

NAACP EXHIBIT 8

| <u>Federal Communications Commission</u> | |
|--|-----------------------------------|
| Docket No. | <u>94-10</u> Exhibit No. <u>8</u> |
| Presented by | <u>NAACP</u> |
| Disposition | Identified <u>6/21</u> |
| | Received <u>6/21</u> |
| | Rejected _____ |
| Reporter | <u>BARBARA WOOD</u> |
| Date | <u>6/21/94</u> |

DECLARATION OF JAN HUTCHINSON

①

I, Jan Hutchinson, respectfully state as follows.

1. My background has been provided in my declaration of May 31, 1994 and is further set out in the attached resumé.

2. In the course of my career, I have worked with approximately 25 radio salespeople. I am thoroughly familiar with all aspects of radio sales.

3. I have never been a witness in a civil rights case before. I am doing this for the NAACP because I love the radio business. It has been good to me personally and professionally, and I want to be sure the business is fair to everyone.

4. I understand that KFUCO-FM has argued that "classical music expertise" (whatever that is) is an appropriate prerequisite to be hired to sell airtime on a classical music station. I am aware that KFUCO-FM changed from a noncommercial to a commercial operation in 1982, and that the station maintains that unlike salespeople at an established commercial classical station, KFUCO-FM salespersons needed classical music expertise because they had to establish KFUCO-FM's "product" to advertisers for the first time.

5. That is preposterous and no broadcaster with any sense would believe it. A radio station is not a record store. The "product" being sold is not classical music; the product is the availability of listeners, in particular numbers and with particular demographics, at particular times of day.

6. Every businessperson interested in buying radio airtime is very familiar with what classical music is. Unlike "new age" or "acid rock", "classical" is not an obscure or esoteric format advertisers wouldn't know anything about. KFUCO-FM was hardly a startup station introducing new music into a market which had never heard this music before.

7. For a few weeks in 1982, when KFUCO-FM's "commercial classical" format was being rolled out, a salesperson might have needed to explain to advertisers how KFUCO-FM operated differently as a commercial station than as a noncommercial station. However, those differences involve announcing style, scheduling, and pacing -- matters easily explainable by a salesperson with radio sales expertise without regard to his or her "classical music expertise."

8. KFUCO-FM had the commercial classical format all to itself. It did not need to differentiate itself from any other commercial classical station. It did, however, need to convince advertisers that its listeners had attractive demographics and were tuning in to hear the programming, whatever that programming might happen to be.

9. Radio salespeople need to know radio sales. Someone who is good at selling airtime on a Black or country/western radio station is far more qualified to sell for a classical station than a classical musician who can't interpret an Arbitron report. A good automobile salesperson who doesn't know Brahms from Beethoven will do far better in classical radio airtime sales than a Symphony season ticket holder who's never set foot in a radio station.

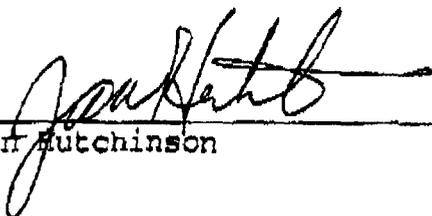
3

10. An advertiser on classical radio might occasionally have a special need, such as being scheduled for spots during a symphony rather than during an opera. Thus, it might be important for a classical music salesperson to know the difference between a symphony and an opera. But any good radio salesperson could learn, in a couple of hours or less, everything he or she would need to know about classical music in order to service almost every advertiser's special needs.

11. I understand that KFUC-FM has also argued that qualified Blacks with classical music expertise are hard to find. That argument might have some merit in Springfield or Peoria, but certainly not in St. Louis. St. Louis has an enormous pool of qualified Black radio professionals who can do any job in any radio station and do it very well.

I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed 6/16/94.



