

#### Response to Audit for KZTP 22/23 EEO

Attached you will find our filing and response to our Iowa EEO Audit for 2022 and 2023. Post covid, has seen a steep decline here in rural Iowa and Minnesota in applicants for any positions. What we find is many are people taken from other jobs/companies. We here are Radio Works are down at least 3 FT positions due to loss of advertising income since Covid shutdowns. In on of the documented instances we tried for 4 months to even get an applicant. When we did, that person was offered the job as we felt they could do the duties. They lasted a bit, but they did not make it a full year. We again advertised for the Marketing Specialist position, and got no applicants via recruitment sources except for 1 individual who previously worked in Radio in another state as an on air personality. Due to that understanding of the business, when he came forward, we decided to hire him to move to an Marketing Specialist postion (sales). An actual incredible hire he has turned into our top biller.

In this report the only other two positions we hired for were quite unique. On Air hire was actually a former employee who left for another station, they did not like that fit and came back and asked to get their job back. So it was simply a rehire walk in essentially of a person who had already worked here.

The Media Specialist job was created as our local Computer Tech store decided to close their doors. Their main tech has been in our office/studios fixing things for a couple of years working for them. He was about to loose his job. He wanted to expand his technical field of work to more graphics and video. We decided to create a division here to serve our advertising clients to fit this. We did advertise, and received no other applicant's he was then hired and still is employed here. All other employees here are all staff members for quite some time.

I did in the course of this audit discover an error in my 2022 report. That error was corrected on the recruitment sources page, and I have re uploaded that corrected report in the additional files of the EEO tab on KZTP's page on the FCC upload portal. I also left the incorrect page up to show and labled the new one as "corrected"

All other documents are attached, including career fair photos, and career expo's we have attended at our local high school and community college.

Chad Cummings VP/GM Radio Works LLC

Radio Works – 28779 County Highway 35 – Worthington, Mn 56187 – 507-376-6165 www.myradioworks.net

Radio Works does not discriminate the sale of advertising time, and accepts no advertising which is placed with intent to discriminate on the basis of race, gender or ethnicity. Advertiser hereby certifies that it's not buying air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, gender, national origin, or ancestry.



# Federal Communications Commission Washington, D.C. 20554

March 22, 2024

KZTP-FM, SIBLEY, IA, Fac ID 164085 Absolute Communications, L.L.C. 28779 County Highway 35 Worthington, MN 56187

#### Dear Licensee:

1. In accordance with 47 CFR § 73.2080(f)(4), KZTP-FM, SIBLEY, IA, Fac ID 164085 (the Station) and all other stations, if any, in the same station employment unit (defined by 73.2080(e)(2) as commonly owned stations in the same market that share employees) (the Unit) has been randomly selected for an audit of its Equal Employment Opportunity (EEO) program. A copy of section 73.2080 of the Federal Communications Commission (FCC or Commission) rules can be found here: https://www.fcc.gov/enforcement/eb-eeo/equal-employment-opportunity-rules.

#### 2. Audit Data Requested.

- (a) If the Unit has fewer than five full-time employees (defined by section 73.2080(e)(1) as employees regularly assigned to work 30 hours a week or more), submit a response listing the Unit's full-time employees identified by job title (no personal names should be provided), the number of hours each is regularly assigned to work per week, and a response to Question 2(b)(vi) below. Please also see Questions 3 and 4 below for guidance regarding brokers and brokered stations.
- (b) If the Unit employs five or more full-time employees, provide the following information:
  - (i) Copies of the Unit's two most recent EEO Public File Reports, described in section 73.2080(c)(6).
  - (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).
  - (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).
- (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 the Unit's full-time vacancies filled during the period covered by the above-noted EEO Public File Reports.
- (v) Dated documentation demonstrating performance 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 section 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.
- (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 gender. 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.
- (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

<sup>&</sup>lt;sup>1</sup> For on-air announcements that aired multiple times to advertise the position, you may send a traffic log summary documenting the timeframe during which the announcements aired (in lieu of the log in its entirety). The log showing all air dates and times may be required for additional verification, but the Unit need not provide with its initial response.

how the Unit has informed employees and job applicants of its EEO policies and program.

- (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.
- (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.
- (x) If your entity is a religious broadcaster and any of the Unit's full-time employees are subject to a religious qualification as described in section 73.2080(a) of the rules, the Unit should indicate that status in its response and provide data as applicable to its EEO program. For example, for those full-time hires subject to a religious qualification, you must provide only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source that referred the person hired. No other records are required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain and provide all records for such hires and complete the initiatives required under section 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.
- (c) Resumes, company training manuals, posters, employee handbooks, and corporate guidebooks are not required to be submitted. If any of the information in these or similar materials is relevant to any part of this audit letter, the Unit may provide a summary of any content if it so wishes. If this audit requires an unusually burdensome volume of documentation, the Unit may contact EEO staff at (202) 418-1450 at least seven days prior to the response deadline to discuss alternative ways of condensing the information.

#### 3. Time Brokerage—Licensee of brokered station(s) receives audit letter.

If any station included in the Unit is subject to a time brokerage agreement, the licensee must immediately forward a copy of this letter to the broker under each such agreement. Additionally, if the Unit employs fewer than five full-time employees, the licensee must respond by providing a list of the Unit's full-time employees listed by job title, the number of hours each employee is assigned to work, and a response to paragraph 2(b)(vi) above. If the Unit employs five or more full-time employees, the licensee must respond fully to paragraph 2(b).

