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EQUAL EMPLOYMENT OPPORTUNITY PROGRAMI GENERAL POLICY

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

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

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

II RESPONSIBILITY FOR IMPLEMENTATION

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

III POLICY DISSEMINATION

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

The station's employment application form contains a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, state, or federal agency if they believe they have been the victims of discrimination.

Appropriate notices are posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state, or federal agency if they believe they have been the victim of discrimination.

IV RECRUITMENT

With a small staff of employees, job vacancies occur infrequently. (During the past twelve months, for example, only two vacancies occurred and one part-time employee became a full-time employee. Consequently, little recruitment efforts were required.) When vacancies do occur, it is the policy of KFLO and KFLO-FM to seek out qualified minority and female applicants. We deal only with employment services, including state employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex.

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

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

V TRAINING

Station resources and/or needs are such that we are unable to institute specific programs for upgrading the skills of employees. However, we do encourage employees to seek additional job-related formal education. We also encourage training through workshops, seminars, etc. Approved training programs qualify employees for time off with pay while acquiring additional education and/or training.

VI AVAILABILITY SURVEY

Based on current information compiled by the Research and Analysis Section of the Missouri Division of Employment Security, the respective minority and female workforce in the station's recruitment area is as follows:

	<u>Women</u>	<u>Blacks, Hispanic, Oriental and American Indian</u>
Percentage in the Workforce	42.9	18.7

VII CURRENT EMPLOYMENT SURVEY

There has been a change in our employment profile since the filing of our last Annual Employment Report. Attached is an updated report identifying the incumbents under each FCC Form 395 category for the two week period beginning May 1, 1983 and ending May 15, 1983.

(Section V and VI) (applicable to all respondents)

SECTION V FULL-TIME PAID EMPLOYEES JOB CATEGORIES ¹	(Section V and VI) (applicable to all respondents)												
	ALL EMPLOYEES ²			MALE					FEMALE				
	Total Columns 2 + 3 (1)	Male (2)	Female (3)	MINORITY GROUP EMPLOYEES				White, not of Hispanic origin (8)	MINORITY GROUP EMPLOYEES				White not of Hispanic origin (13)
				Black, not of Hispanic origin (4)	Asian or Pacific Islander (5)	American Indian or Alaskan Native (6)	Hispanic (7)		Black, not of Hispanic origin (9)	Asian or Pacific Islander (10)	American Indian or Alaskan Native (11)	Hispanic (12)	
Officials and Managers	7	6	1					6					
Professionals	4	2	2					2	1				
Technicians	3	3						3					
Sales workers													
Office and Clerical	4	1	3					1					3
Craftsperson (Skilled)													
Operatives (Semi-skilled)													
Laborers (Unskilled)													
Service Workers													
TOTAL	18	12	6					12	1				
Total employment from previous Report (if any)	17	11	6					11	1				

SECTION VI PART-TIME PAID EMPLOYEES JOB CATEGORIES ¹	(Section VI column titles same as Section V)												
	Total Columns 2 + 3 (1)	Male (2)	Female (3)	Black, not of Hispanic origin (4)	Asian or Pacific Islander (5)	American Indian or Alaskan Native (6)	Hispanic (7)	White, not of Hispanic origin (8)	Black, not of Hispanic origin (9)	Asian or Pacific Islander (10)	American Indian or Alaskan Native (11)	Hispanic (12)	White not of Hispanic origin (13)
Officials and Managers													
Professionals	4	4						4					
Technicians	3	3						3					
Sales workers													
Office and Clerical													
Craftsperson (Skilled)													
Operatives (Semi-skilled)													
Laborers (Unskilled)													
Service Workers													
TOTAL	7	7						7					
Total employment from previous Report (if any)	7	7						7					

¹Refer to instructions for explanation of all title functions.
²Include "Minority Group Employees" and others. See instruction 7.

VIII JOB HIRES

During the twelve month period beginning July 1, 1983 and ending June 30, 1983, we hired a total of two persons, both male.

