

**LeSEA BROADCASTING OF TULSA, INC.
61300 IRONWOOD ROAD
SOUTH BEND, INDIANA 46614
(574) 291-9043**

March 27, 2018

Via Upload to Online Public Inspection File (“OPIF”)

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: KWHB
Tulsa, Oklahoma
Fac. Id. 37099
FRN: 0011666849**

Response to EEO Audit Email Dated February 26, 2018

Dear EEO Staff:

In order to satisfy your EEO audit email dated February 26, 2018, LeSEA Broadcasting of Tulsa, Inc. (“LeSEA”) hereby uploads this response to the Online Public Inspection File (“OPIF”) for station KWHB, Tulsa, Oklahoma (Fac. Id. 37099). The responses in this letter follow the outline in your audit email request which begins with Section 2.

Section 2. EEO Requirements

KWHB is the only station within the station employment unit (“SEU”). In the previous two-year period, KWHB has only maintained 5 or more full-time employees from February 1, 2017 – January 31, 2018 for which audit data is attached. During the preceding year from February 1, 2016- January 31, 2017, the station was not required to complete an EEO public file report because the station did not have five or more full time employees. As such, no audit data is attached for the latter period. As fully discussed in Section 3(i) below, LeSEA is a religious broadcaster that applies a religious qualification to all of its positions. Thus, this response will be limited accordingly.

Section 3 – Audit Data Requested

- (a) Please find attached as Exhibit A, the most recent EEO public file report for the SEU covering the dates February 1, 2017 – January 31, 2018. For the immediately preceding period of February 1, 2016- January 31, 2017, the station was not required to complete an EEO public file report because the station did not have five or more full time employees.

KWHB's website is <https://kwhbtv47.com/> which provides a link to the most recent EEO report.

- (b) Not applicable. LeSEA is a religious broadcaster as that term is defined in Section 73.2080(a) and has elected to and does apply a religious qualification to all of its employment positions. LeSEA is not required to complete the initiatives listed under this section.
- (c) Interviewees – See attached Exhibit A EEO Public File Report covering the dates February 1, 2017 – January 31, 2018.
- (d) Not applicable. LeSEA is a religious broadcaster as that term is defined in Section 73.2080(a) that has elected to and does apply a religious qualification to all of its employment positions. LeSEA is not required to complete the initiatives listed under this section.
- (e) There are no pending or resolved complaints involving KWHB during its current license term 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.
- (f) Starting June 1, 2014 through the date of this letter, various levels of employees have been involved in the maintenance of the Stations' EEO program. Ultimate responsibility for station compliance rests with the General Manager and LeSEA's Human Resources Department. Both have been provided with copies of LeSEA's EEO policy, a summary of the specific EEO requirements and detailed instructions on EEO compliance. LeSEA has adopted this corporate EEO policy and uses it in all applicable aspects of recruitment of full-time positions.

For any full-time vacancy, the General Manager and LeSEA's Human Resources Department are involved in all recruiting and hiring practices for that specific position. This allows them to ensure that the EEO policy and requirements are being followed for each vacancy and that job applicants are made aware of LeSEA's EEO policy. Job applicants who are considered for positions are asked to complete a job application which clearly states that LeSEA considers itself to be a religious broadcaster for purposes of EEO and applies a religious qualification to all full-time positions.

- (g) Starting June 1, 2014 through the date of this letter, LeSEA has and continues to evaluate its recruitment program periodically throughout each year. LeSEA monitors the sources used to make certain that they are appropriate for each position and if they are referring qualified candidates using data maintained through the required recordkeeping. Sources that are not generating responses or referring qualified candidates are removed and replaced with new sources that have the potential to provide better qualified candidates.