- 4. Time Brokerage—Broker receives audit letter.
- (a) Broker receives audit letter from brokered station licensee. The broker must submit information requested in paragraph 2(b) above concerning information relating only to its own full-time employees working on behalf of the brokered station, as required by section 73.2080(f)(3) of the Commission's rules. If recruitment activity for those brokered station employees is maintained with that of other stations licensed to you, and you lack the ability to separate the information, submit information pertaining to both.
- (b) Broker receives audit letter directly from Commission. If any station in the Unit is licensed to you, submit information requested in paragraph 2(b) above for the Unit's EEO program. If recruitment activity pertaining to full-time employees working on behalf of another station you broker is maintained with that of the Unit, and you lack the ability to separate the information, submit information pertaining to both.
- (c) Broker described in 4(a) or 4(b). If full-time employees at the station you broker, combined with full-time employees at the Station (or Unit), total fewer than five, you need only respond to this letter by submitting a list of full-time employees (identified by job title and number of hours regularly assigned to work per week) for both the brokered station(s) and subject Station as well as a response to paragraph 2(b)(vi).

#### 5. Procedures.

- (a) The response to this audit letter must be uploaded to the FCC-hosted online public inspection file (https://publicfiles.fcc.gov/) belonging to each station in the Unit by no later than May 6, 2024. The response should be placed in the EEO Audits, Investigations, and Complaints subfolder in the online public file (found at EEO Records>>Additional Documents>> EEO Audits, Investigations, and Complaints). Include in the response the Station's Facility ID Number and an e-mail address of a Station representative.
- (b) Any extension of time must be requested at least five days prior to aforementioned deadline (via email to EB-EEO@fcc.gov), indicate the additional time the Unit believes it needs to complete its response (not to exceed 45 days) and will be granted only upon a showing of good cause. Unless and until an extension is granted, the original deadline remains in effect.
- (c) If the Unit submitted an EEO audit response in 2022 or 2023 and/or the most recent license renewal application(s) applicable to the Unit were granted after February 1, 2022, send an email to EB-EEO@fcc.gov for additional guidance on whether a response is required. In the email, provide a reference to the relevant filings/applications before the Commission.
- (d) The accuracy and completeness of the response must be certified by an officer, partner or other principal of the Station licensee or broker (as appropriate) or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee.

(See 47 CFR § 1.16.) To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (see 18 U.S.C. § 1001; 47 CFR § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is punishable by sanctions in accordance with section 73.2080(g).

- (e) As required by sections 73.3526(e)(10) (commercial stations) and 73.3527(e)(11) (noncommercial educational stations), a copy of this letter and the response must be placed in the FCC-hosted online public inspection file belonging to each station in the Unit. Consequently, the response should NOT include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. The FCC does not require that employment units retain such information in their records, or that such information be provided in response to this letter.
- (f) Upon receipt, audit responses will be reviewed for completeness. If any questions arise or there are missing materials, EEO staff will contact you. The Enforcement Bureau no longer issues letters to licensees upon completion of our review of audit responses.
- 6. Should you have any questions, please contact EEO Staff at EB-EEO@fcc.gov or (202) 418-1450. Thank you for your cooperation.

Sincerely,

/s/ Elizabeth Goldin

Elizabeth E. Goldin Assistant Chief, Investigations & Hearings Division Enforcement Bureau

#### Annual EEO Public File Report Form

#### KZTP FM SIBLEY IOWA

#### **Annual EEO Public File Report**

The purpose of this EEO Public File Report ("Report") is to comply with Section 73.2080(c)(6) of the FCC's 2002 EEO Rule. This Report has been prepared on behalf of the Station Employment Unit that is comprised of the following station(s): KZTP FM, SIBLEY, IOWA, KWOA AM, KITN FM, and KUSQ FM Worthington MINNESOTA and is required to be placed in the public inspection files of these stations, and posted on their websites, if they have websites.

The information contained in this Report covers the time period beginning December 1, 2022 to and including November 30, 2023.

The FCC's 2002 EEO Rule requires that this Report contain the following information:

- 1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
- 2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080(c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
- 3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
- 4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
- 5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c)(2) of the FCC rules.

Appendices 1, 2, and 3 which follow have been designed, in the aggregate, to provide the required information. Please note that the numbers listed on Appendix 2 under the column entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of full-time job positions listed on Appendix 1.

For purposes of this Report, a vacancy was deemed "filled" not when the offer was extended but when the hiree accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person and/or over the telephone.

#### Appendix 3 to

#### Annual EEO Public File Report Form

Covering the Period from December 1, 2022 to November 30, 2023

Station(s) Comprising Station Employment Unit: KZTP-FM
Section 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken by
KUSQ-FM / KITN-FM / KWOA-AM

Participate in Events Sponsored by Educational Institutions:

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM GM/VP Chad Cummings spoke to local elementary students and did a community reading program with them. Cummings spoke of the importance of good reading in the on air capacity of radio.

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM participated in Noon Kiwanis and KKids Club, as part of the community businesses fostering work-readiness, entrepreneurship and financial literacy skills. KZTP On-Air Personality/Sports Director, Ryan McGaughey and Director of Promotions Andy Johnson presented a thirty minute session on media, communications, marketing and radio.

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM had a local intern, in a Job Shadow Program. They shadowed Director of Marketing Natalie Mulder, also working with on air staff Barry Roberts to learn about communications and promotions.

#### General Outreach

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM General Manager, Chad Cummings and Marketing Specialist, Natalie Mulder, spoke to local Kiwanis, Booster Club and Students at Minnesota West Community and Technical College. This communication gave a glimpse into the business aspect of radio, rather than the typical knowledge of on air personalities.

KZTP-FM, KUSQ-FM. KITN-FM, KWOA-AM sales staff attended a Big Deals training session in Minneapolis, MN, in May of 23. They attended various classes on different sales methods and procedures, interactive sales techniques and ways to improve and maximize sales dollars. The conference was attended by Marketing Specialists, Natalie Mulder, Andy Johnson, Coral Riley

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM General Manager, Chad Cummings was a guest panelist for Early Risers Kiwanis talking about their digital marketing and how to reach more customers with information and advertising. Cummings also spoke of career opportunities with the company in the digital spectrum. Explaining our new features of marketing with Media Works.

