

Small broadcasters — like small market broadcasters — have special concerns in employment. In order for small broadcasters to remain viable, they should be free of unnecessary recordkeeping, so long as they have no history of discrimination. Elevating process over performance, for these broadcasters in particular, detracts from their ability to serve the public. NAB urges the Commission to relieve small broadcasters of unnecessary paperwork.

**V. THE COMMISSION SHOULD ENCOURAGE BROADCASTERS TO CONDUCT JOINT RECRUITMENT EFFORTS AND INDUSTRY-SPONSORED EMPLOYMENT SERVICES.**

The *Notice* seeks comment on what the Commission can do to encourage joint recruitment efforts by broadcasters.<sup>62</sup> This is an important issue because some of the Orders issued as a result of the *Policy Statement* have tended to downplay the importance of joint recruitment efforts of broadcasters.

One of the essential elements to complying with the Commission's EEO requirements is that broadcasters must contact minority-specific and female-specific sources when advertising job openings. Unfortunately, many local minority and female organizations are too often not productive in providing licensees with *any* referrals, let alone referrals for jobs which are unique to the broadcast industry, such as on-air or certain technical positions.<sup>63</sup>

On the other hand, joint recruitment efforts by broadcasters have been demoted by the Commission to the category of "general" sources. For example, the Commission has classified as "general" sources the employment clearinghouses operated by NAB, the Nebraska

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<sup>62</sup> *Notice, supra* note 2, ¶ 25.

<sup>63</sup> See, e.g., Comments of Earshot Broadcasting, *supra* note 43, at 2; Comments of KUTZ-FM, filed May 13, 1994; Comments of KGMI/KISM, filed May 13, 1994; Comments of Grants Pass Broadcasting, filed May 23, 1994.

Broadcasters Association, the Kansas Association of Broadcasters and the National Association of Farm Broadcasters.<sup>64</sup> While these sources, by law, cannot specifically target minorities and females, one of their primary functions is to help create greater employment opportunities for women and minorities in the broadcast industry. Placing these activities in the same category as such publications as *Supermarket News*<sup>65</sup> diminishes their importance.

By downplaying the importance of joint recruitment efforts, the Commission has provided a disincentive for their use. Such efforts are of greater significance than the mere placing of an advertisement in a general circulation newspaper or a trade publication. They require considerable time and effort on the part of the industry as a whole and the individual broadcasters who participate. They also reflect the industry's genuine concern for and commitment to equal employment opportunities for minorities and women. The Commission can encourage the development of joint recruitment efforts by giving broadcasters more credit for their use.

Moreover, many licensees participate in job fairs or receive unsolicited resumes, even though the station may have no job openings at the time. Such applicant leads are placed in a file or "drawer" and reviewed whenever openings become available. Yet, the standards established under the *Policy Statement* would discount use of the file or "drawer" because it is not minority-specific. The Commission should not penalize broadcasters who use this means of considering minority applicants, and instead encourage this method by recognizing its use in reviewing licensees' efforts.

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<sup>64</sup> See *Midland Broadcasters, Inc. (KAMJ(AM)/KMAJ-FM)*, *Omaha Great Empire Broadcasting, Inc. (WOW(AM)/WOW-FM)*, *Stauffer Communications, Inc. (WIBW(AM)/WIBW-FM)*, FCC 94-104, adopted April 20, 1994, released April 28, 1994, at 7 n.6 and 10.

<sup>65</sup> See *id.* at 7 n.6.

In addition, the Commission should also recognize broadcasters' other efforts to comply with its EEO regulations. NAB and state associations are actively providing seminars and other activities designed to inform broadcasters about EEO requirements. Following the Kerner Report, NAB established a unit, currently known as the Department of Human Resource Development ("HRD"), to address the challenges of assisting all licensees in meeting their EEO obligations through the identification, recruitment, placement, and promotion of minorities and women in the broadcast industry.

Central to this effort continues to be the Employment Clearinghouse ("ECH") of HRD. ECH is a national free resume referral service with an emphasis on the identification and recruitment of minorities and women. Job seekers and broadcasters in search of qualified and qualifiable personnel are brought together through the service. The experience of persons registered with ECH range from entry-level to management.

To help facilitate broadcaster-minority job seeker connections, ECH conducts regional broadcast career seminars that include job fair components. Since September 1993, ECH has conducted two career seminars, one in Atlanta and another in Chicago earlier this year. Over 150 minority job seekers attended the two-day sessions and job fairs, with participation from over 50 broadcasters. The next seminar is scheduled for early November of 1994.

Counseling is also provided by ECH for prospective broadcast employees and current station employees seeking assistance in career planning. Approximately 2,000 resumes are in ECH data files, and computer listings are also maintained in some 26 categories of industry jobs. In addition, broadcasters may call the Clearinghouse for personalized service in finding job candidates.

