
DEFENSIVE MEASURES 003356

- ✓ Take no action which might prevent a discharged employee from obtaining new employment.
 - Instruct anyone involved in a termination not to discuss the employee or the discharge.
- ✓ Treat a discharged employee with humanity, and never be angry or punitive in the exit interview.
- ✓ Exercise caution in providing references for former employees, as a recommendation may be used against you.
- ✓ Do not treat an unemployment compensation hearing lightly if you decide to contest a claim, since a determination of an unemployment compensation agency may be significant in a subsequent discrimination suit filed against you by the discharged employee.
- ✓ Respond to unemployment claims with the same reasons you relied on when discharging the employee.

EEOC Proceedings

- ✓ If a complaint is filed with the EEOC, conduct an immediate and thorough investigation.
- ✓ Never settle a charge without first consulting with a qualified attorney or other EEO professional.
- ✓ Gather and preserve all records relating to the charge.
- ✓ Never retaliate against an employee who has filed a complaint of discrimination, or treat the employee any differently from other employees.
- ✓ Cooperate with the EEOC, but be careful not to allow the agency to take advantage of you.
- ✓ If and when you submit information to the EEOC, remember that the information also will be made available to the FCC.

Final Advice

DON'T FORGET: This handbook is not a substitute for legal advice. In addition, this handbook does not discuss the multitude of state and local laws that might govern your operations. For advice on a specific EEO question or problem, and for information as to what your state requires, you should always consult with a qualified attorney or other EEO professional.

**MINORITY EMPLOYMENT AT KFUE(AM) AND KFUE-FM
BASED ON ANNUAL EMPLOYMENT REPORTS FOR 1983-1990**

000001

<u>Pay Period Ending</u>	<u>Job Categories</u>	<u>Number of Minorities/ Total</u>	<u>Percent of Minorities</u>	<u>Percent of 100% Parity</u>
<u>1/31/83</u>	<u>Full-time</u>			
	Overall	1/17	5.9%	37.7%
	Top 4	1/14	7.2%	45.8%
	Bottom 5	0/3	0.0%	0.0%

<u>Pay Period Ending</u>	<u>Job Categories</u>	<u>Number of Minorities/ Total</u>	<u>Percent of Minorities</u>	<u>Percent of 100% Parity</u>
<u>1/31/84</u>	<u>Full-time</u>			
	Overall	1/18	5.6%	35.6%
	Top 4	1/15	6.7%	42.7%
	Bottom 5	0/3	0.0%	0.0%

NOTES:

- Calculations are based on 15.6% minorities in the St. Louis, Missouri - Illinois MSA (HDO, footnote 6 on page 4).
- All minorities are Black, except one Hispanic employed during the pay period ending January 31, 1989.
- In 1984, 1985, 1986, and 1987 separate reports with identical employment figures were filed for each station, KFUE(AM) and KFUE-FM.

MINORITY EMPLOYMENT AT KFUD(AM) AND KFUD-FM
 BASED ON ANNUAL EMPLOYMENT REPORTS FOR 1983-1990

000002

<u>Pay Period</u> <u>Ending</u>	<u>Job</u> <u>Categories</u>	<u>Number of</u> <u>Minorities/</u> <u>Total</u>	<u>Percent of</u> <u>Minorities</u>	<u>Percent of</u> <u>100%</u> <u>Parity</u>
<u>1/31/85</u>	<u>Full-time</u>			
	Overall	2/17	11.8%	75.4%
	Top 4	1/15	6.7%	42.7%
	Bottom 5	1/2	50.0%	320.5%

<u>Pay Period</u> <u>Ending</u>	<u>Job</u> <u>Categories</u>	<u>Number of</u> <u>Minorities/</u> <u>Total</u>	<u>Percent of</u> <u>Minorities</u>	<u>Percent of</u> <u>100%</u> <u>Parity</u>
<u>1/31/86</u>	<u>Full-time</u>			
	Overall	1/17	5.9%	37.7%
	Top 4	0/14	0.0%	0.0%
	Bottom 5	1/3	33.3%	213.7%

