

Dixie's Opposition, which was filed with the Commission on
April 14, 1989.

Respectively submitted,

Daniel F. Van Horn
/s/ Daniel F. Van Horn
Daniel F. Van Horn

Susan A. Marshall
/s/ Susan A. Marshall
Susan A. Marshall

Arent, Fox, Kintner, Plotkin
& Kahn
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339
(202) 857-6030

Counsel for Dixie Broadcasting,
Inc., Debtor-In-Possession

Date: April 17, 1989

Exhibit A

STATEMENT

I, Nat Tate, hereby state under penalty of perjury as follows:

1. I am a Black male currently employed on a full-time basis as an account executive at Stations WHOS/WDRM, in Decatur, Alabama. I have been working at WHOS/WDRM in my current position since April 1, 1989.

2. Prior to my current employment, I worked at Stations WHOS/WDRM in August 1982 as Sales Manager on a full-time basis. At that time, I also worked on programming matters. In April 1983, I left the stations to start a full-time business of my own in Decatur.

3. After I left the employ of Stations WHOS/WDRM, however, I maintained contact with their General Manager, J.

6. In October 1982, while I was working at WHOS/WDRK, Mr. Bramlett hired Ricky Patton, a Black, as a full-time account executive and on-air announcer. Mr. Patton worked at the stations until May 1983 when he left to work at a Huntsville Black-format station.

Executed on this 14 day of APRIL, 1989.


Nat Tate

Exhibit C

STATEMENT

I, J. Mack Bramlett, hereby state under penalty of perjury as follows:

1. I am an officer and director of the licensee and General Manager of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama. Stations WHOS and WDRM are licensed to Dixie Broadcasting, Inc., Debtor-In-Possession.

2. I have worked at Stations WHOS and WDRM since 1962. I have been responsible for the Equal Employment Opportunity Program at the stations since 1976 when the current licensee acquired them. I have held the title of officer and director of the licensee since 1976, as well.

3. I have read the foregoing "Opposition to Petition to Deny" and all of the exhibits attached thereto and have determined that, to the best of my knowledge and belief, all of the facts contained therein concerning the employment record and affirmative action efforts of WHOS and WDRM were gathered and supplied by me and my staff and are accurate and complete.

Executed on this 4 day of April, 1989.


J. Mack Bramlett

CERTIFICATE OF SERVICE

I, Valerie Brooks, hereby certify that a copy of the foregoing SUPPLEMENT TO OPPOSITION TO PETITION TO DENY was mailed, postage prepaid, this 17th day of April, 1989, to the following:

Charles Carter, Esq.
Associate General Counsel
NAACP
4805 Mt. Hope Dr.
Baltimore, MD 21215

David Honig, Esq.
1800 N.W. 187th St.
Miami, FL 33056

Valerie Brooks
/s/ Valerie Brooks
Valerie Brooks

M
M
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X.
6

Federal Communications Commission	
Docket No. <u>92-207</u>	Exhibit No. <u>6</u>
Presented by <u>MASS MEDIA</u>	
Disposition	Identified <u>2/17</u>
	Received <u>2/17</u>
	Rejected _____
Reporter <u>BARBARA LOKO</u>	
Date <u>2/17/93</u>	

15 MAR 1991

MMB Ex. 6

FCC MAIL SECTION

MAR 15 12 30 PM '91

CVY

Esquire, counsel for NAACP, et al. Failure to provide this information will delay our decision regarding your license renewal. Should you have any questions regarding this matter, please contact Hope G. Cooper, Esquire at (202) 632-7069.

Sincerely,

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Federal Communications Commission	
Docket No.	<u>92-207</u> Exhibit No. <u>7</u>
Presented by	<u>MASS MEDIA</u>
Disposition	Identified <u>2/17</u>
	Received <u>2/17</u>
	Rejected _____
Reporter	<u>B</u>
Date	<u>2/17/93</u>

Arent Fox Kintner Plotkin

CONFIDENTIAL

Susan A. Marshall
202/857-6110

April 18, 1991

RECEIVED

APR 18 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Glenn A. Wolfe, Chief
EEO Branch
Enforcement Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Room 7218
Washington, D.C. 20554

Re: Stations WHOS(AM) and WDRM(FM), Decatur, Alabama

Dear Mr. Wolfe:

Submitted herewith, on behalf of Dixie Broadcasting, Inc., Debtor-in-Possession, licensee of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama, is a Supplemental Report relative to the employment practices of WHOS and WDRM.

