



Date: 3/25/19

EEO Staff  
Policy Division, Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> 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](http://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 10<sup>th</sup>, 2017
- The South Louisiana Community College Spring Career Fair, April 5<sup>th</sup> 2017
- The Lafayette Economic Development Authority Job Fair, May 9<sup>th</sup> 2017
- The University of Louisiana at Lafayette B.I. Moody School of Business', "Business and Breakfast Gathering" April, 10<sup>th</sup> 2017
- The University of Louisiana at Lafayette Spring Career Fair, February 28<sup>th</sup>, 2018
- The University of Louisiana at Lafayette Fall Career Fair, September 25<sup>th</sup>, 2018
- The Lafayette Economic Development Authority Job Fair, May 8<sup>th</sup> 2018
- The University of Louisiana at Lafayette Student Athlete Career Networking Night, September 25<sup>th</sup>, 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](mailto: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**

<b><u>Position</u></b>	<b><u># Employees</u></b>	<b><u>#Hours Required</u></b>
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-Janurary 31, 2018 and February 1, 2018-Janurary 31, 2019 as required by the audit letter.

# DELTA MEDIA

Corporation

Delta Media Corporation  
 Equal Employment Opportunity Public File Report  
 KDCG TV, KWLB TV, 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



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

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

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

	email: melanie.wallace@remingtoncollege.edu		
31	<b>Grambling University</b>	No	0
	Contact: Johnny Patterson		
	403 Main Street, Grambling, LA 71245		
	318-274-2346		
	email: millagea@gram.edu		
32	<b>Allaboutcountry.com</b>	No	0
	Contact: Kim Hennes		
	311 E. Center Avenue, Lake Bluff, IL 60044		
	910-520-9154		
	email: kim@allaboutcountry.com		
33	<b>Traffic Directors Guild of America</b>	No	0
	Contact: Larry Keene		
	1000 Avenida Aeropuerto Bldg. 114 San Juan Capistrano, CA 92676		
	949-429-7063		
	email: tdge@earthlink.net		
34	<b>Freeman School of Business - Tulane</b>	No	0
	Contact: Ira Soloman		
	7 McAlister Drive, Tulane University, New Orleans, LA 70118		
	504-865-5000		
	email: careers@tulane.edu		
35	<b>Glass Media</b>	No	0
	Contact: James Glass		
	18920 Misty Lake Drive, Cleveland, OH 44136		
	440-539-0234		
	radiowatch@glassmedia.biz		
36	<b>Louisiana College</b>	No	0
	Contact: Mercer		
	1140 College Drive, Pineville, LA 71360		
	318-487-7011		
	email: mercer@lacollege.edu		
37	<b>LSU Shreveport</b>	No	0
	Contact: Gina Starnes		
	One University Place, Room 230, Shreveport, LA 71115		
	318-797-5062		
	fax: 318-797-5366		
38	<b>Craigslist</b>	No	0
	accounts.craigslist.org/login		
39	<b>Louisiana State University at Eunice</b>	No	0
	Contact: Atina Wright		
	PO Box 1129 Room A-102, Eunice, LA 70535		
	337-550-1430		
	website: www.collegecentral.com/LSUE		
40	<b>National Alliance of State Broadcasters Association</b>	No	0
	website: careerpage.org		
	<b>Loyola University New Orleans</b>		
	Contact: Jamie Pollett		

41	6363 St. Charles Avenue, New Orleans, LA 40118	No	0
	504-865-3676		
	website: www.myinterfase.com/loyola/employer		
42	<b>Walk In</b>	No	1
43	<b>UL Job Fair</b>	No	0
	Contact: Kim Billeadeau		
	104 E. University Ave, Lafayette, LA 70504		
	337-262-5300		
44	<b>Department of Veterans Affairs</b>	No	0
	Contact: Ronald R Schroeder		
	3010 Knight Street Suite 110, Shreveport, LA 71105		
	318-861-3984		
45	<b>RAB</b>	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	<b>Indeed</b>	No	
	www.indeed.com/hire		
<b>TOTAL INTERVIEWEES DURING 12 MONTH PERIOD</b>			<b>15</b>



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1	Scholarship	Delta Media stations promoted the Louisiana Association of Broadcasters Scholarship Program Announcement and PSA (Airdates: 12/20/2018-1/31/19)
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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February 1, 2018 - January 31, 2019

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