



May 3, 2024

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

Via Station Upload to OPIF

Dear Ms. Goldin:

This letter, together with Exhibits 1 through 19, serves as the response by Tennessee Broadcasting Partners (the “Licensee”), licensee of WBBJ-TV, Jackson, Tennessee (“WBBJ” or the “Station”), to the Enforcement Bureau’s March 22, 2024, request for audit data relating to the station employment unit’s EEO program. WBBJ is the only station within its employment unit (the “Employment Unit” or “Unit”), and it operates in the Jackson TN Nielsen Designated Market Area.

The responses to the relevant audit data requests are set forth below, and the required documentation is provided in the attached exhibits downloadable from the Station’s online public inspection file.

Audit Data Request 2(b)(i). Copies of the Unit’s two most recent EEO Public File Reports, described in section 73.2080(c)(6).

Response: The EEO Public File Reports for the Employment Unit covering April 1, 2021, through March 31, 2022, and April 1, 2022, through March 31, 2023, are provided as Exhibits 1 and 2, respectively.¹ With respect to inconsistencies between the information

¹ WBBJ has submitted the reports covering the periods April 1, 2021, to March 31, 2022, and April 1, 2022, to March 31, 2023. These are the two most recent EEO Public File Reports filed at the time the Bureau’s March 22, 2024, letter was issued. The April 1, 2023, to March 31, 2024, report was due shortly after the audit data request was issued; however, the Licensee promptly began gathering responsive records from its private business files upon issuance of the letter. Additionally, the relevant two-year period for completion of the required number of outreach activities ended on March 31, 2023, making this pair of Reports the most appropriate to submit.

provided in the Employment Unit’s EEO Public File Reports and this response, the information contained herein shall control and, to the best of the Employment Unit’s knowledge, is true and correct.

Audit Data Request 2(b)(ii). For each station in the Unit that maintains a website, the website address. If the Unit’s most recent EEO Public File Report is not posted on each website as required by section 73.2080(c)(6), identify that website and explain why the report is not so posted. If the Unit does not maintain a website, but its corporate site contains a link to a site pertaining to the Unit, identify the corporate website address where the Unit’s most recent EEO Public File Report is linked pursuant to section 73.2080(c)(6).

The Employment Unit’s most recent EEO Public File Report is posted on the Internet at wbbjtv.com. The report is accessible to website visitors at the bottom of the WBBJ homepage in the right-hand column via the “EEO” link, as highlighted in yellow below:

| | | |
|---------------------------|----------------------|------------------|
| News | Community | About |
| Local News | Community Calendar | Meet The Team |
| Weather | Community Spotlight | Contact Us |
| WBBJ Daily Video Forecast | Contests & Giveaways | Advertise |
| Radar | Web Extras | TV Schedule |
| Maps | Most Popular | ABC News |
| Crime | News Tips | ABC.com |
| Mugshots | Mugshots | AG Web |
| Crime Stoppers | Careers | ESPN |
| Sports | Seen On 7 | CBS |
| Daily Sportscast | Educator of the Week | EEO |
| High School | Lost & Found Pets | FCC Public File |
| Football Friday Nights | Multiplying Good | FCC Applications |
| College | Obituaries | Terms of Use |
| National Sports | | Privacy Policy |
| | | On Facebook |
| | | On Twitter |
| | | On Instagram |
| | | On YouTube |
| | | WBBJ News App |
| | | WBBJ Weather App |

The link launches the most recent report. The report is available from this direct link: <https://www.wbbjtv.com/content/uploads/2024/04/a/k/EEO-PUBLIC-FILE-REPORT.pdf>

Audit Data Request 2(b)(iii). For each of the Unit’s full-time positions filled during the period covered by the EEO Public File Reports noted above, or since acquisition of the Unit (if during that period), the date of hire as required by section 73.2080(c)(5)(vi) as well as 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 the burden of responding to this audit, if a job notice was sent to multiple sources, the Unit may include in its response: (1) documentation showing one such notice was sent, (2) a list of the

additional sources to which the notice was distributed, and (3) a statement confirming notices to all additional sources used to announce the vacancy were retained, as required by section 73.2080(c)(5)(iii). Include, however, copies of all job announcements sent to any organization (identified separately from other recruitment sources) that has notified the Unit that it wants to be notified of the Unit's job openings, as described in section 73.2080(c)(1)(ii).