000003

**MINORITY EMPLOYMENT AT KFUP(AM) AND KFUP-FM
BASED ON ANNUAL EMPLOYMENT REPORTS FOR 1983-1990**

<u>Pay Period Ending</u>	<u>Job Categories</u>	<u>Number of Minorities/ Total</u>	<u>Percent of Minorities</u>	<u>Percent of 100% Parity</u>
<u>1/31/87</u>	<u>Full-time</u>			
	Overall	0/18	0.0%	0.0%
	Top 4	0/16	0.0%	0.0%
	Bottom 5	0/2	0.0%	0.0%

<u>Pay Period Ending</u>	<u>Job Categories</u>	<u>Number of Minorities/ Total</u>	<u>Percent of Minorities</u>	<u>Percent of 100% Parity</u>
<u>1/31/88</u>	<u>Full-time</u>			
	Overall	0/23	0.0%	0.0%
	Top 4	0/19	0.0%	0.0%
	Bottom 5	0/4	0.0%	0.0%

**MINORITY EMPLOYMENT AT KFUD(AM) AND KFUD-FM
 BASED ON ANNUAL EMPLOYMENT REPORTS FOR 1983-1990**

000004

<u>Pay Period Ending</u>	<u>Job Categories</u>	<u>Number of Minorities/ Total</u>	<u>Percent of Minorities</u>	<u>Percent of 100% Parity</u>
<u>1/31/89</u>	<u>Full-time</u>			
	Overall	1/26	3.8%	24.7%
	Top 4	1/22	4.5%	29.1%
	Bottom 5	0/4	0.0%	0.0%

<u>Pay Period Ending</u>	<u>Job Categories</u>	<u>Number of Minorities/ Total</u>	<u>Percent of Minorities</u>	<u>Percent of 100% Parity</u>
<u>1/31/90</u>	<u>Full-time</u>			
	Overall	3/27	11.1%	71.2%
	Top 4	0/20	0.0%	0.0%
	Bottom 5	3/7	42.9%	274.7%

CLASSIC99

K F U O · F M

003278

000001

DATE: April 26, 1989

TO: Bob Thomson ✓
Ron Klemm
Dennis Stortz
Paula Zika

FROM: Tom Lauher

RE: UPDATE MATERIALS --- ENCLOSED

The material in the folder represents the updated materials we will use in the station's hiring process. Your folders should include the following:

1. "Application for Employment - KFUE-FM".
2. KFUE-FM EEO Policy Statement.
3. Copy of our "Policy Statement on Sexual Harassment."
4. Copy of memo previously issued to supervisors regarding sexual harrasment.
5. Copy of posted "Notice to Employees and Applicants for employment Regarding station EEO Policy and Program."
6. KFUE-FM Data Form and Instructions for its use.
7. KFUE-FM Applicant Flow Chart.
8. Updated Position Descriptions.
9. Copy of letter we send to Recruitment and Placement Services.
10. The reminder memo to our receptionist regarding the Public Inspection File.
11. "KFUE-FM Guidelines for Dealings with Record Companies and Record Promotors."
12. Copy of memo to KFUE-FM Programming/Announcing staff regarding "Sections 317 & 507 of the Communications Act of 1934."

Those of us who are in hiring positions will need to become very familiar with these forms. If it fits schedules, let's get together Friday morning at 9:15 to go over this material.

CC: Paul Devantier
Jim Rice

85 FOUNDERS LANE, ST. LOUIS, MISSOURI 63105 (314) 725-3030

CLASSIC 99

K F U O · F M

003279

file
3-8-89

6

DATE: March 8, 1989

000002

TO: Dennis Stortz
Ron Klemm
Bob Thomson
Paula Zika

FROM: Tom Lauher, General Manager

SUBJECT: SEXUAL HARASSMENT

Attached to this Memorandum is a copy of our Station Policy on Sexual Harrassment. Since we have several new employees, we thought it appropriate to distribute a copy of this policy to each employee to supplement the posting on our bulletin board.

The Policy is self-explanatory. KFUE-FM will not tolerate acts of sexual harassment. As our personal representative, we are confident that you will not only comply with this Policy, but will also work to ensure that the employees within your area of responsibility also comply with the Policy.

