



Date: 3/25/19

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

Re: EEO Audit Response
Wilderness Communications, LLC, KLWB-DT New Iberia, LA (Fac. ID 82476)

Dear EEO Staff:

Wilderness Communications ("Wilderness") hereby responds to the FCC's February 14, 2019 EEO Audit Letter directed to the above-referenced station. Station KLWB-DT is part of a fourteen-station employment unit including commonly owned stations:

KBCA, Alexandria, LA (Fac. ID 16940)
KDCG-CD, Opelousas, LA (Fac. ID 349)
KXKW-LP, Lafayette, LA (Fac. ID 167755)
KXKW-LD, Lafayette, LA (Fac. ID 33177)
KLWB, New Iberia, LA (Fac. 82476)
KLWB-FM, Carencro, LA (Fac. ID 183335)
KLSO, Opelousas, LA (Fac. ID 35607)
KLSO-FM, Simmesport, LA (Fac. ID 164163)
KOGM, Opelousas, LA (Fac. ID 33220)
KFXZ, Lafayette, LA (Fac. ID 41054)
KFXZ-FM, Opelousas, LA (Fac. ID 9416)
KYMK-FM, Maurice, LA (Fac. ID 11605)
KVOL, Lafayette, LA (Fac. ID 9415)
KLCJ, Oak Grove, LA (Fac. ID 183334)

2. The employment unit currently has 26 full time employees (a list is attached) and, accordingly, Wilderness hereby responds to each of the lettered paragraphs of the FCC's letter. These responses cover the period of time of the two most recent EEO reports, February 1, 2017-January 31, 2018 and February 1, 2018-January 31, 2019, as required by the Audit Letter.

- (a) Copies of the employment unit's two most recent EEO Public File Reports are attached. A copy of the most recent report is available on the following stations' websites at: <http://www.kdcg.com>, (KDCG), <http://www.metv.com>, (KLWB Acadiana linked from metvnetwork.com), <http://www.1037thegame.com>, (KLWB-FM), <http://www.elsaborradio.com>, (KSLO and KSLO-FM), <http://www.mustang1071.com>, (KOGM), <http://www.z1059.com>, (KFXZ), <http://www.106.1063radiolafayette.com>, (KYMK-FM), www.kvol1330.com, (KVOL). KXKW-LD does not have a website; however, the call letters are linked to KLSO and KSLO-FM's website where current EEO reports are available. KBCA does not have a current website, however there is a link for KBCA on the employment unit's corporate website, <http://deltamediacorp.com> where EEO reports are available. KLCJ does not have a website, it is a translator station of KVOL.
- (b) Attached are copies of all available communication announcing job openings listed in the employment unit's two most recent EEO Public File Reports, including on-air announcement logs and copy. Other on-air announcement logs are available upon request.
- (c) Attached is information regarding the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled in the unit during the two most recent EEO Public File Reports.
- (d) Points below will document Wilderness' recruitment initiatives, mentoring programs and training for staff as well as unit personnel involved during the periods covered in the two most recent EEO Public File Reports. There are 26 full time employees in the Unit and the Lafayette DMA has a population of over 250,000 people. Therefore, the employment unit is required to perform four initiatives within a two-year period.

Participation in Job Fairs:

- The University of Louisiana at Lafayette Spring Career Fair, February 10th, 2017
- The South Louisiana Community College Spring Career Fair, April 5th 2017
- The Lafayette Economic Development Authority Job Fair, May 9th 2017
- The University of Louisiana at Lafayette B.I. Moody School of Business', "Business and Breakfast Gathering" April, 10th 2017
- The University of Louisiana at Lafayette Spring Career Fair, February 28th, 2018
- The University of Louisiana at Lafayette Fall Career Fair, September 25th, 2018
- The Lafayette Economic Development Authority Job Fair, May 8th 2018
- The University of Louisiana at Lafayette Student Athlete Career Networking Night, September 25th, 2018
- KLWB personnel involved in these initiatives included a rotation of upper management including the General Manager, VP of Television, Traffic Manager and Office Manager.
- KLWB has an established relationship with the University of Louisiana at Lafayette and offers an ongoing internship for students to receive credit through the accredited university program. In 2017 four students participated and in 2018 five students participated.