The following is a list of all positions filled by the Station during the period covered by this audit and the date on which that position was filled. The following list tracks the order the positions appear on the first page (after the cover page) in the Station's Public File Reports, and the corresponding exhibit number we have assigned to them for this response is included for convenience:

| POSITION | DATE OF HIRE | EXHIBIT NO. |
|-------------------------------------|---|--------------------|
| Assistant Business Manager | 11/10/2021 | 3 |
| Account Executive | 4/6/2021 | 4 |
| Account Executive | 10/25/2021 | 5 |
| IT Technician | 9/29/2021 | 6 |
| Programming/Traffic Assistant | 8/23/2021 | 7 |
| Multimedia Journalist (2 positions) | 5/4/2021 6/28/2021 | 8 |
| Multimedia Journalist | 11/8/2021 | 9 |
| Photographer | 1/10/2022 | 10 |
| | | |
| Account Executive | 3/13/2023 | 11 |
| Anchor-Producer | 6/6/2022 | 12 |
| IT Technician | 6/13/2022 | 13 |
| Multimedia Journalist (4 positions) | 8/1/2022 8/22/2022 9/12/2022 1/23/2023 | 14 |
| Producer | 11/21/2022 | 15 |
| Master Control Operator | 5/23/2022 | 16 |
| Director-Videographer | 10/10/2022 | 17 |

The Employment Unit filled 19 full-time vacancies during the applicable period.² For each job opening, the Employment Unit has attached (as Exhibits 3 through 17) all available copies of advertisements, bulletins, letters, faxes, e-mails, or other communications announcing job openings and all available documentation that such communications were sent to recruitment sources used by the Employment Unit.

² The Report for the period ending March 31, 2022, includes a reference to a Master Control Operator was filled during the reporting period. That reference was in error. The position in question was filled during the following reporting period ending March 31, 2023.

For each of the job openings listed in response to Audit Data Request 2(b)(iii) and the corresponding exhibit, the attached documentation includes the job description and all available dated copies of the communication of the job vacancy to recruitment sources used to fill the particular vacancy.³ In a few cases each and every copy of notification has not been retained. However, the exhibits attached illustrate that for the period covered by the audit, the Employment Unit had a regular practice of sending vacancy notifications to a wide variety of sources, which, in the aggregate, were reasonably calculated to reach the Station’s entire community.

Most of the Unit’s recruitment sources are notified of vacancies by posting to third-party websites and distribution to schools (often via the Handshake platform). Available copies of these postings are included the attached exhibits. The Unit’s web team uploads job vacancies to the Station’s “Careers” web page (<https://www.wbbjtv.com/careers/>), and job postings are also posted and maintained internally at the Station. Additionally, for several positions the Unit used hard-copy letters to notify certain recruitments sources, available copies of which are included with the attached exhibits.

Please note the Station used on-air announcements to disseminate some job vacancy notifications during the relevant period. Copies of the Station invoices for these spots are included where applicable.

Finally, no recruitment source has requested vacancy notifications as entitled by Section 73.2080(c)(1)(ii).

***Audit Data Request 2(b)(iv).** As required by section 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all of the Unit’s full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.*

Response: The total number of interviewees for each vacancy and the referral source for each interviewee for all full-time vacancies filled during the applicable period are as follows (again, these positions are listed in the order in which they appear in the Public File Reports):

| POSITION FILLED | NO. OF INTERVIEWEES | REFERRAL SOURCES FOR INTERVIEWEES |
|------------------------------|---------------------|--|
| Assistant Business Manager | 7 | On-Air Announcement (3) Station Website (4) |
| Account Executive (4/6/2021) | 4 | Employee Referral (2) Client Referral Indeed.com |

³ In the case of any inconsistencies between the information provided in the Unit’s EEO Public File Reports about the list of recruitment sources utilized for any particular vacancy in Attachment A thereof and the dated list of job vacancy announcements included in the exhibits attached with the instant response, the information contained in the attached exhibits controls and, to the best of the Licensee’s knowledge, is true and correct.