There are a few things we would ask you specifically to watch out for:

1. Be careful that sexual joking and teasing, if allowed to take place at all, not get out of hand. Be particularly alert to this when you have new female employees who are unaccustomed to working with men, and vice versa.
2. Be aware that your own well-meaning conduct might be misunderstood. Avoid physical contact with employees, even if it is nothing more than a pat on the rear or putting your arm around someone's shoulder.
3. Keep your eyes open for subtle conduct among your employees, such as a man who constantly brushes up against women, "accidentally."
4. Take particular care to treat all employees consistently and fairly, regardless of their sex or physical attractiveness. We are all human, and it is sometimes easy to fall into a pattern of allowing an attractive or especially likeable employee to "get by" with things that would not be tolerated in other employees. Don't do it.

Supervisors or other employees who are found to have engaged in sexual harassment will be disciplined. Although each case will be judged on its facts, such discipline may include suspension, demotion or discharge.

Because of differences in employees' values and backgrounds, some individuals may find it difficult to recognize their own behavior as sexual harassment. We hope to create an awareness of the kinds of conduct which may be construed as sexual harassment, so that you and the employees under your supervision will be able to avoid problems.

Our goal is to have and maintain a dignified, professional, and comfortable atmosphere, and we believe that the elimination of sexual harassment is essential to that goal.

85 FOUNDERS LANE, ST. LOUIS, MISSOURI 63105 (314) 725-3030

INSTRUCTIONS FOR USE OF KFUE-FM DATA FORM

1. This form should be completed by or on behalf of every applicant who submits a resume and/or employment application to KFUE-FM. Anyone calling about a job opening should be asked to come to the station to complete an employment application.
2. This form must be kept separate from an applicant's resume and/or employment application, and should not be seen by the person making hiring decisions until after the employment decision has been made.
3. After an offer of employment has or has not been made, this form should continue to be maintained in a separate file. It should never be placed in an employee's personnel file.
4. In addition to making a notation on this form, you should send a letter to any applicant to whom you make an offer of employment and which is rejected, detailing the terms of the offer, and documenting the fact that the offer was rejected and any reasons given. Copies of these letters should be kept on file.
5. On a regular periodic basis, the data from these forms should be compiled on the KFUE-FM Applicant Flow Chart, maintained in the business office.

KFUO-FM EEO DATA FORM

000004

NOTE: The data requested by this form will assist us in complying with equal employment opportunity obligations. This form will be maintained in a file separate from your resume and/or employment application. The information you provide on this form will not be available to the person who evaluates your employment application, and will not be used in any way in determining whether to offer you employment. Part B of the form will not be completed until after a decision on your application has been made, and, if an offer of employment is made, until after you have accepted or rejected the offer.

PART A

NAME: _____ DATE: _____

REFERRED BY: _____

RACE:

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

SEX: F M

PART B

POSITION FOR WHICH APPLICANT APPLIED: _____

HIRED: YES NO

IF NO, REASONS: _____

IF OFFER MADE AND REJECTED, REASONS GIVEN BY APPLICANT: _____

003282

KFUO-FM APPLICANT FLOW CHART

000005

Time Period of Report _____

Person Preparing Report _____

Date Prepared _____

- *1-American Indian or Alaskan Native
- 2-Asian or Pacific Islander
- 3-Black, not of Hispanic Origin
- 4-Hispanic or Spanish-Surnamed
- 5-White, not of Hispanic Origin

- **1-Interviewed, no offer
- 2-Interviewed, offer extended, and hired
- 3-Interviewed, offer extended, but rejected

003284

000007

KFUCO-FM EEO POLICY STATEMENT

IT IS THE POLICY OF KFUCO-FM TO PROVIDE EQUAL EMPLOYMENT OPPORTUNITY TO ALL QUALIFIED INDIVIDUALS WITHOUT REGARD TO RACE, COLOR, RELIGION, NATIONAL ORIGIN, AGE, OR SEX, IN ALL PERSONNEL ACTIONS INCLUDING RECRUITMENT, EVALUATION, SELECTION, PROMOTION, COMPENSATION, TRAINING, DISCIPLINE, AND TERMINATION. IT IS ALSO THE POLICY OF KFUCO-FM 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, AGE 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. COPIES OF OUR EQUAL EMPLOYMENT OPPORTUNITY PROGRAM ARE AVAILABLE TO ALL INTERESTED PERSONS IN THE BUSINESS OFFICE.

003285

APPLICATION FOR EMPLOYMENT -- KFUD-FM

000008

Discrimination because of a person's race, color, creed, religion, sex, national origin, or age in employment and personnel practices is prohibited by the Federal Communications Commission. If you believe your equal employment rights have been violated, you may contact the appropriate local, state or federal agency.

