

Bicoastal Media Licenses III, LLC
1 Blackfield Drive #333
Tiburon, CA 94920

March 29, 2019

To: FCC Online Public Files

Re: EEO Audit Response for Bicoastal Media Licenses III, LLC
Station KOOS, North Bend, OR
Facility Id No. 5210

Bicoastal Media Licenses III, LLC, licensee of radio station KOOS, North Bend, Oregon, is responding to the letter dated February 14, 2019, from Mr. Lewis C. Pulley, Assistant Chief Policy Division, Media Bureau, of the Federal Communications Commission (“Audit Letter”).

KOOS is in an employment unit (“Unit”) that consists of the following stations:

Call Sign	Community	Facility ID
KBBR(AM)	North Bend, OR	5212
KBDN(FM)	Bandon, OR	13875
KJMX(FM)	Reedsport, OR	20434
KOOS(FM)	North Bend, OR	5210
KSHR-FM	Coquille, OR	13872
KTEE(FM)	North Bend, OR	4080
KWRO(AM)	Coquille, OR	13874

Our responses to the questions in part 3 of the audit letter are as follows:

(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 posted on each of these websites, indicate each relevant website and provide an explanation of why the report is not posted, 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 Section 73.2080(c)(6).

The report for 2017, attached as Exhibit 1, covers the period from September 21, 2016 to September 20, 2017. The 2018 Annual EEO Public File Report for the period from September 21, 2017 to September 20, 2018, is attached as Exhibit 2.¹

Full-time hires during the two years under review are:

Market Manager – 4/10/17
Account Executive/Marketing Consultant – 5/8/17
Account Executive/Marketing Consultant – 7/18/17
Market Manager – 7/26/17
Operations Manager/Chief Operator – 10/30/2017
Account Executive/Marketing Consultant – 1/3/18
Account Executive/Marketing Consultant – 8/16/18

The most recent annual EEO Public File Report is linked on the following websites:

<u>Call Sign</u>	<u>Domains</u>
KBBR(AM)	1340kbbbr.com
KBDN(FM)	kbdn.com/
KJMX(FM)	kjmx.rocks
KOOS(FM)	koosfm.com
KSHR-FM	kshr.com
KTEE(FM)	ktee.com
KWRO(AM)	kwro.com

(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).

¹ The annual reports were revised in connection with preparing for the audit. The 2017 report was revised to remove the reference to hiring a part-time Assistant Traffic Manager on September 14, 2017. The 2018 report was revised to remove the reference to hiring a part-time Assistant Producer on February 5, 2018, and to add a full-time Operations Manager/Chief Operator hired on October 30, 2017 who was inadvertently omitted. The Recruitment Sources Used list on each report was revised to reflect available documentation of contacts with specific sources. The interviewee summary numbers were updated to reflect the removal of part-time positions and the addition of a full-time opening.

Dated copies of available documentation relating to recruitment for fulltime openings during the period under review are provided in the following exhibits:

Exhibit 3	Market Manager – 4/10/17
Exhibit 4	Account Executive/Marketing Consultant – 5/8/17
Exhibit 5	Account Executive/Marketing Consultant – 7/18/17
Exhibit 6	Market Manager – 7/26/17
Exhibit 7	Operations Manager/Chief Operator – 10/30/2017
Exhibit 8	Account Executive/Marketing Consultant – 1/3/18
Exhibit 9	Account Executive/Marketing Consultant – 8/16/18

The Unit retained copies of documentation of notices sent to sources reflected in Exhibits 3 - 9

The Unit has log sheets for on air job announcements stored electronically.

No organization requested notices of job openings.

(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.

Market Manager, 4/10/17 – 7

- Oregon Association of Broadcasters – 2
- All Access – 4
- Personal referral – 1

Account Executive/Marketing Consultant, 5/8/17 – 1

- Craigslist – 1

Account Executive/Marketing Consultant, 7/18/17 – 1

- Radio ads – 1

Market Manager, 7/26/17 – 7

- Oregon Association of Broadcasters – 2
- Washington State Association of Broadcasters – 1
- All Access – 3
- Personal referral – 1

Operations Manager/Chief Operator, 10/30/2017 – 3

- Bicoastal Media website – 2
- Craigslist – 1

Account Executive/Marketing Consultant, 1/3/18 – 2

- Craigslist – 1
- Bicoastal Media website – 1

Account Executive/Marketing Consultant, 8/16/18 – 3

Craigslist – 1

Radio ads – 1

Bicoastal Media website – 1

(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.