This Supplemental Report is being submitted in response to a letter, dated March 15, 1991, from you to the Vice President of the licensee. Based on informal conversations with Hope G. Cooper of your staff, the deadline for submitting the Report has been extended to and including today, April 18, 1991.

Please call me if you have any questions concerning the enclosed materials.

Sincerely,

Susan A. Marshall

Susan A. Marshall
Counsel for Dixie Broadcasting, Inc.,
Debtor-in-Possession

SAM/pat

Courtesy Copy: Hope G. Cooper, Esquire

cc (w/enc.): David E. Honig, Esquire

HMB ENFORCEMENT
CONTROL SECTION

APR 23 1991

RECEIVED

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Washington, DC 20036-5339

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ITT 440266
Facsimile: 202/857-6395

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Bethesda, Maryland 20814-3413

Lowers Crescent Drive
Arlington, Virginia 22182-2733

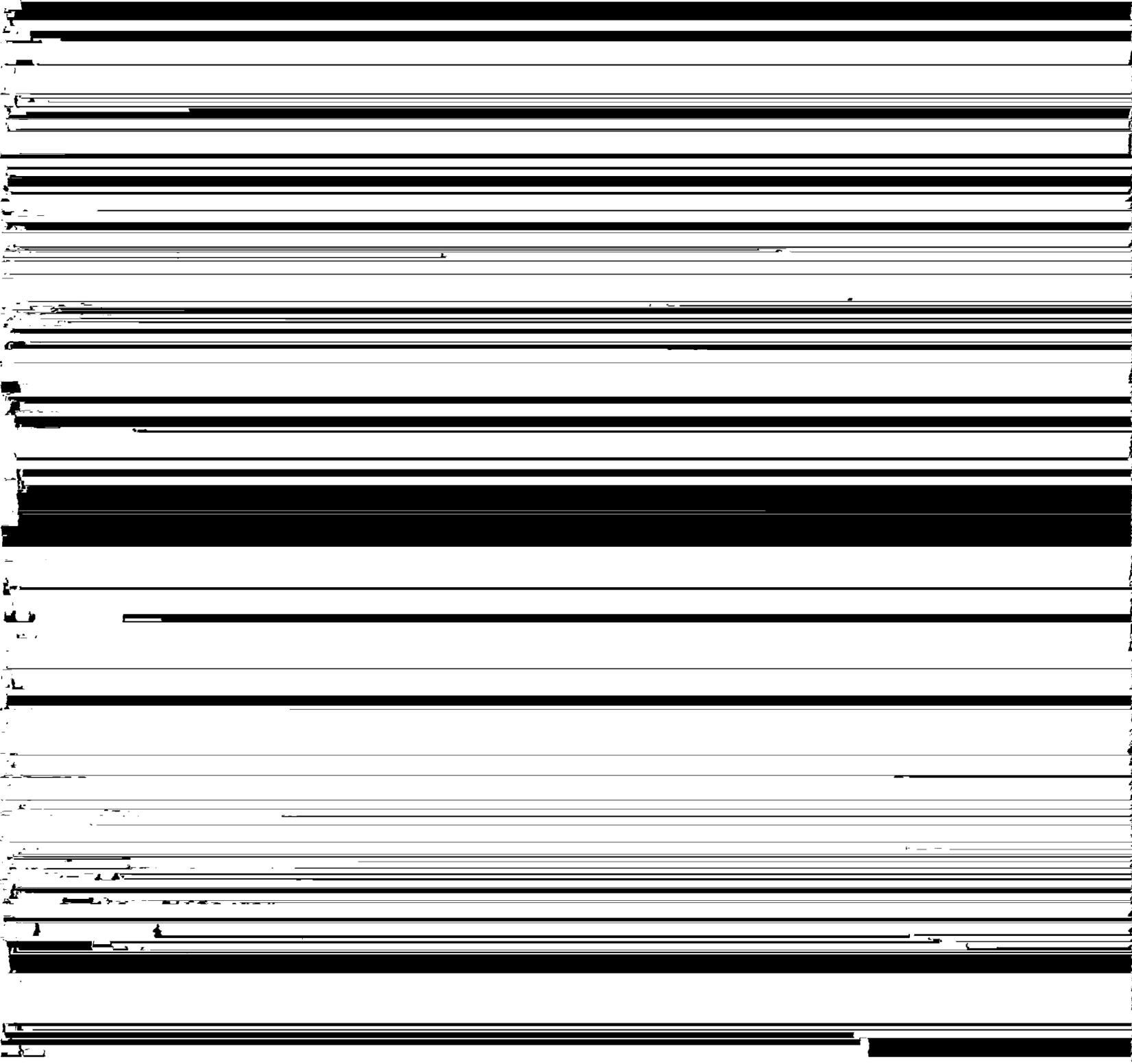
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APR 18 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SUPPLEMENTAL REPORT 1/

