

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Review of the Commission's Broadcast and)	
Cable Equal Employment Opportunity Rules)	MM Docket No. 98-204
and Policies)	
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PETITION FOR RULEMAKING

David Oxenford
Kelly Donohue
Wilkinson Barker Knauer, LLP
1800 M Street, NW, Suite 800N
Washington, DC 20036
Tel: 202.783.4141
E-mail: doxenford@wbklaw.com
*Counsel for Sun Valley Radio, Inc. and
Canyon Media Corporation*

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SUMMARY

Sun Valley Radio, Inc. (“Sun Valley”) and Canyon Media Corporation (“Canyon Media”) hereby petition the Commission to initiate a rulemaking proceeding to revise the equal employment opportunity (“EEO”) rules that currently apply to broadcasters. As further described below, nearly all Americans have access to the Internet, whether through their smartphone, through their personal computers, or through their local library. Paralleling expansive connectivity, job seekers and employers alike rely on the Internet as a primary recruiting/job seeking tool. On the Internet is where they can find each other. By contrast, the daily newspaper, previously cited by the FCC as the presumptive way to reach all groups within a community, now pales in its reach within the community compared to the Internet. Given these changes, it is time to update the Commission’s rules to reflect today’s technological and employee recruitment landscape. Specifically, Sun Valley and Canyon Media urge the Commission to modify its EEO policies in order to allow broadcasters, if they so choose, to rely on Internet recruitment sources, coupled with their on-air advertising, when conducting outreach for new job openings.

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PETITION FOR RULEMAKING

Pursuant to Sections 1.1, 1.41, and 1.401 of the Federal Communications Commission’s (“FCC’s” or “Commission’s”) rules,¹ Sun Valley Radio, Inc. (“Sun Valley”) and Canyon Media Corporation (“Canyon Media”) hereby petition the Commission to initiate a rulemaking proceeding to revise the equal employment opportunity (“EEO”) rules that currently apply to broadcasters.² Specifically, for the reasons discussed below, Sun Valley and Canyon Media urge the Commission to modify its EEO policies in order to allow broadcasters, if they so choose, to rely on Internet recruitment sources, coupled with their on-air advertising, when conducting outreach for new job openings. This proposal is not an attempt to cut back on the underlying obligations to recruit for job openings. Instead, it is meant to recognize the realities of today’s employment marketplace – that recruiting is done online, and that mandating other outreach when the one used by the vast majority of job

¹ 47 C.F.R. §§ 1.1, 1.41, 1.401.

² Pursuant to section 1.401(c), a party filing a rulemaking petition must indicate how its interests will be affected by the requested action. As broadcasters, Sun Valley and Canyon Media are impacted directly by the existing requirements and would be impacted by any efforts to update the Commission’s rules to better reflect the current technological climate.

seekers is unnecessary and unlikely to be a productive use of the resources of the broadcaster who wants to reach candidates actively seeking broadcast positions.

I. BACKGROUND AND SUMMARY

Back in 2002, the Commission adopted the EEO rules that currently apply to broadcasters (“2002 Rules”).³ In addition to the general obligation of all broadcasters to avoid discrimination, the 2002 Rules adopted a three-pronged affirmative action requirement designed to bring new people into the broadcast industry. In essence, the Commission’s goal was to expand the industry’s hiring pool, by giving the public more notice of broadcast job openings and more information about the duties and requirements for broadcast positions. The first two prongs of the 2002 Rules mandate the wide dissemination of information about specific job openings at broadcast stations. The purpose of these rules is to give the general public information about specific job openings at broadcast stations.⁴ The Commission feared that too many broadcast positions were filled through an “old-boy’s network” of broadcast consultants and word-of-mouth referrals.⁵ The Commission thus established a requirement that broadcasters publicize job openings in a manner designed to let all groups within the station’s community know of specific openings.

In adopting the EEO Rules, the Commission specifically considered whether reliance on Internet-only recruitment sources would satisfy the requirement that broadcast positions be “widely disseminated.” It voiced concerns regarding access of minority and rural

³ *Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies*, MM Docket No. 98-204, Second Report and Order and Third Notice of Proposed Rulemaking, 17 FCC Rcd 24018 (2002), recon pending (“2002 Report and Order”).

⁴ *Id.* at 24042 ¶ 67 (“The purpose of our rules is to ensure equal opportunity and nondiscrimination for all prospective applicants, not to achieve the proportional representation of particular groups.”).