## **KZTP** EEO PUBLIC FILE REPORT

[ 12/1/2022-11/30/2023]
(Note: Period determined by FCC license renewal filing date and not on calendar basis)

## I. VACANCY LIST

See Master Recruitment Source List (MRSL) for recruitment source data

| Job Title                | Recruitment Sources (RS) Used to Fill Vacancy | RS Referring<br>Hiree |
|--------------------------|-----------------------------------------------|-----------------------|
| 1 - Marketing Specialist | 1,2,3,4,5,6,7,8,9,10,11,12,13                 | 13                    |
|                          |                                               |                       |

| Job Title            | Date of Hire |
|----------------------|--------------|
| Marketing Specialist | 8/1/23       |
|                      |              |

## KZTP EEO PUBLIC FILE REPORT [ 12/1/22- 11/30/23 ]

## II. MASTER RECRUITMENT SOURCE LIST (MRSL)

| RS<br>Number | RS Information                                                                                                         | Source Entitled<br>to Vacancy<br>Notification?<br>(Yes/No) | No. of Interviewee<br>Referred by RS<br>12/1/18 – 11/30/19<br>period |
|--------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|----------------------------------------------------------------------|
| 1            | On-air Broadcast Schedules on KZTP-FM<br>28779 County Highway 35<br>Worthington, MN 56187 (507) 376-6165               | N                                                          |                                                                      |
| 2            | Station web site, www.myradioworks.net                                                                                 | N                                                          |                                                                      |
| 3            | LinkedIn Job Forum www.linkedin.com                                                                                    | N                                                          |                                                                      |
| 4            | Iowa Lakes Community College 300 S. 18th Street Estherville, IA (712) 362-2604 Bob Pritchard rpritchard@iowalakes.edu  | N                                                          |                                                                      |
| 5            | MN Job Service Mary Mathia / Ron Kellen PO Box 159 Worthington, MN 56187 (507) 376-3116                                | N                                                          |                                                                      |
| 6            | MN West College Career Board<br>1450 Collegeway<br>Worthington, MN 56187 (507) 372-3400                                | N                                                          |                                                                      |
| 7            | Southwest MN State University Career Services 1501 State Street Marshall, MN 56258 (507) 537-6221 www.mustangjobs.com  | N                                                          |                                                                      |
| 8            | Nobles Co. Integration Collaborative Leann Enninga<br>117 11th Avenue, Suite 1<br>Worthington, MN 56187 (507) 376-3300 | N                                                          |                                                                      |
| 9            | All Access Radio Magazine www.allaccess.com                                                                            | N                                                          |                                                                      |
| 10           | Northwest Iowa Community College Job Board<br>603 West Park Street<br>Sheldon, IA 51201 (712) 324-5061                 | N                                                          |                                                                      |
| 11           | Facebook                                                                                                               | N                                                          |                                                                      |
| 12           | Employee Referrals                                                                                                     | N                                                          |                                                                      |
| 13           | Non-Employee Referrals / Walk-In                                                                                       | N                                                          | 1                                                                    |
|              | TOTAL INTERVIEWEES OVER                                                                                                | 12-MONTH PERIOD                                            | 1                                                                    |



Hello, Thank you for spreading the word on our job opportunity. 7/1/2023

**Job Opportunity** 

Marketing Specialist

This full time position at Radio Works is located in Worthington Mn. Hours of business are 8:30am to 4:30pm Monday through Friday. There are a few occasions for promotions that hours outside of this schedule are required, but few.

This position's key responsibilities are to generate revenue by developing and building market potential though forecasting, lead generation, qualification and closing of radio ad sales, and recommending new opportunities to existing and prospective businesses in your given territory.

Candidates will need to possess presentation skills, internal communication skills, territory management and the ability to meet sales goals. Working knowledge of media sales is proffered, but not required. You need to be self driven.

Apply via resume by mail, or dropping off in person to Radio Works 28779 County Highway 35, Worthington Mn 56187, or via email to sales@myradioworks.net Attn: Natalie Mulder, Director of Marketing.

Radio Works provides employee benefits including health insurance, dental insurance, paid vacation time, paid sick days, and paid holidays. We offer complete job training internally and through hired sources. We also offer career development which can provide growth and advancement. Our employees enjoy and business casual work environment.

Radio Works LLC is an equal opportunity employer, We do not discriminate base on race, gender, ethnicity, disability, or religious affiliation. We encourage Military Veterans to apply.

Radio Works – 28779 County Highway 35 – Worthington, Mn 56187 – 507-376-6165 www.myradioworks.net



RADIO WORKS LLC KUSQ-FM/KITN-FM/KZTP-FM/KWOA-AM 28779 COUNTY HIGHWAY 35 WORTHINGTON, MN 56187

Multi-Station Order Confirmation OrderID: 1824-135

Sponsor: Product:

Radio Works

Radio Works - Marketing Specialist

Estimate/PO:

AccountRep: BillingCycle:

Chad Cummings Calendar Month None-Statement Only 7/1/2023 - 7/31/2023

InvoiceType: Run Dates:

Items Ordered: Gross Amount: 548 0.00 0.00

Discounts: Agency Commission:

0.00

Net Amount:

0.00

RADIO WORKS

Scheduled Station(s): KUSQ FM / KITN FM / KWOA AM / KZTP FM Radio Works - Marketing Specialist

| Prin | ted 4/23/2024 4:37:34 PM |              |              |                 |     |     |     |     |     |     |     |               |        |             |               |         |         |           | Page 1     |
|------|--------------------------|--------------|--------------|-----------------|-----|-----|-----|-----|-----|-----|-----|---------------|--------|-------------|---------------|---------|---------|-----------|------------|
|      | Run Dates                | Run Weeks    | Run Times    |                 | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Week<br>Total | Length | Description | Avail<br>Type | Copy ID | Qty     | Item Cost | Total Cost |
| 01   | 7/1/2023 - 7/31/2023     | Ali Weeks    | 06:00 AM - 1 | 0: <b>00 PM</b> | 4   | 5   | 4   | 5   | 4   | 5   | 4   | 31            | :30    | Spot        |               | 20128C  | 137     | 0.00      | 0.00       |
|      | Calendar Month Projec    | ted Billing: |              |                 |     |     |     |     |     |     |     |               |        |             |               |         |         |           |            |
|      | Jul-23                   |              | 0.00         | Aug             | -23 |     |     | 0.  | 00  |     |     | Sep-23        |        | 0           | 0.00          |         | Q3-2023 |           | 0.00       |

#### Annual EEO Public File Report Form

#### KZTP FM SIBLEY IOWA

#### **Annual EEO Public File Report**

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The information contained in this Report covers the time period beginning December 1, 2021 to and including November 30, 2022.

The FCC's 2002 EEO Rule requires that this Report contain the following information:

- 1. A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
- 2. For each such vacancy, the recruitment source(s) utilized to fill the vacancy (including, if applicable, organizations entitled to notification pursuant to Section 73.2080(c)(1)(ii) of the new EEO Rule, which should be separately identified), identified by name, address, contact person and telephone number;
- 3. The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
- 4. Data reflecting the total number of persons interviewed for full-time vacancies during the Applicable Period and the total number of interviewees referred by each recruitment source utilized in connection with such vacancies; and
- 5. A list and brief description of the initiatives undertaken pursuant to Section 73.2080(c)(2) of the FCC rules.

Appendices 1, 2, and 3 which follow have been designed, in the aggregate, to provide the required information. Please note that the numbers listed on Appendix 2 under the column entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of full-time job positions listed on Appendix 1.

For purposes of this Report, a vacancy was deemed "filled" not when the offer was extended but when the hiree accepted the job offer. A person was deemed "interviewed" whether he or she was interviewed in person and/or over the telephone.

## KZTP EEO PUBLIC FILE REPORT [ 12/1/21– 11/30/22 ]

## II. MASTER RECRUITMENT SOURCE LIST (MRSL)

| RS<br>Number | RS Information                                                                                                         | Source Entitled<br>to Vacancy<br>Notification?<br>(Yes/No) | No. of Interviewees<br>Referred by RS<br>12/1/21 – 11/30/22<br>period |
|--------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|-----------------------------------------------------------------------|
| 1            | On-air Broadcast Schedules on KZTP-FM<br>28779 County Highway 35<br>Worthington, MN 56187 (507) 376-6165               | N                                                          | 1                                                                     |
| 2            | Station web site, <u>www.myradioworks.net</u>                                                                          | N                                                          |                                                                       |
| 3            | LinkedIn Job Forum www.linkedin.com                                                                                    | N                                                          |                                                                       |
| 4            | Iowa Lakes Community College 300 S. 18th Street Estherville, IA (712) 362-2604 Bob Pritchard rpritchard@iowalakes.edu  | N                                                          |                                                                       |
| 5            | MN Job Service Mary Mathia / Ron Kellen PO Box 159 Worthington, MN 56187 (507) 376-3116                                | N                                                          |                                                                       |
| 6            | MN West College Career Board<br>1450 Collegeway<br>Worthington, MN 56187 (507) 372-3400                                | N                                                          |                                                                       |
| 7            | Southwest MN State University Career Services 1501 State Street Marshall, MN 56258 (507) 537-6221 www.mustangjobs.com  | N                                                          |                                                                       |
| 8            | Nobles Co. Integration Collaborative Leann Enninga<br>117 11th Avenue, Suite 1<br>Worthington, MN 56187 (507) 376-3300 | N                                                          |                                                                       |
| 9            | All Access Radio Magazine<br>www.allaccess.com                                                                         | N                                                          | Ž.                                                                    |
| 10           | Northwest Iowa Community College Job Board<br>603 West Park Street<br>Sheldon, IA 51201 (712) 324-5061                 | N                                                          |                                                                       |
| 11           | Facebook                                                                                                               | N                                                          |                                                                       |
| 12           | Employee Referrals                                                                                                     | N                                                          |                                                                       |
| 12           |                                                                                                                        |                                                            |                                                                       |

## KZTP EEO PUBLIC FILE REPORT

[ 12/1/2021-11/30/2022]

(Note: Period determined by FCC license renewal filing date and not on calendar basis)

## I. VACANCY LIST

See Master Recruitment Source List (MRSL) for recruitment source data

| Recruitment Sources (RS) Used to Fill Vacancy | RS Referring<br>Hiree                            |
|-----------------------------------------------|--------------------------------------------------|
| 1,2,3,4,5,6,7,8,9,10,11,12,13                 | 13                                               |
| 13                                            | 13                                               |
| 1,2,3,4,5,6,7,8,9,10,11,12,13                 | 11                                               |
|                                               | to Fill Vacancy 1,2,3,4,5,6,7,8,9,10,11,12,13 13 |

| Job Title                 | Date of Hire |
|---------------------------|--------------|
| Digital Media Speciailist | 2/21/22      |
| Marketing Specialist      | 7/11/22      |
| On Air Mornings           | 10/24/22     |

#### Appendix 3 to

#### Annual EEO Public File Report Form

Covering the Period from December 1, 2021 to November 30, 2022

Station(s) Comprising Station Employment Unit: KZTP-FM
Section 3: Supplemental (Non-Vacancy Specific) Recruitment Activities Undertaken by
KUSQ-FM / KITN-FM / KWOA-AM

#### Participate in Events Sponsored by Educational Institutions:

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM GM/VP Chad Cummings spoke to local elementary students and did a community reading program with them. Cummings spoke of the importance of good reading in the on air capacity of radio.