This is a Supplemental Report relative to the employment practices at Stations WHOS(AM) and WDRM(FM), Decatur, Alabama. It is being prepared in response to a letter dated



able for the 1982 through February 1989 period concerning the stations' EEO efforts was supplied in its July 28 response. However, the licensee submits that the July 28 Report contains sufficient information to demonstrate the success of the stations' efforts to attract African-American employees.

The July 28 Report reflects that, during the 1982 through February 1989 period, the stations used a substantial number of recruitment sources to fill job openings. Advertisements were placed in Broadcasting Magazine, Radio and Records and The Huntsville Times. The stations recruited employees from a number of schools, including National Career College, the University of Alabama and Calhoun Community

As a result of their contact with these recruitment
sources from 1982 through February 1989, the stations hired

Moreover, as is evident from the attached materials, since February 1989, WHOS and WDRM have maintained their aggressive recruitment efforts and their close contacts with African-American community leaders. The attached letter from Nathan W. Tate, Sr., President of the Decatur/Morgan County Chapter of the NAACP (see Exhibit B hereto), praises WHOS and WDRM for their continued association with the NAACP and their efforts to recruit African-Americans for job openings on a voluntary basis. The attached letter from Hundley Batts, co-owner of African-American Station WEUP (See Exhibit C hereto), reflects the "unique association" and supportive working relationship between Mr. Bramlett and WEUP.

Furthermore, since the licensee's July 28 Report, in addition to the NAACP and local minority broadcasters, WHOS and WDRM have continued to utilize other local recruitment sources, such as A&M University, Calhoun College, the University of Alabama and Oakwood College. Since February 1989, the stations have had eight job openings, seven of which were in the FCC Form 395-B upper-four job categories. Three of these positions, or almost 40%, were filled by African-Americans and numerous minority applicants were interviewed for these jobs. The following is a summary of the licensee's recent recruitment efforts:

4/(...continued)

WHOS and WDRM were doing something right--based on the fact that they were the only stations in Decatur which reported the employment of any African-Americans.

- On February 15, 1989, the stations filled a full-time management-level position for Public Affairs Director and News Anchor. A total of five people (two African-American women and three White women) were referred from A&M University, Calhoun College and local African-American owned radio stations. An African-American female was hired for the position.
- On April 10, 1989, the stations filled a full-time upper-four Sales Professional position. A total of six people were interviewed for the job (two African-American women, one African-American man, two White women and one White man). These individuals were referred from A&M University, Calhoun College and local African-American radio stations. An African-American male was hired.
- On April 30, 1989, the stations filled a full-time announcing position. Two people were interviewed (two White males). Referrals were sent from A&M University, local African-American owned radio stations and other area radio and television facilities. One of the White males was hired for the job.
- On July 14, 1989, the stations filled a full-time Sales Professional position. Three people were interviewed (two African-American women and

On June 30, 1990, the stations filled a full-time receptionist position. Four people were interviewed (two African-American women and two White women). Referrals were sent from the University of Alabama, local African-American owned radio stations and local African-American leaders. A White female was hired.

On July 30, 1990, the stations filled a full-time management-level position of technician. A total of seven people were interviewed (three African-American men and four White men). Referrals were sent from the local chapter of the NAACP, local African-American owned radio stations and Calhoun College. An African-American male was hired to fill the position.

In sum, although the stations' July 28 Report did not provide complete information, it is clear from the Report that for the period 1982 through February 1989, the licensee did engage in aggressive recruitment efforts to employ African-Americans for job openings and that the licensee's efforts were successful--apparently the most successful in the stations' city of license. More recently, the licensee has maintained its close ties with local African-American community leaders and has continued to utilize other local minority recruitment sources. As a result of its communications with these sources, almost 40% of its recent job openings have been filled by African-Americans. Consequently, despite the small number of African-American workers available in the local labor force (7.4%), the close ties WHOS and WDRM have maintained with the local African-American community leaders and other recruitment sources have continued to reap successful results.