Jan Hutchinson

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JAN HUTCHINSON

716 Le'Manns Drive
Manchester, Missouri 63021
Car 578-6370 Home (314) 394-0799

CAPABILITIES

- * Acquire new clients and maintain existing advertisers
- * Provide professional, ethical representation to national and local advertising agencies and direct accounts
- * Establish and direct effective sales staff
- * Create higher audience visibility through promotions
- * Supervise commercial production and all aspects of operations and continuity
- * Plan marketing strategy, to increase audience
- * Provide leadership qualities

ACHIEVEMENTS

- * Proven sales record, over three years as top biller at two stations
- * Acquire, develop and service over 100 new accounts
- * Increase station financial base and secure future income
- * Create specific proposals and packages to increase clientele
- * Coordinate operations for several formats
- * Operate technical equipment; radio, video, film
- * Served over eleven years in St. Louis radio with background in several positions
- * Design and execute promotions to increase audience, enhance station ratings and provide revenue
- * Solve account problems
- * Acquire new major accounts; Dillard's, JC Penney, St. Louis Symphony Orchestra, Olive Garden, Landmark Banks, A.G. Edwards and more

CAREER HISTORY

WIBV-AM, Belleville: General Sales Manager
 KXOK/KLTH-FM, Clayton: Acting General Sales Manager, Account Executive, Promotions
 KFUD-FM, Clayton: Acting General Sales Manager, Account Executive, Promotions, Copywriter, Voice Talent
 KADI-AM/FM, St. Louis: Production Director, Public Service Director, Copywriter, Continuity/Traffic Coordinator, Voice Talent Announcer/DJ
 KWK-AM/FM, St. Louis: Special Promotions Assignment, Live concert simulcast coverage
 KSHE-FM, Crestwood: Acting Production Director, Copywriter, Continuity/Traffic, Promotions Assistant, Photography
 KWRE-AM, Warrenton: Announcer/DJ, Production, Copywriter, Voice Talent
 AFFAIRS MAGAZINE: Advertising Director, Account Executive, Ad lay-out/paste up, Photographer, Model
 TURQUOISE FILM/VIDEO PRODUCTIONS: General Manager, Office Manager, Photographer/Cinematographer, Oxberry Animation Camera operator
 CONTEMPORARY PRODUCTIONS/MEDIASOURCE ADVERTISING: Office Manager, Media Buyer

Advertising specialist with excellent communication skills, team player. copywriting

(5)

JAN HUTCHINSON
716 Le'Manns Drive
Manchester, Missouri 63021
Office 961-0050 Home 394-0799

ACTRESS * COMMERCIALS * PRINT MODEL * VOICE TALENT

RADIO

The Cheese Place
Danica Furniture
Dierbergs Courtyard Restaurants
Dierbergs FTD Florists
Jean Phillipe Hair Salon
The Natural Way
Oriental Rug Center
Philibert Security

Plaza Frontenac
Saint Louis Symphony Orchestra
Sambeau's Limited
Telepro Communications
Wallpapers To Go

TELEVISION/VIDEO/FILM

Contemporary Productions
Comedy Blast
Healthcare Network
Holtens Frozen Hamburgers
Hussman Refrigeration
Planes Trains & Automobiles
Ralston Purina/Continental Baking
Robert Half/Account Temps

Sally Jesse Raphael
Superior Savings & Loan
United Van Lines
Venture Stores
World Federalists

LIVE PERFORMANCES

Air Force Training Seminar - roleplaying model
Charlies - VJ/DJ/MC
Dillard's - Ralph Lauren/Polo promotion
Fantasies - VJ/DJ/MC
Hidden Valley Ski Resort - 3 years, DJ/MC
J.C. Penneys - Petite Fashions, 3 locations
Mikes On Maryland, Chase Park Plaza - VJ/DJ/MC Manager
St. Louis Social Singles, Joe Hanons - DJ/MC
Six Flags Over Mid-America - Friday At The Flags - VJ/MC
West Port Playhouse - Looks of the 80's Fashion Show - MC/Producer
Whisper's, Radisson Hotel - DJ/VJ/MC

PRINT

American Optometric Association - brochure
Best Sound - back cover magazine ad
Edgewood Chemical Dependency Unit - front cover brochure
Executive Limousine Service - back cover, magazine ad
Ralston Purina - cereal survey, Bran News box

CAREER HISTORY

KFUO-FM, St. Louis - LSM, A/E, copywriter, voice talent, photographer
KSHE-FM, St. Louis - Production Director, copywriter, continuity
KADI-AM/FM, St. Louis - DJ/Announcer, Production Director, Public
Service Director, voice talent, copywriter, photographer
KWRE-AM, Warrenton - DJ/Announcer, production, voice talent
AFFAIRS MAGAZINE - Advertising Director, A/E, model, photographer
TURQUOISE FILM/VIDEO PRODUCTIONS - GM, Office Manager, coordinator
CONTEMPORARY PRODUCTIONS/MEDIASOURCE ADVERTISING - Office Manager,
media buyer, copywriter, operations coordinator
MULTICOM COMMUNICATIONS - Sales Manager, A/E, Office Manager,
Entertainment Coordinator