Resumes are received by mail from applicants or through contacts with ECH staff at conventions and conferences. Applicants and other interested persons may check on daily job listings

through the "ECH Jobline," a toll-free telephone service. Over the past 18 years, more than 500 known broadcast job placements have been made through the Employment Clearinghouse.

NAB's Department of Human Resource Development is recognized nationwide as a dependable resource center. In addition to actions of ECH, the benefits of HRD's outreach initiatives and activities through participation in a variety of minority-focused conferences and forums held by a broad spectrum of groups (e.g., African American, Hispanic, Asian, Native American), are passed on to licensees in need of productive recruitment sources and greater assistance in responding to broadcast career and programming issues of minority groups. Current examples are: the scheduled participation of ECH staff as job fair exhibitors and panelists during the Unity '94 convention of the four major minority media organizations (African American, Hispanic, Asian, Native American), where over 6,000 minority media professionals and job seekers will be registered, July 26-31 in Atlanta, Georgia.

Toward the end of cultivating fruitful non-traditional sources for broadcasters' minority employee recruitment through state associations, the department head of HRD will serve on a distinguished plenary panel of African American leaders at the opening of the national Assembly of The Links, Inc., June 26, 1994, in Louisville, Kentucky. The Links is an organization of over 8,000 African American professional women with 241 chapters in 40 states and the District of Columbia. Through efforts of HRD, several state associations have already begun to work with Links chapters in directing Black and other minority youth and young professionals to careers in broadcasting. Similar liaison and facilitation activities are being carried out by HRD with colleges and universities, and other sources with significant minority and female populations.

Since issuance of the Commission's February EEO Policy Statement, HRD has played an integral role in the planning and execution of two NAB Regional Radio License Renewal Seminars designed to educate licensees in more productive operation practices to avoid sanctions and forfeitures related to EEO violations and other station matters. Over 100 broadcasters participated in these two seminars. NAB will continue this seminar schedule over the next three years to prepare licensees one year before their renewal applications are due.

Since the beginning of 1994, HRD has made special EEO presentations during five state broadcast associations, with more scheduled before the end of the year. Similar presentations have also been made before specially organized state radio groups, and are regularly scheduled events during NAB's annual and radio conventions.

The Commission should not discount participation in such activities as "general" sources when reviewing licensees' EEO efforts, and instead recognize that licensees who engage in these activities are making good faith efforts to comply with the Commission's EEO rules.

**VI. THE COMMISSION'S ENFORCEMENT PROCEDURES REGARDING PROMOTION AND RETENTION OF MINORITY AND FEMALE EMPLOYEES ARE ADEQUATE.**

*The Notice* seeks comment about the adequacy of the Commission's broadcast EEO enforcement regarding the promotion and retention of female and minority employees, and any suggestions for change.<sup>66</sup> NAB believes that the current enforcement procedures are adequate because they provide the Commission with a general overview of each licensee's employment picture, without saddling the licensee with overly burdensome paperwork requirements. Therefore, no changes are necessary.

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<sup>66</sup> *Notice, supra* note 2, ¶ 24.

As noted in Section II., the Commission's EEO enforcement role is limited "to that of assuring *on an overall basis* that stations are engaging in employment practices which are compatible with their responsibilities in the field of public service programming."<sup>67</sup> Currently, the Commission requires licensees to submit annually information regarding the number of females and minorities employed by their stations in nine different categories. In addition, each licensee is required to submit at renewal time a summary of hires and promotions made by its station(s) during the 12 months preceding the filing of the renewal application. This information is sufficient to give the Commission an overall view of how each licensee is faring in the employment of women and minorities in key positions, as well as the flow of women and minorities through the licensee's hierarchy.

Since, as noted *supra*, employment of women and minorities as officials and managers in the broadcast industry is exceeding the Commission's processing guidelines, promotion and retention data would primarily be used to detect discrimination. However, if an individual believes that his/her station is discriminating, either in hiring or promotions, he/she has ample avenues to pursue a complaint. The individual may file a complaint with the EEOC or even take the licensee to court. The Commission must be notified of the filing of such a complaint or lawsuit, and if there is an adjudication against the station, that fact must be disclosed to the Commission in the renewal application. The EEOC will also share with the Commission information regarding complaints filed against broadcasters.<sup>68</sup> A complaint, or possibly a challenge to the renewal, may also be filed with the Commission.

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<sup>67</sup> See note 14, *supra* (emphasis added).

<sup>68</sup> FCC & EEOC Memorandum of Understanding, 70 F.C.C.2d 2320 (1978).

Thus, the Commission already is privy to substantial information regarding the hiring, promotion and retention practices of licensees. As the NAACP has noted, "The majority of broadcasters do not discriminate."<sup>69</sup> The Commission itself has found that only four percent of licensees' EEO programs are deficient, and the cases involving those deficiencies have shown virtually no instances of discrimination. This leads to the conclusion that very few, if any, licensees discriminate. Therefore, little, if any, benefit would be realized in requiring additional information from each licensee.