⁵ *Id.* at 24043 ¶ 68 (“Our purpose is to ensure that word-of-mouth recruitment practices are not the sole method of recruitment and that all members of the public have an opportunity to compete for available jobs.”).

populations to the Internet, citing to a 2002 report by the National Telecommunications and Information Administration (“NTIA”) that showed that, as of September 2001, only half of U.S. households had an Internet connection, with continuing disparities in usage among different segments of society.⁶ Ultimately, the Commission concluded that it was premature to recognize the Internet as a sole recruitment source, although it indicated it would “continue to monitor the viability of the Internet as a recruitment source and [would] consider petitions seeking to demonstrate in the future that circumstances have changed sufficiently to warrant a change in [its] policy.”⁷

Much has changed in the nearly 15 years since the Commission’s adoption of this policy, which was adopted just prior to the launch of LinkedIn⁸ and five years prior to the launch of the iPhone.⁹ The word “smartphone” was just entering the lexicon.¹⁰ AOL was still the top website while Facebook and Twitter were still years away.¹¹ Today, everyone and everything is increasingly connected to the Internet, from streetlights¹² to recycle bins¹³

⁶ *Id.* at 24050 ¶ 98.

⁷ *Id.* at 24051 ¶ 99.

⁸ LinkedIn, *A Brief History of LinkedIn*, <https://ourstory.linkedin.com> (last visited Aug. 17, 2016).

⁹ Press Release, Apple, *Apple Reinvents the Phone with iPhone* (Jan. 9, 2007), www.apple.com/pr/library/2007/01/09Apple-Reinvents-the-Phone-with-iPhone.html.

¹⁰ *See, e.g.*, Google Books Ngram Viewer (search for “smartphone,” case-insensitive, smoothing of 1, years 1986-2008), <https://goo.gl/BbSnNB> (last visited Aug. 17, 2016).

¹¹ Philip Bump, *From Lycos to Ask Jeeves to Facebook: Tracking the 20 most popular web sites every year since 1996*, THE WASHINGTON POST, THE INTERSECT (Dec. 15, 2014) (“*Popular Websites*”), <https://www.washingtonpost.com/news/the-intersect/wp/2014/12/15/from-lycos-to-ask-jeeves-to-facebook-tracking-the-20-most-popular-web-sites-every-year-since-1996>.

¹² Kansas City Living Lab, Project Overview, <http://kclivinglab.com/program-overview/> (last visited May 31, 2016) (city installing smart lighting to ensure safer streets, and more efficient management of roads, bridges and city assets through use of data and analytics gathered from sensors placed along the streetcar starter line in the downtown area).

¹³ *See* Smartbin, <https://www.smartbin.com/> (“smart” recycle bin that uses Internet-connected sensors to assess fill levels).

to pets¹⁴ and even cows¹⁵ and other livestock.¹⁶ The FCC itself has recognized the ubiquity of the Internet, allowing broadcasters to discharge disclosure obligations by online postings in connection with contest rules¹⁷ and their public file obligations.¹⁸

As further described below, nearly all Americans have access to the Internet, whether through their smartphone, through their personal computers, or through their local library. Paralleling expansive connectivity, job seekers and employers alike rely on the Internet as a primary recruiting/job seeking tool. On the Internet is where they can find each other. By contrast, the daily newspaper, cited by the FCC in the 2002 Rules as the presumptive way to reach all groups within a community,¹⁹ now pales in its reach within the community compared to the Internet. Given these changes, it is time to update the Commission's rules to reflect today's technological and employee recruitment landscape.

¹⁴ See FitBark, <https://www.fitbark.com/> (Internet-connected dog activity and sleep monitor).

¹⁵ See Cowlar, <http://www.cowlar.com/> (smart collar for cows that monitor milk yield and herd health).

¹⁶ According to Cisco Systems, more than half a billion (563 million) mobile devices and connections were added in 2015, and global mobile devices and connections grew to 7.9 billion, up from 7.3 billion in 2014. It reports that mobile devices and connections will grow to 11.6 billion by 2020 at a compound annual growth rate of 8 percent and that, by 2020, there will be 8.2 billion handheld or personal mobile-ready devices and 3.2 billion machine-to-machine connections (e.g., GPS systems in cars, asset tracking systems in shipping and manufacturing sectors, etc.). See *Cisco Visual Networking Index: Global Mobile Data Traffic Forecast Update, 2015-2020* (Feb. 1, 2016) at <http://www.cisco.com/c/en/us/solutions/collateral/service-provider/visual-networking-index-vni/mobile-white-paper-c11-520862.html>.

