



Cordero de Dios, que quitas el pecado del mundo... danos la paz.
Lamb of God, you take away the sins of the world... grant us peace.

September 11, 2023

Elizabeth Goldin, Esq., Assistant Chief
Investigations & Hearings Division, Enforcement Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: EEO Audit of WACC(AM), Hialeah, Florida (FIN: 28874)

To Whom It May Concern:

Pax Catholic Communications, Inc. (“Pax”) hereby supplements its Response, dated June 8, 2023 (“Response”), with respect to the letter from the Commission’s EEO Staff, dated April 24, 2023 (“Letter”), informing Pax that the employment unit (“Unit”) associated with WACC(AM), Hialeah, Florida (“Station”) has been randomly selected for an audit of its EEO program.

Specifically, the response to item 2(b)(iii) is being supplemented by providing additional information with respect to the following Exhibits: attached as Exhibit 2(b)(iii)-2-Supp is additional available documentation supporting the recruitment undertaken for the Board Operator position, filled on March 8, 2021 and again on April 5, 2021; attached as Exhibit 2(b)(iii)-3-Supp is additional available documentation supporting the recruitment undertaken for the Board Operator/Stewardship, filled on January 3, 2022 and for the Board Operator/Editing, filled on January 18, 2022; and attached as Exhibit 2(b)(iii)-5-Supp is additional available documentation supporting the recruitment undertaken for the Radio Traffic Log, filled on July 25, 2022.

In addition, attached is an Affidavit of the Senior Director of Human Resources for the Archdiocese of Miami (“ADOM”).¹ As set forth in that Affidavit, ADOM advertised for full-time all positions that were filled during the October 1, 2020 through September 30, 2022 period on its Instagram and Facebook pages as “stories,” which are removed automatically by Meta after 90 days, rather than as traditional “postings,” which remain available until they are manually removed. Unfortunately, Pax has been unable to retrieve the “stories,” but the attached Affidavit clarifies and confirms that the postings indeed were made available on ADOM’s Instagram and Facebook pages. In the future, ADOM will post notices of job openings at Pax either through traditional postings, rather than as “stories,” or ADOM staffers will print screenshots and retain them with their files.

I hereby certify that the foregoing response is accurate and complete to the best of my knowledge, information and belief. Should you have any questions regarding the foregoing

¹ As explained in the Response, the Archbishop of Miami is the person in control of Pax. As such, the Senior Director of Human Resources of ADOM has responsibility for placing advertisements for job openings with Pax.



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response, please contact our attorney, Mark B. Denbo, at 202-350-9656 or mdenbo@fccworld.com.

Sincerely,


Roberto Garza
Director

Attachments

EXHIBIT 2(b)(iii)-2-Supp

**Board Operator position filled on March 8, 2021 and April
5, 2021**



[← Back to jobs](#)

Board Operator (Part-Time)

Radio Paz – Miami, FL

[Sponsor this job](#)

● Closed

[View public job page](#)

0

Clicks

■ Your job

Gathering data...

Check back tomorrow to see how your job is performing.

10

Details

Posted: January 8, 2021

Views: 0

Applications received: [42 total](#)

Published: 03/02/2021

Board Operator/Social Media Specialist - Radio Paz

Radio Paz, the Catholic Spanish radio programming of the Archdiocese of Miami has an opening for full-time, Board Operator/Social Media Specialist. This position will be responsible for running the on-air equipment including the broadcast console. Assist radio hosts with the production of their LIVE programs and ensure in-air broadcasts are levelled and transmitting high quality audio. In Social Media, the Social Media Specialist is to update our Instagram accounts including Facebook, Instagram, YouTube and Twitter. Share content daily and interact with followers in a respectful manner. Broadcast LIVE shows and special programming when necessary through social media platforms. Update the Sound Cloud system and report the summary of statistics of the social media platforms.

This individual will perform all duties and responsibilities in alignment with the mission, vision and values of the Catholic Archdiocese of Miami.

Schedule: 40 hours/week

Responsibilities:

- Run the on-air equipment at Radio Paz WACC 830AM.
- Operate standard broadcast console.
- Monitor and transmit live programs.
- Observe regulations and policies under the direction of the Chief Operator.
- Update the Facebook, Twitter, Instagram and YouTube platforms daily.
- For YouTube content if there is no content created by Radio Paz, look for other means that content can be shared.
- Share content first through Facebook and then prioritize the other platforms.
- Interact daily with listeners who follow us on social platforms.
- Link social platforms to the website through the content that is created.
- Broadcast Buenos Días Misionero LIVE on Fridays. Create a post with images, videos and information that summarize the visit.
- Broadcast LIVE on Facebook LIVE important broadcasts organized by the Content Department.
- Update the Sound Cloud system.
- Meet regularly with the content department to plan broadcasts and the content that is announced by the platforms.
- Update team on site traffic analytics.
- Uphold and model the moral code consistent with the teachings of the Roman Catholic Church and the mission and charism of the Archdiocese of Miami Pax Catholic Communications.