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM participated in Junior Achievement, as part of the community businesses fostering work-readiness, entrepreneurship and financial literacy skills. KZTP On-Air Personality/Sports Director, Ryan McGaughey presented a thirty minute session on media, communications, marketing and radio.

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM had a local intern from Mankato State, in a Job Shadow Program. She was here through the summer job shadowed Director of Marketing Natalie Mulder, also working with on air staff Barry Roberts to learn about communications and promotions.

#### General Outreach

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM General Manager, Chad Cummings and Marketing Specialist, Natalie Mulder, attended Leadercast at Minnesota West Community and Technical College. Leadercast was formed to provide Management Leadership Training on a higher level.

KZTP-FM, KUSQ-FM. KITN-FM, KWOA-AM sales staff attended a Big Deals training session in Minneapolis, MN, in September 22. They attended various classes on different sales methods and procedures, interactive sales techniques and ways to improve and maximize sales dollars. The conference was attended by Chad Cummings, General Manager, Marketing Specialists, Natalie Mulder, Andy Johnson, Coral Riley

KZTP-FM, KUSQ-FM, KITN-FM, KWOA-AM General Manager, Chad Cummings was a guest panelist for The Community Ed Social Media Breakfast Club talking about their digital marketing and how to reach more customers with information and advertising. Cummings also spoke of career opportunities with the company in the digital spectrum. Explaining our new features of marketing with Media Works.



RADIO WORKS LLC KUSQ-FM/KITN-FM/KZTP-FM/KWOA-AM 28779 COUNTY HIGHWAY 35 WORTHINGTON, MN 56187

**Multi-Station Order Confirmation** OrderID: 1824-118

Sponsor: Product:

Radio Works

Media Works/Marketing Specialist

Estimate/PO: AccountRep:

**Chad Cummings** Calendar Month

BillingCycle: InvoiceType: Run Dates:

None-Statement Only 5/12/2022 - 6/30/2022

Items Ordered: Gross Amount:

1,000 0.00 0.00

Discounts: Agency Commission: 0.00 Net Amount:

0.00

RADIO WORKS

#### Scheduled Station(s): KUSQ FM / KITN FM / KWOA AM / KZTP FM Media Works/Marketing Specialist

| Prin | ted 5/3/2024 2:57:17 PM |              |                     |       |     |     |     |     |     |     |               |        |             |               |         |         |           | Page 1     |
|------|-------------------------|--------------|---------------------|-------|-----|-----|-----|-----|-----|-----|---------------|--------|-------------|---------------|---------|---------|-----------|------------|
|      | Run Dates               | Run Weeks    | Run Times           | Mon   | Tue | Wed | Thu | Fri | Sat | Sun | Week<br>Total | Length | Description | Avali<br>Type | Copy ID | Qty     | Item Cost | Total Cost |
| 01   | 5/12/2022 - 6/30/2022   | All Weeks    | 06:00 AM - 10:00 PM | 5     | 5   | 5   | 5   | 5   | 5   | 5   | 35            | :30    | Spot        |               | 18724C  | 250     | 0.00      | 0.00       |
|      | Calendar Month Project  | ted Billing: |                     |       |     |     |     |     |     |     |               |        |             |               |         |         |           |            |
|      | Apr-22                  |              | 0.00 M              | ay-22 |     |     | 0.  | 00  |     |     | Jun-22        |        | 0           | .00           |         | Q2-2022 | •         | 0.00       |



RADIO WORKS LLC KUSQ-FM/KITN-FM/KZTP-FM/KWOA-AM 28779 COUNTY HIGHWAY 35 WORTHINGTON, MN 56187

Multi-Station Order Confirmation
OrderID: 1824-134

Sponsor: Product: Radio Works

Radio Works - Digital Media Specialist

Estimate/PO:

AccountRep: BillingCycle: InvoiceType:

Chad Cummings Calendar Month None-Statement Only 1/1/2022 - 1/31/2022

 Run Dates:
 1/1/202

 Items Ordered:
 496

 Gross Amount:
 0.00

 Discounts:
 0.00

 Agency Commission:
 0.00

 Net Amount:
 0.00

RADIO WORKS

# Scheduled Station(s): KUSQ FM / KITN FM / KWOA AM / KZTP FM Radio Works - Digital Media Specialist

| Prin | ted 4/23/2024 4:36:26 PM |              |                  |       |     |     |     |     |     |     |     |               |        |             |               |         |         |           | Page 1     |
|------|--------------------------|--------------|------------------|-------|-----|-----|-----|-----|-----|-----|-----|---------------|--------|-------------|---------------|---------|---------|-----------|------------|
|      | Run Dates                | Run Weeks    | Run Times        |       | Mon | Tue | Wed | Thu | Fri | Sat | Sun | Week<br>Total | Length | Description | Avail<br>Type | Copy ID | Qty     | Item Cost | Total Cost |
| 01   | 1/1/2022 - 1/31/2022     | All Weeks    | 06:00 AM - 10:00 | PM    | 4   | 4   | 4   | 4   | 4   | 4   | 4   | 28            | :30    | Spot        |               | 19334C  | 124     | 0.00      | 0.00       |
|      | Calendar Month Projec    | ted Billing: |                  |       |     |     |     |     |     |     |     |               |        |             |               |         |         |           |            |
|      | Jan-22                   |              | 0.00             | Feb-2 | 22  |     |     | 0.  | 00  |     |     | Mar-22        |        | 0           | .00           |         | Q1-2022 |           | 0.00       |



5/10/22

This job can be listed in your soonest available time for students, graduates, or followers. Thank you

**Job Opportunity** 

**Marketing Specialist** 

This full time position at Radio Works is located in Worthington Mn. Hours of business are 8:30am to 4:30pm Monday through Friday. There are a few occasions for promotions that hours outside of this schedule are required, but few.