¹⁷ *Amendment of Section 73.1216 of the Commission's Rules Related to Broadcast Licensee-Conducted Contests*, Report and Order, 30 FCC Rcd 10468 (2015).

¹⁸ *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Second Report and Order, 27 FCC Rcd 4535 (2012) (for television); *Expansion of Online Public File Obligations to Cable and Satellite TV Operators and Broadcast and Satellite Radio Licensees*, Report and Order, 31 FCC Rcd 526 (2016) (for broadcast radio and other licensees).

¹⁹ *2002 Report and Order*, 17 FCC Rcd at 24047 n. 147 (noting that “if a broadcaster placed advertisements for a general manager position in a widely circulated local newspaper every day for a week, we would consider this recruiting effort to be sufficient to ensure wide dissemination reasonably calculated to reach the entire community.”).

Therefore, the Commission should initiate a rulemaking to reform the broadcasting EEO recruitment rules to reflect modern career recruitment and job seeking practices that will allow broadcasters to rely on the world’s most powerful and ubiquitous recruitment source – the Internet.

II. THE INTERNET IS WIDELY AVAILABLE TO A VAST MAJORITY OF AMERICANS

The Obama Administration has, by its own terms, “expanded broadband access nationwide, improved high-speed connectivity in rural areas and public computer centers, and increased Internet capacity in schools, libraries, public safety offices, and other community buildings.”²⁰ Recent Commission data bears this out, with the number of Internet connections surpassing people.²¹ Residential connections exceeded 290 million as of June 2015²² and, according to the Pew Research Center, nearly 70% of Americans own a smartphone.²³ For those that may not have connections at home, libraries and other public spaces provide access ensuring that nearly everyone who wants to access the Internet can get online.²⁴ Although some of the disparities among demographic groups that the Commission

²⁰ The White House, at <https://www.whitehouse.gov/issues/technology> (last visited Dec. 11, 2016).

²¹ Internet Access Services: Status as of June 30, 2015, Industry Analysis and Technology Division, Wireline Competition Bureau, Aug. 2016 at 2 (observing that in June 2015, Internet connections reached 342 million), http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0805/DOC-340664A1.pdf (“Summer 2016 Internet Access Report”); United States Census Bureau, U.S. and World Population Clock (estimating the population of the United States at roughly 324 million in August 2016, up from 321 million in June 2015), <http://www.census.gov/popclock>.

²² Summer 2016 Internet Access Report at 14 Figure 8 (noting the total number of fixed and mobile residential connections exceeding 200 kbps in at least one direction).

²³ Pew Research Center, *Device Ownership Over Time* (As of July 2015, 68% of American adults have a smartphone), <http://www.pewinternet.org/data-trend/mobile/device-ownership> (last visited Aug. 17, 2016). Another Pew Research study indicates that the percentage of smartphone ownership in the African-American and Hispanic communities is relatively higher than among white non-Hispanics. See Pew Research Center, *U.S. Smartphone Use in 2015* (Apr. 1, 2015), at <http://www.pewinternet.org/2015/04/01/us-smartphone-use-in-2015/>.

²⁴ See, e.g., Michael O’Rielly, Commissioner, *Embrace the Internet for EEO “Widely Disseminated*

identified in its *2002 Report and Order* remain, the digital divide is much smaller today.²⁵

American Internet connectivity and use is far different that it was in 2002, and the rules should reflect this shift.²⁶

III. ONLINE RECRUITING IS THE NORM FOR THE VAST MAJORITY OF COMPANIES, WHILE TRADITIONAL RECRUITING SOURCES ARE ON THE DECLINE

Although the Commission determined the record did not sufficiently demonstrate that “the Internet ha[d] become well known as a principal resource for job seekers” in 2002, any new record developed in response to the petition and subsequent rulemaking will tell a different story.²⁷ The Internet has transformed the way employers and job applicants seek out each other. Employment websites, such as Indeed.com, Monster.com and Careerbuilder.com, as well as other online job resources, such as Craigslist.com and

Rule,” FCC BLOG (Feb. 20, 2015 3:15 pm) (noting that 100 percent of public libraries provide access to the Internet, <https://www.fcc.gov/news-events/blog/2015/02/20/embrace-internet-eeo-widely-disseminated-rule>; Press Release, American Library Association, *Libraries support digital readiness with tech training, STEM programs, more robust online collections* (July 22, 2014) (reporting on a recent study that found “98% of libraries provide free public access to Wi-Fi, up from 89% in 2012”), <http://www.ala.org/news/press-releases/2014/07/libraries-support-digital-readiness-tech-training-stem-programs-more-robust>; OpenWiFiSpots, *Find free WiFi hotspots anywhere* (recording over 66,000 “free wifi hotspots in the US”), <http://www.openwifispots.com> (last visited Aug. 17, 2016).

