

Gray Miller Persh LLP

Attorneys at Law
2233 Wisconsin Ave., NW, Suite 226
Washington, DC 20007

Barry S. Persh
(202) 776-2458
bpersh@graymillerpersh.com

March 19, 2020

Submitted via Online Public Inspection File

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

NOTE: No Filing Fee Required

Re: Response to EEO Audit Letter
Station WMAW-TV, Meridian, MS (Facility ID 43169)
Station WMPN-TV, Jackson, MS (Facility ID 43168)

Dear EEO Staff:

On behalf of Mississippi Authority for Educational Television, we transmit herewith a response to FCC audit letter requests for information concerning the EEO programs of noncommercial educational television stations WMAW-TV, Meridian, Mississippi and WMPN-TV, Jackson, Mississippi.

Should any questions arise concerning this response, kindly contact the undersigned individual.

Very truly yours,



Barry S. Persh
bpersh@graymillerpersh.com
Counsel for Mississippi Authority
for Educational Television

Enclosure



Mississippi Public Broadcasting

March 5, 2020

EEO Staff, Policy Division
Media Bureau
Federal Communications Commission
Washington, D.C. 20554

Re: **Response to EEO Audit Letter**
Mississippi Authority for Educational Television
Station WMAW-TV, Meridian, MS (Facility ID 43169)
Station WMPN-TV, Jackson, MS (Facility ID 43168)

EEO Staff:

Mississippi Authority for Educational Television (“MAET” or “Mississippi Public Broadcasting”) hereby responds to FCC audit letters dated February 6, 2020 requesting information concerning the EEO programs of noncommercial educational television stations WMAW-TV, Meridian, Mississippi and WMPN-TV, Jackson, Mississippi. Stations WMAW-TV and WMPN-TV are both part of the same MAET joint employment unit (the “Unit”) of co-owned stations which share employees. The Unit employs more than five full-time employees, and MAET therefore provides the following information in response to the audit request.

Item # 3(a). MAET encloses copies of the Unit’s annual EEO public file reports for the periods covering (i) February 1, 2019 to January 31, 2020, and (ii) February 1, 2018 to January 31, 2019 as Attachment 1.

The Mississippi Public Broadcasting station web site is available at: <http://www.mpbonline.org/>. The annual EEO public file report is posted at: <http://www.mpbonline.org/more/legal/public-files-reports/>.

The dates of the full-time hires for the periods covered by the 2019-2020 and 2018-2019 EEO reports are as follows:

Job Title	Date of Hire
Office Director I	2/13/2019
Administrative Assistant V	2/20/2019
ETV- Deputy Director	3/13/2019
Division Director I	4/1/2019
ETV- Executive Producer	5/1/2019
Branch Director I	7/1/2019
Office Director I	10/1/2019



Education Specialist	10/8/2019
ETV- Producer/Director	10/14/2019
ETV- Announcer/Producer	10/28/2019
ETV- Executive Producer	11/12/2019
ETV- Broadcast Technician, Lead	11/24/2019
Projects Officer IV, Sp	12/2/2019
Projects Officer IV, Sp	2/20/2018
Projects Officer IV, Sp	5/1/2018
Administrative Asst. V	6/1/2018
ETV- Deputy Director	6/11/2018
Division Director I	7/1/2018
ETV- Senior Producer/Director	7/2/2018
ETV- Videographer Editor	7/10/2018
ETV- Program Manager	8/1/2018
ETV- Broadcast Technician, Lead	9/4/2018
ETV- Project Technician	11/13/2018
Education Specialist	1/7/2019
ETV- Senior Producer/Director	1/14/2019

Item # 3(b). MAET encloses, at Attachment 2, documentation of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions noted above from the 2019-2020 and 2018-2019 annual reporting periods. No outside organizations notified MAET that they want to be notified of openings.

Item # 3(c). The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2019-2020 and 2018-2019 reports are as follows:

Job Title	Referral Source	# of interviewees
Office Director I	Agency Job Posting (MAET)	1
	Agency Website	1
	Agency Social Media	0
	Agency Radio Station	0
	New Horizon Membership Development	0
	NETA	0
	SimplyHired.com	1
	State Personnel Board	0
Administrative Assistant V	Agency Job Posting (MAET)	1
	Agency Website	1
	Agency Radio Station	2
	Agency Social Media	0
	Antonelli College	0
	Bellhaven College	0
	Copiah-Lincoln Comm College	0

