

Washington Square

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Washington, D.C. 20036-5339

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*B/K/L
See
files*

April 15, 1988

ANNUAL EMPLOYMENT REPORT REMINDER

The filing deadline of May 31 for the FCC's Annual Employment Report (FCC Form 395-B */) ("Report") is approaching. The Report form should have been mailed directly

significant disparity between your employment profile and the racial and sexual make-up of the work force in your community, you should carefully evaluate your employment practices to determine whether the effectiveness of your affirmative action program could be improved.

If you would like our assistance in preparing or filing your Report, or in the evaluation of your employment practices, please call the attorney with whom you normally work or Susan Marshall (202-857-6110). If you do not file your Report through our office, we would appreciate your sending us a copy along with a copy of your transmittal letter to the Commission, so that our files may be complete.

* * * * *

<u>Federal Communications Commission</u>	
Docket No. <u>92-207</u>	Exhibit No <u>15</u>
Presented by <u>MASS MEDIA</u>	
Disposition	Identified <u>2/17</u>
	Received <u>2/17</u>
	Rejected _____
Reporter <u>BARBARA LORR</u>	
Date <u>2/17/93</u>	

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June 16, 1988

NEW FCC EEO POLICIES

Last year, the FCC adopted a new Form 396, which is to be filed with broadcast license renewal applications and is intended to reflect a station's equal employment

deemed a failure by stations to engage in a "meaningful" ongoing self-assessment to determine whether their own actions or efforts could be improved. Therefore, we urge you to review your station's policies and procedures to make certain that you keep accurate and complete records of referrals from recruitment sources, so that you can properly

The following attached forms will be discussed below:

1. Equal Employment Opportunity Program Applicant Data Forms.
2. Applicant Summary Form.
3. Model Letters to Recruitment Sources.
4. Notices for Employment Applications and Advertisements.

1. Equal Employment Opportunity Program Applicant Data Forms. This two-part form is designed to help determine the value of various recruitment and referral sources and the effectiveness of advertisements in attracting qualified minority and female employees.

Part A should be completed for any person who sends in a resume or visits the station seeking employment. If the applicant stops by the station or is called in for an interview, Part A should be completed by him or her when the employment application is submitted. If an applicant mails a resume or stops by the station without completing an employment application, Part A should be completed to the extent possible by station personnel. The referral source, if known, should always be recorded.

Part A should be kept in a file separate from any employment application. It must not be seen by anyone at the station involved in making the hiring decision, until after a decision has been made as to whether or not to offer employment and, if an offer is made, until after the applicant has accepted or rejected it.

Part B should be completed by the person who makes the hiring decision or a decision to reject the applicant. It is less important to complete Part B for applicants sending unsolicited resumes, when there are no openings available, but it should be completed for all applicants evaluated when an opening is being filled.

After Part B is completed, it should be associated with Part A and kept in a file to be used when

**/(...continued)
placed in your public file.

completing the enclosed Applicant Summary Form or FCC Form 396 or during other exercises evaluating the station's EEO program. Parts A and B should never be kept in an employee's personnel file.

2. Applicant Summary Form. This form is designed for monitoring the overall effectiveness of the station's recruitment process. It should be completed quarterly and kept where it will be readily available at license renewal time.

3. Model Letters to Recruitment Sources. These are suggested letters which you may send to each source listed in your EEO program. They are to be used for two purposes: the first letter (Sample A) is a general letter alerting the sources that you will be contacting them in the future as

BROADCAST EQUAL EMPLOYMENT OPPORTUNITY PROGRAM REPORT

(To be filed with broadcast license renewal application)

(For FCC Use Only)
Code No. _____

Call Letters _____

Name of Licensee _____
 City and State which station
 is licensed to serve _____

TYPE OF BROADCAST STATION (Check one)