Furthermore, any additional information that the Commission might receive regarding retention of women and minorities in broadcasting could have dubious validity. A chief characteristic of employment in broadcasting is the high degree of mobility. Most stations have high turnover rates as employees move from market to market or from station to station within a market. There are numerous reasons not discrimination-related why employees may leave a station. Retention data, therefore, would not be a good barometer of discrimination or affirmative action at a given station.

Considering the fact that the employment of women and minorities in upper-four job categories at broadcast stations is already outpacing the Commission's processing guidelines and is generally comparable to the nation as a whole, there is no basis to seek such additional information. NAB recommends that the Commission refrain from requiring licensees to submit additional promotion and retention information.

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<sup>69</sup> Reply to Opposition to Petition for Reconsideration, *In the Matter of Standards for Assessing Forfeitures for Violations of the Broadcast EEO Rules*, filed by NAACP on April 4, 1994, at 3.

**VII. CHANGES TO THE RENEWAL APPLICATION, ANNUAL EMPLOYMENT REPORT AND INQUIRY PROCEDURES, AS DISCUSSED IN THE NOTICE, ARE UNNECESSARY AND WOULD NEEDLESSLY ADD TO THE PAPERWORK BURDEN SHOULDERED BY BROADCAST LICENSEES.**

The Commission seeks comment on whether it should gather additional information from licensees in its employment-related forms and when inquiring into licensees' hiring efforts when conducting an inquiry at renewal time.<sup>70</sup> NAB believes that such additional information gathering will needlessly add to the paperwork burden imposed on licensees and provide little additional benefit to the Commission. NAB therefore urges the Commission to reject these concepts.

**A. The Suggested Changes to the EEO Program Report Would Greatly Increase the Paperwork Burden on Licensees, But Provide Little Benefit.**

The Commission asks whether it should expand the information on overall recruitment and hiring required to be filed at renewal time by each licensee in its EEO Program Report (Form 396). Currently, the Report form requires stations to provide the number of job hires and promotions — overall and in upper four job categories — they experienced during the 12 months before filing for renewal, the number of each involving women and minorities, and a sampling of the sources contacted for their recruitment efforts, as well as the number of women and minority referrals from these sources.

The *Notice* inquires as to whether, for *each* vacancy filled during the twelve-month period prior to the filing of the FCC Form 396, licensees should be required to list:

- title and job classification;
- date the position was filled;

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<sup>70</sup> *Notice, supra* note 2, ¶¶ 27-29.

- the number, referral source, gender and race or national origin status of applicants and interviewees;
- the fulltime or part-time status of the position;
- the gender, race or national origin of the successful candidate;
- the recruitment sources contacted; and
- the number, race or national origin and sex of referrals received from each recruitment source.

The Commission does not explain why such additional information may be necessary.

NAB believes that such changes are totally unwarranted. As noted *supra*, 96 percent of stations pass a first or second-step scrutiny of their EEO programs at renewal. Broadcasters are hiring women and minorities at over 80 percent of parity, well over 50 percent in the upper four job categories. In addition, 51 of 60 television stations (85 percent) in Maryland, Virginia, West Virginia and the District of Columbia have met or exceeded the Commission's processing guidelines during the first of the mid-term reviews required under the Cable Act of 1992.<sup>71</sup> Moreover, the Commission has not indicated dissatisfaction with the information currently provided on Form 396. Thus, there is no basis for expanding the information sought on the form.

This expanded EEO program is almost identical to the reporting requirements that are currently placed on only those licensees whose results and efforts have been found deficient.<sup>72</sup>

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<sup>71</sup> See Notice, *supra* note 2, ¶ 16.

<sup>72</sup> See *id.* at 4 n.7.

By adopting such a program for all licensees, the Commission would treat *all* licensees as if they had violated its EEO rules, even though a mere four percent eventually face that sanction. Such a reporting requirement would needlessly create new paperwork for licensees and further delay the renewal process by causing the Commission to pore through more records.

In 1975, Commissioner Hooks had favored such a requirement, but only for licensees with 25 or more fulltime employees.<sup>73</sup> However, he was concerned that minorities and women in broadcasting were becoming victims of the so-called "jobs without responsibility" syndrome, i.e., they were not being hired in "responsible positions which they are capable of performing."<sup>74</sup> That reasoning is not applicable to the current situation. In 1975, women were employed in only 13.26 percent of the upper four job categories; minorities in only 9.6 percent.<sup>75</sup> By 1992, the percentages had risen to 32.6 percent for women and 16.1 percent for minorities.<sup>76</sup> More telling are the actual job totals. From 1975 to 1992 the number of upper-four jobs in the industry increased by 31,934 (from 95,365 to 127,299). At the same time, the number of upper-four jobs held by women jumped 28,717 (from 12,644 to 41,461), while minority-held upper-four jobs climbed 11,333 (from 9,155 to 20,488).<sup>77</sup> Thus, women have gotten 90 percent, and minorities nearly 40 percent, of the new upper-four jobs in broadcasting since 1975.

