

February 7, 2019

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: *Ex Parte* disclosure pursuant to 47 CFR § 1.1206(b) in MB Docket Nos. 17-105,18-23

Dear Ms. Dortch:

On February 6, 2019 the following individuals, who represent members of The Leadership Conference on Civil and Human Rights Media and Telecommunications Task Force, met with Commissioner Starks' legal advisor Michael Scurato to discuss the above-captioned proceeding. Attending the meeting were: Cheryl Leanza, United Church of Christ, OC Inc.; K.J. Bagchi, Asian Americans Advancing Justice | AAJC; Francella Ochillo and Daiquiri Ryan, National Hispanic Media Coalition; and Gavin Logan, National Urban League. We reviewed the Leadership Conference's filing in this docket, which is attached.

Specifically, we emphasized that the Commission is required by law to collect EEO employment data and the Commission voted to do so in 2004 under the leadership of Michael Powell, but never has collected that data. We encouraged the FCC to make sure that job applicants in the broadcast industry have a means by which to learn of broadcasters' outreach and recruitment programs by looking at a broadcaster web site—most potential applicants for a broadcast job would otherwise have no means to know that EEO procedures are disclosed in a station's public file. We urged the FCC to create a database of EEO recruitment filings to improve the means by which FCC staff can review these filings and replace the need for Form 397. Ms. Leanza expressed concern with regard to proposals in the docket that support *in camera* review of data.

We strongly encouraged Commissioner Starks to push the FCC to quickly re-initiate collection of EEO employment data.

On February 7, 2019, I held a telephone conversation with Elizabeth McIntyre in Commissioner Rosenworcel's office, repeating substantially the same information. I emphasized to Ms. McIntyre that the FCC does not know if its EEO outreach and recruitment regulations are working because we do not have employment data tracking actual employment rates in the aggregate. Also, in response to her question, I compiled the attached example for how a member of the public can find EEO reports via station public files. The process is difficult for even a seasoned user and would be virtually impossible for a member of the public seeking information about how a broadcast station recruits for its positions and which recruitment methods are successful.

If you have further questions, do not hesitate to contact me at 202-904-2168 or [cleanza@alhmail.com](mailto:cleanza@alhmail.com).

Sincerely,



Cheryl A. Leanza  
United Church of Christ, OC Inc.

Attachments

## Appendix: Finding EEO Reports in the Online Public File

This is a sample of the steps it takes to find EEO reports on the FCC's public file, using WJLA in Washington DC.

Start here: <https://publicfiles.fcc.gov/>

Search by call letters, click on the call letters of the station you wish you review.

<https://publicfiles.fcc.gov/tv-profile/wjla-tv>

In the station's file, hover over each of the yellow icons until you find Equal Employment Opportunity Records. This will bring you to the following page:

<https://publicfiles.fcc.gov/tv-profile/wjla-tv/equal-employment-opportunity-records/>

Form 396-A is listed, which are the EEO outreach and recruitment models. The 397 reports are listed at the bottom of this page and whether a station has fewer than 5 employees is listed on this page. A user can open the Form 397 report and view all the information on that report.

Click the "Additional Documents" tab and you will arrive here:

<https://publicfiles.fcc.gov/tv-profile/wjla-tv/equal-employment-opportunity-records/additional-documents/>

Click on the bottom folder, labeled EEO Public File Reports:

<https://publicfiles.fcc.gov/tv-profile/wjla-tv/equal-employment-opportunity-records/additional-documents/eo-public-file-reports/65876f57-ed15-500e-23bc-5e791de93a43/>

This is a list of all the annual EEO outreach reports filed from this station since 2010.