

April 25, 2023

Ms. Elizabeth E. Goldin
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

**Re: Equal Employment Opportunity (EEO) Audit Response
WZLB FM Valparaiso, FL Facility ID 60811**

Dear Ms. Goldin:

JVC Media of Florida, LLC ("JVC Florida"), licensee of WZLB(FM), Valparaiso, Florida (Facility ID No. 60811) ("WZLB") hereby responds to the FCC's April 24, 2023 EEO Audit Letter ("Audit Letter"). WZLB is part of a single employment unit which includes the broadcast stations identified below, which is licensed to JVC Florida:¹

WHWY Holt, FL 56374 ; WECQ Destin, FL 19475 ; WWAV Santa Rosa Beach, FL 19473

This employment unit currently consists of 12 full-time employees. Accordingly, JVC Florida hereby responds to each of the lettered paragraphs of the Audit Letter:

(a) Copies of the employment unit's two most recent EEO Public File Reports, covering the period beginning January 25, 2021, (this is the day JVC consummated the purchase of the unit and began operating the stations) and ending January 24, 2023, are attached hereto in **Attachment A**. Copies of the employment unit's two most recent EEO Public File Reports are available on the station website at the address below. Each station's website contains a direct link to the employment unit's two most recent EEO Public File Reports.

<u>Call Sign</u>	<u>Primary Website</u>
WZLB	https://floridamanradio.com/fort-walton/

Between January 25, 2021 and January 24, 2023, the employment unit hired 0 full-time employees. Between January 25, 2021 and January 24, 2023, the unit had no open positions to fill.

(b) Copies of all communications announcing the job openings would be listed in the EEO reports. Since the unit had zero openings, no accountments are listed

(c) The requested information is included in the EEO Public File Reports attached hereto in **Attachment A**.

(d) Listings demonstrating the employment unit's participating in recruitment initiatives during the period covered by the two most recent EEO reports. The unit participated in local Chamber job fairs but no positions were offered.

(e) JVC Florida are not aware of any pending or resolved discrimination complaints filed against the employment unit during the period of time covered by this response.

(f) When a station or the employment unit as a whole identify a job need, an initial job description and job advertisement are prepared by the employment unit's Director of Human Resources based on consultation with the manager requesting the hire. After completion of the initial job description, the description is sent to the Department Head of the department requesting the hire for review and to determine whether there are any suggested recruitment sources that should be used in addition to JVC Florida's standard sources. Once the Department Head and Director of Human Resources have approved the job description, the employment unit's Office manager forwards the job description to the recruitment sources identified for the job opening, including the all-staff email for existing employees. As described in the attached EEO Public File Reports, JVC Florida typically uses its stations' websites, local newspapers, and national and industry related job posting websites. It is JVC Florida's policy and the Human Resource Directors responsibility to ensure vacancy announcements inform applicants that the station is an E-Verify and Equal Opportunity Employer. In addition, employees have access to an electronic handbook that discusses JVC Florida's EEO policies, including the employment unit's EEO, anti-discrimination, and reasonable actuation policies. Employees also receive a hard copy of the company handbook as part of the stations onboarding and initial training process.

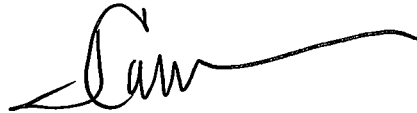
(g) JVC Florida routinely conducts a review of its recruiting sources to ensure its vacancy announcements reach a wide audience. As part of that process, JVC Florida regularly searches for the broadest and most effective avenues to inform potential candidates of job openings. JVC Florida also engages with its employees to seek feedback on the effectiveness of

its recruitment efforts and to seek input with respect to its EEO policies and to identify additional resources to be used in connection with recruitment.