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<sup>73</sup> See *Nondiscrimination of Licensees Employment Practices (Notice of Inquiry and Notice of Proposed Rule Making)*, 54 F.C.C.2d 354, 371 (1975) (Concurring Statement of Commissioner Hooks). Commissioner Hooks did state a desire that all licensees maintain such records "of their own volition . . . ." *Id.* at 370.

<sup>74</sup> *Id.*

<sup>75</sup> See *Nondiscrimination in Employment Practices (Broadcast)*, *supra* note 14, at 230.

<sup>76</sup> See note 5, *supra*.

<sup>77</sup> See *1992 Employment Report*, *supra* note 5.

Requiring *all* licensees to file at renewal time additional information regarding their hiring activities in order to *perhaps* find a few more violators is a pointless exercise in micromanagement. Such a requirement would needlessly tie up valuable Commission resources, and is precisely the kind of regulatory burden which Congress sought to eliminate when it passed the Paperwork Reduction Act of 1980.<sup>78</sup> The Commission must refrain from placing even more unnecessary reporting requirements on licensees, and reject the revisions to the EEO Program Report addressed in the *Notice*.

**B. Breaking "Officials and Managers" into Seven Job Categories Would Not Provide the Commission with Any More Information Than It Currently Receives.**

The *Notice* seeks comment on whether the Annual Employment Report should be modified to request information regarding 15 job categories, instead of the current nine.<sup>79</sup> The suggested change would add Corporate Officers, General Manager, Chief Technician, Comptroller, General Sales Manager and Production Manager to the list of positions about which licensees would have to provide race and gender information.

NAB believes that such a change is unnecessary. The additional categories are management-level positions currently already included under the "Officials and Managers" category. Many stations have no more than two or three of these positions; thus, the additional reporting categories would be of little benefit to the Commission. Moreover, the Commission already has a mechanism for obtaining data about these positions, and therefore there would be little benefit to the Commission in gathering data about these specific job titles. In addition, as

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<sup>78</sup> Pub. L. No. 96-511, 94 Stat. 2812 (1980).

<sup>79</sup> See *Notice*, *supra* note 2, ¶ 29.

with the EEO Report Form, the Commission has expressed no dissatisfaction with the information currently provided on the Annual Employment Report.

Congress and the Commission have had a goal to provide more general employment and management opportunities for women and minorities.<sup>80</sup> As noted throughout these Comments, the broadcasting industry has provided such opportunities at a pace similar to the general workforce. Additional reporting categories would provide the Commission with little benefit considering the success already achieved by the industry and the limited nature of the Commission's EEO role.

Obviously, the suggested change to the Annual Employment Report has no clear benefit to the Commission or even a purpose. NAB opposes this change.

**C. Inquiring into the Hiring Opportunities of the Last Three Years of the License Term — Combined with the Annual Employment Reports of the Entire License Term — Should Provide the Commission an Adequate View of a Licensee's EEO Efforts, and Would Be Consistent with Even the Most Stringent Employment-Related Recordkeeping Requirements of Other Agencies.**

The Commission also seeks comment on proposed changes to its inquiry procedures in seeking more information regarding a licensee's recruitment efforts.<sup>81</sup> Currently, if a deficiency is found in a licensee's EEO efforts at renewal time, the Commission asks the licensee to provide recruitment and hiring information for the last three years of the license term. The *Notice* asks whether the Commission should inquire about hiring practices over another period of time, including the entire license term. In addition, the Commission raises the question of whether it should conduct on-site EEO audits in certain cases.

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<sup>80</sup> See 1992 Cable Act, § 22(g), *supra* note 3.

<sup>81</sup> See *Notice*, *supra* note 2, ¶ 27.

NAB opposes expansion of the inquiry procedures. Once again, the Commission has expressed no dissatisfaction with the current information-gathering process and therefore states no basis for the proposed change. The current three-year inquiry covers 60 percent of a television station's and nearly 50 percent of a radio station's license term, and therefore should provide the Commission with an adequate representation of the licensee's EEO efforts. Expansion of the inquiry would seem to be unwarranted.

The Commission's three-year inquiry matches the retention of employment information under even the most stringent federal laws. Other such periods are for more general employment data, such as compensation and payroll records under the Equal Pay Act<sup>82</sup> and the Age Discrimination in Employment Act ("ADEA"),<sup>83</sup> and employee verifications required under the Immigration Reform and Control Act.<sup>84</sup> The Commission already requires licensees to retain information three times longer than similar recruitment information required under the ADEA.<sup>85</sup>

Similarly, expanded use of on-site audits is unnecessary. The Commission has reserved the right to conduct audits "where it appears that a more comprehensive analysis of a particular licensee's employment practices is warranted,"<sup>86</sup> generally, in cases involving a "serious factual dispute."<sup>87</sup> The documentation filed with the renewal application, supplemented by an inquiry letter, if necessary, provide the Commission with sufficient data to make a determination

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<sup>82</sup> 29 C.F.R. § 516.5.