EXHIBIT A

STATEMENT

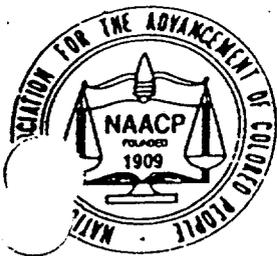
I, J. Mack Bramlett, hereby state under penalty of perjury as follows:

1. I am an officer and director of the licensee and General Manager of Stations WHOS(AM) and WDRM(FM), Decatur, Alabama. Stations WHOS and WDRM are licensed to Dixie Broadcasting, Inc., Debtor-in-Possession.
2. I have worked at Stations WHOS and WDRM since 1962. I have been responsible for the stations' Equal Employment Opportunity Program since 1976 when the current licensee acquired WHOS and WDRM. I have held the title of officer and director of the licensee since 1976, as well.
3. I have read the foregoing Supplemental Report relative to the employment practices of Stations WHOS and WDRM and have determined that, to the best of my knowledge and belief, all of the facts contained therein concerning the employment record and affirmative action efforts of WHOS and WDRM were gathered and supplied by me and my staff and are accurate and complete.

Executed on this 18 day of April, 1991.


J. Mack Bramlett

EXHIBIT B



NATHAN W. TATE, SR.
President

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
DECATUR/MORGAN COUNTY CHAPTER 5024
702 BANK STREET, N.E. • DECATUR, AL 35601 • (205) 340-1318 • 24 HOUR HOTLINE

April 8, 1991

Mr. J. Mack Bramlett
General Manager
Stations WHOS (AM) & WDRM (FM)
P.O. Box 789
Decatur, Alabama 35602

Dear Mack:

This letter is written to confirm to the Federal Communications Commission our business relationship over the past 25 years.

I am an African American male and am currently the President of the Decatur Chapter of the NAACP. As previously reported to the FCC, prior to working at the NAACP, I worked with you at Stations WHOS and WDRM from August 1982 through April 1983 as Sales Manager. When I left the stations in April 1983 to start a full-time business of my own in Decatur, I still maintained contact with you and continued to consult with you about my career goals. I did return to work at both stations in April 1989 as an Account Executive on a full-time basis and stayed there until investing in my own radio station about seven months later.

During the past years, I have also referred a number of individuals for positions at WHOS and WDRM. Among the referrals was Bruce E. Hill, an African American who was hired as an on-air announcer on a full time basis. Another referral was Mr. Willie Acklin, an African American who was referred for a part-time announcing position.

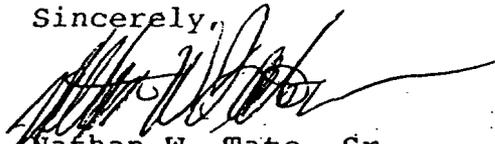
Since January 1991, you and your staff have been closely involved with me in my capacity as President of the local NAACP in your efforts to recruit African American employees for positions at WHOS and WDRM. I have found through my relationship with you --- both now and in the past --- that you and WHOS and WDRM have always striven to consider minorities for available positions.

Mr. Bramlett
Page 2

Hopefully, other radio stations in your area will follow your lead and efforts to recruit African Americans for job openings on a ~~voluntary~~ basis.

I look forward to our continuing close relationship.

Sincerely,



Nathan W. Tate, Sr.
President
NAACP

EXHIBIT C



April 7, 1991

Mr. Mack Bramlett, General Manager
WDRM Radio Station
P. O. Box 789
Decatur, Alabama 35602

Re: WEUP/WDRM: A Unique Association

Dear Mr. Bramlett:

Finding competitors who are in the same business to share ideas and resources is not an easy thing to do. For the past few years WEUP and WDRM has fostered a working relationship that has been beneficial and rewarding. Specifically, because of your unselfish interest and concern WEUP has benefited from it's association with you and WDRM in the following ways:

- o Consultation and review of market data to better serve clients and secure additional clients(advertisers). Such market data has been useful in presenting the advertising community with a broader perspective of the Black consumer's buying patterns and qualitative strengths.
- o In order to provide a different and most needed dimension to our sports broadcast you were again unselfish and allowed us to use Ms. Kathy Jordan, your News and Public Affairs Director, who is a Black Female. Kathy handled our Pre, Post and Half Time Shows. This commitment on your part was unheralded in the radio industry to allow your morning news anchor to work at a Black owned station and continue employment with WDRM.
- o Collaborative efforts in the sales arena have been of tremendous help to WEUP. The ability to consult with the leading station in the market in terms of techniques and