NAACP EXHIBIT 9

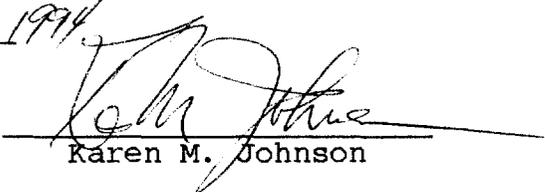
| <u>Federal Communications Commission</u> | |
|--|-----------------------------------|
| Docket No. | <u>94-10</u> Exhibit No. <u>9</u> |
| Presented by | <u>NAACP</u> |
| Disposition | Identified <u>6/21</u> |
| | Received <u>6/21</u> |
| | Rejected <u>6/21</u> |
| Reporter | <u>BARBARA LLOYD</u> |
| Date | <u>6/21/94</u> |

①

DECLARATION OF KAREN M. JOHNSON

I, Karen M. Johnson, respectfully state as follows.

1. I am an African American female residing in the city of Alton, Illinois, which is in the St. Louis Metropolitan area. I have been a resident of Alton since 1989.
2. In January of 1990, I went by the name of Karen M. Henderson.
3. In January of 1990, I sought employment at the Lutheran Employment Project of St. Louis, Missouri and was referred to KFUCO radio station, by Elston McCowan.
4. I applied, in person, for the position of Receptionist on Jan 26, 1990. Prior to my applying for this position, I had six consecutive years experience as a receptionist.
5. I was never interviewed for this or any other position by KFUCO.
6. Shortly after I applied, I received via mail a standard rejection letter regarding the position of receptionist.
7. I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed June 15, 1994

Karen M. Johnson

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: KAREN M. HENDERSON DATE: 26 JAN 90

REFERRED BY: LUTHERAN EMPLOYMENT PROJECT

RACE: BLACK

- 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: RECEPTIONIST

HIRED: YES NO

IF NO, REASONS: _____

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

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2) EMPLOYMENT SERVICES

000019

ORGANIZATION Lutheran Employment Project PERSON CONTACTED _____

Elston McOwan DATE CONTACTED 1/17/90

RESULT Referred two candidates for receptionist position. Both were interviewed. One was hired.

ORGANIZATION _____ PERSON CONTACTED _____

DATE CONTACTED _____

RESULT _____

3) EDUCATIONAL INSTITUTIONS

INSTITUTION _____ PERSON CONTACTED _____

DATE CONTACTED _____

RESULT _____

4

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: Bridget Denise Williams DATE: 1-19-78

REFERRED BY: Lutheran Employment Project

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: Receptionist

HIRED: YES NO

IF NO, REASONS: _____

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

003563



APPLICATION FOR EMPLOYMENT

The Lutheran Church—Missouri Synod consists of over 6,000 congregations in the United States, united to do mission and ministry more effectively and on a worldwide scale in 30 countries. Founded in 1847, it ranks second among Lutheran religious groups and is the sixth largest religious body in North America. Total membership is 2.7 million. Headquarters are located in St. Louis with 38 District offices located throughout the United States and Canada.

THE
LUTHERAN CHURCH
MISSOURI SYNOD

PERSONAL DATA

Date 26 JAN 90

| | | | | |
|--|--|---------------------|---|--|
| Name Last: <u>HENDERSON</u> , First: <u>KAREN</u> , Middle: <u>M.</u> | | | | Social Security No. <u>344-54-2488</u> |
| Street <u>2010 BROOKER</u> | | | | Telephone <u>618/462-2282 or 462-4819</u> |
| City <u>ALTON</u> | State <u>IL</u> | Zip <u>62002</u> | Are you 18 years or older <u>yes</u> | |
| Position Desired <u>Receptionist</u> | | | Date Available <u>05 FEB 90</u> | |
| Do you have any relatives employed by the Synod <u>NO</u> | | | If yes, who <u>N/A</u> | |
| Religious Affiliation <u>BAPTIST</u> | Name & address of congregation <u>TABERNACLE MISSIONARY BAPTIST 2620 AMELIA ST. ALTON 62002</u> | | Pastor <u>REV. L.C. CALMISE</u> | |
| Have you ever been convicted of a felony <u>NO</u> | | | If yes, explain <u>N/A</u> | |