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

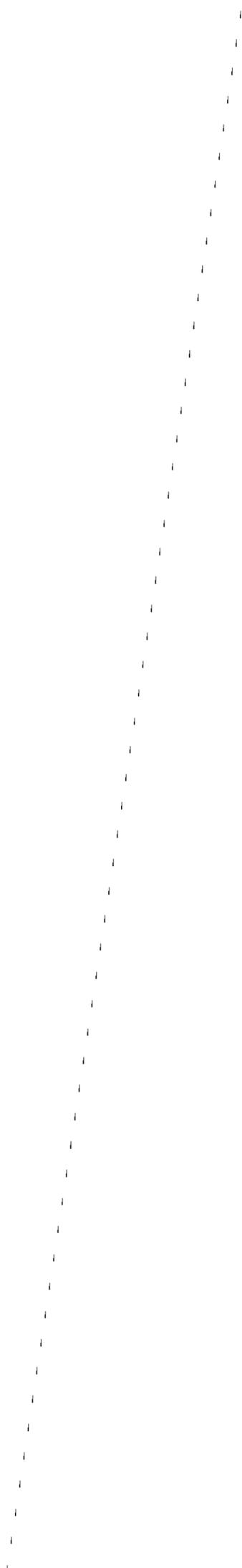
IX PROMOTION

It is our policy to provide promotions on a nondiscriminatory basis. Further, to assure that minorities and women are given due consideration for promotional opportunities, special effort is taken to encourage minorities and women to qualify and apply for advancement.

X EFFECTIVENESS OF AFFIRMATIVE ACTION PLAN

As is indicated in our employment report, of 18 full time employees, 6 or 33% are female. We believe this compares favorably with statistics shown. The report also indicates the level to which certain female and minorities have risen in the organization. 1 of the six female employees is at management level and 2 female employees including 1 black female are at the professional level.

KFUC and KFUC-FM have long been committed to Equal Employment Opportunity and will continue to act affirmatively to maintain that commitment.



NAACP EXHIBIT 26

<u>Federal Communications Commission</u>	
Docket No.	<u>94-10</u> Exhibit No. <u>26</u>
Presented by	<u>NAACP</u>
Disposition	Identified <u>6/21</u>
	Received _____
	Rejected _____
Reporter	<u>BARBARA WARD</u>
Date	<u>6/21/94</u>

Approved by OMB
3000-0070
Expires 04/30/88

CERTIFICATION

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United States of America
Federal Communications Commission
Washington, D. C. 20554

I certify that I am President
(Official title, see Instruction 1)
of The Lutheran Church - Missouri Synod
(Exact legal title or name of respondent)

that I have examined this Report, that to the best of my knowledge and belief all statements in the Report are true, correct and complete.

(Date of certification must be within 60 days of the date shown in Item 1 and in no event prior to Item 1 date):

Ralph A. Bohman SEP 27 19 89
(Signature) (Date)

Ownership Report

NOTE: Before filling out this form, read attached instructions

Section 310(d) of the Communications Act of 1934 requires that consent of the Commission must be obtained prior to the assignment or transfer of control of a station license or construction permit. This form may not be used to report or request an assignment of license/permit or transfer of control (except to report an assignment of license/permit or transfer of control made pursuant to prior Commission consent).

1. All of the information furnished in this Report is accurate as of

September 22, 19 89

(Date must comply with Section 73.3815(a), i.e., information must be current within 60 days of the filing of this report, when 1(a) below is checked.)

Telephone No. of respondent (include area code):

(314) 725-3030

Any person who willfully makes false statements on this report can be punished by fine or imprisonment. U.S. Code, Title 18, Section 1001.

This report is filed pursuant to Instruction (check one)

1(a) Annual 1(b) Transfer of Control or Assignment of License 1(c) Other

for the following stations:

Name and Post Office Address of respondent:

The Lutheran Church - Missouri Synod
85 Founders Lane
ST. Louis, MO. 63105

Call Letters	Location	Class of service
KFUO KFUO-FM	Clayton, MO.	AM/FM Combined

4. Name of entity, if other than licensee or permittee, for which report is filed (see Instruction 3):

NOT APPLICABLE

2. Give the name of any corporation or other entity for whom a separate Report is filed due to its interest in the subject licensee (See Instruction 3):

NOT APPLICABLE

5. Respondent is:

- Sole Proprietorship
- For-profit corporation
- Not-for-profit corporation
- General Partnership
- Limited Partnership
- Other: _____

3. Show the attributable interests in any other broadcast station of the respondent. Also, show any interest of the respondent, whether or not attributable, which is 5% or more of the ownership of any other broadcast station or any newspaper or CATV entity in the same market or with overlapping signals in the same broadcast service, as described in Sections 73.3555 and 78.501 of the Commission's Rules.