This position's key responsibilities are to generate revenue by developing and building market potential though forecasting, lead generation, qualification and closing of radio ad sales, and recommending new opportunities to existing and prospective businesses in your given territory.

Candidates will need to possess presentation skills, internal communication skills, territory management and the ability to meet sales goals. Working knowledge of media sales is proffered, but not required. You need to be self driven.

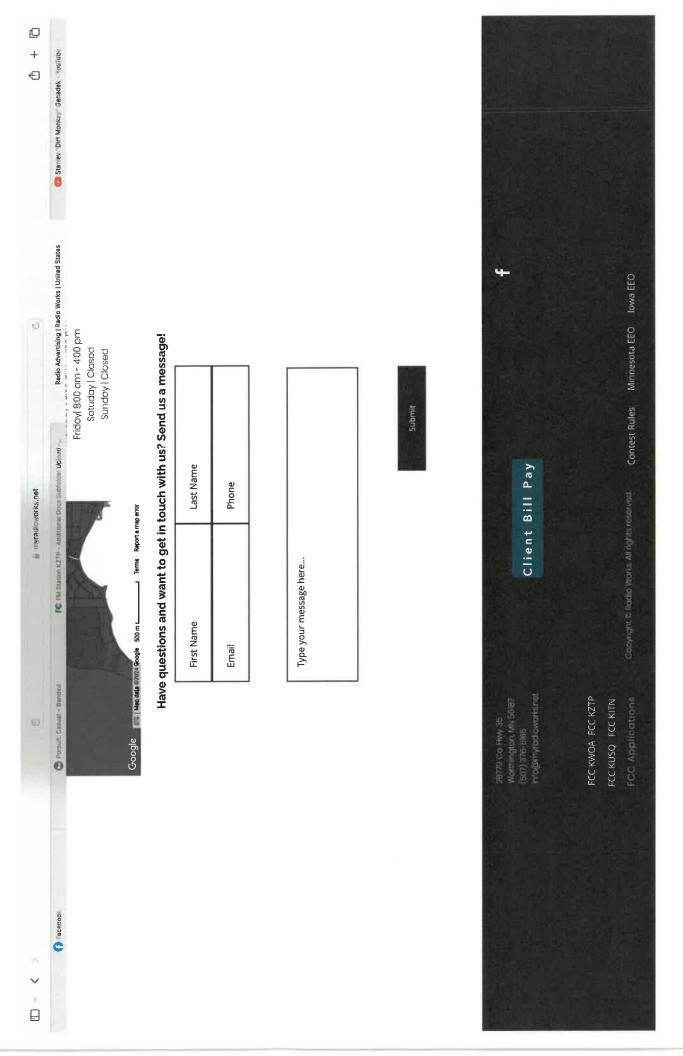
Apply via resume by mail, or dropping off in person to Radio Works 28779 County Highway 35, Worthington Mn 56187, or via email to <a href="mailto-sales@myradioworks.net">sales@myradioworks.net</a> Attn: Natalie Mulder, Director of Marketing.

Radio Works provides employee benefits including health insurance, dental insurance, paid vacation time, paid sick days, and paid holidays. We offer complete job training internally and through hired sources. We also offer career development which can provide growth and advancement. Our employees enjoy and business casual work environment.

Radio Works LLC is an equal opportunity employer, We do not discriminate base on race, gender, ethnicity, disability, or religious affiliation. We encourage Military Veterans to apply.

Radio Works – 28779 County Highway 35 – Worthington, Mn 56187 – 507-376-6165 www.myradioworks.net

Radio Works does not discriminate the sale of advertising time, and accepts no advertising which is placed with intent to discriminate on the basis of race, gender or ethnicity. Advertiser hereby certifies that it's not buying air time under this advertising sales contract for a discriminatory purpose, including but not limited to decisions not to place advertising on particular stations on the basis of race, gender, national origin, or ancestry.





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Annual EEO Public File Report Form

KZTP FM SIBLEY 10WA

Annual EEO Public File Report

The purpose of this EEO Public File Report ("Report") is to compty with Section 713.2600(b)(g) of the FOC'S 2000 EEO Publ. This Report has been repeated on behalf of the Station Employment Unit that is comprised of the following stabion(g); KZIP FM, SIBLEY, 10WA, KWODA AM, KTIN PM, and KUSO FM Worthington MINNESOTA and is required to be placed in the public inspection flee of these stations, and posted on their weeklies.

The information contained in this Report covers the time period beginning December 1, 2022 to and including November 30,2023.

The FCC's 2002 EEO Rule requires that this Report contain the following information:

- A list of all full-time vacancies filled by the Station(s) comprising the Station Employment Unit during the Applicable Period;
- For each such vacancy, the recruitment source(s) utilized to fill the vecancy (including, if applicable, organizations entitled to northication pursuant to Section 73.2080(c)(1)(t)) if the new EEO Rule, which should be separately identified, identified by name, address, contact person and telephone number;
- The recruitment source that referred the hiree for each full-time vacancy during the Applicable Period;
- Data reflecting the total number of persona interviewed for full-time vacanrides during the Applicable Period and the total number of interviewees referred by each recultment source utilized in connection with such vacanrides; and
- 5. A list and brief description of the inhialives undertaken pursuant to Section 73,2080(c)(2) of the PCC rules.