EDUCATION

| Name of School | Major Course of study | ACADEMICS | Highest Grade Completed | Did you Graduate? | Degree |
|--|--|---------------------|--|-------------------|----------------|
| <u>ALTON PUBLIC SCHOOLS DIST # 11</u> | | <u>GENERAL</u> | <u>8</u> | <u>YES</u> | |
| <u>ALTON SR. HIGH</u> | | <u>COLLEGE PREP</u> | <u>12</u> | <u>YES</u> | <u>DIPLOMA</u> |
| Business or Trade School* | <u>N/A</u> | | | | |
| College* —Please give the last year attended or year graduated | <u>LEWIS & CLARK COMMUNITY COLLEGE</u> | | <u>AMERICAN SIGN LANGUAGE, ENGLISH AND INTERPERSONAL COMMUNICATION</u> | <u>NO</u> | <u>N/A</u> |
| Graduate School* | <u>N/A</u> | | | | |
| List any Academic Honors | | | | | |

Additional Education or Training: FT. CAMPBELL, KY - DEFENSE LANGUAGE INSTITUTE - GERMAN HEADSTART & INTERMEDIATE 1987
FT. CAMPBELL, KY - COMPUTER LAB - WORDPROCESSING (WORDSTAR) & LOTUS 1-2-3

SKILLS

| | |
|---|--|
| Typing speed words per minute <u>30-35</u> | Can you transcribe machine dictation? <u>NO</u> |
| Describe your Word Processing experience <u>FT. CAMPBELL, KY - 1987 - ALSO OWN COMPUTER ON WHICH I DO WORDPROCESSING</u> | |
| Describe your data entry (CRT) experience <u>FMC, SAN JOSE CA 1983, FT. CAMPBELL, KY - AMERICAN RED CROSS 1984</u> | |
| Other business machines you can operate <u>COPIERS, MICRASCHE, MICROFILM REPRO, BLUEPRINT REPRO</u> | |
| Do you fluently speak any foreign languages? <u>NO, BUT CAN SPEAK SOME GERMAN AND AMERICAN SIGN LANGUAGE</u> | |
| Describe other skills | |

PERSONAL REFERENCES

| Name and Address | Telephone | Business or Profession | Length of Acquaintance |
|--|---------------------|------------------------|------------------------|
| 1 MRS. MACHELL TURNER 9125 K. TUMBLE WOOD RUN LAUREL, MARYLAND | 301/725-7231 | R.N. | 15 yrs. |
| 2 MS. JOAN Y. WILLIAMS 2816 CIRCLE DR. ALTON, IL | 618/465-9205 | CASEWORKER | 15 yrs. |
| 3 MRS. JACQUELINE R. DAVIS 2946 SEMINOLE RD WOODBRIIDGE, VA | 703 612/494-0355 | ADMIN. ASS'T. | 4 yrs. |
| 4 MR. MARVIN MONK 1145 VERNIE ALTON, IL | 618/462-8347 | | |

PREVIOUS EMPLOYMENT

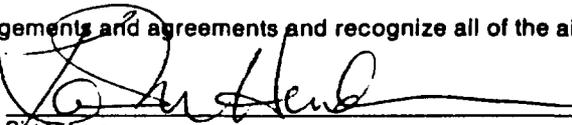
| Present or Last Employer | Telephone | From | To | Position and Duties |
|---|--------------|-------|-------|---|
| BEVERLY FAIRM FOUNDATION Address 6301 HUMBERT RD. City, State, Zip GODFREM, IL | 618/466-0367 | 04/88 | 07/88 | DEVELOPMENTAL TRAINER TEACHING & SUPERVISION OF DEV-DISABLED ADULTS. |
| Next Previous Employer DEPT OF ARMY SPOUSE ABUSE SHELTER Address 101 ST AIRBORNE DIV, HOGGS. City, State, Zip FT. CAMPBELL, KY 42223 | | 01/87 | 10/87 | RECEPTIONIST / INFORMATION - REFERRAL |
| Next Previous Employer AMERICAN RED CROSS Address PO Box 91 / CUMPFEE RD. City, State, Zip FT. CAMPBELL, KY 42223 | | 03/87 | 10/87 | CASEWORKER |
| Next Previous Employer FMC Address 1830 BERLING DR. / 214 B. DEVENY / 328 W. BROADWAY / 1125 COLLEMAN AV. City, State, Zip SAN JOSE, CA 95112 | | 10/82 | 12/85 | RECEPTIONIST / DATA CLERK II - ART FILES / DATA CLERK I - PRINT CLUB / SECURITY |

I hereby certify that the statements made in the above employment application are true and complete to the best of my knowledge and I authorize investigation of those statements. I understand that falsification, misrepresentation, or omission of facts will be sufficient cause for elimination of any consideration for employment or cause for dismissal from the Synod if I have been employed.