²⁵ *Compare 2002 Report and Order*, 17 FCC Rcd at 24050-51 ¶¶ 98-99 (noting Internet use by Blacks reached 39.8 percent and Internet by Hispanics reached 31.6 in September 2001 compared to 59.9 percent of Whites) with Andrew Perrin and Maeve Duggan, *Americans’ Internet Access: 2000-2015 As internet use nears saturation for some groups, a look at patterns of adoption*, Main Findings (June 26, 2015) (“African-Americans and Hispanics have been somewhat less likely than whites or English-speaking Asian-Americans to be internet users, but the gaps have narrowed. Today, 78% of blacks and 81% of Hispanics use the internet, compared with 85% of whites and 97% of English-speaking Asian Americans.”), <http://www.pewinternet.org/2015/06/26/americans-internet-access-2000-2015>.

²⁶ *See, e.g.*, Pew Research Center, *Internet Use Over Time* (noting that in 2002, 61% of Americans used the Internet, but in January 2014 – now over two years ago – 87% of Americans used the Internet), <http://www.pewinternet.org/data-trend/internet-use/internet-use-over-time> (last visited Aug. 17, 2016).

²⁷ *2002 Report and Order* at 24050 ¶ 97.

Linkedin.com, draw millions of views each month.²⁸ Importantly, these resources are free to job seekers unlike access to a college-run job board (that requires an individual to pay to be a student) or an association job board (which may require membership dues). According to a recent Pew Research Center Study, the Internet is a “near universal resource” for many of today’s job hunters: among Americans who have looked for work in the last two years, 90% have utilized online resources in their most recent job search and 84% say they applied for a job online.²⁹ Moreover, a recent Joint Center paper observes that “[i]n recent years, as the Internet has emerged as a key tool for finding and applying for employment in the U.S., African Americans as a group have become among the most active users of online job search,”³⁰ demonstrating that individuals who may have traditionally been excluded by “insular recruitment practices”³¹ are using modern technology to overcome this deficit. Even the then Chair of the Commission recognized in 2012 the prevalence of online sources for job recruiting.³²

²⁸ For example, according to analytics company Similarweb, the Monster.com website was visited 32.8 million times during the month of July. See <https://www.similarweb.com/website/monster.com>; see also *Popular Websites* (noting that LinkedIn cracked the top 20 websites visited in 2013).

²⁹ *Searching for Work in the Digital Era*, Aaron Smith, Pew Research Center (Nov. 19, 2015), 9, at <http://www.pewinternet.org/2015/11/19/searching-for-work-in-the-digital-era> (“Pew Study”).

³⁰ John B. Horrigan, Joint Center for Political and Economic Studies, *Broadband and Jobs: African Americans Rely Heavily on Mobile Access and Social Networking in Job Search* (2013), at 1 <http://jointcenter.org/sites/default/files/Broadband%20and%20Jobs.pdf>. See also National Minority Broadband Adoption: Comparative Trends in Adoption, Acceptance and Use, Joint Center for Political and Economic Studies, 2 (Feb 2010) at http://jointcenter.org/sites/default/files/MTI_BROADBAND_REPORT_WEB.pdf (reporting that African Americans and Hispanics use the Internet to search for jobs in greater proportion than White Americans; among minority respondents with annual incomes of between \$20,000 and \$50,000, more than 70 percent of African Americans and Hispanics go online for job searches as compared to only 38 percent of White Americans; and that nine out of ten low-income African Americans and 63 percent of low-income Hispanics use the Internet for job searches).

³¹ See *2002 Report and Order*, 17 FCC Rcd at 24040 ¶ 67.