- (e) The employment unit is not aware of any pending or resolved discrimination complaints filed against the employment unit during the period of time covered by this response on the basis of race, color, religion, national origin, or sex.
- (f) During the time period covered by this response, points below will 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:
- Management has clearly posted, in an area accessible to all employees, the latest EEO Labor Laws to be reviewed by anyone at any time.
 - Each level of Management, be it Administrative, Sales, Traffic, Production or Engineering all provide a job description for open positions with essential functions and qualifications set forth. This document is posted on all recruiting sources used by Wilderness and also on station websites.
 - Periodically in management meetings with department heads, the stations hiring practices are discussed. Postings are cycled through one person in Administration for review ensuring proper EEO disclosures.
 - Management has open communication with the head of the Louisiana Association of Broadcasters to solicit recruitment assistance. In each case, the station's EEO policies are fully disclosed.
 - From time to time Management will speak at Senior level communication classes at the University of Louisiana at Lafayette and encourage all students to apply for open positions after graduation. The station member in attendance hands out business cards to each and every student in the class.
 - At job fairs and career networking events, various members of management will be available to answer questions attendees may have.
- (g) During the time period covered by this response, points below will describe the Unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result of analysis:
- Management will, on occasion, convene to examine copy used on ads if the number of applicants is not up to expectations. Adjustments will be made to the copy accordingly.
 - After job fairs, evaluations are made on what can be done better to attract applicants. Whether it includes providing further hand outs and information or if we can improve aesthetics to attract more people.
 - In hosting interns, an agenda is laid out by management encouraging participation and interactively with as many departments as possible. Our goal is to make the interns experience one which is positive and educationally worthwhile.
 - In developing job descriptions and final postings, the management team is interactive in crosschecking information. There are from time to time, omissions of information that are detected and corrections are made.
 - One of the problems we face (depending on the position) is receiving an over-abundance of resumes on line that pick up key words. We are diligent to check them out, however it is difficult to assess every single one.
- (h) During the time period covered by this response, points below will describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions and selection techniques to ensure that Wilderness provides equal opportunity and has no discriminatory effect:
- Wilderness makes every good faith effort to insure everyone is treated fairly in our workplace. This includes meritorious measures and disciplinary measures.
 - Regarding Account Executives, outside call in leads are distributed on a rotational basis with all AEs. Everyone is treated fairly in this regard.

- Communication is close between all department heads. Management meets with employees on a regular basis to evaluate performance based on expectations. Accountability tools and Customer Relationship Management tools are used to document activity.
- A company goal of Wilderness is to develop and retain people. There are promotions from within the company based on ability and merit. In each case an evaluation is made and compensation is adjusted fairly within bounds of the company's business model.
- Compensation is examined on an annual basis, however there are no built-in cost of living raises for anyone.
- Selection techniques are consistent. A minimum of two interviews are conducted with candidates that have shown a reasonable aptitude for the position available. In most cases a third interview is needed to complete the hiring process.

The employment unit is not party to any union agreements.

(i) Wilderness is not a religious broadcaster.

4. None of Wilderness' stations are covered by a time brokerage agreement.

Regarding KLWB TV, Wilderness Communications, Facility ID 82476, Tom Poehler is the station representative that can be contacted for this audit response. E-mail, tpoehler@deltamediacorp.com.

I certify the accuracy and correctness of the information provided in this response to EEO Audit.

Respectfully submitted,



Eddie Blanchard
Vice President
Wilderness Communications

Attachment for paragraph 2.

The employment unit's full-time employees, job title and hours required to work

Wilderness – Full Time Employees

<u>Position</u>	<u># Employees</u>	<u>#Hours Required</u>
Receptionist	1	40 Hrs.
Traffic Manager	1	40 Hrs.
Traffic Assistant	1	40 Hrs.
Account Executive(s)	6	40 Hrs.
Engineering/IT	2	40 Hrs.
Programming	1	40 Hrs.
Production Manager	1	40 Hrs.
Production Assistant	1	40 Hrs.
Office Manager	1	40 Hrs.
Accounting Assistants	2	40 Hrs.
General Manager	1	40 Hrs.
VP of Television	1	40 Hrs.
On Air Talent	7	40 Hrs.