- | | |
|---|---|
| <p style="text-align: center;">Commercial Broadcast Station</p> <p><input type="checkbox"/> AM</p> <p><input type="checkbox"/> FM</p> <p><input type="checkbox"/> Combined AM & FM
in same area</p> | <p style="text-align: center;">Noncommercial Broadcast Station</p> <p><input type="checkbox"/> TV</p> <p><input type="checkbox"/> Low Power TV</p> <p><input type="checkbox"/> International</p> <p><input type="checkbox"/> Educational Radio</p> <p><input type="checkbox"/> Educational TV</p> |
|---|---|

SEND NOTICES AND COMMUNICATIONS TO THE FOLLOWING NAMED PERSON AT THE ADDRESS INDICATED BELOW:

Name	Street Address		
City	State	ZIP Code	Telephone No. ()

FILING INSTRUCTIONS

Broadcast station licensees are required to afford equal opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, national origin, and sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, a license renewal applicant who employs five or more full-time station employees must file a report of its activities to ensure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics). If minority group representation in the available labor force is less than five percent (in the aggregate), equal employment opportunity (EEO) program information for minority group members need not be filed. However, EEO program information must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant employs fewer than five full-time employees, no equal employment opportunity activity information need be filed.

A copy of this report must be kept in the station's public file. These actions are required to obtain license renewal. Failure to meet these requirements may result in license renewal being delayed or denied. These requirements are contained in Section 73.2080 of the FCC Rules (47 CFR 73.2080), and are authorized by the Communications Act of 1934, as amended.

If your station employs fewer than five full-time employees, check the box at left, complete the certification below, return the form to the FCC, and place a copy in your station's public file. You do not have to complete the rest of the form.

If your station employs five or more full-time employees, you must complete all of this form and follow all instructions.

If minority group representation in the available labor force is less than 5 percent (in the aggregate) and you choose not to file EEO program information for minority groups, check the box at left and complete the rest of this form with only the information for your program directed towards women.

CERTIFICATION

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.
U.S. CODE, TITLE 18, SECTION 1001.**

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

The purpose of this document is to remind broadcast station licensees of their equal employment opportunity responsibilities and to provide the licensee, the FCC and the public with information about whether the station is meeting these requirements.

GENERAL POLICY

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

A broadcast station must also encourage applications from qualified minorities and women for hiring and promotion to all types of jobs at the station.

I. RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

NAME _____ TITLE _____

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

II. POLICY DISSEMINATION

A broadcast station must make effective efforts to make management, staff, and prospective employees aware that it offers equal employment opportunity. The Commission considers the efforts listed below to be generally effective. Indicate each practice that your station follows. You also may list any other efforts that you have undertaken.

- Notices are posted informing applicants and employees that the station is an Equal Opportunity Employer and that they have the right to notify an appropriate local, State, or Federal agency if they believe they have been the victims of discrimination.
- Our station's employment application form contains a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, State, or Federal agency if they believe they have been the victims of discrimination.
- We seek the cooperation of the unions represented at the station to help implement our EEO program and all union contracts contain a nondiscrimination clause.
- Other (specify)

III. RECRUITMENT

A broadcast station must make efforts to attract qualified minority and women applicants for all types of jobs at the station whenever vacancies occur.

Indicate each practice that your station follows and, where appropriate, list sources and numbers of referrals.

- When we place employment advertisements with media some of such advertisements are placed with media which have significant circulation or viewership, or are of particular interest to minorities and women in the recruitment area. Examples of media utilized during the past 12 months and the number of minority and/or women referrals are:

	Number of Referrals	
	Minority	Women
_____	_____	_____
_____	_____	_____

- Recruit prospective employees from educational institutions, including area schools and colleges with minority and women enrolments. Educational institutions contacted for recruitment purposes during the past 12 months and the number of minority and/or women referrals are:

Educational Institution	Number of Referrals	
	Minority	Women
_____	_____	_____
_____	_____	_____

- Contact a variety of minority and women's organizations to encourage the referral of qualified minority and women applicants whenever job vacancies occur. Examples of such organizations contacted during the past 12 months are:

Organization	Number of Referrals	
	Minority	Women
_____	_____	_____
_____	_____	_____
_____	_____	_____

- We encourage present employees to refer qualified minority and women candidates for job openings. The number of minority and/or women referrals are:

Minority	Women
_____	_____

- Other (specify) and the number of minority and/or women referrals are:

Minority	Women
_____	_____

IV. JOB HIRES

A broadcast station must consider applicants for job openings on a nondiscriminatory basis. Further, to assure that qualified minorities and women are given due consideration for available positions, it must make efforts to encourage them to apply for job openings.

During the twelve-month period prior to filing this application beginning (Month-Day-Year) _____ and ending (Month-Day-Year), _____ we hired:

Total hires _____ Minorities _____ Women _____

During this period, for positions in the upper four job categories, we hired:

Total hires, upper four categories _____ Minorities _____ Women _____

V. PROMOTIONS

A broadcast station must promote individuals on a nondiscriminatory basis. Further, to assure that qualified minorities and women are given due consideration for promotional opportunities, it must make efforts to encourage them to qualify and apply for advancement.

During the twelve-month period prior to filing this application beginning (Month-Day-Year) _____ and ending (Month-Day-Year) _____ we promoted:

Total promotions _____ Minorities _____ Women _____

During this period, in the upper four job categories, we promoted:

Total promotions, upper four categories _____ Minorities _____ Women _____

VI. AVAILABLE LABOR FORCE

A broadcast station must evaluate its employment profile and job turnover against the availability of minorities and women in the relevant labor market. The FCC will use labor force data for the MSA in which your station is located, or county data if the station is not located in an MSA, to evaluate your station's equal employment efforts. If you use these data in your evaluation, you need not submit them to the FCC.

This section is optional:

As an alternative to MSA or county labor force data, you may use other data that more accurately reflect the percentages of women and minorities in the labor force available to your station. If such alternative data are used, that data must be submitted on the table below and an explanation attached as to why they are more appropriate.

Percentage in the Labor Force	Women	Blacks not of Hispanic Origin	Asian or Pacific Islanders	American Indians or Alaskan Natives	Hispanics

The above information is for: M.S.A. City County
 Other (specify)

VII. COMPLAINTS

You must provide here a brief description of any complaint which has been filed before any body having competent jurisdiction under Federal, State, territorial or local law, alleging unlawful discrimination in the employment practices of the station including the persons involved, the date of filing, the court or agency, the file number (if any), and the disposition or current status of the matter. Examples of such jurisdiction may include the Equal Employment Opportunity Commission, state and local equal opportunity commissions, or other appropriate agencies.

VIII. OTHER INFORMATION

You may also describe other information that you believe would allow the FCC to evaluate more completely your efforts in providing equal opportunity in employment at your station. Submission of such information is optional. Among the additional information you may choose to provide are:

Any training programs the station has undertaken that are designed to enable minorities and women to compete in the broadcast employment market including, but not necessarily limited to, on-the-job training and assistance to students, schools or colleges.

Any problems the station has experienced in assuring equal employment opportunity, or attracting qualified minority and women candidates for employment or promotion.

Any efforts the station has undertaken or will undertake to promote equal opportunity in its employment and to encourage applications from minorities and women.

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM
APPLICANT DATA FORM

PART A

The data requested by this form will assist in meeting the goals of our Equal Employment Opportunity Program. **COMPLETING THIS FORM IS NOT A CONDITION OF EMPLOYMENT. YOU MAY ELECT NOT TO COMPLETE ALL OR PART OF THIS FORM WITHOUT IMPAIRING YOUR EMPLOYMENT OPPORTUNITIES AT THE STATION.** This form will be maintained in a file separate from your resume and employment application. The information you provide on this form is collected for statistical purposes only. **IT WILL NOT BE USED BY ANY PERSON WHO EVALUATES YOUR EMPLOYMENT APPLICATION AND WILL NOT BE USED IN ANY WAY IN DETERMINING WHETHER TO OFFER YOU EMPLOYMENT.**

Thank you for completing this form and assisting us in meeting our equal employment opportunity goals.