WMAW-TV / WMPN-TV EEO Audit Response

	Delta State Univ HCC Millsaps College Miss. St. Univ SimplyHired.com State Personnel Board Tulane University Virginia College	0 0 0 0 5 4 0 0
ETV- Deputy Director	Agency Job Posting (MAET) Agency Website Agency Radio Station Agency Social Media CAHRA SimplyHired.com State Personnel Board	0 1 0 0 0 1 1
Division Director I	Agency Job Posting (MAET) Agency Website Agency Radio Station Agency Social Media SimplyHired.com	1 0 1 0 3
ETV- Executive Producer	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station CPB JournalismJobs.com NETA SimplyHired.com State Personnel Board	0 1 1 1 0 0 0 3 0
Branch Director I	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station Bellhaven College Catholic Charities Citizen Soldiers for Life Employment Security Comm. Film and TV Pro USA HCC Jackson Advocate MAB New Horizon Membership Dev. RTDNA SimplyHired.com State Personnel Board Jewish Christian Foundation	0 1 1 0 0 0 0 0 0 0 0 0 0 0 4 0 0
Office Director I	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station Alcorn State Bellhaven College Catholic Charities Citizen Soldiers for Life Copiah-Lincoln CC Employment Security Comm.	1 1 0 0 0 0 0 0 0 0

WMAW-TV / WMPN-TV EEO Audit Response

	Grambling State Univ	0
	HCC	0
	Jackson State Univ	0
	Journalism Jobs.com	0
	NAACP	0
	PRAM	1
	Midtown Partners	0
	MAB	0
	NETA	0
	New Horizon Membership Dev.	0
	SimplyHired.com	3
	State Personnel Board	1
	Univ of Southern Miss.	0
	Univ of West Alabama	0
Education Specialist	Agency Job Posting (MAET)	1
	Agency Website	1
	SimplyHired.com	7
ETV- Producer/Director	Agency Job Posting (MAET)	0
	Agency Website	0
	Media Match	1
	SimplyHired.com	3
ETV- Announcer/Producer	Agency Job Posting (MAET)	1
	Agency Website	0
	Agency Social Media	1
	Agency Radio Station	0
	Alcorn State	0
	Bellhaven College	0
	Catholic Charities	0
	Citizen Soldiers for Life	0
	Copiah-Lincoln CC	0
	CPB	0
	Employment Security Comm.	0
	Grambling State Univ	0
	HCC	0
	Jackson State Univ	0
	Journalism Jobs.com	0
	Media Match	0
	Midtown Partners	0
	MAB	0
	National Alliance of State Broadcasting Assoc	0
	NAACP	0
	NETA	0
	New Horizon Membership Dev.	0
	PRAM	0
	SimplyHired.com	1
	State Personnel Board	0
	Jewish-Christian Foundation	0
	Univ of West Alabama	0
ETV- Executive Producer	Agency Job Posting (MAET)	1
	Agency Website	1
	Agency Social Media	0
	Agency Radio Station	0
	Broadcast Employment Svcs	0
	CPB	0
	Employment Security Comm.	0
	Grambling State Univ	0

WMAW-TV / WMPN-TV EEO Audit Response

	Journalism Jobs.com	0
	Media Match	0
	Midtown Partners	0
	MN Public Radio	0
	MAB	0
	National Alliance of State Broadcasting Assoc	0
	NABJ	0
	NETA	0
	New Horizon Membership Dev.	0
	RTDNA	0
	SimplyHired.com	1
	State Personnel Board	1
	Univ of West Alabama	0
ETV- Broadcast Technician, Lead	Agency Job Posting (MAET)	1
	Agency Website	0
	Agency Social Media	0
	Agency Radio Station	0
	Media Match	0
	SimplyHired.com	1
	State Personnel Board	0
Projects Officer IV, Sp	Agency Job Posting (MAET)	0
	Agency Website	1
	Agency Social Media	0
	Agency Radio Station	0
	Media Match	0
	Southern Public Relations Federation	1
	SimplyHired.com	2
	State Personnel Board	1
Projects Officer IV, Sp	Agency Job Posting (MAET)	1
	Agency Website	0
	Agency Social Media	0
	Agency Radio Station	0
	Alabama Broadcasters Assoc	0
	Broadcast Employment Svcs	0
	Copiah-Lincoln CC	0
	Employment Security Comm.	0
	HCC	0
	Holmes CC	0
	MN Public Radio	0
	Miss. College	0
	Miss. State Univ.	0
	NETA	0
	New Horizon Membership Dev.	0
	NPR List Serve	0
	SimplyHired.com	1
	SBE	0
	Tougaloo College	0
	Tulane Univ.	0
	Univ of Miss.	0
	Univ of Southern Miss.	0
	Urban League of Greater Jackson	0
Projects Officer IV, Sp	Agency Job Posting (MAET)	1
	Agency Website	1
	Agency Radio Station	0