<sup>83</sup> 29 C.F.R. § 1627.3(a).

<sup>84</sup> 8 C.F.R. § 274a.2(b)(2).

<sup>85</sup> 29 C.F.R. § 1627 (b).

<sup>86</sup> *Report and Order*, *supra* note 14, at 244.

<sup>87</sup> *Notice of Inquiry*, *supra* note 75, at 362.

about the adequacy of the EEO programs of the vast majority of licensees. Expanding the use of on-site audits would be a needless expenditure of Commission and licensee resources.

The additional inquiry procedures discussed in the *Notice* would result in needless additional paperwork for licensees and the Commission. NAB urges the Commission to reject any expansion of the inquiry process.

**D. The Commission Should Maintain Its EEO Focus on Employment and Refrain from Becoming Involved in Licensees' Other Business Activities.**

The *Notice* seeks comment on whether licensees should be required to encourage minority and female entrepreneurs to conduct business with all parts of the station's operations. The Commission addressed and rejected this issue when it amended its EEO rules in 1987.<sup>88</sup> At the time, the Commission noted that such a proposal is not related to station employment:

[I]t is our intention not to alter the broadcasters' current EEO obligations, and particularly to avoid areas not directly related to the employment practices of the station. . . . Our concern in the matter of broadcast EEO policy is directed primarily at a broadcast licensee's efforts and practices in recruiting, hiring, and promoting within its own station(s).<sup>89</sup>

Moreover, Congress considered such a requirement for broadcasters during its deliberations of the 1992 Cable Act, but abandoned the notion.<sup>90</sup>

The Commission's assessment is just as valid seven years later. The Commission must refrain from micromanaging licensees' operations and focus instead on whether licensees' employment practices are achieving the desired results. Recordkeeping requirements should reflect the Commission's two-step process — the Commission should initially require only enough

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<sup>88</sup> See *Report and Order*, *supra* note 19, at 3969 ¶ 15.

<sup>89</sup> *Id.*

<sup>90</sup> See H.R. Conf. Rep. No. 862, 102d Cong., 2d Sess. 96-97 (1992).

information to determine whether a licensee's EEO program is "plainly satisfactory,"<sup>91</sup> and additional information where there is question about the licensee's practices.

Licensees will do business with those entrepreneurs who can provide the products and services desired by licensees, at a fair price. There is nothing to indicate that race or gender is a consideration.

If the Commission were to extend its EEO principles to include licensees' dealings with other businesses, it would run the risk of straying too far afield from the statutorily based nexus for its EEO authority. The purpose behind the Commission's EEO initiative is to ensure that women and minorities are an integral part of licensees' programming decision-making, thus promoting diversity of viewpoints. The proposal contained in the *Notice* bears little relationship to that purpose, and the Commission has demonstrated no real need for such a requirement. NAB recommends that the Commission again reject such a requirement.

#### **VIII. THE COMMISSION SHOULD ELIMINATE RECORDKEEPING FOR PART-TIME HIRES.**

The Commission seeks comment regarding the treatment of part-time hires.<sup>92</sup> Specifically, the Commission asks whether it should eliminate efforts documentation for part-time hires and what level of consideration should be given part-time hires, given that its primary focus is on fulltime employment.

NAB believes that consideration of part-time employment should be secondary to the Commission's focus on fulltime employment. After all, the Commission's purpose in

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<sup>91</sup> See note 22, *supra*.

<sup>92</sup> *Notice*, *supra* note 2, ¶ 22.

regulating licensees' EEO programs is to ensure that women and minorities have proper input in licensees' programming decisions. Part-time employees rarely have such input. Part-time employment, therefore, should only be considered as a mitigating factor in licensees' EEO efforts.

Still, part-time employment is a good training ground for the broadcast industry. Individuals who work part-time often advance to fulltime status, at either their current stations or other broadcast outlets. The Commission's policies should therefore support stations' hiring of part-time workers. In that vein, the paperwork burden on licensees should be at a minimum. Additional paperwork requirements would only serve as a disincentive for licensees to hire part-time workers. In order to encourage use of part-time employees, efforts documentation concerning such positions should therefore not be required.

## IX. CONCLUSION

The considerable success of the broadcasting industry in its efforts to employ women and minorities demonstrates that drastic changes in the Commission's EEO requirements are not warranted. The additional recordkeeping and reporting requirements addressed in the *Notice* would provide the Commission with little benefit, while dramatically increasing the paperwork burden on licensees. The Commission should instead find ways to encourage broadcasters to find new, innovative ways to recruit qualified women and minorities. First-time EEO offenders — whose only "crime" is that their recruitment efforts did not match the "guidelines" set forth in the *Policy Statement* — should not be penalized, but instead should be allowed the opportunity to modify their recruitment process.