The Synod has the right, exercisable at any time, and without notice, to change wages, non-accrued benefits, and policies as well as to terminate, with or without cause, the employment relationship. I understand that no manager or representative of The Lutheran Church—Missouri Synod, other than the Personnel Committee of the Synod, has any authority to enter into any agreement for employment for any specified period of time or to make any agreement contrary to the foregoing.

I understand that all employees of the Synod are expected to respect the official doctrines of the Synod and to pursue lifestyles that are morally in harmony with its teachings.

I agree that I have read and understand the above acknowledgements and agreements and recognize all of the above as conditions of employment.


Signature

26 JAN 90
Date

INTERVIEWERS COMMENTS

Lutheran Job Placement - pants

KAREN JOHNSON-HENDERSON
2010 BOOKER
ALTON, IL 62002
(618) 462-2282

CAREER INTEREST

Social Services

DEVELOPMENTAL TRAINING EXPERIENCE

TEACHING self-help, cognitive, language, gross/fine motor, independent living skills, behavior modification, and sensory stimulation to developmentally disabled adults. Beverly Farm Foundation, Godfrey, IL 1988. Specialized Services, Granite City, IL 1979-1982. Alton State Hospital, Alton, IL 1979.

EVALUATING client skills for the purpose of setting goals/objectives, obtaining contract work and placement. Beverly Farm Foundation, Godfrey, IL 1988. Specialized Services, Granite City IL 1979-1982.

SUPERVISING, PLANNING & IMPLEMENTING all classroom schedules, O-J-T, recreational activities. Beverly Farm Foundation, Godfrey, IL 1988. Camp Rainbow, Ft. Campbell, KY 1987. Specialized Services, Granite City, IL 1979-1982.

CASEWORKING/COUNSELING

FINANCIAL ASSISTANCE & BUDGET PLANNING to military personnel & dependent families. American Red Cross, Ft. Campbell, KY 1987.

COMMUNICATION with military personnel, families American Red Cross Stations & chapters internationally, American Red Cross Ft. Campbell, KY 1987.

COUNSELING provided information/referral to clients, assisted clients in making arrangements for financial assistance, legal services, psychotherapy, marriage counseling, child care, goal/objective setting, employment. Beverly Farm, Godfrey, IL 1988. American Red Cross, Ft. Campbell, KY 1987. Dept. of Army Spouse Abuse Shelter, Ft. Campbell, KY 1987. American Red Cross Rape Crisis Team, Ft. Campbell, KY 1987. Specialized Services, Granite City, IL 1979-1982.

RECREATIONAL COORDINATING

COACHING Special Olympics, Beverly Farm Foundation, Godfrey, IL 1988. Specialized Services, Granite City, IL 1979-1982. Alton State Hospital, Alton, IL 1979.

(con't.)

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OFFICE SKILLS

CLERICAL filing, typing, record keeping, use of office machines. Beverly Farm Foundation, Godfrey, IL 1988. Dept. of Army, Spouse Abuse Shelter, Ft. Campbell, KY 1987. American Red Cross, Ft. Campbell, KY 1987. FMC San Jose, CA 1982-1987. Specialized Services, Granite City, IL 1979-1982.

PUBLIC RELATIONS providing information/referral, answering phones, making public announcements, greeting clients/customers, checking & issuing badges. FMC San Jose, CA 1982-1985. Dept. of Army Spouse Abuse Shelter, Ft. Campbell, KY 1987. American Red Cross, Ft. Campbell, KY 1987.

SPECIAL SKILLS

German - Headstart & Intermediate Language Lab Ft. Campbell, KY 1987.
Word processing (Word Star), and Lotus 1,2,3 Computer Lab Ft. Campbell, KY 1987.
Computer Data Entry - FMC, San Jose, CA 1983.
Caseworking - American Red Cross, Ft. Campbell, KY 1987.