100% interest in former
Radio Station KICX-AM (new call
letters being applied for)
McCook, NE.

If a limited partnership, is certification statement included as in Instruction 4?

Yes No

8. List officers, directors, cognizable stockholders and partners. Use one column for each individual or entity. Attach additional pages, if necessary. See Instruct 4, 5, and 8.

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Line (Read carefully - The numbered items below refer to line numbers in the following table.)

- 1. Name and residence of officer, director, cognizable stockholder or partner (if other than individual also show name, address and citizenship of natural person authorized to vote the stock). List officers first, then directors and, thereafter, remaining stockholders and partners.
- 2. Citizenship.
- 3. Office or directorship held.
- 4. Number of shares or nature of partnership interest.
- 5. Number of votes.
- 6. Percentage of votes.
- 7. Other existing attributable interests in any other broadcast station, including nature and size of such interest.
- 8. All other ownership interests of 5% or more (whether or not attributed as well as any corporate officership or directorship, in broadcast, cab or newspaper entities in the same market or with overlapping signals the same broadcast service, as described in Sections 73.3555 and 76.5 of the Commission's Rules, including the nature and size of such interest and the position held.

1	(a)	(b)	(c)
	SEE EXHIBIT A		
2			
3			
4			
5			
6			
7			
8			

FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

The solicitation of personal information requested in this Report is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to assess compliance with the Commission's multiple ownership restrictions. The staff, consisting variously of attorneys and examiners, will use the information to determine such compliance. If all the information requested is not provided, processing may be delayed while a request is made to provide the missing information. Accordingly, every effort should be made to provide all necessary information. Your response is required to retain your authorization.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552(d)(3) AND THE PAPERWORK REDUCTION ACT P.L. 96-511, DECEMBER 11, 1980, 44 U.S.C. 3507.

EXHIBIT A
Ownership Report (8)

Each member of the Board has one vote.

Name and Residence	Citizenship	Office or Directorship held and date of election
Rev. Dr. Ralph A. Bohlmann 1333 South Kirkwood Road St. Louis, MO. 63122	U.S.	President of Applicant and member of Board of Directors 1989
Rev. Dr. August T. Mennicke 1333 South Kirkwood Road St. Louis, MO. 63122	U.S.	First Vice-President of Applicant and member of Board of Directors 1989
Rev. Dr. Robert H. King 901 Roland Court Jefferson City, MO. 65101	U.S.	Second Vice-President of Applicant and member of Board of Directors 1989
Rev. Dr. Robert C. Sauer 2716 Norwich St. Charles, MO. 63301	U.S.	Third Vice-President of Applicant and member of Board of Directors 1989
Rev. Dr. Eugene W. Bunkowske 4 Cloverdale Place Ft. Wayne, IN. 46825	U.S.	Fourth Vice-President of Applicant and member of Board of Directors 1989
Rev. Dr. Walter A. Maier 12017 Westwind Drive Ft. Wayne, IN. 46825	U.S.	Fifth Vice-President of Applicant and member of Board of Directors 1989
Rev. Dr. Walter L. Rosin 1333 South Kirkwood Road St. Louis, MO. 63122	U.S.	Secretary of Applicant and member of Board of Directors 1989
Dr. Norman D. Sell 1333 South Kirkwood Road St. Louis, MO. 63122	U.S.	Treasurer and Chief Financial Officer of Applicant and member of Board of Directors 1989
Dr. John P. Schuelke 1333 South Kirkwood Road St. Louis, MO. 63122	U.S.	Executive Director of the Board of Directors 1989
Mr. Donald J. Brosz Malkerns Research Station P. O. Box 4 Malkerns, Swaziland	U.S.	Member of Board of Directors 1989
Mr. John L. Daniel 949 Little Lehigh Drive Emmaus, PA. 18049	U.S.	Member of Board of Directors 1989
Mr. Clifford A. Dietrich 4616 Arlington Avenue Ft. Wayne, IN. 46807	U.S.	Member of Board of Directors 1989

EXHIBIT A (continued)
Ownership Report (8)