NAB urges the Commission to adopt the concepts conveyed in these Comments: relief for "small" and small market broadcasters; encouragement of joint recruitment efforts; more

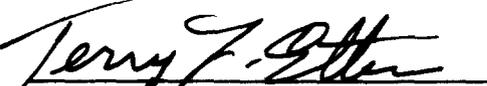
flexibility in the use of alternative labor force data; and no recordkeeping for part-time hires. The suggested relief would further enable broadcasters to reach out to qualified women and minorities in their markets, giving these segments of society an even greater voice in licensees' programming decisions.

Respectfully submitted,

NATIONAL ASSOCIATION OF  
BROADCASTERS  
1771 N Street, N.W.  
Washington, D.C. 20036

  
Henry L. Baumann

  
Steven A. Bookshester

  
Terry L. Etter

Counsel

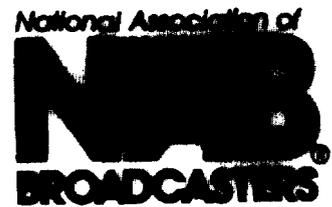
Dwight Ellis  
Vice President, NAB Human Resource Development

Mark R. Fratrick, Ph.D.  
Vice President, Economist  
NAB Research & Planning

June 13, 1994

**APPENDIX A:**

**SELECTED PORTIONS OF THE 1992 RADIO EMPLOYEE COMPENSATION &  
FRINGE BENEFITS REPORT**



# **1992 RADIO EMPLOYEE COMPENSATION AND FRINGE BENEFITS REPORT**

National Association of Broadcasters  
1771 N Street, N.W., Washington, DC 20036  
(202) 429-5300

Prepared by Brenda Helregel, NAB Research and Planning Department

For questions regarding this report call either:

Mark R. Fratrick, Vice President/Economist  
Brenda Helregel, Manager of Financial and Management Research  
at (202) 429-5380

Additional copies of this report are available through NAB Services,  
1771 N Street, N.W., Washington, DC 20036-2891  
For price information, please call (800) 368-5644

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## Methods

Questionnaires requesting salary and fringe benefits information were mailed to all U.S. commercial radio stations in March 1992. Of these 6,161 radio operations (AM/FM combos were included as one operation), the post office returned 92 as undeliverable. An additional 6 operations indicated that they were off the air or out of business. Of the remaining 6,063 radio operations, 1,490 returned questionnaires for a return rate of 24.6%. However, 1,430 operations returned usable questionnaires for a final response rate of 23.6%. Since this survey has such a low response rate, care should be taken when interpreting the data.

From the information collected, 35 tables have been prepared based on revenue categories, station type (AM Fulltime, FM AM/FM, AM Daytime), and categories of market populations. Information regarding these categorizations were requested in the survey.

Respondents were given the following instructions to fill out the employee compensation information.

**Fill in only those jobs which exist at your station.** Where duties of two classifications may be combined at your station, classify this person by major responsibility.

**Base Salary.** The base salary for each department head and support staff should be the annual compensation level as of March 31, 1992. For sales personnel only, the annual compensation should be the 12 months of April 1, 1991 to March 31, 1992.

**Starting Annual Salary.** The starting annual salaries are for new employees with little or no experience.

**Bonus.** The bonus paid to each of the department heads should be for the period of April 1, 1991 through March 31, 1992.

**Number of Fulltime Employees.** Fulltime is defined as employees working 30 hours or more a week. At radio-television stations, employees working in both radio and television will be included only if they regularly work 30 hours or more a week in radio.

**Fringe Benefits.** Report fringe benefits offered to majority of employees.

Each table contains the average and median base salary for 12 different department heads as well as their average and median annual bonus. Also included in each table are average, median, and average starting salaries for 12 different support staff positions. Definitions of these support staff positions can be found on page 72.

Average and median compensation for sales staff as well as the percent of stations using each of eight different compensation methods also are found in each table. The final area covered in each table is fringe benefits information including average number of paid holidays and paid sick days as well as the amount of vacation offered.

Two items within the tables merit special attention. The first, N/R, signifies that no stations responded to that category. Second, the average bonus is the average for all reported department heads whether they received a bonus or not. When the median bonus is 0 it signifies that at least half of the stations responding with a salary figure did not pay a bonus to that position during the past year.