Name: _____ Date: _____

Referred by: _____

Race: [check only one]

- American Indian or Alaskan Native
- Asian or Pacific Islander
- Black, not of Hispanic Origin
- Hispanic or Spanish-Surnamed
- White, not of Hispanic Origin

Sex:

- Female
- Male

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM
APPLICANT DATA FORM

PART B

Name: _____

Position: _____
(indicate whether full or part-time)

Offer Made: [] Yes [] No

If yes, offer accepted: [] Yes [] No

Completed by: _____ Date: _____

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM
APPLICANT SUMMARY FORM FOR QUARTER ENDED (INSERT DATE)

<u>Date</u>	<u>Position (and whether full or part time)</u>	<u>Race</u>	<u>Sex</u>	<u>Referral Source</u>	<u>Offer Extended (Date)</u>	<u>Offer Accepted (Date)</u>
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[LETTER TO RECRUITMENT SOURCES]

[SAMPLE A]

[This letter should be sent to each recruitment source identified in your EEO plan (FCC Form 396 or 396A) as well as to other potential recruitment sources as they are identified. NOTE: This letter includes a commitment to advise the addressee of subsequent job openings. If you make that commitment, it is important that you follow through on it.]

Dear _____:

From time to time, we have job openings at Station _____ which require a variety of skills and talents. Because _____, the licensee of Station _____, is an equal opportunity employer, we encourage members of minority groups and women to apply for these positions. We seek your help in referring qualified applicants to us.

We will be contacting you as job openings arise at Station _____. In the meantime, if you know of qualified applicants who may be interested in working at the station, please do not hesitate to refer them directly to me. Also, if you know of any other organization which may be of assistance in our equal employment opportunity effort, it would be helpful if you would advise us as to its name and address.

I would appreciate your completing the enclosed self-addressed stamped postcard for our records.

Sincerely,

[LETTER TO RECRUITMENT SOURCES]

[SAMPLE B]

[This letter should be sent to each recruitment source identified in your EEO plan (FCC Form 396 or 396A) as well as to other potential recruitment sources as they are identified. This letter is to be used to advise the addressee of specific job openings.]

Dear _____:

We have a job opening at Station _____. The job requires [add description of job]. A decision on the job will be made on [add date]. Therefore, applications should be sent to us by [add date].

Because _____, the licensee of Station _____, is an equal opportunity employer, we encourage members of minority groups and women to apply for this position. We seek your help in referring qualified applicants to us.

If you know of qualified applicants who may be interested in applying for this position, please do not hesitate to refer them directly to me. Also, if you know of any other organization which may be of assistance in our equal employment opportunity effort, it would be helpful if you would advise us as to its name and address.

I would appreciate your completing the enclosed self-addressed stamped postcard for our records.

Sincerely,

[REPLY POSTCARD TO BE ENCLOSED
WITH LETTER TO RECRUITMENT SOURCES]

This is to acknowledge that I have received a letter from
Station _____ seeking female and minority referrals
for job openings at the station.

Signature

Date

The following action [has been] [will be] taken:

Other organizations to contact:

[EEO NOTICE FOR EMPLOYMENT APPLICATION]

_____, licensee of Station _____, is an equal employment opportunity employer. _____ seeks and employs qualified persons in all job classifications and positions without regard to race, color, religion, national origin or age. Such discrimination is prohibited by law. If you believe you have been discriminated against, you have the right to notify the Federal Communications Commission, 1919 M Street, N.W., Washington, DC 20554; the Equal Employment Opportunity Commission [insert here address of state EEO agency].

[EEO NOTICE FOR ADVERTISEMENT TEXT]

[name of company] IS AN EQUAL OPPORTUNITY EMPLOYER AND ENCOURAGES MINORITY AND FEMALE APPLICANTS.

