE Broadcasting/ Chickasaw Nation for allowing me to intern there on an informal basis this past winter.

The ECU Mass media department has been in a state of flux the last couple of years, so securing a formal internship for school credit seemed a bit difficult, so I really appreciate the fact that you were able to work around that.

The training provided to me by you, Craig Stone and Pete Roper, allowed me to see the many varied career paths available in radio, specifically areas of broadcasting that I was unaware of or too timid to pursue, such as sales. I learned very quickly that both areas of the operation, both sales and programming, are critical to the overall success of the stations. I was especially interested in KADA-AM (the sports station), and how easy it was to partner with the station in Norman (KREF) to obtain a lot of the programming, but insert the commercials for your station. I was also amazed how most of the employees actually function and serve many different departments of the stations. The fact that you, the General Manager, actually goes to the transmitter sites among all of your other duties amazed me. It was also interesting to see how the sales people also double with on-air duties, and how that actually helps their sales to be on the air!

I also found it especially interesting how computer skills and the skills of your Program Director Craig Stone, are so vital to the automation of the station, and how dependent the station is on expert computer programming to handle things when no employees are present in the building. Once again, and entirely new career path that I had never thought of!

So once again, please accept my thanks and extend my thanks to all of the members of your staff for the wonderful opportunity that you afforded me. It will be an invaluable part of my education and hopefully will lead to bigger and better things in the exciting world of media. If by some small chance I can ever be of service to you, please reach out!

Sincerely,



P.S. Also thanks to the cool promotional cd's that you gave me, that will be a permanent experience there!!

Exhibit 3

Exhibit 3

The Chickasaw Nation, licensee of KADA(AM), is a federally recognized Sovereign Indian Tribe (the "Licensee"). Although we are a minority owned company, we believe deeply in a diversified workforce. As a result, besides the information provided in the letter response to the EEO Audit of KADA, the Licensee has taken part in many additional recruitment initiatives. While this list is not exhaustive, it provides the Commission an insight into how management of the Licensee encourages participation in EEO outreach opportunities.

- The Licensee airs 30-40 commercials monthly on each of the stations in the Unit to promote the recruitment of a diverse group of applicants.
- The Licensee sends recruitment letters to minority oriented entities and colleges and universities to make staff, clients and students aware of how to contact Licensee regarding job openings.
- Employees of the Licensee attend Oklahoma Association of Broadcasters training session on EEO rules and compliance.
- The Licensee welcomes groups of students for studio tours to promote an interest in broadcasting.
- The Licensee hosts two job fairs annually, and attends and sponsors additional job fairs throughout the year.
- The Licensee sponsors and attends the Oklahoma Association of Broadcasters Student Day and Career Fair.
- The General Manager of the Licensee speaks to Introduction to Mass Media classes at local university.
- The Unit, in conjunction with the parent company (Licensee) sponsors a "Student Day Luncheon" at the Oklahoma Association of Broadcasters annual conference where an opportunity occurs to speak to a young, diverse group of students about Employment Opportunities in the broadcast industry.
- The Unit utilizes social media to spread the message of diversity employment opportunities.
- The General Manager also sits on the Board of Directors of the National Association of Broadcasters Board of Directors and participates actively with other broadcasters to gather and share information on how to better serve the EEO policies of the FCC.