- (h) Starting June 1, 2014 through the date of this letter, LeSEA has undertaken periodic reviews of pay, benefits, seniority practices, promotions and selection techniques to ensure that each meets appropriate standards and are consistent with the company's financial abilities as a non-profit entity. While the process is informal, it is still effective as it is currently administered. There are no unions.
- (i) LeSEA is a religious broadcaster as that term is defined in Section 73.2080(a) that has elected to and does apply a religious qualification to all of its employment positions. Pursuant to this FCC audit email request section, LeSEA is only required to keep a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hire. No other records are required for those hires.

Section 4 – Time Brokerage Agreements

Not applicable.

I, Andrew Sumrall, President of LeSEA Broadcasting of Tulsa, Inc., licensee of KWHB (DT), hereby certify that the information provided in this letter is accurate and complete.



Andrew Sumrall

Station Representative Contact: Joseph C. Chautin, III, Esq., jchautin@hardycarey.com

EEO PUBLIC FILE REPORT

Dates: February 1, 2017 – January 31, 2018

| Station Employment Unit | | | | | |
|-------------------------|----------|----------------------|-----------|---------|----------------------|
| Call Sign | Fac. Id. | Community of License | Call Sign | Fac. Id | Community of License |
| KWHB (DT) | 37099 | Tulsa, Oklahoma | | | |
| | | | | | |
| | | | | | |

| Recruitment Sources | | | |
|--|------------------|--|--------------|
| Source | Contact | Address | Phone |
| Broken Arrow Ledger | Jacqui McFarland | www.tulsaworld.com/communities/brokenarrow | 918.581.7315 |
| Indeed website | Jacqui McFarland | www.indeed.com | 918.581.7315 |
| KWHB website | Lisa Slayton | www.kwhb.com | 574.291.8200 |
| Memorial Baptist Church bulletin board | Joy Jewitt | 2800 S. Yale, Tulsa, OK 74114 | 918.744.0079 |
| Tulsa World Newspaper | Jacqui McFarland | 318 S. Main, Tulsa, OK 74103 | 918.581.7315 |
| Tulsa World Website | Jacqui McFarland | www.TulsaWorld.com | 918.581.7315 |
| Word of Mouth | Dan Smith | 406 S Boulder, Suite 102, Tulsa, OK 74103 | 918.254.4701 |
| | | | |

| Vacancies Filled During Period | | | | |
|--------------------------------|-------------|-------------------------|----------------|----------|
| Position Filled | Date Filled | Source | Interviewee(s) | Hiree |
| | | | | |
| Local Sales Manager | 04/18/2017 | Tulsa World Newspaper | 1 | |
| | | Tulsa World website | 2 | 1 |
| | | Indeed website | 1 | |
| | | KWHB website | 0 | |
| | | Word of Mouth | 1 | |
| | | Broken Arrow Ledger | 1 | |
| | | Memorial Baptist Church | 0 | |
| | | Total: | 6 | 1 |
| Account Executive | 06/29/2017 | Tulsa World Newspaper | 1 | |
| | | Tulsa World website | 0 | |
| | | Indeed website | 1 | 1 |
| | | KWHB website | 0 | |
| | | Word of Mouth | 1 | |
| | | Memorial Baptist Church | 0 | |
| | | Total: | 3 | 1 |
| Media Sales Executive | 09/18/2017 | Tulsa World Newspaper | 1 | |
| | | Tulsa World website | 0 | |
| | | Indeed website | 1 | |
| | | KWHB website | 0 | |
| | | Word of Mouth | 2 | 1 |
| | | Memorial Baptist Church | 0 | |
| | | Broken Arrow World | 1 | |
| Total: | 5 | 1 | | |

| Position Filled Media Sales Executive | Date Filled 10/05/2017 | Source | Interviewee(s) | Hiree |
|---|---------------------------|-------------------------|----------------|-------|
| | | Tulsa World Newspaper | 1 | |
| | | Tulsa World website | 0 | |
| | | Indeed website | 0 | |
| | | KWHB website | 0 | |
| | | Word of Mouth | 2 | 1 |
| | | Memorial Baptist Church | 0 | |
| | | Broken Arrow World | 1 | |
| | | | Total: 4 | 1 |