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Federal Communications Commission	
Docket No.	92-20
Exhibit No.	16
Presented by	MPS MEDIA
Disposition	Identified 2/17
	Received 2/17
	Rejected
Reporter	BARBARA LORID
Date	2/17/93

Arent, Fox, Kintner, Pl

Washington Square 1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339

Daniel F. Van Horn
(202) 857-6030

December 7, 1988

Mr. J. Mack Bramlett
Stations WHOS/WDRM
P. O. Box 789
Decatur, Alabama 35602

Dear Mack:

Enclosed is a copy of the renewal applications for
WHOS/WDRM as filed with the Commission. Please see that
these materials are placed in your local public records file.

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Federal Communications Commission	
Docket No.	92-207 Exhibit No 17
Presented by	MASS MEDIA
Disposition	Identified 2/17
	Received 2/17
	Rejected
Reporter	BARBARA LORD
Date	2/17/93

1. GENERAL POLICY

It is our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is also our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

2. RESPONSIBILITY FOR IMPLEMENTATION

Mack Bramlett, Vice President, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and no person is discriminated against in employment because of race, color, religion, national origin or sex.

3. POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment policy and their individual responsibilities in carrying out this policy, the following communication efforts are made:

- a. The station's employment application form contains a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, state, or federal agency if they believe they have been the victims of discrimination.
- b. Appropriate notices are posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state, or federal agency if they believe they have been the victim of discrimination.

RECRUITMENT

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration in filling job vacancies, we utilize the following recruitment procedures.

- a. We attempt to maintain a systematic communication, both orally and in writing, with a variety of minority and women organizations to encourage the referral of qualified minority and female applicants. Examples of such organizations during the past twelve months are:

<u>Organization/Source</u>	<u>Number of Referrals</u>
Alabama A & M University	0
Calhoun Community College	1
NAACP	0

- b. In addition to the organizations noted above, which specialize in minority and women candidates, we deal only with employment services, including state employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. Examples of these employment referral services contacted during the past twelve months and the number of referrals are:

<u>Organization/Source</u>	<u>Number of Referrals</u>
Alabama Employment Service	4

When utilizing media for recruitment purposes, help-wanted advertisements always include a notice that we are an Equal Opportunity Employer and contain no indication, either explicit or implied, of a preference for one sex over another.

When we place employment advertisements in printed media some of such advertisements are placed in media which have significant circulation or are of particular interest to minorities and women. Examples of publications utilized during the past twelve months and the number of referrals are:

<u>Media</u>	<u>Number of Referrals</u>
Decatur Daily	3
Huntsville Times	2
The Birmingham News	1

We encourage present employees, particularly minority and female employees, to refer minority and female candidates for existing and future job openings.

4. We provide on-the-job training to upgrade the skills of employees. Tangible benefits of such training to minority and women employees during the past 12 months is briefly described as follows:

(See Attachment A)

5. We provide assistance to students, schools or colleges in programs designed to enable minorities and women to compete in the broadcast employment market on an equitable basis.
6. Based on information derived from the State Of Alabama, Department of Industrial Relations, Alabama State Employment Service, the respective minority and female workforce in the station's recruitment area is as follows:

	<u>Women</u>	<u>Blacks</u>	<u>Oriental</u>	<u>Am. Indian</u>	<u>Spanish-Surnamed</u>
Percentage in the workforce	35.9%	8.4%	0%	0%	0%

7. CURRENT EMPLOYMENT SURVEY

There has been no change in our employment profile since the filing of our most recent Annual Employment Report.

8. JOB HIRES

During the twelve month period beginning October 1, 1980 and ending October, 31, 1981, we hired a total of 14 persons of whom (0) were minorities and (4) were women.

An analysis of our recruitment techniques, job applications, and new hires suggest that a sufficient number of qualified minorities and women are