EDUCATION

Undergraduate classes in Interpersonal Communications American Sign Language and English, Lewis & Clark Community College, Godfrey, IL 1980.
Alton High School, Alton, IL 1978. (Diploma)

References Available Upon Request

Karen Henderson

003567 (9)

- 7 - punctual
- ✓ 9 - pleasant voice
- ✓ 7 - good appearance
- 8 - positive
- ✓ 8 - friendly
- ✓ 9 - good communication skills
- 7 - motivated
- 8 - organized
- 7 - multiple tasks
- ✓ 9 - ~~good guest greeter~~ good guest greeter
- ✓ 8 - works well with people
- 7 - ability to prioritize
- ✓ 8 - dependable
- ✓ 8 - pleasant personality

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(48)

NAACP EXHIBIT 10

| <u>Federal Communications Commission</u> | |
|--|------------------------------------|
| Docket No. | <u>94-10</u> Exhibit No. <u>10</u> |
| Presented by | <u>NAACP</u> |
| Disposition | Identified <u>6/21</u> |
| | Received <u>6/21</u> |
| | Rejected _____ |
| Reporter | <u>BARBARA LORO</u> |
| Date | <u>6/21/94</u> |

①

Declaration of Michael C. Williams

1. Michael C. Williams, respectfully state as follows:
2. I am a resident of the city of St. Louis, state of Missouri, I have been a resident of St. Louis, all my life.
3. I have been the editor and associate publisher of the Sentinel Newspaper since 1976, and have attended Lincoln University, Jefferson City, Mo. for undergraduate work, and St. Louis University Law School for graduate work.
4. My responsibility with the newspaper is to run the day to day operations of the paper, and monitor its editorial and advertising content.
5. To the best of my knowledge, besides the ads placed in the January 25, 1990 publication, KFUE has NEVER PLACED any other advertisements in the Sentinel Newspaper.
6. I want to stress that KFUE has never contacted me in regards to job referrals for African-Americans, or anyone else for that matter.
7. I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed: June 16, 1994

Michael Williams

Michael C. Williams
Editor & Associate Publisher
Sentinel Newspaper
2900 North Market, 63106

963396

CLASSIFIED

data processing

NETWORK/TELECOMMUNICATIONS SPECIALIST

Data Research is a nationwide vendor of VAX based automated library systems. As a result of a growth rate in excess of 40% we currently have an immediate opening for the following position:

The Network/Telecommunications Specialist position is a challenging position that is responsible for the configuration, implementation, installation and support of telecommunication networks located at customer sites. This is a position that offers a chance to enhance your knowledge of a variety of communication hardware/software. Experience with DEC Communication equipment, Digital Communication Associates Communication equipment, Gandalf Communication equipment, Paradyne Communication equipment, and DECNET/X25 protocol is desired. This position requires an Associates Degree or equivalent experience, and knowledge of DEC VAX/VMS. Ability to travel and assume rotating on-call responsibilities. Please send a resume with salary requirement to:

Data Research Assoc., Inc.
1276 N. Warson Rd.
St. Louis, MO. 63132
Attn: Jenni

No telephone calls please.
Equal Opportunity Employer

Banking

CUSTODIAL/OFFICE MAINTENANCE

Immediate opening for Custodial/Office Maintenance worker for non-commercial religious radio station. Must have valid drivers license for pick-up and delivery tasks. Call 725-3030. Equal Employment Opportunity Employer.

ASSISTANT DIRECTOR OF ALUMNI PROGRAMS

Washington University is seeking applications from college graduates, who have at least 2 years experience in public relations, sales, or related field, to work with the Office of Alumni and Development Programs. This position requires working with alumni and parent activities in St. Louis and throughout the United States. Preference will be given to candidates who have graduated from Washington University. Deadline is February 15, 1990. Send resume to:

Julie Ann Kohn
Director, Alumni Relations
and Parent Programs
Washington University
Campus Box 1210
One Brookings Drive
St. Louis, MO. 63130

Affirmative Action/Equal Opportunity Employer
Employment eligibility verification required upon hire

TELEMARKETING

Part-time evening position available for telephone research. No selling involved. Candidates must have a good speaking voice. Ideal for college students interested in communications. Please send resume to:

St. Louis Sentinel
2900 North Market St.
Box 1001
St. Louis, Mo. 63106
Equal Opportunity Employer M/F

CATV DESIGNER

Gencom Cable Associates is currently interviewing candidates for a CATV Designer position. Primary responsibilities shall be to establish a corporate level design department specializing in rebuilds, upgrades and fiber optic distribution. The position shall report to the Vice President of Engineering. Qualified candidates will have advanced electronics knowledge, supervisory ability, an operations background, a minimum of ten years in CATV design and at least three years experience with CAD, including selection, set-up and operation. Competitive salary and benefits package. Qualified candidates only submit resume, salary history and requirements to: (No phone calls please).

Gencom Cable Associates, Inc.
14522 South Outer 40 Rd., Suite 300
Chesterfield, MO. 63017

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CLASSIFIED

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RECEPTIONIST/SECRETARY

Immediate opening for Receptionist/Secretary for non-commercial religious radio station. Call 725-3030. Equal Employment Opportunity Employer.

DIRECTOR OF VOLUNTEERS

B.A. Graduate 2 years experience chauffers license flexible hours. Send resumes to:

ANNIE MALONE CHILDREN'S HOME
2612 ANNIE MALONE DRIVE
ST. LOUIS, MO. 63113

EQUAL OPPORTUNITY AGENCY - EEO

EXECUTIVE DIRECTOR

Christian Social Service Agency

Challenging position confronting problems of poverty and racism. BA/BS church professionals preferred 5 years experience / social service or management / church or non profit sector. Send resume by February 19, 1990 to:

PAKT
8301 Booker
Kinloch, MO. 63140

PRODUCTION DIRECTOR

HELP WANTED

"ATTENTION: EARN MONEY TYPING AT HOME! 32,000/yr. income potential. Details. (1) 602-838-8885 Ext. T-1776."

FOR SALE

Snow Plow for Sale \$400.00. Call Mr. or Mrs. Shucks 367-6474 between 9 a.m. - 5 p.m. Mon. thur Fri.

NEEDED: S PR

Elementary K-5, Middle Selected individuals will be the programs. Qualification at the grade level a experience as a leader in education. Deadline: application or letter be received by Feb. 2, 1990

SCHOOL
UNIVERSITY
8346
University

RECEPTIONIST SECRETARY

Roberts Broadcasting is seeking outgoing and congenial person who possess good phone etiquette. Duties include greeting the public, answering multi line phone, typing, and basic computer skills: Phone 367-4600 EXT. 44. Equal Opportunity Employer M/F.

Help Wanted

ACCOUNTING CLERK

The City of Richmond Heights, Missouri is accepting applications for an experienced Accounting Clerk to be responsible for accounts payable, bank reconciliations, monthly journal entries and other related data. Successful candidate will possess an extensive knowledge of and background in municipal accounting and procedures as well as an ability to quickly adapt to the use of computerized general ledger, payroll and accounts payable program. Actual computer experience preferred. Additionally the candidate must work well with others and must be experienced at self-initiating actions and working with minimal supervision. Starting salary will range from \$18,800 to \$20,700, depending upon qualifications and experience, with a very competitive benefits package. Applications will be accepted until February 19, 1990.

Laboratory

COLOR

Follows written procedures. computer and equipment in laboratory. Performs a wide variety of High School education plus math or equivalent. Must have preparation of clear, concise fringe benefits. Interested applicants should send resume to:

Patricia

NAACP EXHIBIT 11

| Federal Communications Commission | |
|-----------------------------------|------------------------|
| Docket No. | <u>94-10</u> |
| Exhibit No. | <u>11</u> |
| Presented by | <u>NAACP</u> |
| Disposition | Identified <u>6/21</u> |
| | Received <u>6/21</u> |
| | Rejected _____ |
| Reporter | <u>BARBARA LORD</u> |
| Date | <u>6/21/94</u> |

①

DECLARATION OF OTIS D. WOODARD

I Otis D. Woodard, respectfully state as follows.

1. I am a resident of the city of St. Louis of the state of Missouri. I have been a resident of St. Louis since 1969.

2. I have been the director of Lutheran North St. Louis Outreach for twenty-one years. Based on the gospel derived from the Lutheran church this agency responds to calls for help of the needy in St. Louis and Illinois. The theme of my work has been the Gospel After The Benediction. We provide food, clothing, shelter, crisis counseling and social education. We get calls from companies, organizations, and many individuals requesting job references from Lutheran Outreach.