WMAW-TV / WMPN-TV EEO Audit Response

	Agency Social Media	0
	SimplyHired.com	1
	State Personnel Board	1
Administrative Asst. V	Agency Job Posting (MAET)	2
	Agency Website	0
	Agency Social Media	0
	SimplyHired.com	1
	State Personnel Board	2
ETV- Deputy Director	Agency Job Posting (MAET)	1
	Agency Website	1
	Agency Social Media	0
	Agency Radio Station	0
	CAHRA	0
	CPB	0
	Midtown Partners Inc	0
	NETA	0
	SimplyHired.com	2
	State Personnel Board	1
Division Director I	Agency Job Posting (MAET)	1
	Agency Website	0
	Agency Social Media	0
	Agency Radio Station	0
	SimplyHired.com	0
	State Personnel Board	0
ETV- Senior Producer/Director	Agency Job Posting (MAET)	1
	Agency Website	2
	Agency Social Media	0
	Agency Radio Station	0
	Alabama Broadcasters Assoc	0
	All Access	0
	Antonelli College	0
	Broadcast Employment Svcs.	0
	C Cubed Inc.	0
	CPB	0
	HCC	0
	Media Match	0
	Miss. Film Commission	0
	Miss Valley State	0
	NAACP State Office	0
	NETA	0
	SimplyHired.com	5
	Virginia College	0
ETV- Videographer Editor	Agency Job Posting (MAET)	1
	Agency Website	2
	Agency Social Media	0
	Agency Radio Station	0
	Alabama Broadcasters Assoc	0
	All Access	0
	Antonelli College	0
	Broadcast Employment Svcs.	0
	C Cubed Inc.	0
	CPB	0
	HCC	0
	Media Match	0
	Miss. Film Commission	0

WMAW-TV / WMPN-TV EEO Audit Response

	Miss Valley State NAACP State Office NETA SimplyHired.com Virginia College	0 0 0 5 0
ETV- Program Manager	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station Alabama Broadcasters Assoc All Access Antonelli College Broadcast Employment Svcs. C Cubed Inc. CPB HCC Media Match Miss. Film Commission Miss Valley State NAACP State Office NETA SimplyHired.com Virginia College	1 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 5 0
ETV- Broadcast Technician, Lead	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station SimplyHired.com State Personnel Board	1 0 0 0 2 0
ETV- Project Technician	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station Alabama Broadcasters Assoc Broadcast Employment Svcs Cotiah-Lincoln CC Employment Security Comm. HCC Holmes CC Jackson Advocate MN Public Radio Miss. State Univ. NETA New Horizon Membership Dev. NPR List Serve RTDNA SimplyHired.com Jewish-Christian Foundation SBE Tulane Univ. Univ of Miss. Univ of Southern Miss.	1 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 1 0 0 0 0 0
Education Specialist	Agency Job Posting (MAET) Agency Website Agency Social Media Agency Radio Station	1 1 1 1

	Alabama Broadcasters Assoc	0
	Alcorn State	0
	Employment Security Comm.	0
	HCC	0
	Jackson State Univ.	0
	Midtown Partners	0
	Millsaps College	0
	Miss. Film Commission	0
	Miss. College	0
	Miss. Univ for Women	0
	NAACP State Office	0
	MAB	0
	NETA	0
	New Horizon Membership Dev.	0
	SimplyHired.com	2
	State Personnel Board	0
	Tougaloo College	0
	Univ of Miss.	0
	Univ of Southern Miss.	0
ETV- Senior Producer/Director	Agency Job Posting (MAET)	0
	Agency Website	1
	Agency Social Media	0
	Agency Radio Station	0
	Broadcast Employment Svrcs	0
	Current	1
	Employment Security Comm.	0
	Grambling State	0
	JournalismJobs.com	0
	Midtown Partners	0
	MN Public Radio	0
	MAB	0
	NABJ	0
	NETA	0
	National Education Writers Assoc	0
	New Horizon Membership Dev.	0
	RTDNA	0
	SimplyHired.com	1
	Jewish Christian Foundation	0
	Tulane Univ.	0
	Univ of West Ala.	0

Item # 3(d). MAET encloses documentation of recruitment initiatives performed during the periods covered by the 2019-2020 and 2018-2019 public file reports as [Attachment 3](#). The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the Unit is 85. The market for the Unit has a population of more than 250,000. Based on these factors, MAET is required to perform four initiatives during each two-year period.