**Table XIV  
Population Size 50,000 - 100,000**

**All Stations**

<b>Department Heads</b>	<b>Average Base Salary</b>	<b>Average Bonus</b>	<b>Median Base Salary</b>	<b>Median Bonus</b>
General Manager/Station Manager	40,384	3,578	36,000	0
Chief Engineer	18,361	131	18,850	0
Contract Engineer	8,656	71	6,000	0
Program Director	20,254	536	19,200	0
Operations Director	21,938	576	20,437	0
News Director	17,977	213	18,000	0
Sports Director	17,976	383	16,200	0
Business Manager/Controller	17,006	68	17,056	0
Traffic Manager/Supervisor	14,275	128	14,000	0
Community/Public Affairs Director	13,252	177	12,563	0
Promotion/Marketing Director	17,378	227	14,540	0
Research Director	N/R			

<b>Support Staff</b>	<b>Average Number Fulltime Employees</b>	<b>Annual Compensation (\$) Average</b>	<b>Median</b>	<b>Average Starting Compensation (\$)</b>
On-Air Personality	4	15,618	15,000	12,871
News Announcer	1	15,740	14,400	14,759
News Reporter	1	15,451	14,400	12,351
Farm Reporter	1	20,873	20,005	15,053
News Editor	1	17,831	16,425	16,478
Sports Reporter	1	13,254	13,000	13,294
Technician	1	16,056	14,700	16,196
Continuity Writer/Copywriter	1	15,308	15,080	13,761
Production Person	1	14,964	14,400	14,073
Music Person	1	13,686	14,600	10,015
Traffic/Computer Operator	1	13,890	13,100	12,556
Sales Support Person	2	15,336	14,560	13,350

	----- Sales Personnel -----				
	Account Executive	General Sales Manager	Local Sales Manager	National Sales Manager	Co-op Coordinator
<b>Number</b>	4				
<b>Annual Compensation (\$)</b>					
<b>Average</b>	23,888	38,907	29,412	28,450	21,769
<b>Median</b>	20,125	38,000	30,100	22,650	20,000

**Table XIV  
(continued)**

----- Sales Personnel -----					
	Account Executive	General Sales Manager	Local Sales Manager	National Sales Manager	Co-op Coordinator
<b>Methods of Compensation (% of response)</b>					
Salary Only	4	19	23	0	40
Salary & Bonus	3	15	9	20	0
Straight Com.	27	6	13	30	40
Draw Against Com.	25	4	2	0	0
Salary & Com.	27	27	23	30	10
Salary, Bonus & Com.	10	24	23	20	10
Straight Com. w/bonus	5	3	6	0	0
Other	0	1	2	0	0

**BENEFITS**

Paid Sick Days (average) **8**      Accumulate? Yes **30%** No **70%**

Paid Vacation (average weeks)	-----Years of Service-----							Paid Holidays (average) <b>6</b>
	1	2	3	5	10	15	20+	
	1	2	2	2	3	3	3	

-----% of Response-----					
		Paid In Full By Company	Paid in Full by Employee	Cost Shared by Co. & Employee	Not Provided
Hospitalization:	Employee	29	4	50	17
	Dependents	4	35	42	19
Surgical Benefits:	Employee	28	3	50	19
	Dependents	4	33	43	20
Major Medical:	Employee	29	3	49	18
	Dependents	5	35	41	19
H.M.O.:	Employee	8	2	14	76
	Dependents	0	10	12	78
Dental:	Employee	8	4	15	73
	Dependents	1	12	14	73
Vision:	Employee	1	3	4	92
	Dependents	0	4	4	92
Disability:	Short Term	15	4	14	66
	Long Term	12	7	9	72
Accidental Death:	Employee	29	3	22	46
	Dependents	9	13	18	60
Group Life:	Employee	37	3	27	34
	Dependents	5	16	19	59
Pension Plan		3	1	3	93
Profit Sharing		6	0	2	93
401-K Plan		1	4	11	84
Employee Stock Option Plan		1	1	1	98
<b>Education/Career Development</b>					
Tuition Reimbursement		13	1	14	73
Workshops, Seminars etc.		38	1	10	51

**Table XV  
Population Size 25,000 - 50,000**

**All Stations**

<b>Department Heads</b>	<b>Average Base Salary</b>	<b>Average Bonus</b>	<b>Median Base Salary</b>	<b>Median Bonus</b>
General Manager/Station Manager	29,700	1,772	26,040	0
Chief Engineer	15,926	577	14,690	0
Contract Engineer	8,828	16	5,200	0
Program Director	17,563	274	16,680	0
Operations Director	17,786	114	17,730	0
News Director	15,237	149	15,000	0
Sports Director	13,216	0	14,000	0
Business Manager/Controller	16,313	239	15,000	0
Traffic Manager/Supervisor	13,157	9	13,000	0
Community/Public Affairs Director	12,019	0	12,000	0
Promotion/Marketing Director	19,955	45	16,000	0
Research Director	9,100	0	9,100	0

<b>Support Staff</b>	<b>Average Number Fulltime Employees</b>	<b>Annual Compensation (\$) Average</b>	<b>Median</b>	<b>Average Starting Compensation (\$)</b>
On-Air Personality	3	15,493	13,270	11,669
News Announcer	1	14,412	14,519	14,502
News Reporter	1	13,560	14,000	12,441
Farm Reporter	1	14,605	16,800	18,000
News Editor	1	13,874	12,300	11,900
Sports Reporter	1	16,377	12,727	11,400
Technician	1	14,575	13,000	14,583
Continuity Writer/Copywriter	1	14,184	12,500	13,033
Production Person	1	19,932	16,000	13,450
Music Person	1	13,223	13,500	12,000
Traffic/Computer Operator	1	14,214	14,000	12,289
Sales Support Person	2	15,099	14,500	12,414

