

STARVED/ROCK MED/A

December 14, 2023

Ms. Elizabeth E. Goldin
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20002

**Re: Equal Employment Opportunity Audit; WLPO(AM), La Salle, IL
(Fac. ID No. 36645)**

Dear Ms. Goldin:

Starved Rock Media, Inc. (“Starved Rock” or “Licensee”), licensee of Station WLPO(AM), La Salle, IL (Fac. ID No. 36645) (“WLPO” or the “Station”), herein responds to the Federal Communications Commission letter dated October 30, 2023, regarding a random Equal Employment Opportunity (“EEO”) audit of WLPO (the “EEO Audit Letter”).

The Employment Unit (the “Unit”) is comprised of the following stations in addition to WLPO: WAJK(FM), La Salle, IL (Fac. ID No. 36181) and WLWF(FM), Marseilles, IN (Fac. ID No. 3958). Please see the responses regarding the EEO Audit Letter below:

2(b) – Number of Unit Employees:

The Unit has 13 full-time employees.

2(b)(i) – EEO Public File Reports, Web Sites:

Attached as Exhibit A are the 2021-2022 and 2022-2023 EEO Public File Reports (“PFRs”), copies of which are in the Online Public Inspection Files (“OPIFs”) of each of the stations in the Unit. The reports were timely filed but minor amendments to the reports were filed in connection with the preparation of this response (further described below).

2(b)(ii) – Unit Station Websites:

The websites of the stations in the Unit can be found at the following URLs:

<https://www.starvedrock.media/wlpo/> (WLPO)

<https://www.starvedrock.media/wajk/> (WAJK)

<https://www.starvedrock.media/wlwf/> (WLWF)

2(b)(iii) – Full Time Hires During PFR Periods:

There were no full-time hires during the period covered by the attached PFRs.

Licensee's 2021-2022 PFR stated that a part-time hire was made during the review period. As this information was not needed and created unnecessary confusion, a corrected PFR has been uploaded to Licensee's Public File and is included in Exhibit A.

Licensee's 2022-2023 PFR included reference to a full-time position that was not filled. As this information was not needed and created unnecessary confusion, a corrected PFR has been uploaded to Licensee's Public File and is included in Exhibit A.

2(b)(iv) – Interviewees:

As reflected in its PFRs, no full-time hires were made during either reporting period.

2(b)(v) – Recruitment Initiatives:

As reflected above, the Unit has 13 full-time employees.

The Unit is located in a market with a population of *less* than 250,000.

As reflected in the two attached EEO Public File Reports, the EU participated in recruitment initiatives during the reporting periods 2021-2022 and 2023-2023. Dated documentation for representative initiatives is provided in Exhibit B, demonstrating compliance with Section 73.2080(c)(2).

2(b)(vi) – Complaints:

To the best of Licensee's knowledge, there are no currently pending complaints alleging unlawful discrimination in the Unit's employment practices on the basis of race, color, religion, national origin, or sex before any federal, state, or local body with competent jurisdiction. Licensee has not resolved any such complaints during the current license term of the stations in the Unit.

2(b)(vii) – Management EEO Responsibilities and Distribution of EEO Policies:

Becky Stiles, Office Manager of the Unit, oversees and is responsible for the implementation of EEO policies within the Unit and for corporate oversight of the Unit's EEO policies. She ensures that notice of every job opening in the Unit is sent to and/or posted with each of the Unit's sources, that notices are run on-air on the Unit stations, and that all job ads contain the proper EEO declaration. The Unit staff involved in hiring are advise on state, federal, and FCC EEO regulations, as well as general human resources best practices. To achieve compliance with Section 73.2080(c)(5)(v) of the FCC's rules, employees tasked with hiring responsibilities communicate information about vacancies and hiring to the Office Manager, who keeps records regarding hiring

processes. These policies reflect the general EEO and Human Resources practices of Licensee as an equal opportunity employer. The Unit is not a union “shop.” As reflected in the two attached EEO Public File Reports, the EU participated in recruitment initiatives during the reporting periods 2021-2022 and 2023-2023. Dated documentation for each initiative is provided in Exhibit B, demonstrating compliance with Section 73.2080(c)(2).

2(b)(viii) – Recruitment Program Analysis:

The Office Manager continually evaluates the Unit’s hiring practices, outreach initiatives, and EEO procedures to ensure they achieve equal opportunity in hiring and broad outreach and quality candidates. Sources are reviewed for effectiveness . Unproductive sources are removed and/or additional sources are added to the sources solicited by the Unit as deemed appropriate.

2(b)(ix) – Examination of Pay, Benefits, etc.:

The General Manager and Office Manager of the Unit oversee the pay structure, benefits, seniority practices, promotions, and hiring selection techniques used by the Unit to ensure EEO compliance throughout the year. They oversee internal company/Unit training to permit current employees to qualify for higher positions.

I, John Spencer, Owner and Station Manager of Starved Rock Media, Inc., declare under penalty of perjury that the foregoing information is true and correct.

Dated: December 14, 2023



John Spencer
Owner/Station Manager
Starved Rock Media, Inc.

EXHIBIT A

EEO PUBLIC FILE REPORTS –
2021-2022 AND 2022-2023 REPORTING PERIODS

EXHIBIT B

RECRUITMENT INITIATIVE DOCUMENTATION –
2021-2022 AND 2022-2023 REPORTING PERIODS