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May 5, 2022

Via Online Public Inspection File

Investigations & Hearing Division
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554
Attn: Elizabeth Goldin

Re: **Sinclair Media Licensee, LLC**
Response to March 2022 EEO Audit
KTVM-TV, Butte, MT (Facility ID 18066)

Dear Ms. Goldin,

On behalf of Sinclair Media Licensee, LLC, the licensee of KTVM-TV, Butte, MT (Facility ID 18066), we submit the following materials in response to your March 21, 2022 EEO Audit Letter.

Please contact the undersigned if you have any questions concerning this matter.

Respectfully submitted,

Jessica T. Nyman
Counsel for Sinclair Media Licensee, LLC

Response of Sinclair Media Licensee, LLC to March 21, 2022 Letter

Sinclair Media Licensee, LLC (“Licensee”), the licensee of KTVM-TV, Butte, MT (Facility ID 18066), hereby responds to the March 21, 2022 Letter (the “March 21 Letter”) from Elizabeth Goldin, Assistant Chief, Investigations & Hearings Division, Federal Communications Commission. The March 21 Letter states that the station employment unit (“SEU”) for KTVM-TV has been selected for an audit of its EEO program. KTVM-TV and KDBZ-CD, Bozeman, MT (Facility ID 18083) constitute an SEU.

Question 2(b)(i)

The SEU’s two most recent EEO Public File Reports are attached as Exhibit 1.

Question 2(b)(ii)

KTVM-TV and KDBZ-CD’s website is <https://nbcmontana.com>. The SEU’s most recent EEO Public File Report is properly linked to on the website.

Question 2(b)(iii)

The responsive materials are attached as Exhibit 2. Copies of all notices sent to all sources have been retained pursuant to Section 73.2080(c)(5)(iii) of the Commission’s Rules. The SEU did not air job announcements.

Question 2(b)(iv)

The number of interviewees for each vacancy and the referral source for each interviewee are listed in the two EEO Public File Reports attached as Exhibit 1.

Question 2(b)(v)

The SEU employs 6 full-time employees and 1 part-time employee, and is located in a market with more than 250,000 people. Therefore, the SEU must perform four recruitment

initiatives during each two-year period. The SEU's EEO recruitment initiatives are described in the attached EEO Public File Reports and supporting documentation is included as Exhibit 3.

Question 2(b)(vi)

There have been no pending or resolved complaints during the current license term.

Question 2(b)(vii)

Each level of management is responsible for adhering to the following EEO policy of its parent company, Sinclair Broadcast Group, Inc. (the "Company"):

- All managers are held accountable to ensure that they adhere to the FCC's EEO rules and policies as well as all nondiscrimination laws.
- It is each station's responsibility to inform all employees and employee organizations (where applicable) of the Company's EEO Policy and enlist cooperation from the Company's employees to ensure the Company's hiring practices meet EEO standards.
- All stations must communicate with community sources and enlist assistance in recruiting for all vacancies.
- It is the responsibility of all managers to exclude any and all forms of prejudice or discrimination in hiring practices.
- It is the responsibility of all station management to continuously review job structure and employment practices to ensure equality of opportunity.

In order to adhere to the policy mentioned above, the SEU follows a Three-Prong Outreach System to ensure that the SEU recruits widely for all full-time vacancies, notifies any and all community groups and organizations that request job vacancy notifications, and performs additional recruiting activities from a menu of options.

Outreach Prong 1 – Recruitment for Full-Time Vacancies

It is the obligation of the SEU to recruit for full-time vacancies and ensure a "wide-dissemination" of information concerning each job vacancy. This is achieved by utilizing a variety of recruitment sources designed to achieve broad outreach and target all segments of the broadcast community's population, e.g., trade schools, junior colleges, colleges and universities,

minority and women's groups and organizations, community organizations, area unemployment facilities, and other groups or organizations that assist in job placement. All vacancies are posted to the corporate website with an employment link found on each station's website.

Outreach Prong 2 – Notification to Community Groups

The SEU promotes openings to as many sources as possible, actively pursues additional sources that target women and minorities, and attends local job fairs. The SEU also maintains a mailing list of organizations that have requested to receive all job vacancy information. The SEU takes great care to ensure that all job vacancies are sent to those organizations requesting information. The SEU notifies the community on how to receive notice of vacancies by utilizing tools such as on-air spots.

Outreach Prong 3 – Menu Option Initiatives

The SEU chooses options from the following menu to widely disseminate information to the community and ensure broad outreach. The underlined options indicate the utilized mechanisms the station chose to inform employees and job applicants of its EEO policies and programs.

- Attend Job Fairs
- Host Job Fairs
- Co-sponsor Community Job Fair with Minority Focus
- Develop Internship Program
- Participate in Educational Events
- Sponsor Community Information Events to Educate Public on Broadcasting Careers
- Alternative Internet Programs beyond Posting of Jobs
- Participate in Community Events
- Develop Scholarship Program
- Develop Training Program to Foster Promotability
- Mentoring Program for Station Employees
- Post Upper-level Jobs in Trade Publications and Minority-Focused Publications
- Train Management on EEO and Discrimination Issues

Question 2(b)(viii)

The SEU keeps a list of all full-time vacancies each year, by job title, as well as a list of all organizations sent information on job vacancies. Dated copies of advertisements, letters, faxes, and e-mails announcing job vacancies are also maintained. Furthermore, each year a report is created for and placed into each station's Online Public Inspection File and posted to the stations' website on the anniversary date of the filing of the stations' license renewal applications. The SEU also uses the Oracle Recruiting Cloud Applicant Tracking System ("ORC") to track how applicants hear of any job openings. The system also allows for the SEU to maintain recruitment reports as well as EEO statistics.

Question 2(b)(ix)

It is the policy of the SEU that employment decisions will be based on such factors as merit, qualifications, competence, and the needs of the SEU. Employment practices are not influenced or affected by virtue of the applicant's or employee's race, color, creed, religion, sex, national origin, age, disability, handicap, or any other characteristic protected by law.

The SEU puts forth the following efforts to ensure that there is equal opportunity within employment practices and no discriminatory effects:

- Formal performance reviews are conducted annually to provide both department heads and all employees the opportunity to discuss job tasks, identify and correct weaknesses, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals. At this time, all employees are reviewed for merit increases and pay adjustments.
- The SEU follows an annual budget established by the corporate headquarters. Pay scales are determined prior to the selection process.
- All employees are subject to a probation period of ninety days. This is an opportunity for new employees to become familiar with the Company and their job.
- Department transfers and promotions are strongly encouraged. Therefore, the SEU employs an Internal Application Program to inform employees of openings and to identify qualified and interested applicants who might not otherwise be known to the hiring manager. Generally, all employees must have at least one year of service and have

performed competently in their current position for at least one year prior to applying for another position.

Question 2(b)(x)

The Licensee is not a religious broadcaster.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 5, 2022.

Don Thompson

Don Thompson
EVP, Chief Human Resources Officer
Sinclair Broadcast Group, Inc.