| POSITION FILLED | NO. OF INTERVIEWEES | REFERRAL SOURCES FOR INTERVIEWEES |
|-------------------------------------|----------------------------|--|
| Account Executive (10/25/2021) | 3 | Employee Referral (2) Facebook |
| IT Technician | 6 | Indeed.com (6) |
| Programming/Traffic Assistant | 6 | Tenn. Association of Broadcasters Station Internal Posting (2) Station Website Indeed.com (2) |
| Multimedia Journalist (2 positions) | 6 | TVJobs.com (3) Station Website Employee Referral Handshake |
| Multimedia Journalist | 6 | TVJobs.com (3) Station Website Handshake (2) |
| Photographer | 5 | TVJobs.com (2) Station Website (2) Employee Referral |
| | | |
| Account Executive | 1 | Employee Referral |
| Anchor-Producer | 8 | TVJobs.com Tenn. Association of Broadcasters Lane College Freed Hardman University Union University Station Website LinkedIn iHire Broadcasting |
| IT Technician | 5 | On-Air Announcement (2) Indeed.com (2) Career Expo-Job Fair |
| Multimedia Journalist (4 positions) | 22 | TVJobs.com (4) Station Website (5) Employee Referral (2) iHire Broadcasting (11) |
| Producer | 4 | Station Website (3) Employee Referral |
| Master Control Operator | 4 | Tenn. Association of Broadcasters Station Internal Posting On-Air Announcement Indeed.com |
| Director-Videographer | 7 | TVJobs.com (3) Station Website (2) Employee Referral (2) |

* * * * *

Audit Data Request 2(b)(v). Dated documentation of the Unit’s recruitment initiatives described in section 73.2080(c)(2) during the period covered by the above-noted EEO Public File Reports, such as participation in job fairs, events with educational institutions, and mentoring or training programs for staff. Specify the Unit personnel involved in each recruitment initiative. In addition, provide the Unit’s total number of full-time employees and state whether the population of the market in which any of the Unit’s stations operates is 250,000 or more. Based upon these two factors and as required by sections 73.2080(c)(2) and (e)(3) of the Commission’s rules, state whether the Unit is required to perform two or four points worth of initiative activities within a two-year period (measured from the date the stations in the Unit file their renewal applications and the second, fourth, sixth and eighth anniversaries of that date). If the Unit performed more than the required number of initiative activities, it may provide documentation for only the required amount in its response, i.e., two or four points worth. If any documentation provided appears inadequate, e.g., it is not dated or does not clearly prove the Unit’s participation, the Commission may ask for additional verification.

Response: The total number of full-time employees of the Employment Unit varies over time. The total number of full-time employees in the Employment Unit as of May 1, 2024, was 54. The Employment Unit’s Nielsen Designated Market Area is Jackson, TN, which is located in the Jackson, TN Metropolitan Statistical Area, which has a population less than 250,000 people. By the Employment Unit’s calculation, the Unit is required to perform two (2) initiatives in each applicable two-year period. As detailed in the EEO Public File Reports in Exhibits 1 and 2, WBBJ met and exceeded the requirements of the FCC’s EEO rule in this regard for the two-year period ending March 31, 2023.

During the period of time covered by the two most recent EEO Public File Reports, the Employment Unit engaged in the following recruitment initiatives described under § 73.2080(c)(2) and has provided, as Exhibits 18 and 19, respectively, documentation demonstrating performance of the following recruitment initiatives:

| Participation in Job Fairs (47 C.F.R. § 73.2080(c)(2)(i)) Exhibit 18 | |
|---|----------------------------|
| <i>Activity</i> | <i>Personnel Involved</i> |
| Tennessee Association of Broadcasters Virtual Job Fair, April 26, 2021: Station personnel attended, and the Station promoted the event on-air. | Business Manager |
| Tennessee Association of Broadcasters Virtual Job Fair, August 2-6, 2021: Station personnel attended, and the Station promoted the event on-air. | General Manager |
| Jackson Housing Authority Job Fair, September 20, 2022: Station personnel attended. | Assistant Business Manager |

| | |
|--|---------------------|
| Tennessee Association of Broadcasters Virtual Job Fair, March 27-31, 2023: Station personnel attended and promoted the event on-air. | Programming Manager |
|--|---------------------|

| |
|--|
| Establishment of a Mentoring Program for Station Personnel (47 C.F.R. § 73.2080(c)(2)(ix)) Exhibit 19 |
|--|

| <i>Activity</i> | <i>Personnel Involved</i> |
|--|---|
| Ongoing 2021-2022 and 2022-2023: The Station has established a mentoring program in the News Department to train new employees. Each new employee in the department spends two weeks rotating among experienced News employees to learn about News equipment required to perform their jobs and about reporting in the Jackson, TN, market. The News Director and other News managers also share curated outside resources to help News employees improve their skills. | News Director Photographer/Editors Multimedia Journalists |

Audit Data Request 2(b)(vi). Any pending or resolved complaints involving the Unit filed during the Unit’s current license term(s) before any body 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 the Unit must report all complaints, regardless of their status or disposition.