During the periods covered by the 2019-2020 and 2018-2019 reports, MAET completed the following initiatives, involving station personnel as indicated:

Internship Program

- Mississippi Authority for Educational Television offers internship opportunities to all students enrolled in or recently graduated from an institution of higher learning
- Included internships in the areas of legal/support services, administration, communication, education, news and public affairs, and television/production
- *Station personnel involved:* Digital Program Manager, Director of Community Outreach, News Director, HR Director, Personnel Officer, Deputy Director of Education, Deputy Director of Support Services, Assistant Television Director, Television Director

Equal Employment Opportunity Training for Management and Staff

- MAET Agency In-House Training: Sexual Harassment Awareness and Prevention; CPB Workplace Harassment Training Online
- *Station personnel involved:* all MAET employees

Training Programs for Station Personnel

- State Personnel Board's Workforce Development Program: Basic Supervisory Course; Administrative Services Certification Program;
- MAET Agency In-House Training: MAGIC- Shopping Cart Training; Active Shooter Training: What Should You Do?; Enterprise Security Awareness Training
- Various Conference Trainings (see attached Public File Reports for more details)
- *Station personnel involved:* all MAET employees

Participation in Job Fairs

- January 30, 2019; Media Girls LA Career Fair (Alcorn); February 12, 2019; Mississippi College Career Day 2019; February 27, 2019; Media Girls LA Career Fair (JSU); June 11, 2019; New Horizon Church Career Fair 2019; November 6 – 7, 2019; Pathways2Possibilities Career Fair; November 20, 2019; American Graduate Hiring Event; February 12, 2018; Mississippi College Career Day 2018; April 11, 2018; Hinds Community College Job Fair 2018; June 13, 2018; New Horizon Church Career Fair 2018; October 30, 2018: Pine Belt Job Fair– Governor's Job Fair MS Employment Expo; January 17, 2019: Military, Veterans, Spouses and Dependents Job Fair
- *Station personnel involved:* Director of Community Outreach, Education Specialist/Community Outreach Specialist, Community Engagement Specialist and Community Liaison Specialist, Personnel Officer and Payroll Officer, Director of Human Resources and Human Resources Specialist

Listing of upper-level category openings in job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities

- See attached Public File Reports and 3(c) above for more details

Item # 3(e). There was one complaint alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex filed during the current license term before any body having competent jurisdiction under applicable law: A complaint was administratively filed on January 22, 2015 with the U.S. Equal Employment Opportunity Commission ("EEOC") with EEOC Charge Number 846-2015-08617. The charge was

filed by Lasharne Patton (“Patton”), and her complaint alleged racial discrimination under Title VII of the Civil Rights Act. MAET had reassigned some job duties within her department, including transferring some job duties from Patton to other less compensated employees. Patton’s pay was not changed, she was not demoted, and neither her working hours nor working conditions changed in any way as a result of the restructuring of job duties in that department. No finding was made by the EEOC of discrimination, and the matter ended at that administrative stage in the third quarter of 2015 and is now closed.

Item # 3(f). Responsibilities of each level of management to implement the Unit’s EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

Applicants: For every job applicant to MAET, there are ample opportunities for the applicant to be exposed to MAET’s EEO Policy. Every printed job posting contains an EEO statement at the top or bottom of the advertisement, whether in print or on the internet. Applicants who research MAET via the internet will find the EEO/FCC policy located near the bottom of the main page at www.mpbonline.org and may also learn of the EEO policy under the “Legal” section. In addition, on-air job announcements include MAET’s EEO Policy. Also, the applicant might learn of the EEO Policy throughout the Careers page on the website. The Internship Application is available online and informs the potential intern of MAET’s EEO Policy on the application. The website’s About page also includes a link to the Mississippi State Personnel Board’s webpage which also states that agencies of the state of Mississippi are equal employment opportunity employers. Applicants are informed at the beginning of an interview of the EEO Policy and told about the interview plan with a description of its purpose. A representative from the Human Resources Department sits in with all interviews in order to assist, answer any questions from applicants regarding the EEO Policy, and to serve as educational support to supervisors looking to fill a vacancy.

Employees: MAET utilizes a variety of methods to continually inform and remind employees of MAET’s EEO Policy including (1) website, (2) posters, (3) ongoing training, (4) job postings, (5) MAET Policy Handbook, and (6) Mississippi State Personnel Board *State Employee Handbook*. Once an applicant becomes an employee, he/she is informed of MAET’s EEO Policy during the Employee Orientation that occurs within the first two (2) weeks of employment. The employee is given a copy of MAET’s Policy Handbook containing sections regarding equal employment opportunity. The employee is also given a copy of the Mississippi State Personnel Board’s *State Employee Handbook* which contains an equal employment opportunity statement. As noted above, the EEO Policy is posted throughout the agency’s website. The agency displays current *Equal Employment Opportunity* posters in four separate conspicuous places throughout the agency. When an employment position becomes available, the job announcement is also distributed via email to all personnel and prominently displayed on bulletin boards throughout the agency. MAET’s EEO Policy can be found on those announcements. The agency also has a designated Equal Employment Opportunity Commission representative.