Exhibit A

Attachment in response to paragraph (a), copies of the last two EEO public file reports:

Attached on the following pages are the last two EEO Public File Reports including the dates of February 1, 2017-January 31, 2018 and February 1, 2018-January 31, 2019 as required by the audit letter.



Delta Media Corporation
 Equal Employment Opportunity Public File Report
 KDCG TV, KWLTV, KBCA TV, KLWB FM, KXKW, KSLO AM/FM, KOGM FM, KFXZ AM, KYMK FM, KVOL AM
 February 1, 2017 - January 31, 2018

RECRUITMENT SOURCE LIST

No.	Type of Outreach Initiative (Example: Internship, Job Fair, Etc.)	Brief Description of Activity (Include date, description of event, participation, etc)
1	Scholarship	Delta Media stations promoted the Louisiana Association of Broadcasters Scholarship Program Announcement and PSA (Airdates: 2/1/17-2/10/17)
2	Internship	Delta Media has established a relationship with the local University and offers an ongoing internship program. Students are able to receive credit for their internship through the accredited university program. Four (4) students participated.
3	Job Fair	Delta Media stations participated in four (4) job fairs. 1) ULL Spring 2017 Career Fair Febuary 10, 2017; 2) SLCC Spring 2017 Career Fair April 5, 2017; 3) Leda Job Fair May 9, 2017 ; 4) Business & Breakfast at UL April 10, 2017



Delta Media Corporation

Equal Employment Opportunity Public File Report

KDCG TV, KWLTV, KBCA TV, KLWB FM, KXKW, KSLO AM/FM, KOGM FM, KFXZ AM, KYMK FM, KVOL AM

February 1, 2017 - January 31, 2018

POSITIONS FILLED DURING REPORTING PERIOD

Job Title	Sources Used To Fill Position (Numbers correspond to the number used in the Recruitment Source List)	Source Referring Hiree
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Professional Reference
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	In house recruitment
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Regional Help wanted
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Regional Help wanted
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	UL Career Services
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Professional Reference
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Professional Reference
Traffic Assistant	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Referred by friend
Traffic Assistant	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Regional Help wanted
Traffic Assistant	1-8, 9, 11, 18, 25, 31, 43, 46, 49	Regional Help wanted
Board Op	2,6	Referred by friend
Board Op	2,6	Referred by friend
Board Op	2,6	Referred by friend



Delta Media Corporation
 Equal Employment Opportunity Public File Report
 February 1, 2017 - January 31, 2018

RECRUITMENT SOURCE LIST

No.	Recruitment Source (Name, address, contact person, telephone number)	Entitled to Vacancy Notification (Yes/No)	No. Interviewees Referred During Reporting Period by Source
1	LAB	No	0
	Contact: Polly Prince Johnson		
	www.broadcasters.org		
	660 Florida Street, Baton Rouge, LA 70801		
	225-267-4522		
2	University of Louisiana at Lafayette	No	1
	Contact: Kim Billeadeau		
	104 E. University Ave, Lafayette, LA 70504		
	337-262-5300		
	careerservices.louisiana.edu		
3	Acadianahelpwanted.com	No	7
	Contact: Shelby Marion		
	6465 Greenwood Plaza Blvd. Ste. 400, Centennial, CO 80111		
	303-562-0236		
4	LEDA	No	0
	Contact: Ryan Lagrange		
	211 E. Deval Court, Lafayette LA 70504		
	337-593-1400		
	lafayette.org/jobs		
5	In House Recruitment	No	0
	Contact: Chuck Wood		
	3501 NW Evangeline Thruway, Carencro LA 70520		
	337-896-1600		
6	KXKW-FM, KLWB-FM, KFXZ-FM, KYMK-FM, KOGM-FM	No	0
	Contact: Chuck Wood		
	3501 NW Evangeline Thruway, Carencro LA 70520		
	337-896-1600		
7	Referred by Friend	No	5
8	Professional Reference	No	1