(h) During the time period covered by this response, JVC Florida has implemented a number of policies to analyze the employment unit's pay, benefits, seniority practices, promotions and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect. JVC Florida's employee manual details the company's non-discriminatory measures for pay, benefits, seniority and promotions. Special written evaluations may be conducted as necessary to advise employees of any performance or disciplinary problems. JVC Florida will continue to evaluate and revise these processes as necessary to ensure equal opportunity is provided to all employees and applicants. JVC Media is not party to any union agreements at the employment unit.

(i) JVC Florida is not a religious broadcaster.

Sincerely,

A handwritten signature in black ink, appearing to read 'JCar', with a long horizontal flourish extending to the right.

John Caracciolo
CEO and Member
JVC Media of Florida, LLC

Enclosures

Attachment A

EEO Reports

2021 Annual EEO Public File Report

JVC Media of FL LLC

Stations included: WECQ Destin, FL; WHWY Holt, FL; WWAV Santa Rosa Beach, FL; WZLB Valparaiso, FL

Reporting period: January 25, 2021 (date of consummation of the station by JVC Media of FL LLC) through January 24, 2022

Number of Full-time employees: 12

Durning this time period we hired zero full time employees. There were zero applicants interviewed. **Durning this time period we had no full-time openings.**

Recruitment/Referral Sources

- All Access.com
- FWB Chamber of Commerce
- Indeed
- Linkedin
- Job Fair of FT Walton Beach
- Inside Radio
- Internal referrals
- On air announcements

1. Each station in this unit maintains a web site and the most recent EEO report is posted on the stations web site
 2. There were no job openings during this reporting period
 3. There are no complaints involving this unit filed during the license term
-

Internship Program with Five Towns College

We work with the Five Towns College internship department to offer students an in-depth look into the world of entertainment and technology, where they will have the opportunity to make valuable contributions to our company, experience hands-on opportunities and gain valuable skills to leverage their future career.

JVC offers opportunities in a ton of areas which means students can find themselves doing anything from running the board in a broadcasting booth or being a voice behind the mic. Many students of our internship program have moved onto entry level positions within JVC Media.

Establishment of an internship program is designed to assist members of the community to acquire skills needed for broadcast employment.

Every employee is required to sign an employee acknowledgement form. They acknowledge receipt of the JVC Media Employee Handbook and acknowledge that they carefully read and understand the employee handbook.

Every employee is required to sign an acknowledgement of receipt of the Anti-Harassment/Non-discrimination policy of JVC Media LLC.

Every employee is required to take a one-hour class on harassment in the work place. The class is a video presentation administered by the Director of Human Resources Janet LePorin.

The class covers:

- examples of prohibited conduct that would constitute unlawful sexual harassment
- includes information concerning the federal and state statutory provisions concerning sexual

Station participation in job fairs and hiring events

Hiring Event, American Legion Post 75 898 E James Lee Blvd Crestview, FL
April 21, 2021

Panhandle Job Fair
September 6, 2021
First Baptist Church
Christian Life Center
21 First St. SE
Fort Walton Beach, FL 32548

Doors Open 9:30 – 10:00 Exclusively for Military, Military Families, and Veterans
and are open to Universal job seekers from 10:00 a.m. to 2:00 p.m. (CST). The
station operation manager and promotion team attended this event.

2022 Annual EEO Public File Report

JVC Media of FL LLC

Stations included: WECQ Destin, FL; WHWY Holt, FL; WWAV Santa Rosa Beach, FL; WZLB Valparaiso, FL

Reporting period: January 25, 2022 through January 24, 2023

Number of Full-time employees: 12

During this time period we hired zero full time employees. There were zero applicants interviewed. **During this time period we had no full-time openings.**

Recruitment/Referral Sources

- All Access.com
- FWB Chamber of Commerce
- Indeed
- LinkedIn
- Job Fair of FT Walton Beach
- Inside Radio
- Internal referrals
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1. Each station in this unit maintains a web site and the most recent EEO report is posted on the station's web site
 2. There were no job openings during this reporting period
 3. There are no complaints involving this unit filed during the license term
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Establishment of an internship program is designed to assist members of the community to acquire skills needed for broadcast employment.