Response: There have been no such complaints during the applicable time period.

Audit Data Request 2(b)(vii). In accordance with section 73.2080(b), during the Unit’s current license term(s) (or since acquisition of the Unit (if during that period)), a description of the responsibilities of each level of Unit management responsible for implementing Unit EEO policies and how the Unit has informed employees and job applicants of its EEO policies and program.

Response: *Enforcement of EEO Policies.* Management-level staff from the Employment Unit's marketing, operations, accounting, sales, and news departments and the Vice President and General Manager (collectively, the "Managers") are responsible for ensuring enforcement of the Unit's EEO policies. The Managers each have significant input into hiring, termination, and daily supervision of Employment Unit employees.

Executive management of the Employment Unit's corporate parent, Bahakel Communications, Ltd. ("Bahakel") (the "Executive Management Team"), also participates in ensuring enforcement of EEO policies. The Executive Management Team meets to discuss EEO policy issues, as needed. Additionally, Bahakel's Human Resources Manager and Executive Vice President have an ongoing dialogue to address EEO policy issues as they arise and routinely remind station managers, including those at WBBJ, about the company's EEO policies. When particular EEO issues arise, the company will communicate with Bahakel's outside general counsel to facilitate discussions regarding EEO policies, as appropriate.

The Employment Unit's Managers monitor and enforce the Employment Unit's EEO policies on a continuing basis. For more than a decade, the Unit has utilized a legal EEO Primer, including periodic revisions and updates, prepared by the state broadcasters' association. The EEO Primer and other EEO compliance materials provided by the association have served as resources during ongoing EEO-related discussions among the Managers.

The Vice President and General Manager and Business Manager, with input as needed from the Executive Vice President, are together responsible for ensuring that Unit job vacancy notifications are disseminated in a widespread manner, in accordance with FCC rules and internal policies. The Business Manager creates vacancy notifications and is responsible for having those notices sent to recruitment sources. Following distribution of vacancy notifications, the Managers are then responsible for obtaining and recording on standard forms interviewee information for each vacancy within the Employment Unit. This information is delivered to the Business Manager, who uses standard EEO forms and procedures to ensure that all required data are gathered, recorded, and maintained. The Business Manager, under the supervision of the Executive Vice President, prepares the annual EEO Public File Report. Outside FCC legal counsel is consulted as needed each year.

The Managers also ensure EEO program and policy enforcement by actively engaging in the recruitment/hiring process. When conducting the recruitment for a particular position, the Manager of the particular department with the job vacancy discusses with the Business Manager the job responsibilities and the qualifications required to fill the position. Together, they determine the recruitment sources to be used. The Manager of the department with the vacant position, in consultation with the Vice President General Manager, selects the candidate who will be hired.

The Managers and other Station personnel actively participate in the Employment Unit's various outreach initiatives. Together, the Managers, in consultation with the Business Manager, decide which outreach initiatives to conduct and which station personnel will participate.

Unit's Efforts to Inform Employees and Applicants of EEO Policies and Program. The Employment Unit provides all new employees with policy manuals containing the Employment Unit's anti-discrimination and EEO policy. Each employee, including management-level employees, must sign a form stating that they have received and reviewed the policy. The policy reads as follows:

EQUAL OPPORTUNITY POLICY

It is the policy of WBBJ to comply with all requirements of federal, state and local law with regard to equal opportunity in the recruitment, selection, training, utilization, promotion, termination, or any other job related action. The Company does not discriminate against a person because of his/her race, color, age, religion, sex, pregnancy, disability, national origin, citizenship, genetic information, veteran status of any other characteristic protected by law. Any employee that believes he or she has been discriminated against should immediately report such discrimination to the President of the Company or use the complaint procedure outlined in the following pages.