9	NAACP	No	0
	Contact: Janelle Chagois		
	604 St. John Street, Lafayette, LA 70501		
	337-233-4262		
10	United Negro College Fund	No	0
	Contact: Sylvia Waler		
	8260 Willow Oaks Corporate Drive, Fairfax, VA 22031		
	225-820-0165		
11	Hispanic Chamber of Commerce	No	0
	Contact: Darlene Kattan		
	PO Box 58031, Metairie, LA 70158		
	504-885-4262		
12	Monroe Women's Business & Professional Association	No	0
	Contact: Judy Wilson		
	6011 Desiard #40, Monroe, LA 71209		
	318-342-8807		
13	Urban League of New Orleans	No	0
	Contact: Gilda Ebanks		
	2912 Canal Street, New Orleans, LA 70119		
	504-620-2332		
14	National Council of Negro Women	No	0
	Contact: Pamela White		
	PO Box 8013, New Orleans, LA 70182		
	504-827-0050		
15	Army Career and Alumni Program	No	0
	Contact: Tami B Culbreath		
	7950 Alabama Ave. Bldg. 2155 Ste. 105, Fort Polk, LA 71459		
	337-531-1591		
16	LSU	No	0
	Contact: Amy Caillouet		
	1502 Patrick F Taylor Hall, Baton Rouge, LA 70803		
	225-578-2162		
17	Website: lafayetteradioadvertising.com	No	0
	Contact: Dave Landry		
	1749 Betrand Drive, Lafayette, LA 70506		
	337-233-6000		
18	Southern University of Baton Rouge	No	0
	Contact: Tamara Montgomery		
	PO Box 10400, Baton Rouge, LA 70813		
	225-771-4500		
19	Louisiana Tech Career College	No	0
	email: careercenter@latech.edu		
	305 Wisteria Street, Ruston, LA 71272		
	318-257-4336		
	Southeastern University		
	Contact: Stormy Bougeois		

20	548 Western Ave. Hammond, LA 70402 website: www.selu.edu/career 985-549-2121	No	0
21	McNeese State University Contact: Cheryl Bellard 4205 Ryan St. Lake Charles, LA 80609 website: mcneese.edu/career 337-475-5612	No	0
22	Tulane University Contact: Michelle Elking 6823 St. Charles Ave. New Orleans, LA 70118 website: tulane-csm.symplicity.com/employers 504-865-5000	No	0
23	Delgado Community College Contact: Brian Simon 615 City Park Ave. New Orleans, LA 70119 email: bsimon@dcc.edu 504-671-5000	No	0
24	Our Lady of Holy Cross College Contact: Jennifer Tubwell 4123 Woodland Drive, New Orleans, LA 70131 email: jtubwell@olhcc.edu 504-394-7744	No	0
25	Southern University of New Orleans Contact: Joe Marion 6400 Press Drive, New Orleans, LA 70126 email: jmarion@suno.edu 504-286-5389	No	0
26	LA Works / Department of Labor Contact: Greg Ganier 1001 N. 23rd Street, Baton Rouge, LA 70802 337-948-1377	No	0
27	Allaccess.com Contact: Mark Capuano 11 Music Circle Suite 101, Nashville, TN 37203 615-252-6400	No	0
28	Louisianagrad.com Contact: Tara email: tara@businessreport.com	No	0
29	AMFMJOBS.com Contact: Mark Holloway PO Box 4116, Oceanside, CA 92052 800-374-0119	No	0
30	Remington College Contact: Melanie Wallace 118 Rue Fontaine, Lafayette, LA 70508 337-981-4010	No	0

	email: melanie.wallace@remingtoncollege.edu		
31	Grambling University	No	0
	Contact: Johnny Patterson		
	403 Main Street, Grambling, LA 71245		
	318-274-2346		
	email: millagea@gram.edu		
32	Allaboutcountry.com	No	0
	Contact: Kim Hennes		
	311 E. Center Avenue, Lake Bluff, IL 60044		
	910-520-9154		
	email: kim@allaboutcountry.com		
33	Traffic Directors Guild of America	No	0
	Contact: Larry Keene		
	000 Avenida Aeropuerto Bldg. 114 San Juan Capistrano, CA 926		
	949-429-7063		
	email: tdge@earthlink.net		
34	Freeman School of Business - Tulane	No	0
	Contact: Ira Soloman		
	7 McAlister Drive, Tulane University, New Orleans, LA 70118		
	504-865-5000		
	email: careers@tulane.edu		
35	Glass Media	No	0
	Contact: James Glass		
	18920 Misty Lake Drive, Cleveland, OH 44136		
	440-539-0234		
	radiowatch@glassmedia.biz		
36	Louisiana College	No	0
	Contact: Mercer		
	1140 College Drive, Pineville, LA 71360		
	318-487-7011		
	email: mercer@lacollege.edu		
37	LSU Shreveport	No	0
	Contact: Gina Starnes		
	One University Place, Room 230, Shreveport, LA 71115		
	318-797-5062		
	fax: 318-797-5366		
38	Craigslist	No	0
	accounts.craigslist.org/login		
39	Louisiana State University at Eunice	No	0
	Contact: Atina Wright		
	PO Box 1129 Room A-102, Eunice, LA 70535		
	337-550-1430		
	website: www.collegecentral.com/LSUE		
40	National Alliance of State Broadcasters Association	No	0
	website: careerpage.org		
	Loyola University New Orleans		
	Contact: Jamie Pollett		