PERSONAL DATA

Date _____

Name (Last) First Middle Social Security No.

Street Telephone

City State Zip ()

Are you 18 years or older
Yes No

Applying for Position as: Part-Time/Full-Time

Do you have any physical or mental conditions that may limit your ability to perform the job for which you have applied? Yes No

Person to notify, in case of Accident.

If yes, explain.

Do you have transportation
Yes No

Are you a United State Citizen or do you presently have the legal right to remain in the United States? Yes No

Date Available

Have you ever been convicted of a felony? Yes No

If yes, what were the charges? Please explain.

EDUCATION

Name of School Major Course of Study Highest Grade Completed Did You Graduate? DEGREE

High School

Business or Trade School

College* - Please give the last year attended or year graduated

Graduate School

List Any Academic Honors

Additional Education or Training*

*Date Required for Verification

EMPLOYMENT HISTORY

Present or Last Employer	Telephone	From	To	Position and Duties
Address		Reason for Leaving		
City, State, Zip		Salary		
Next Previous Employer		From	To	
Address		Reason for Leaving		
City, State, Zip		Salary		
Next Previous Employer		From	To	
Address		Reason for Leaving		
City, State, Zip		Salary		
Next Previous Employer		From	To	
Address		Reason for Leaving		
City, State, Zip		Salary		

OPTIONAL

000010

School Activities -- honorary, social, sports, etc.*

What positions of leadership or responsibility have you held in school, work, or elsewhere?

Of what civic, technical, trade, professional or other organization are you a member?*

Any outside business activities? Describe:

List foreign languages: () read () spoken () written

REFERENCES

Name two people who have known you at least two years (do not include relatives, former employers, personnel of this company, or persons whose affiliation may reflect your race, sex, religion, or national origin.)

Name: _____

Address: _____

Business: _____

Position: _____

Telephone: _____

Name: _____

Address: _____

Business: _____

Position: _____

Telephone: _____

003288

000011

I HEREBY CERTIFY THAT THE ANSWERS TO THE FOREGOING QUESTIONS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND I UNDERSTAND THAT ANY MISSTATEMENT OF FACT WILL, IF I AM EMPLOYED, SUBJECT ME TO IMMEDIATE DISMISSAL. I ALSO UNDERSTAND THAT AS A NORMAL EMPLOYMENT PROCEDURE, A ROUTINE INQUIRY MAY BE MADE CONCERNING MY BACKGROUND AND QUALIFICATIONS. I AUTHORIZE SUCH AN INVESTIGATION AND UNDERSTAND THAT, UPON MY WRITTEN REQUEST, INFORMATION ON THE NATURE AND SCOPE OF THE INQUIRY, IF ONE IS MADE, WILL BE PROVIDED TO ME. MY PRESENT EMPLOYER [MAY] [MAY NOT] BE CONTACTED. (PLEASE CIRCLE ONE.)

DATE: _____ SIGNATURE: _____

STATION KFUE-FM IS AN EQUAL OPPORTUNITY EMPLOYER. STATION KFUE-FM SEEKS AND EMPLOYS QUALIFIED PERSONS IN ALL JOB CLASSIFICATIONS AND POSITIONS WITHOUT DISCRIMINATION ON THE BASIS OF RACE, COLOR, RELIGION, NATIONAL ORIGIN, AGE, OR SEX. SUCH DISCRIMINATION IS PROHIBITED BY LAW. IF YOU BELIEVE YOU HAVE BEEN DISCRIMINATED AGAINST, YOU MAY NOTIFY THE FEDERAL COMMUNICATIONS COMMISSION, THE EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, THE MISSOURI COMMISSION ON HUMAN RIGHTS, 625 NORTH EUCLID, SUITE 605.

CLASSIC 99

K F U O · F M

003289

000012

DATE: March 8, 1989

TO: Dennis Stortz
Ron Klemm
Bob Thomson
Paula Zika

FROM: Tom Lauher, General Manager

SUBJECT: SEXUAL HARASSMENT

Attached to this Memorandum is a copy of our Station Policy on Sexual Harassment. Since we have several new employees, we thought it appropriate to distribute a copy of this policy to each employee to supplement the posting on our bulletin board.