Dr. Robert Hirsch Rt. 1, Box 708 Woodland Ridge Yankton, S.D. 57078	U.S.	Member of Board of Directors 1989
Rev. Dr. Henry L. Koepchen P.O. Box 2326 10 Conscience Bay Road Setauket, N.Y. 11733	U.S.	Member of Board of Directors 1989
Rev. Dr. Arnold G. Kuntz 5751 Richmond Avenue Garden Grove, CA. 92645	U.S.	Member of Board of Directors 1989
Mr. Gilbert E. LaHaine 2401 Stirling Avenue Lansing, MI 48910	U.S.	Member of Board of Directors 1989
Rev. Victor H. Marzhausen 4154 Hillaire Road White Bear Lake, MN 55110	U.S.	Member of Board of Directors 1989
Dr. Florence Montz P.O. Box 1293 Bismarck, ND 58502	U.S.	Member of Board of Directors 1989
Dr. Harold M. Olsen 975 Durkin Drive Clock Tower Village Springfield, IL. 62704	U.S.	Member of Board of Directors 1989
Mr. Lester W. Schultz 2103 E. 15th Street Russellville, AR 72801	U.S.	Member of Board of Directors 1989
Dr. Donald E. Snyder 48 Church Hill Road Henrietta, NY 14467	U.S.	Member of Board of Directors 1989
Rev. Richard L. Thompson Trinity Lutheran Church 537 Grand Avenue Billings, MT 59101	U.S.	Member of Board of Directors 1989

NAACP EXHIBIT 27

<u>Federal Communications Commission</u>	
Docket No.	<u>94-10</u> Exhibit No. <u>27</u>
Presented by	<u>NAACP</u>
Disposition	Identified <u>6/21</u>
	Received <u>6/22</u>
	Rejected _____
Reporter	<u>BARBARA LORD</u>
Date	<u>6/21/94</u>

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CLASSIC RELIGION:

Religious Program Concerns

for KFUD-FM

A Confidential Report

to

The Standing Committee on Broadcast

Lutheran Church--Missouri Synod

Ron Klemm, Program Director
October 26, 1988

85 FOUNDERS LANE
ST LOUIS, MO 63105
(314) 725-0099

(2)

Classical music has always been a large emphasis of the programming on KFUC and KFUC-FM since their inception. Classical music now comprises the single focus of KFUC-FM's programming. But what about religious programming? Where is it? What is our programming approach and philosophy? We hope to address some of these questions today, and by addressing them, raise more challenging questions to discuss future direction for the station.

I. HISTORY:

The founders of KFUC, John H. C. Fritz, Richard Kretschmar and Walter A. Maier, were interested in ministering to the "whole man", and in their discussions and decisions concerning this ministry, found that classical music was "compatible and consistent" to a total world and life view of glorifying God in all of life."

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In the early days of KFUCO-FM, there was much religious programming, as well as classical music programming since radio was not yet a highly specialized medium. There was considerable simulcasting of the AM and FM stations in those days, and when I arrived on the scene in 1978, we were broadcasting classical music on both stations in various dayparts. In addition, worship-oriented programming, complete with homilies, prayer, and hymns, was broadcast without explanation on both stations.

Until the early 1980's, KFUCO-FM broadcast three successive church services from area Lutheran churches on Sunday mornings. (KFUCO-AM broadcast only two.) KFUCO-FM like it's sister station, continued to air the more typical, traditional religious programs like "The Lutheran Hour", "Joy", "Portals of Prayer" and "Day by Day with Jesus."

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But we were challenged by the potential for outreach on KFUC-FM. We saw opportunity for a unique witness. We tried different means of achieving that outreach through the development of programming more compatible with the classical music format. Each day during the noon hour, we produced and broadcast a program entitled "Choral Concert", which was an attempt to play carefully chosen music and make appropriate commentary that would alert listeners to the spiritual nature of the text. The program ran for five years and received much positive response, primarily from choral and church music enthusiasts.

We also briefly tried to insert short, commercial-like spots into our regular classical programming which promoted church-going, seeking, the Lord, relying on the Lord's strength, living a praise-filled life, etc. We began with the Advent season. After four weeks of these small messages, it was decided that these were intrusive or otherwise inappropriate for our programming.