³² Prepared Remarks of FCC Chairman Julius Genachowski at the National Urban League “Connecting the Dots” Report Release, Washington, D.C. (May 2, 2012) at

Online social networks are playing an increasingly key role in job seeking, as well.³³ Nearly two-thirds of Americans now use social media sites such as Facebook, Twitter, and Instagram.³⁴ According to a survey by Glassdoor, a staggering 86% of people in the first ten years of their career are likely to use social media in their job search.³⁵ Overall these studies make clear that nearly all Americans feel confident “in their ability to navigate various aspects of the digital job hunt.”³⁶

How Americans are accessing online job sources is also changing. Mobile is quickly gaining traction as the “key source of online access,” with “many job seekers” using mobile phones as part of their search for employment.³⁷ Over 40% of all smart phone owners have used their phones as part of the job search.³⁸ An impressive 94% of those job seekers have used their phones to browse or search for jobs online.³⁹ Further, many employers, including

https://apps.fcc.gov/edocs_public/attachmatch/DOC-313883A1.pdf (reporting that 77% of African-Americans have used broadband to search for jobs, that almost all Fortune 500 companies post their job openings only online, and that, in today’s world, you need broadband to find a job and apply for a job, because companies increasingly require online applications).

³³ Canyon Media was recently the subject of an EEO audit in which it disclosed that in some cases, it relied heavily on social media and on-air advertising to advertise for some openings. Yet Canyon Media’s social media footprint as compared to the footprint of the local paper demonstrates exactly why the Commission’s rules are out of touch with modern times. In a market with a population of 190,000, Canyon Media’s Facebook pages cumulatively have 75,000 Facebook fans, with the average post reaching 120,000. Facebook’s reach far outperforms the circulation of more traditional outlets, including for example, the local newspaper, The Spectrum, which has a circulation of 12,000. It is hard to imagine how a Facebook post that reaches over 100,000 readers would not constitute wide dissemination of an opening (especially when coupled with on-air advertising), while a paper that reaches only 12,000 subscribers arguably would.

³⁴ Pew Study at 7.

³⁵ *Top HR Statistics*, Glassdoor for Employers, at <https://www.glassdoor.com/employers/popular-topics/hr-stats.htm> (last visited Aug. 16, 2016). 79 percent of *all* Americans are likely to use social media, according to the survey. *Id.*

³⁶ Pew Study at 13.

³⁷ Pew Study at 16.

³⁸ Pew Study at 17.

³⁹ Pew Study at 18.

the Commission, require applicants to apply for jobs through their websites unless doing so “poses a hardship.”⁴⁰

While the online employment marketplace is thriving, traditional means to advertise job openings continue to wither. More than 175 papers closed in the period between 2007 and 2010,⁴¹ and more have closed or dropped to three or fewer publication days per week since then.⁴² With the number of daily newspapers – which often require paid subscriptions – continuing to shrink or move online, the days of taking out classified ads may soon be a thing of the past.⁴³ Likewise, with budgets under severe strain, services provided by state

⁴⁰ See, e.g., USAJobs, FCC, How to Apply (“To apply to this announcement go to the website: <https://fcc.usajobs.gov>.... If applying online poses a hardship, please contact the Federal Communications Commission's Human Resources Office....”), <https://fcc.usajobs.gov/GetJob/ViewDetails/447168900/#btn-how-apply>.

⁴¹ STEVE WALDMAN AND THE WORKING GROUP ON INFORMATION NEEDS OF COMMUNITIES, FCC, THE INFORMATION NEEDS OF COMMUNITIES: THE CHANGING MEDIA LANDSCAPE IN A BROADBAND AGE 349, 41 (2011) (“*INC Report*”), available at http://transition.fcc.gov/osp/inc-report/The_Information_Needs_of_Communities.pdf.

⁴² See PEW RESEARCH CENTER’S PROJECT FOR EXCELLENCE IN JOURNALISM, *Newspapers: Stabilizing, But Still Threatened* (State of the News Media 2013), at <http://stateofthemediamedia.org/2013/newspapers-stabilizing-but-still-threatened/>; see also Katrina M. Mendolera, *Navigating Traditional Media Through Social Media and Other Digital Practices*, VOCUS STATE OF THE MEDIA REPORT 2014, p.8 (2014) (reporting that 152 newspapers closed in 2012 and 114 newspapers closed in 2013). See also PEW RESEARCH CENTER, *State of the News Media 2016*, 4, 9 (June 2016), at <http://www.journalism.org/files/2016/06/State-of-the-News-Media-Report-2016-FINAL.pdf> (noting that in 2015, the “newspaper sector had perhaps the worst year since the recession and its immediate aftermath,” and that there are 126 fewer daily papers in 2014 than in 2004).