The Policy is self-explanatory. KFUC-FM will not tolerate acts of sexual harassment. As our personal representative, we are confident that you will not only comply with this Policy, but will also work to ensure that the employees within your area of responsibility also comply with the Policy.

There are a few things we would ask you specifically to watch out for:

1. Be careful that sexual joking and teasing, if allowed to take place at all, not get out of hand. Be particularly alert to this when you have new female employees who are unaccustomed to working with men, and vice versa.
2. Be aware that your own well-meaning conduct might be misunderstood. Avoid physical contact with employees, even if it is nothing more than a pat on the rear or putting your arm around someone's shoulder.
3. Keep your eyes open for subtle conduct among your employees, such as a man who constantly brushes up against women, "accidentally."
4. Take particular care to treat all employees consistently and fairly, regardless of their sex or physical attractiveness. We are all human, and it is sometimes easy to fall into a pattern of allowing an attractive or especially likeable employee to "get by" with things that would not be tolerated in other employees. Don't do it.

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Our goal is to have and maintain a dignified, professional, and comfortable atmosphere, and we believe that the elimination of sexual harassment is essential to that goal.

003291

000014

Dear _____:

Station KFUO-FM is an Equal Opportunity Employer. From time to time, we have job openings at our station which require a variety of skills and talents. We encourage members of minority groups and women to apply for these positions, and we seek your help in referring minorities and women to us.

We will be contacting you as job openings arise at our station. In the meantime, if you know of minority group members and/or women who might be interested in working at our station, please do not hesitate to refer them directly to me. In the event you do not presently know of any such candidates, please refer them to me whenever they come to your attention.

If you are aware of any other organization which may be of assistance to us in this regard, I would also appreciate having its name and address. I am enclosing a reply form, and ask that you complete and return it to me to acknowledge receipt of this letter.

Thank you for your assistance.

Sincerely,

Tom Lauher
General Manager

003292

000015

This is to acknowledge that I have received a letter from Station KFUC-FM 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:

Name

Address

NOTICE TO EMPLOYEES AND APPLICANTS
FOR EMPLOYMENT REGARDING STATION
EEO POLICY AND PROGRAM

000016

(TO BE POSTED AT ALL TIMES IN A CONSPICUOUS LOCATION)

It is the policy of Station KFUO-FM to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin, or age, all personnel actions including recruitment, evaluation, selection, promotion, compensation, training, discipline, and termination.

It is also the policy of Station KFUO-FM 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, age 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. Copies of our Equal Employment Opportunity Program are available to all interested persons in the business office.

We would like to ask your cooperation and assistance in our efforts to recruit, hire and promote qualified women and minorities. In this regard, if you know of individuals who might be interested in and qualified to work at the station, we encourage you to refer them to us.

All applicants and employees are entitled to equal employment opportunity. If you believe you have been discriminated against, you have the right to notify the Federal Communications Commission, 1919 M Street, N.W., Washington, D.C. 20554; the Equal Employment Opportunity Commission, 525 North Euclid or the Missouri Commission on Human Rights, 625 North Euclid, Suite 605.

NOTICE TO EMPLOYEES AND APPLICANTS
FOR EMPLOYMENT REGARDING STATION
EEO POLICY AND PROGRAM

000017

(TO BE POSTED AT ALL TIMES IN A CONSPICUOUS LOCATION)

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All applicants and employees are entitled to equal employment opportunity. If you believe you have been discriminated against, you have the right to notify the Federal Communications Commission, 1919 M Street, N.W., Washington, D.C. 20554; the Equal Employment Opportunity Commission, 25 North Euclid or the Missouri Commission on Human Rights, 625 North Euclid, Suite 605.

003295

000018

KFUCO-AM EEO POLICY STATEMENT

IT IS THE POLICY OF KFUCO-AM TO PROVIDE EQUAL EMPLOYMENT OPPORTUNITY TO ALL QUALIFIED INDIVIDUALS WITHOUT REGARD TO RACE, COLOR, RELIGION, NATIONAL ORIGIN, AGE, OR SEX, IN ALL PERSONNEL ACTIONS INCLUDING RECRUITMENT, EVALUATION, SELECTION, PROMOTION, COMPENSATION, TRAINING, DISCIPLINE, AND TERMINATION. IT IS ALSO THE POLICY OF KFUCO-AM 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, AGE, OR SEX.