NO-HARASSMENT POLICY

WBBJ is committed to maintaining a work environment that is free from discrimination and in which employees at all levels can devote their full attention and best efforts to the job. Harassment has no place in the work environment. WBBJ does not authorize and will not tolerate any form of unlawful harassment.

The workplace is for work. Harassment disrupts the work environment. The Company is committed to maintaining a work environment which is free from harassment. The Company does not approve of harassment of any type within the workplace and will not tolerate the harassment of its employees by anyone, including managers, supervisors, co-employees, customers or vendors. Harassment consists of unwelcome conduct which is based upon an individual's protected status such as sex, pregnancy, color, race, religion, national origin, age or disability. While all forms of unlawful harassment are prohibited, sexual harassment deserves special mention.

1.1 *Definition of Sexual Harassment:*

The Equal Employment Opportunity Commission (EEOC) has issued guidelines regarding sexual harassment in the workplace. Under these guidelines, sexual harassment will be treated as unlawful sex discrimination in violation of Title VII of the Civil Rights Act of 1964, as amended.

"Sexual Harassment" is defined by the EEOC guidelines as follows:

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

(1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment includes threats or insinuations, either explicitly or implicitly, that an employee's refusal to submit to sexual advances will adversely affect the employee's employment, evaluation, wages, advancement, assigned duties, shifts or any other conditions of employment.

Sexually harassing conduct in the workplace, whether committed by managers, supervisors, co-employees, customers or vendors, is also prohibited. Such conduct may include, but is not limited to, unwanted sexual flirtations, advances, or propositions; verbal abuse of a sexual nature; unwanted graphic verbal comments about an individual's body; the display in the workplace of inappropriate and sexually suggestive objects, pictures, writing, language or drawings; or unwelcome touching or physical contact. Such conduct, whether committed by persons of the same or opposite sex, is prohibited whether or not it rises to a level that might legally constitute unlawful harassment.

1.2 *Definition of Non-Sexual Harassment:*

Harassment for purposes of this policy is verbal or physical conduct that is derogatory or that shows hostility toward an individual because of his or her race, color, religion, sex, pregnancy, national origin, age or disability, and that creates an intimidating, hostile, or offensive working environment. Harassment may include, but is not limited to, epithets, abusive language, slurs, jokes, or other verbal or physical conduct relating to an individual's race, color, religion, sex, pregnancy, national origin, age or disability.

1.3 *Responsibility and Complaint Procedure:*

Each manager and supervisor should maintain his or her workplace free from harassment, sexual harassment, and intimidation. In addition, managers and supervisors should discuss this policy with their employees, and assure them that they are not required to endure insulting, degrading or exploitive sexual treatment, or unlawful harassment of any type. Managers and supervisors must immediately report to the President any complaints received from their employees concerning harassment, including, but not limited to, sexual harassment. Managers and supervisors must also report to the President any other potentially harassing conduct or incidents of which they might see, hear or otherwise become aware.

Any employee affected by any type of visual, verbal or physical harassing conduct, whether from managers, supervisors, co-employees, customers or vendors has an obligation to report the matter.

To report harassment or discrimination, an employee may bring his or her complaint or observation to the immediate supervisor. If an employee is uncomfortable bringing a complaint to the attention of his or her supervisor, then the employee should contact the Department Manager. If the complaint or observation of harassment involves someone in the employee's direct line of command, or if the employee is uncomfortable discussing the matter with his or her direct supervisor, the employee is urged to go to another supervisor, the Department Manager or the General Manager. If the employee is uncomfortable in reporting to any of these individuals, the employee should report to the Division Head or to the Corporate Human Resources Department at (888) 266-2525. These individuals have been trained to respond appropriately to reports of harassment or discrimination

It is your responsibility as an employee without fear of reprisal, to bring any form of harassment, including but not limited to sexual harassment, to the attention of management. An investigation of the complaint will be handled with confidentiality to the fullest extent possible. Any employee who subjects another to harassment or to other inappropriate conduct will be subject to disciplinary action up to and including termination. It is the responsibility of the Company to make the intensely fact-specific determination of whether harassment actually has occurred, and to help determine what, if any, disciplinary or corrective action will be taken.