⁴³ See *Print is Dying, Digital is No Savior: the Long, Ugly Decline of the Newspaper Business Continues Apace*, WGBH News, by Dan Kennedy, at <http://news.wgbh.org/2016/01/26/local-news/print-dying-digital-no-savior-long-ugly-decline-newspaper-business-continues> (Jan. 26, 2016) (the emergence of Craigslist, which offers free online classified ads, has resulted in a 40 percent decline in newspaper advertising revenue). Trends in print readership also demonstrate this decline. In 2015, only 20 percent of adults in the United States got their news from print newspapers. See *Newspapers: Fact Sheet*, Pew Research Center (June 15, 2016), at <http://www.journalism.org/2016/06/15/newspapers-fact-sheet/> By contrast, 62 percent of adults get news on social media. See *News Use Across Social Media Platforms 2016*, Pew Research Center (May 26, 2016), at <http://www.journalism.org/2016/05/26/news-use-across-social-media-platforms-2016/#social-news-consumers-and-other-news-platforms> (also noting that 67% of U.S. adults are Facebook users).

and local departments of labor nationwide are moving online, with customers “opting to use online, rather than in-person services.”⁴⁴ Other states have moved to regionalized career centers or have replaced them altogether with call centers.

IV. THE PUBLIC INTEREST WILL BE SERVED BY THE ADOPTION OF A REVISED EEO POLICY THAT ALLOWS FOR INTERNET-ONLY RECRUITING

The Commission’s statement that the regulations it adopted in 2002 “provide sufficient flexibility” is false in today’s environment,⁴⁵ and correcting the mismatch between the rules and modern recruitment practices will serve the public interest. New technologies have allowed employers to expand the potential talent pool, as well as reduce their overall costs. By allowing broadcasters to direct their efforts to widely disseminate job openings, including in some cases by using Internet-only sources along with their on-air recruitment efforts,⁴⁶ the Commission will enable broadcasters to increase the efficiency of their recruitment efforts and meet job seekers where they are. Job seekers will not suffer because they are already looking for opportunities online, where they can often access employment

⁴⁴ See *Department of Labor Closing Career Center in One City*, at <http://www.walb.com/story/29242036/departments-of-labor-closing-career-center-in-one-city>. See also *New Report Fuels Fears of Decline of Regional Occupational Programs*, at <https://edsources.org/2014/new-report-fuels-fears-of-decline-of-regional-occupational-programs/56617> (noting that regional occupational centers have “suffered cutbacks and are fading away.”); *Labor Department Eliminating 95 Jobs New Britain Jobs Center to Close*, at http://www.centralctcommunications.com/newbritainherald/article_ded8baa6-3b83-11e5-b9ce-abfe3ca03cf8.html (reducing job centers in Connecticut from 11 to 6 due to budget cuts); *Another rural Alaska job center shut down amid fresh round of budget cuts*, at <https://www.adn.com/business-economy/2016/08/11/another-rural-alaska-job-center-shuts-down-amid-fresh-round-of-budget-cuts/> (shutting down workforce development center in Alaska); *State closing Kearney, Holdrege career centers*, at http://www.kearneyhub.com/news/local/state-closing-kearney-holdrege-career-centers/article_02cf3fda-9a0e-5f0c-ab12-acdd76e97964.html (closing for workforce development centers in Nebraska).

⁴⁵ 2002 Report and Order, 17 FCC Rcd at 24043 ¶ 70.

⁴⁶ A study by the Radio Advertising Bureau highlighted how the radio and the Internet together serve as a “powerful combination” for advertising, collectively reaching about 83% of the 18-54 population on a daily basis. See *Radio and the Internet: Powerful Complements for Advertisers*, The Radio Ad Lab, p. 12 (Feb. 2007), at <http://www.rab.com/public/ral/studyDocs/radioInternetFull.pdf>.

resources for free. This is a win-win-win.

V. CONCLUSION

For the foregoing reasons, Sun Valley and Canyon Media respectfully request that the Commission promptly initiate a rulemaking proceeding to reform the current EEO rules that apply to broadcasters.

Respectfully submitted,

/David D. Oxenford/

David Oxenford

Kelly Donohue

Wilkinson Barker Knauer, LLP

1800 M Street, NW, Suite 800N

Washington, DC 20036

Tel: 202.783.4141

E-mail: doxenford@wbklaw.com

*Counsel for Sun Valley Radio, Inc. and
Canyon Media Corporation*

December 12, 2016