Total Number of Full-Time Employees: 6

All the stations in the unit are located in Coos County, Oregon, which has a population of 63,888. Thus, the stations are required to perform two initiatives over a two-year period.

The following illustrative initiatives were undertaken during the period under review with the involvement of the station personnel listed next to the initiative.

Internship Program – Student from North Bend High School during the Third Semester of 2016/2017 school year worked with our Operations Manager. This specific intern is described in the 2017 Annual EEO Public File Report in Exhibit 1.

Mentoring – Traffic Manager/Business Manager mentored by the Market Manager. This activity is described in detail in the 2017 and 2018 Annual EEO Public File Reports in Exhibits 1 and 2.

Training for staff – Training for Ops Managers done by Simian/BSI. See Exhibit 10. Training for Account Executives by RAB (see Exhibit 11) and by Sales Manager and Market Manager, Production staff trained by Ops manager.

Job Fairs

-5/2/2017 – South West Oregon Community College - Market Manager.

-3/8/2018 – Community Job Fair at Three Rivers Casino Resort with the Coquille Tribe – Market Manager and Business Manager. See Exhibit 12.

Community Organizations

-February 2017 – Sales Manager presented to the South Coast Business Development Corporation

-9/26/2017 – Sales Manager participated in the launch of a new employment organization, WorkSource Coos. Station aired promotions and broadcast a live remote during the event. See Exhibit 13.

(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.

No complaints filed.

(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.

The Market Manager is responsible for implementation and administration of the stations' EEO policies at the local level. EEO training is on-going in the Market Manager's meetings with staff throughout the year. EEO policy implementation is reviewed annually by the licensee's President and Chief Operating Officer during the budget process and periodically throughout the year during his station visits with market management.

All printed advertisements for full-time employment include "Equal Opportunity Employer." The licensee's employment application states that it is an "Equal Opportunity Employer" and that it "considers applicants for all positions without regard to race, color, religion, sex, national origin, marital status, the presence of non-job related medical condition or handicap, or any other legally protected status." The Unit's Equal Employment Opportunity policy is posted internally on the Staff Bulletin Board for all employees to view.

The Unit's EEO policy is included in the Employee Handbook. All employees are required to acknowledge that they have read the Handbook and to sign a form that they have read and understood it.

(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.

Because the Unit is small, the Market Manager is aware of all recruitment efforts that occur for openings she oversees. She reviews the effectiveness of the recruitment program in conjunction

with recruiting for vacancies and undertaking outreach initiatives. When recruitment is necessary, a general review is given to: A) are current recruitment sources in keeping with the generally accepted sources for the position and the industry; B) are new recruitment sources possible or necessary in generating a desired interest; C) are some previously traditional sources no longer viable, for sake of repetition, functionality or engagement; and D) cost. A general analysis of the readily available recruitment sources has determined that when recruitment is necessary, the greatest response is from the immediate local area. The Market Manager also reviews the effectiveness of the program during her preparation of the Annual EEO Public File Reports for the stations.

In addition, the Unit has its communications counsel review its Annual EEO Public File Report each year. Counsel provides suggestions for improvement to the recruitment program to the extent needed.

(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.

Senior management meets each year at budget time to analyze pay levels for each position within each department. During that time, senior management evaluates compensation and benefits to ensure all employees regardless of race, color, religion, national origin or sex have equal opportunities for and access to any pay increase, promotions or job openings at any business unit within the Company. Employee evaluations are gauged by the following general criteria: A) overall job performance; B) quality of work; C) attendance; and D) attitude. Subcategories include, but are not limited to, performance in cross trained areas (as we have a small staff), proactive abilities and positive awareness, and participation.

It is Bicoastal Media's policy to make available to all Company employees any job opening within the Company. In addition to our outreach efforts, employees that are looking to advance and may be willing to relocate are made aware of job openings within the Company. Each year we compare employment statistics of the radio industry with our own to see how we measure up.

There are no union contracts or union employees within the Unit.

(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.

Not applicable.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based on information provided by the Market Manager of the Unit.



Kevin P. Mostyn
Vice President & Chief Technology Officer