



MRR License LLC
5589 Greenwich Road
Suite 200-C
Virginia Beach, VA 23462

December 14, 2023

To the Online Public Files of the stations in the Employment Unit

Re: KEZS (FM), Cape Girardeau, MO
Facility ID No. 74580
EEO Audit Response

MRR License LLC, licensee of FM broadcast station KEZS-FM, Cape Girardeau, Missouri, hereby responds to the letter dated October 30, 2023, from Elizabeth E. Goldin, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau. This response provides information relating to the licensee's employment unit (the "Unit"), which includes the following stations:

KEZS-FM, Cape Girardeau, MO, Facility ID No. 74580
KZIM(AM), Cape Girardeau, MO, Facility ID No. 74582
KGIR(AM), Cape Girardeau, MO, Facility ID No. 64622
KCGQ-FM, Gordonville, MO, Facility ID No. 64621
KGKS(FM), Scott City, MO, Facility ID No. 78626
KSIM(AM), Sikeston, MO, Facility ID No. 35605

The following are our responses to the questions in part 2(b) of the audit letter.

(i) Copies of the Unit's two most recent EEO Public File Reports, described in section 73.2080(c)(6).

The 2021–2022 Annual EEO Public File Report for the period from September 19, 2021 – September 20, 2022, is attached as **Exhibit 1**. The 2022–2023 Annual EEO Public File Report for the period from September 21, 2022 – September 20, 2023 is attached as **Exhibit 2**.

(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 most recent annual EEO Public File Report is linked on the following websites:

CALL SIGN	DOMAIN
KEZS-FM	www.k103fm.com
KZIM(AM)	www.kzimksim.com
KGIR(AM)	www.semoespn.com
KCGQFM	www.realrock993.com
KGKS(FM)	www.939mikefm.com
KSIM(AM)	www.kzimksim.com

(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 Unit hired one (1) full-time employee during the period under review.¹

Date of hire: 9/19/2022 (Marketing Rep).² For documentation, see **Exhibit 3**.

(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.

Total Number of Persons Interviewed for the Unit’s one full-time vacancy: **5**

Recruitment Sources Referring Interviewees	Number of Persons Interviewed that the Source Referred
KEZS, KGKS, KCGQ, KZIM, KSIM, KGIR	4
Word of Mouth / Referral	1
TOTAL	5

¹ Although the first page of the 2021–2022 Annual EEO Public File Report indicates that “a total of 2 full time position was filled,” this is an inadvertent error. There was only one full time position filled during the relevant reporting period.

² The Unit uses the job titles of “Marketing Representative” and “Local Sales Account Executive” interchangeably.

(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 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 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.

Total Number of Full-Time Employees: **19**

MMR License LLC employs more than 10 full-time individuals in the Unit and does not operate in a market where the population is 250,000 or more. Accordingly, the Unit is required to participate in two recruitment initiatives over a two-year period.

Participated in at least 4 Job Fairs by station personnel who have the substantial responsibility in making hiring decisions.

- Mississippi River Radio Job Fair – Exhibit 4
- Southeast Missouri State University Job Fair – **Exhibit 4**
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- Southeast Missouri State University Job Fair – **Exhibit 4**

Participated in at least 4 events sponsored by organizations representing groups present in the community interested in broadcast employment issues, including conventions, career days, workshop, and similar activities.

- Scott City High School Arts Club for School of Real Rock (Miss. River Radio) – **Exhibit 5**
- Missouri Educators Tour with the Missouri Chamber of Commerce – **Exhibit 5**
- School of Real Rock (Mississippi River Radio) with Jackson R-S High School – **Exhibit 5**
- School of Real Rock (Mississippi River Radio) Nell Holcomb Students – **Exhibit 5**

Establishment of internship programs designed to assist members of the community to acquire skills needed for broadcast employment.

- Internship program for high school students – **Exhibit 6**
- Internship program for Southeast Missouri State University students – **Exhibit 6**
- Internship Program to learn to create podcast content and use broadcast equipment – **Exhibit 6**

(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.

None.

(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.

The General Manager is responsible for implementation and administration of the stations' EEO policies at the Unit. EEO policy implementation is reviewed annually during the budget process by the licensee's President and Chief Operating Officer as well as periodically throughout the year during meetings with Unit management.

All printed, online and on-air radio advertisements for full-time employment include "Equal Opportunity Employer." The licensee's employment application states that it is an "Equal Opportunity Employer" and also includes its Applicant Data Record stating that "applicants are considered for all positions, and employees are treated during employment without regard to race, color, religion, sex, national origin, age, marital status, or veteran status, medical condition or handicap." The Unit's Equal Employment Opportunity policy is posted internally on the EEO bulletin board for all employees to view.

The Unit's EEO policy is included in the Employee Handbook. All employees are required to acknowledge that they have read the Handbook and to sign a form that they have read and understood it.

(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.

The Unit's management team meets throughout the year to discuss any openings that may be on the horizon or that are currently open and discusses its recruitment efforts and to ensure compliance. The General Manager is aware of all full-time recruitment efforts that occur for openings and reviews the effectiveness of the recruitment program in conjunction with recruiting for vacancies and undertaking outreach initiatives. In addition, the Unit has its communications counsel review its Annual EEO Public File Report each year. Counsel provides suggestions for improvement to the recruitment program if necessary.

(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.

Senior management meets each year at budget time to analyze pay levels for each position within each department. During that time, senior management evaluates compensation and benefits to ensure all employees regardless of race, color, religion, national origin or sex have equal opportunities for and access

to any pay increase, promotions or job openings within the Unit. In addition to our outreach efforts, employees that are looking to advance and may be willing to relocate, are made aware of job openings at other markets within the Unit's parent company.

There are no union contracts or union employees with the Unit.

(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.

The licensee is not a religious broadcaster.

The undersigned declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct based on information provided by the General Manager/Market Manager, General Sales Manager, Operations Manager and Program Directors of the Unit.

/s/ David J. Wilhelm
David J. Wilhelm
Vice President & Secretary
Mississippi River Radio LLC
Sole Member of MRR License LLC

Attachments: Exhibits 1 – 6