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The class covers:

- examples of prohibited conduct that would constitute unlawful sexual harassment
- includes information concerning the federal and state statutory provisions concerning sexual

During this time period the stations also participated in the annual Multi Chamber of Commerce Job Fair at St. Mary's Church March of 2022; General Manager and Promotions Director were present.

Job Fairs in March and September at the University of West Florida. Radio station department heads were present and spoke with candidates. Okaloosa County Job Fair, February 2022 at Emerald Coast Convention Center.

City of Fort Walton Beach Career Fair 2022 Saturday, June 25, 2022 - 10:00am to 2:00pm. Station Operation Manager attended. Promotion team attended.

JVC Media participated in the job fairs as a community outreach but did not have any positions open at the time.

Declaration of John Caracciolo

I, John Caracciolo, declare under penalty of perjury that the following information is true and correct.

I am the CEO and a Member of JVC Media of Florida, LLC ("JVC Florida"), the licensee of WZLB(FM), Valparaiso, Florida (Facility ID No. 60811) ("WZLB"). This Statement is submitted in response to the April 23, 2022 letter of Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau, Federal Communications Commission, concerning a random audit of Stations' EEO compliance (the "EEO Audit Letter").

I have reviewed the forgoing response to the EEO Audit Letter, and the information contained therein is correct to the best of my knowledge and belief.

In response to Question 2(b)(vi) of the EEO Audit Letter, the licensee affirms that it is not aware of any discrimination complaints filed against it during the current license term of WZLB or any station in the unit.

I am primarily responsible for overseeing compliance with JVC Florida's outreach initiatives, and I can attest to the fact that JVC Florida works with Five Towns College to offer students an in-depth look into the broadcast and entertainment industries by running an internship program. Students are given opportunities to develop on-air portfolios, build skills in broadcast production, and explore other critical aspects of WZLB's operations. JVC Florida's internship program has helped students find jobs in the industry, including in entry level positions within JVC Florida.

In addition, I have personal knowledge regarding the preparation of WZLB's EEO Public File Reports covering the period from January 25, 2021, the day JVC began operation of the stations, through January 24, 2023 were timely prepared and kept with the station's other hard copy files. The station's two most recent EEO Public File Reports were not timely uploaded to the station's online public inspection file due to an issue with the FCC server and the inability to upload to our Ft. Walton unit.



John Caracciolo
CEO and Member
JVC Media of Florida, LLC

Executed on this 5 day of June, 2023

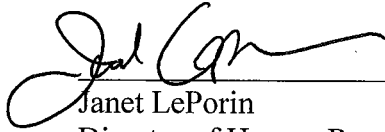
Declaration of Janet LePorin

I, Janet LePorin, declare under penalty of perjury that the following information is true and correct.

I am the Director of Human Resources for JVC Media of Florida, LLC ("JVC Florida"), the licensee of WZLBFM), Valparaiso, Florida (Facility ID No. 60811) ("WZLB"). This Statement is submitted in response to the April 24, 2023 letter of Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau, Federal Communications Commission, concerning a random audit of Stations' EEO compliance (the "EEO Audit Letter").

I have review the forgoing response to the EEO Audit Letter, and the information contained therein is correct to the best of my knowledge and belief.

I am primarily responsible for conducting and overseeing compliance with JVC Florida's anti-harassment training as reported on WZLB's EEO Public File Report, and I can attest to the fact that JVC Florida conducted its annual anti-harassment training as reporting on WZLB's EEO Public File Report. In addition, I oversee JVC Florida's recruitment efforts for any job opening listed for WZLB. During the time period of January 25, 2021 to January 24, 2023 WZLB and the unit had no job openings. The unit has 12 full time employees.



Janet LePorin
Director of Human Resources
JVC Media of Florida, LLC

Executed on this 25 day of April, 2023