41	6363 St. Charles Avenue, New Orleans, LA 40118		No	0
	504-865-3676			
	website: www.myinterfase.com/loyola/employer			
42	Walk In		No	1
43	UL Job Fair		No	0
	Contact: Kim Billeadeau			
	104 E. University Ave, Lafayette, LA 70504			
	337-262-5300			
44	Department of Veterans Affairs		No	0
	Contact: Ronald R Schroeder			
	3010 Knight Street Suite 110, Shreveport, LA 71105			
	318-861-3984			
45	RAB		No	0
	Contact: Bob Lawrence			
	1320 Greenway Drive, Ste. 500, Dallas, TX 75038			
	88-276-2729			
	email: blawrence@rab.com			
46	LinkedIn		No	0
47	Radio Online		No	0
48	Sportscasters Talent Agency of America		No	0
49	Indeed		No	
	www.indeed.com/hire			
TOTAL INTERVIEWEES DURING 12 MONTH PERIOD				15



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2	Internship	Delta Media has established a relationship with the local University and offers an ongoing internship program. Students are able to receive credit for their internship through the accredited university program. Five (5) students participated.
3	Job Fair	Delta Media stations participated in four (4) job fairs. 1) ULL Spring 2018 Career Fair Febuary 28, 2018; 2) ULL Fall 2018 Career Fair September 25, 2018; 3) Leda Job Fair May 8, 2018 ; 4) Student Athlete Career Networking Night at UL September 25, 2018



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Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Professional Reference
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Professional Reference
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Professional Reference
Account Executive	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Professional Reference
Digital Strategic Specialist	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Indeed.com
Operations Manager	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	All Access
Program Director	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	All Access
Traffic Assistant	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Referred by friend
Administrative Assistant	1-8, 9, 11, 18, 25, 31, 43, 46, 49, 50	Referred by friend
On Air Personality	6,26	Station Website
On Air Personality	6,26	Station Website
On Air Personality	6,26	Station Website
On Air Personality	6,26	Station Website
On Air Personality	6,26	Professional Reference
On Air Personality	6,26	Professional Reference
On Air Personality	6,26	Professional Reference
On Air Personality	6,26	Professional Reference
Board Op	2,6	Station Website
Board Op	2,6	Station Website
Board Op	2,6	Station Website
Board Op	2,6	Station Website



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1	LAB	No	0
	Contact: Polly Prince Johnson		
	www.broadcasters.org		
	660 Florida Street, Baton Rouge, LA 70801		
	225-267-4522		
2	University of Louisiana at Lafayette	No	1
	Contact: Kim Billeadeau		
	104 E. University Ave, Lafayette, LA 70504		
	337-262-5300		
	careerservices.louisiana.edu		
3	Acadianahelpwanted.com	No	7
	Contact: Shelby Marion		
	6465 Greenwood Plaza Blvd. Ste. 400, Centennial, CO 80111		
	303-562-0236		
4	LEDA	No	0
	Contact: Ryan Lagrange		
	211 E. Deval Court, Lafayette LA 70504		
	337-593-1400		
	lafayette.org/jobs		
5	In House Recruitment	No	0
	Contact: Chuck Wood		
	3501 NW Evangeline Thruway, Carencro LA 70520		
	337-896-1600		
6	KXKW-FM, KLWB-FM, KFXZ-FM, KYMK-FM, KOGM-FM	No	5
	Contact: Chuck Wood		
	3501 NW Evangeline Thruway, Carencro LA 70520		
	337-896-1600		
7	Referred by Friend	No	2
8	Professional Reference	No	6