1.4 Prohibition against Retaliation

The Company also prohibits retaliation against person(s) who, in good faith, bring a complaint of harassment to management's attention. If you believe you have been retaliated against for reporting discrimination or harassment, or for making such a complaint, or for participating in an investigation related to discrimination or harassment, you should immediately report the alleged retaliatory action using the procedure outlined above.

Our Commitment to an Effective No-Harassment or Equal Opportunity Policy

Finally, if you feel that WBBJ has not met its obligations under this policy, or if you are not satisfied with the way in which your report of harassment or discrimination was handled, you should contact your Corporate Human Resources Department at (888) 266-2525. An effective No-Harassment or Equal Opportunity policy depends on all of us, working together, to address this very important subject.

* * *

For job applicants, the Unit's status as an Equal Opportunity Employer (EOE) appears in all the job vacancy notifications (see attached exhibits), including job postings on the Station's website and third-party websites disseminating the vacancy information.

The Unit's website homepage (www.wbbjtv.com) contains the link "Careers" at the bottom center relating to the Unit's employment opportunities. When a potential applicant clicks on the "Careers" hyperlink, he or she is taken to a listing of positions currently available at the Station and other stations in the corporate family. All these postings likewise have a clear Equal Opportunity Employer (EOE) notation.

***Audit Data Request 2(b)(viii).** In accordance with section 73.2080(c)(3), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of 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.*

Response: The Employment Unit continually monitors and analyzes its EEO recruitment program. The Managers and the Business Manager informally but routinely and on an ongoing basis discuss recruiting initiatives, the quantity and quality of candidates applying for vacancies, and potential recruiting sources that would allow the Employment Unit to better reach the community. The Executive Vice President and the Business Manager also work together to prepare and review the annual EEO Public File Report, and the Managers actively participate in the recruitment and interview process to ensure compliance with the Employment Unit's EEO program. The Business Manager continually maintains and reviews the recruitment source list.

Additionally, the Business Manager, in consultation with the Executive Vice President, has periodically reviewed the Employment Unit's recruitment sources to identify any that have not proven fruitful and to add new recruitment sources, as appropriate. These analytical efforts have streamlined the vacancy notification process as well as improved the overall quality and quantity of referrals from the recruitment source list as a whole.

***Audit Data Request 2(b)(ix).** As required by section 73.2080(c)(4), during the Unit's current license term(s) (or since acquisition of the Unit (if during that period)), a description of 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.*

Response: *Compensation and Benefit Levels.* The Employment Unit's compensation levels are reviewed on an annual basis during budget preparation by the Managers and the Executive Management Team to ensure the levels provide equal opportunities for all employees and do not have a discriminatory effect. The Unit conducts annual performance reviews for full-time employees and generally offers salary increases based on the cost of living and added job responsibilities; in some cases, the Unit offers merit-based increases.

Benefits are determined by the Executive Management Team, which reviews the benefits plan on an annual and as-needed basis. All full-time employees are entitled to the same benefit package.

Seniority Practices and Promotions. The Managers conduct annual written and oral performance appraisals for each employee. Internal promotions are based upon the results of the performance appraisals and discussions among the Managers and the Executive Management

Team (all of whom have responsibility for enforcing the Employment Unit's EEO program and policy).

No Union Participation. The Unit has had no Union agreements in place during the relevant time period.

Selection Techniques. After providing notification of job vacancies to the community, the employee selection process is based upon the experience, qualifications, talents, and, in the case of sales, market knowledge of the individual candidates. The Vice President and General Manager is consulted on each employee selection.

The remaining audit data requested is not applicable. The Licensee is not a religious broadcaster and has no time brokerage arrangements.

WBBJ is uploading a copy of this letter and the attached exhibits to the Station's online public inspection file.

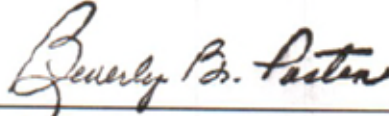
If you have any questions regarding this response or need any further information, please call or email our attorney Elizabeth Spainhour at 919-573-6229 or espainhour@brookspierce.com.

[signature appears on following page]

The undersigned, under penalty of perjury, declares the foregoing to be true, complete, and correct to the best of her personal knowledge.

This the 3rd day of May, 2024.

By:

A handwritten signature in cursive script, reading "Beverly B. Poston", written over a horizontal line.

Beverly B. Poston
President of the Managing Partner
Tennessee Broadcasting Partners
Licensee of WBBJ-TV