Appendicas 1, 2, and 3 which follow have been designed, in the aggregate, to provide the required information. Desse note that the numbers listed on Appendix 2 under the number entitled "Full-time Positions for Which This Source Was Utilized" refer to the number of full-time plot positions issued on Appendix 1.

For purposes of this Report, a vecancy was deemed "filled" not when the offer was extended but when the histories excepted the job offer. A person was deemed "interviewed" whether ha or she was interviewed in person and/or over the teleptrons.



I. VACANCY LIST

| Job Title                | Recruitment Sources (RS) Used RS Referring<br>to Fill Vacency Hiree | RS Referrin |
|--------------------------|---------------------------------------------------------------------|-------------|
| 1 - Marketing Specialist | 1,2,3,4,5,6,7,89,10,11,12,13                                        | 13          |

| Job Title            | Date of Hire |
|----------------------|--------------|
| Marketine Specialist | 8/1/22       |

# KZTP EEO PUBLIC FILE REPORT | 112/172- 1159/23 | |1. MASTER RECRUITMENT SOURCE LIST (MRSL.)

| RS<br>Number | R3 teformation                                                                                                                 | to Vacancy<br>Notification?<br>(Yea/No) | Referred by RS<br>12/1/16 – 11/30/19<br>period |
|--------------|--------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------|------------------------------------------------|
| -            | On-air Broadcast Schodules on KZTP-FM<br>28779 County Highway 35<br>Worthingsa, MN 56187 (507) 376-6165                        | z                                       |                                                |
| 7            | Station web site, www.ns.retignends.neg                                                                                        | z                                       |                                                |
| en           | LinkedIn Job Forum                                                                                                             | z                                       |                                                |
| -            | lows Lakes Connaunity College<br>300 S. 18th Street<br>Baheville, IA (712) 562-2604<br>Bab Phitchird prinklandglowskikes.edu   | z                                       |                                                |
| <b>"</b>     | MAN Job Service Mary Mathia / Ron Kellen<br>PO Box 159<br>Worthington, MN 56187 (507) 376-3116                                 | z                                       |                                                |
| •            | MN West College Curver Board<br>1450 Collegeway<br>Worthington, MN 56187 (507) 372-3400                                        | z                                       |                                                |
| 2            | Southwest MN State University Cirror Services<br>1501 State Street<br>Marchall, MN 56228 (507) 537-6221<br>www.mishanglobs.com | z                                       |                                                |
| 00           | Nobles Co. Introgration Collaborative Lourn Emiriga<br>117 11th Avenue, Sulie 1<br>Worthington, MN 56187 (507):376-3300        | ×                                       |                                                |
| 0            | All Access Radio Magazino www.allacons.com                                                                                     | z                                       |                                                |
| 9            | Northwest fown Community College Job Board<br>603 West Park Street<br>Shedden, JA 51201 (712) 324-3061                         | z                                       |                                                |
| =            | Facebook                                                                                                                       | z                                       |                                                |
| 12           | Employee Referals                                                                                                              | z                                       |                                                |
| ₽            | Non-Employee Referrals / Walk-In                                                                                               | 2                                       | -                                              |





## **Marketing Specialist Position**

Radio Works is looking for someone who enjoys talking with others, has a passion to succeed and thrives on providing exceptional customer service. If that sounds like you, then you are perfect for our Marketing Specialist position. As a Marketing Specialist, you would be given a well-established list of current local businesses, a guaranteed base salary, along with a generous benefits package including health & dental, vacation & sick days. Plus, regular business hours with the flexibility to schedule your day to maximize your success. To apply, drop off a resume at Radio Works located at 28779 County Hwy 35, Worthington, MN 56187, or email it to sales@myradioworks.net. Radio Works is an Equal Opportunity Employer.

Radio Works – 28779 County Highway 35 – Worthington, Mn 56187 – 507-376-6165 www.myradioworks.net

S A KWOA

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Updated Jan 2021

Take charge of your career & make a change today! This is Natalie Mulder, Director of Marketing at Radio Works. Five years ago, I made a change & joined the Radio Works Team as a Marketing Specialist after 15 years of previous sales experience. And it was one of the best decisions I've made. As a Marketing Specialist, you would have the opportunity to help local businesses develop an effective marketing plan using the Radio Works & Media Works platforms. This is a full-time position that offers the flexibility you're looking for. We'll start you out with a well established account list, guaranteed base salary, plus attractive commission incentives. We also offer a generous benefits package including health & dental insurance, vacation & sick days. If you already have a passion to succeed in your current position & thrive on providing exceptional customer service, we want to hear from you. Radio Works is a true team environment, so if you've been thinking about a career change, now is the time to make that change & join our Marketing Team. Drop off your resume at Radio Works or email it to sales@myradioworks.net!



## **Marketing Specialist Position**

Radio Works is looking for someone who enjoys talking with others, has a passion to succeed and thrives on providing exceptional customer service. If that sounds like you, then you are perfect for our Marketing Specialist position. As a Marketing Specialist, you would be given a well-established list of current local businesses, a guaranteed base salary, along with a generous benefits package including health and dental, vacation and sick days. Plus, regular business hours with the flexibility to schedule your day to maximize your success. To apply, drop off a resume at Radio Works located at 28779 County Hwy 35, Worthington, MN 56187, or email it to sales@myradioworks.net. Radio Works is an Equal Opportunity Employer.

Worthington, Lakefield, Jackson, Lakes

Radio Works is looking for a Marketing Specialist to join our team! Do you enjoy talking with others, have a passion to succeed in your current position and thrive on providing exceptional customer service? Then you're perfect for the job! As a Marketing Specialist, you would be given a well-established list of current local businesses in the Worthington, Lakefield, Jackson and Lakes area, a guaranteed base salary, along with a generous benefits package including health and dental, vacation and sick days. Drop off a resume at Radio Works, located at 28779 County Hwy 35, or email it to <a href="mailto:sales@myradioworks.net">sales@myradioworks.net</a>. Radio Works is an Equal Opportunity Employer.

