

STEPHENS MEDIA GROUP - ROCHESTER, LLC

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*Via Upload to WZNE Online Public Inspection File,
EEO Audits, Investigations, and Complaints Subfolder*

EEO Staff, Policy Division, Media Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: WZNE, Brighton, NY

Fac. Id. 6859

Licensee: STEPHENS MEDIA GROUP - ROCHESTER, LLC

FRN: 0017739384

Response to March 21, 2022 EEO Audit Public Notice

Dear EEO Staff:

In order to satisfy the EEO audit public notice released March 21, 2022, Stephens Media Group - Rochester, LLC ("WZNE") hereby uploads this response to the Online Public Inspection File ("OPIF") for station WZNE, Brighton, NY, Fac. Id. 6859. This response will follow the outline in the audit request which begins with the number 2.

2. Audit Data Requested.

2(b)(i). WZNE is within the station employment unit ("SEU") that includes co-owned WFKL-FM, Fairport, NY (Fac. Id. 37824) and WRMM-FM, Rochester, NY (Fac. Id. 1907). The SEU employs five or more full-time employees. Copies of the Unit's two most recent EEO Public File Reports described in 47 CFR § 73.2080(c)(6) are attached hereto at Exhibit A.

2(b)(ii). The licensee maintains websites for the SEU stations as follows:

Call Sign	Website address	Latest EEO online
WZNE	https://941thezone.com/	https://publicfiles.fcc.gov/fm-profile/WZNE/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/476d48b5-c712-61b3-8dc6-5a7126d3fca7
WFKL-FM	http://fickle933.com/	https://publicfiles.fcc.gov/fm-profile/WFKL/equal-employment-opportunity-records/additional-

		documents/eo-public-file-reports/7e313d60-71c9-46f0-7b92-793bd18570c9
WRMM-FM	http://warm1013.com/	https://publicfiles.fcc.gov/fm-profile/WRMM-FM/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/404b7b03-cb83-facb-0ac5-34964edec66c

2(b)(iii)-(iv). The SEU filled six full-time positions during the period covered by the EEO Public File Reports attached pursuant to 2(b)(ii) above. The number and source of the interviewees for each filled vacancy is specified below:

Position	Date Filled	No. of Interviewees	Referral Source for Interviewees
On-Air / Promotions Director	03/01/2021	2 1 1 1	-All Access -Industry Referral -LinkedIn -Radio Online
Account Executive	6/28/2021	2 2 1	-Indeed -Industry Referral -Station Website
Account Executive	07/13/2021	2 1 1 1 1	-Indeed -Industry Referral -LinkedIn -Station Website -Employee Referral
Operations Manager	07/05/2020	2 3 1 1	-All Access -Industry Referral -Industry Referral -Station Website
Account Executive	07/05/2020	2 2 1	-Indeed -Industry Referral -Station Website
On Air (internal promotion to Program Director)	08/02/2020	4 1 1 3	-All Access -Radio Online -Radio Ink -Industry Referral

Dated copies of all advertisements, bulletins, letters, faxes, e-mails or other communications announcing the vacancy, as described in section 73.2080(c)(5)(iii), are attached at Exhibit B.

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, is attached at Exhibit C, along with the additional required information.

2(b)(vi). Licensee had no complaints, pending or resolved, involving the Unit filed during the Unit's current license term(s) before anybody 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.

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)), the following describes 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: General Manager, Mike Ninnie manages the day-to-day operations of the sales and on-air team. He conducts interviews with potential candidates for sales and on-air positions. He is responsible for local initiatives and job postings at the local level. Human Resources Manager, Steve Dennis and Executive Assistant to Owner Gena Mitchell, work with corporate office to ensure EEO policies and practices are met as well as any state or local requirements for hiring. They both assist with job postings and hiring initiatives. Secondary Interviews for Sales Candidates are conducted by Kerry Knight, National Digital Sales Manager and David Stephens, CEO/Owner. Secondary Interviews for On-Air/Production Candidates are completed by Bob Thornton, SVP of Programming and Technology.

2(b)(viii). In accordance with section 73.2080(c)(3), during the Unit's current license term(s), the following is 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: General Manager, Mike Ninnie manages the day-to-day operations of the sales and on-air team. He conducts interviews with potential candidates for sales and on-air positions. He is responsible for local initiatives and job postings at the local level. Human Resources Manager, Steve Dennis and Executive Assistant to Owner, Gena Mitchell works with corporate office to ensure EEO policies and practices are met as well as any state or local requirements for hiring. They both assist with job postings and hiring initiatives.

2(b)(ix). As required by section 73.2080(c)(4), during the Unit's current license term(s), the following is 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: Human Resources Manager, Steve Dennis periodically reviews pay, benefits, and hiring practices to ensure they provide equal opportunity and are not having a discriminatory effect. The SEU does not have a union agreement.

3. Time Brokerage—Licensee of brokered station(s) receives audit letter. Not applicable.

4. Time Brokerage—Broker receives audit letter. Not applicable.

The station representative contact is Gena Mitchell. She may be reached at the following email address: gena.mitchell@smgnational.com. On any correspondence, please also copy the SEU's FCC Counsel, Joseph Chautin, at jchautin@hardycarey.com.

I declare under penalty of perjury that the foregoing information is accurate and complete to the best of my knowledge and belief.

Stephens Media Group - Rochester, LLC:

A handwritten signature in black ink, appearing to read "David Stephens", written over a horizontal line.

David Stephens, Manager

cc: Joseph Chautin, III, Esq.

Exhibit A

Exhibit B

Exhibit C

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 is attached. SEU personnel involved in each recruitment initiative are as shown below:

Event	Personnel Involved
14 - Preventing Sexual Harassment for NY Managers course	Steve Dennis, HR Manager Mike Ninnie, General Manager
5 - Internship Program	Steve Dennis, HR Manager Mike Ninnie, General Manager
8 - Training Program	Mike Ninnie, General Manager Kerry Knight, Director of Digital Sales David Stephens, Owner
15 – Consulting & Advising Local Non-Profit Wachuku Foundation who is looking to start a radio station in Africa.	Mike Ninnie, General Manager

Total SEU full time employees: **12**

Under 73.2080(c)(2), the SEU is required to perform four menu options every two years because it has more than 10 full time employees. In addition, the market population exceeds 250,000. The SEU completed a total of 9 menu options during the 2020-22 period under review.