	----- Sales Personnel -----				
	<b>Account Executive</b>	<b>General Sales Manager</b>	<b>Local Sales Manager</b>	<b>National Sales Manager</b>	<b>Co-op Coordinator</b>
<b>Number</b>	3				
<b>Annual Compensation (\$)</b>					
<b>Average</b>	17,666	28,558	28,632	42,000	19,387
<b>Median</b>	17,750	25,000	25,000	42,000	17,000

**Table XV  
(continued)**

----- Sales Personnel -----					
	Account Executive	General Sales Manager	Local Sales Manager	National Sales Manager	Co-op Coordinator
<b>Methods of Compensation (% of response)</b>					
Salary Only	6	18	15	38	33
Salary & Bonus	3	16	9	0	17
Straight Com.	24	8	15	25	0
Draw Against Com.	21	4	9	0	0
Salary & Com.	30	30	38	25	17
Salary, Bonus & Com.	10	17	9	13	0
Straight Com. w/bonus	6	8	6	0	0
Other	0	0	0	0	33

**BENEFITS**

Paid Sick Days (average) **7**      Accumulate? Yes **21%** No **79%**

Paid Vacation (average weeks)	-----Years of Service-----							Paid Holidays (average) <b>6</b>
	1	2	3	5	10	15	20+	
	1	2	2	2	2	2	3	

	-----% of Response-----				
	Paid In Full By Company	Paid in Full by Employee	Cost Shared by Co. & Employee	Not Provided	
Hospitalization:	Employee	25	3	41	31
	Dependents	4	37	24	34
Surgical Benefits:	Employee	24	2	38	36
	Dependents	4	36	23	37
Major Medical:	Employee	26	4	39	32
	Dependents	4	38	24	34
H.M.O.:	Employee	5	0	8	87
	Dependents	1	9	4	86
Dental:	Employee	7	6	10	77
	Dependents	1	15	7	77
Vision:	Employee	3	1	4	92
	Dependents	0	5	3	92
Disability:	Short Term	13	3	5	78
	Long Term	8	4	5	82
Accidental Death:	Employee	16	3	17	63
	Dependents	4	14	7	75
Group Life:	Employee	25	5	25	44
	Dependents	3	20	10	67
Pension Plan		3	0	1	96
Profit Sharing		5	0	2	93
401-K Plan		2	2	4	92
Employee Stock Option Plan		2	0	2	96
Education/Career Development					
Tuition Reimbursement		19	1	9	71
Workshops, Seminars etc.		39	0	11	50

**Table XVI  
Population Size Under 25,000**

**All Stations**

<b>Department Heads</b>	<b>Average Base Salary</b>	<b>Average Bonus</b>	<b>Median Base Salary</b>	<b>Median Bonus</b>
General Manager/Station Manager	29,456	1,336	26,000	0
Chief Engineer	14,544	18	12,000	0
Contract Engineer	9,336	3	3,763	0
Program Director	15,859	346	15,000	0
Operations Director	18,593	115	16,800	0
News Director	14,750	112	14,400	0
Sports Director	14,032	27	14,700	0
Business Manager/Controller	14,938	351	15,000	0
Traffic Manager/Supervisor	12,991	225	12,500	0
Community/Public Affairs Director	9,699	33	9,076	0
Promotion/Marketing Director	18,440	1,080	19,600	0
Research Director	1,000	0	1,000	0

<b>Support Staff</b>	<b>Average Number Fulltime Employees</b>	<b>Annual Compensation (\$) Average</b>	<b>Median</b>	<b>Average Starting Compensation (\$)</b>
On-Air Personality	3	13,746	13,000	11,747
News Announcer	1	14,574	14,700	12,834
News Reporter	1	13,156	12,000	10,793
Farm Reporter	1	17,171	16,200	15,150
News Editor	1	15,200	15,200	N/R
Sports Reporter	1	12,000	12,500	11,900
Technician	1	12,117	13,250	12,075
Continuity Writer/Copywriter	2	12,326	12,000	10,208
Production Person	2	14,614	14,000	11,320
Music Person	1	13,274	14,000	11,210
Traffic/Computer Operator	1	12,537	11,960	10,497
Sales Support Person	2	12,395	11,400	11,337

	<b>----- Sales Personnel -----</b>				
	<b>Account Executive</b>	<b>General Sales Manager</b>	<b>Local Sales Manager</b>	<b>National Sales Manager</b>	<b>Co-op Coordinator</b>
<b>Number</b>	2				
<b>Annual Compensation (\$)</b>					
<b>Average</b>	17,468	26,446	20,756	2,400	20,034
<b>Median</b>	16,800	25,000	19,241	2,400	18,500