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Updated Jan 2021

#### **Natalie Mulder**

From:

College Central Network < mail@collegecentral.com>

Sent:

Tuesday, May 31, 2022 10:00 AM

To:

Natalie Mulder

Subject:

Your Minnesota West Community & Technical College Employer Account

This email was sent on behalf of michael.vankeulen@mnwest.edu by College Central Network.

Your company has been approved to post jobs and search résumés online at Minnesota West Community & Technical College.

Please use this secured link to activate your account and then you can begin posting jobs.

In the future, go to <a href="https://www.collegecentral.com/mnwest">https://www.collegecentral.com/mnwest</a> whenever you want to post jobs and search résumés. Please include a salary or salary range in the position description as you will achieve better results.

Thank you for your interest in recruiting with us!

User ID - Radio Works Password - RW password

## Thank You for Applying Letter

Thanks for taking the time to apply for our Marketing Specialist position. We are currently in the process of accepting applications. If your resume and experience is a good fit for this position, we will contact you for an interview.

Sincerely, Natalie

#### **Applicant Offer Letter**

Thanks for coming in to meet with me earlier this week. I would like to extend an offer for the Full-Time Marketing Specialist position with a territory that includes accounts in the greater Worthington, Sibley, Little Rock, George, Sheldon, Sanborn, Hartley, Spirit Lake, Jackson, Lakefield areas. Base salary is \$30,000 gross which is paid every other Friday. However, when you decide you are ready, you have the option of moving to straight commissions that is uncapped at 15% of all advertising & Big Deals sales, with a draw paid on the 15<sup>th</sup> & the balance on the last day of the month.

This position also includes health & dental insurance through Blue Cross/Blue Shield with an employee portion of just \$85 per month. It is available beginning on the 1<sup>st</sup> of the month after completing 30 days of employment. We also offer 2 weeks vacation, plus sick days each year.

Please don't hesitate to let me know if you have any additional questions. I look forward to hearing from you! Natalie



Hello, and welcome to the Radio Works team!

As discussed in your hiring, we offer many benefits to employees (including their families).

Radio Works LLC currently offers all full time employees 2 weeks (10 work days) paid vacation front loaded each calendar year January 1<sup>st</sup> after an employee has worked for Radio Works for 2 full months. Upon completion of 5 years of employment at Radio Works LLC employees gain 1 additional day per calendar year until they reach 15 paid vacation days

Each employee is also given 6 paid sick leave days to use per year front loaded each year January 1<sup>st</sup>. Employees earn this use after working for Radio Works for 2 full months.

Radio Works offers health benefits to employees from BCBS as well as Delta Dental. These benefits are available to employees after 90 days of full time employment. Upon application approval, employees are required to pay 15% of the employee insurance rate, the rest is paid by Radio Works LLC. Should an employee want to enroll in a full family plan, Radio Works LLC will continue to pay 15% of the individual employee cost and the remainder of the full family plan is paid via wage deduction on regular paychecks equally 2 times per month.

All Radio Works employees are privileged to their working rights as required by law. Workers rights posters are hung and available to all employees daily located on the bulletin board in the conference room/break room. Any other employee rights or Benefits Rights may be inquired upon by speaking to VP/GM Chad Cummings.

Employee Benefits and Work Rights in Minnesota

- I. Minimum Wage:
- The minimum wage in Minnesota is \$10.08 per hour for large employers and \$8.21 per hour for small employers.
- II. Overtime Pay:
- Employees in Minnesota are entitled to receive 1.5 times their regular rate of pay for any hours worked in excess of 48 hours in a workweek.

#### III. Paid Time Off:

- In Minnesota, employers are not required to provide paid time off (PTO) to employees. However, many employers offer vacation days, sick leave, and other types of paid leave as part of their benefits package.

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#### IV. Health Insurance:

- Employers in Minnesota with 50 or more full-time employees are required to offer health insurance coverage to their employees.

#### V. Family and Medical Leave:

- Under the Minnesota Parental Leave Act, eligible employees have the right to take up to 12 weeks of unpaid leave for the birth or adoption of a child, or to care for a sick family member.

#### VI. Workers' Compensation:

- Employers in Minnesota are required to provide workers' compensation insurance to employees who are injured on the job.

#### VII. Unemployment Benefits:

- Employees who lose their jobs through no fault of their own are eligible to receive unemployment benefits in Minnesota. The amount and duration of benefits vary based on several factors.

#### VIII. Discrimination and Harassment:

- Minnesota law prohibits discrimination and harassment based on protected characteristics such as race, gender, age, disability, and sexual orientation. Employees have the right to file complaints with the Minnesota Department of Human Rights.

#### IX. Whistleblower Protection:

- Minnesota law protects employees from retaliation for reporting illegal or unethical activities in the workplace. Employees who report violations are protected from adverse actions by their employers.

#### X. Safety and Health:

- Employers in Minnesota must provide a safe and healthy work environment for their employees. Employees have the right to report safety concerns to the Minnesota Occupational Safety and Health Administration (MNOSHA).

This document provides a general overview of employee benefits and work rights in Minnesota. For specific details and information, employees should refer to the relevant state laws and regulations or consult with an employment attorney.

Radio Works – 28779 County Highway 35 – Worthington, Mn 56187 – 507-376-6165

www.myradioworks.net

MN West Career Fair Occos Property Property Worthington ISD 518 Chereer Expo



Worthington ISD 518 Coreer Expo





Cover Expo

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