Management/Supervisors: All of the resources/instructional opportunities available to employees and applicants are also available to management/supervisors. Managers are further educated by (1) weekly meetings, (2) email reminders, (3) counseling with Human Resources Director, (4) counseling with in-house attorney, (5) review of interview plan prior to beginning the interview process, and (6) mandatory attendance to the Basic Supervisory Course. All supervisors

are informed of the EEO Policy by Human Resources prior to beginning the hiring process for vacant positions. For every application that is received by the agency, the race, sex and age are excluded from the application. Each applicant is initially reviewed with the supervisor having no knowledge as to the gender, race or age of the applicant. All applicants are interviewed by a diverse group of employees – labeled the “interview committee.” It is the supervisor’s responsibility to draft the interview questions. The interview questions are then reviewed by his or her immediate supervisor. This process is supervised by Human Resources and if necessary, with consultation from the Deputy Director of Support Services. Any person who supervises at least one other individual is required to attend the Basic Supervisory Course, including an overview of state government coupled with the legal rights and responsibilities, as taught by a state attorney.

Item # 3(g). Efforts to analyze the Unit’s EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

MAET annually reviews its EEO Program with the goal of adapting and improving its procedures and results. MAET’s principal method of analyzing the effectiveness of its EEO recruitment program involves analyzing demographics with respect to hires and promotions. MAET also seeks to regularly improve its EEO efforts through ongoing training of supervisors, consultation with the Attorney General’s Office for the State of Mississippi and Continued Legal Education of the Deputy Director of Support Services in the area of employment law. In addition, MAET seeks information from applicants concerning the application process and the communication of vacancy information and then reviews that data to ensure efficient job recruitments going forward.

Item # 3(h). Efforts to periodically analyze 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:

MAET is an agency of the State of Mississippi. As such, its hiring practices and procedures are largely controlled by the Mississippi State Personnel Board (MSPB). The MSPB, with the authority of the state legislature, establishes pay, benefits, seniority practices, promotions practices, and selection techniques all of which are designed to provide equal employment opportunity to applicants and employees. MAET is able to exercise some discretion within the policies set forth by the MSPB, in areas such as promotions, selection techniques, and testing. Often, promotions occur as a result of an open competitive process whereby the selected candidate is a current employee who proves to be the most qualified candidate for the position. The only positions not subject to the approval of the MSPB are non-state service positions, all of which are upper management positions. MAET believes that its promotion decisions have demonstrated that its efforts to ensure and promote an equal opportunity workplace are effective.

MAET’s selection techniques include use of an interview committee. Each committee formed for the purpose of interviewing potential candidates must be diverse in race and gender as well as include a member outside of the division in which the open position resides. MAET believes that a diverse interview committee is effective for identifying candidates with broad interests and strong interpersonal skills, along with experience. All applications go through the Human Resources Department where they are forwarded to the supervisor without any EEO information attached. The

supervisor screens the applications, and the candidates with the most qualified experience are interviewed. The recommended candidate must be approved by the MSPB in order to be hired.

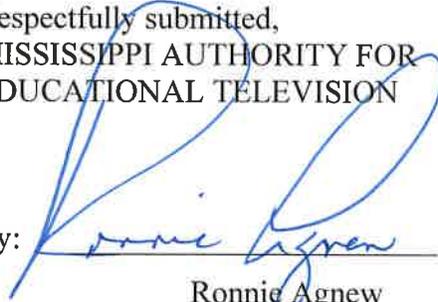
MAET also occasionally conducts tests as part of the interview process (typically limited to positions in its News and Public Affairs and Communications departments). These tests are conducted to determine the writing, editing, and reporting abilities of the candidates. These tests serve merely as additional criteria by which to judge the candidates' overall abilities and aptitude. Also, on most Television/Production positions, MAET requests the candidate submit their portfolio or demo reel in order to determine their level and quality of experience, in accordance with standard industry practice for production.

Items # 3(i), 4(a), 4(b), 4(c), and 4(d) are not applicable.

Mississippi Authority for Educational Television, through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,
MISSISSIPPI AUTHORITY FOR
EDUCATIONAL TELEVISION

By:



Date:

3/5/2020

Ronnie Agnew
Executive Director