3. In KFUE's OPPOSITION TO PETITION TO DENY AND response TO INQUIRY, dated Feb. 23, 1990 on page fifteen, KFUE states, "Finally, KFUE has begun working with Reverend Otis Woodard, a black Lutheran Minister who operates an outreach in northern St. Louis. Reverend Woodard has referred minority applicants to KFUE."

4. KFUE's statement above, in paragraph three, is absolutely untrue. KFUE has never approached me as a referral source for minority applicants. Furthermore I am a lay minister not a Lutheran Reverend.

5. I have a very extensive musical background. My first music teacher was W.W. Handy who was the nephew of the famous musical composer W.C. Handy. Under W.W. Handy's tutelage I studied many forms of music, including classical. I also participated in the ballet during high school. We performed Swan Lake in many southern cities to high school audiences. I sing and play many instruments, including the trombone, baritone, and the ukulele. In fact, I was a member of the KFUE choir and sang the "Amazing Grace" solo on the first KFUE choir album.

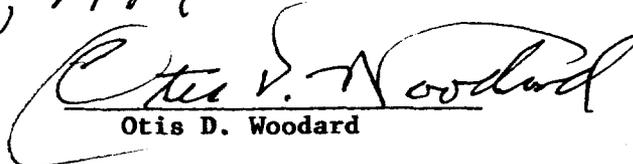
6. Again, I want to stress that I am a life long Lutheran. I was baptized at the age of six at St. Paul's Lutheran church, in Birmingham, Alabama, where I am listed as a founder of the church.

7. Again I also want to stress that KFUE has never contacted me in regards to job referrals for African-Americans, or anyone else for that matter.

8. I declare under penalty of perjury under the laws of the United States of America that the foregoing Declaration is true and correct to the best of my knowledge and belief.

Executed

June 15, 1994


Otis D. Woodard

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June 22, 1994

MEMORANDUM

RE: Testimony of Richard Miller

The following is essentially what I believe Mr. Miller will say in his oral direct testimony. This is offered as my understanding of what he will say based on my conversations with him. He has not seen or specifically endorsed or approved this memorandum, but I believe it is generally accurate.

- A. How a station convinces its advertisers to buy time; the relative importance of specialized knowledge of the format; the qualifications appropriate in considering the employment of a radio salesperson

Advertisers buy demographics: for example, age, race, gender and income. Buyers of airtime want media research data, and are generally not concerned with the minutiae of the music, such as which cellist is playing in which orchestra.

That is why specialized knowledge of the details of the format is not essential for a radio salesperson. He or she cannot hate the music, of course, and can't be stupid. He or she must know, for example, that classical music attracts people with a college education, high income, and people who travel a lot, eat out a lot, and are frequent fliers. In selling for a station with a format such as classical, the task is to persuade the advertiser that the station reaches an upscale market.

Some rudimentary familiarity with the music is helpful. For example, an advertiser might ask how long a symphony is, because he or she might want to know whether it will be interrupted by advertisements. But these things can be learned easily and quickly, and they can be learned on the job. For example, a salesperson who doesn't know very much about classical music, but is a good salesperson, might be asked to take a course on classical music appreciation at a junior college as part of his or her growth process in the job.

Federal Communications Commission

Docket No. 94-10 Exhibit No. 12

Presented by NAACP

Disposition { Identified 6/22
Received 6/22
Rejected _____

Reporter BARBARA LOKO

Date 6/22/94

- B. How hard or easy it is to identify and hire qualified minorities in the St. Louis radio market

If a broadcaster really wants to hire minorities, he or she will find a way to do it. These days, every major broadcast company has managed to comply with the EEO Rule and doesn't rely on excuses. For example, Blacks work in country/western stations everywhere. It doesn't matter that they might not be able to go home and talk to their friends about Conway Twitty and Dolly Parton. It's a job, and you can make money doing it.

To get Blacks to be radio salespersons, one need simply go to the ad agencies and ask the time buyers "of all the rookie salespeople who call on you, who has good potential, and might be persuaded to leave his or her job?" Or get to know Blacks who work in other media, such as newspapers, where the skills transfer easily to radio. It might not be difficult to get a good Black account executive from a daily or weekly newspaper to cross over to radio.

/dh

DH