EXHIBIT 2(b)(iii)-3-Supp

**Board Operator/Stewardship position, filled on January 3,
2022 and Board Operator/Editing position, filled on January
18, 2022**



Published: 12/15/2021

Board Operator / Social Media Specialist (Full-time) / Radio Paz - Radio Paz

Radio Paz, the Catholic Spanish-language radio program of the Archdiocese of Miami has an opening for a full-time, Board Operator / Social Media Specialist. This person will be responsible for running the on-air equipment including the broadcast console. This includes assisting radio hosts with the production of their LIVE programs and ensuring that on-air broadcasts are levelled and transmitting high quality audio. In Social Media, the Social Media Specialist is to update the station's social media accounts including Facebook, Instagram, YouTube, and Twitter; and share content daily and interact with followers in a respectful manner. Broadcast LIVE shows and special programming, when necessary, through social media platforms. Update the SoundCloud system and report the summary of statistics of the social media platforms.



This individual will perform all duties and responsibilities in alignment with the mission, vision, and values of the Catholic Archdiocese of Miami.

Schedule: 40 hours per week, to be determined; must be flexible to work during events.

Qualifications:

- Bachelor degree preferred in communications, marketing, business development or related field; or two years' experience in media platforms; or equivalent education and experience.
- Must speak, read and write Spanish fluently. English-language proficiency also required.
- Must be supportive of the mission and tenets of the Roman Catholic Church; knowledge of church structures a plus.
- Knowledge of and the ability to effectively convey the official teaching of the Church in the Holy Scriptures, doctrine, morality, and spirituality with a demonstrated fidelity to these teachings.
- Knowledge of church documents relating to faith formation.
- Must have positive, can-do attitude; must be a team-player.
- Knowledge of transmission, broadcasting, switching, control, and operation of telecommunication systems; experience with radio consoles preferred.
- Knowledge of social media platforms and creating content. This includes alternative ways to communicate and entertain via written, oral, and visual media.
- Knowledge of basic project management principles.

EXHIBIT 2(b)(iii)-5-Supp
Radio Traffic Log position, filed on July 25, 2022

Published: 06/27/2022

Radio Traffic Log Assistant - Radio Paz

Radio Paz, the Catholic Spanish-language radio program of the Archdiocese of Miami has an opening for a full-time, Radio Traffic Log Assistant. This person will be responsible for entering traffic copy. This includes scheduling contracts, submitting sales reports to advertisement clients and any inquiries from them. Responsible for working through logs daily. Able to write down last minute promos and transmissions that come unexpectedly on the log. Work closely with programming and operations coordinators to make sure that segments and breaks are accurate. Work closely with Administration when closing books for the month. Must coordinate in advance with Executive Assistant when taking time off. Other duties as assigned. This individual will perform all duties and responsibilities in alignment with the mission, vision, and values of the Catholic Archdiocese of Miami.



Schedule: 40 hours per week, to be determined; must be flexible to work during events.

Qualifications:

- › Bachelor degree preferred in communications, marketing, business development or related field with two years' experience in media platforms; or equivalent education and experience.
- › Must speak, read, and write Spanish fluently. English-language proficiency also required.
- › Must have positive, can-do attitude; must be a team-player.
- › Knowledge of basic project management principles.
- › Skilled at needs analysis, using systematic approaches to assess and identify needs.
- › Skilled at implementing action plans.
- › Excellent customer service skills, including ability to maintain focus on and professionalism with people in challenging situations, both in person and by phone.
- › Proficiency in MS Outlook, Word, and Excel are required.
- › Good time management, including ability to manage several projects at the same time.
- › Must be dependable and reliable.
- › Demonstrated ability to multi-task and retain accuracy in an environment of competing deadlines.
- › Supportive of the mission and tenets of the Roman Catholic Church; knowledge of parish structures plus.

AFFIDAVIT OF SENIOR DIRECTOR HUMAN RESOURCES

BEFORE ME, the undersigned authority, personally appeared Lisa Pinto who, being under oath, states:

1. I am over 18 years of age and am the Senior Director of Human Resources for the Archdiocese of Miami (“ADOM”). The employment unit associated with WACC(AM), Hialeah, Florida, which operates in Spanish as “Radio Paz,” has outsourced its employee benefits and hiring operations to ADOM.

2. This affidavit is based upon facts of which I have personal knowledge.

3. In my role as Senior Director of Human Resources, I am responsible for placing advertisements for job openings on behalf of Radio Paz

4. Job openings posted at Indeed.com are further advertised via ADOM’s social media accounts at Facebook and Instagram.

5. ADOM advertised the following “full-time” positions for Radio Paz via the website Indeed.com and at ADOM’s Facebook and Instagram social media accounts that were filled between October 1, 2020 and September 30, 2022:

- a. Technical Coordinator, on June 1, 2021;
- b. Board Operator, on March 8, 2021 and again on April 5, 2021;
- c. Board Operator/Stewardship, on January 3, 2022;
- d. Board Operator/Editing, on January 18, 2022; and
- e. Radio Traffic Log, on July 25, 2022

6. ADOM posts advertisements for full-time positions as “stories” on its Facebook and Instagram pages. Pursuant to the policy of Meta, which operates Facebook and Instagram, “stories” are available only for 90 days following posting. Radio Paz’s Information Technology expert has been unable to retrieve the “stories” associated with the job postings referenced in Items

5(a) through (e) above. In the future, Radio Paz will either: (a) post job openings on Facebook and Instagram as traditional “posts,” rather than as “stories;” or (b) as soon as the postings appear on Facebook and Instagram, several staff members will print screenshots and retain them as PDF documents in their files.

Under penalty of perjury, I swear that the foregoing is true and correct.

FURTHER AFFIANT SAYETH NAUGHT.



Lisa Pinto