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At about the same time, we coerced an always willing Pastor Ron Lind into being the voice of a Sunday evening—and later Sunday noon program entitled "Celebration." "Celebration" was a classical sacred music concert which followed closely the liturgical calendar with commentary written anonymously by Ila Klemm, edited and delivered by Pastor Lind, and produced by myself with seminarian assistance. It was a delight for us to produce the program and to work closely with such a wonderful man of God. This somewhat labor-intensive program unashamably proclaimed God as the center and object of the praise expressed in carefully selected music. These programs became a part of who we were...a non-commercial, classical radio station, owned by the Lutheran Church Missouri Synod. Personally, it was very pleasing and rewarding to be part of such a God-glorifying station.

We became increasingly aware, however, that the station could not continue to be self-sustaining on the given course. Radio had become super-specialized. What we used to call "rock" had now segmented into half-a-dozen different formats. And, among other things, the area's NPR network affiliate had garnered new strength and a major portion of the classical music audience in the market. They had done so by quietly maintaining a consistent classical music presentation. In order to compete, the options were clear: adapt or die.

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In 1983, a major change occurred. KFUC-FM became a commercial radio station. That meant that we no longer were programming to a support base of individuals. We needed to build listenership by having a consistent classical music format so that commercial agencies and businesses around the St. Louis area, as well as nationally, would buy time on the station to reach the audience we could deliver to them. We had to be a viable commercial option for potential advertiser. We had to re-examine our programming. We needed a consistent sound. We needed to maintain credibility in the market. We could no longer sound like we were supported by a church body. We had to sound like a professional commercial classical music station.

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II. WHERE WE ARE TODAY?

Having a consistent classical music sound is imperative for us to maintain credibility. That is a given. The challenge has been and continues to be: how to maintain that credibility without compromising the goals of the KFUCO founders, the KFUCO statement of purpose, the conscience of a church body that seeks to glorify God in all that it does.

After we became commercial, the management of the station (who is no longer with us) instructed us to take "Choral Concert", "Celebration" and other religious oriented programming off the air. For the sake of consistency, we had to play classical music on Sunday morning as well as all the other times of the day. We took up the challenge. Our Sunday morning programming now crescendos with sacred classics, and other more subtle classical music to give our station a decidedly religious-flavored sound on Sunday morning without giving up our classical image. After the worship service from Chapel of the Cross, there is still more of that type of programming, until about 1:00. A survey of the last two months playlists indicates that between 25% and 40% of the selections between 6:00 a.m. and 1:00 p.m. would be considered liturgical classics. Another 20 - 30 % could be termed "liturgical compatible", that is, a selection you may hear as service music in many of our churches.

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In 1986 and 1987, we examined our most obviously religious-oriented programming.

(S)

After "Joy" left the auspices of our station and the LCMS, there were some changes in that program. The music on the whole, became lighter, more along the lines with what KFUC-AM is doing. Also, I felt that the overall quality of the program had gone down. The messages were longer and more didactic, What had been a pretty good half-hour music program had turned into a vehicle for "sermonettes."

"The Lutheran Hour" was examined at the same time. It is easy to demonstrate that a half hour of preaching is not consistent with the classical music format. But the ratings were telling us the only story we needed to hear. Our Sunday numbers for that period were minuscule. It became obvious to me what was happening: listeners who would be tolerant to the program were all in church! Others were tuning away when a preaching program came on. After several in-house discussions, it was decided to quietly drop both programs and measure subsequent response. As suspected, there was little to evaluate.

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We still maintain our worship hour of "Chapel of the Cross." We try to surround it with classical sacred music, as well as classical music which would be appropriate even for worship in our churches. I doubt if there is any station in the world which plays at least one, sometimes two Bach "Cantatas" each Sunday morning to coincide with the liturgical calendar. It's a privilege to keep the tradition of Bach's strong faith alive through the playing of his music!

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III. NOW WHAT?

The statement of purpose for KFUD and KFUD-FM is a good one. It speaks of "supporting the witness of the LCMS" and "contributing to the quality of life in the greater St. Louis area through cultural and fine arts offerings."

I believe that we are living up to our purposes.

I have always been uncomfortable with radio broadcasts of church services. Some of you may not know that I come from a religious broadcasting background. I started out working at the age of 16 for a religious radio station in the Chicago area. When I went to a Christian college, I began to work at the Christian/Fine Arts radio station on campus where I learned much about classical music, but really did a lot of religious music programming, as well. (Actually, the KFUD-AM has benefitted from those years that I spent at KDCR as program director. It plays KDCR's religious music tapes!) Then I

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went to Chicago to work at "The Back to God Hour". I was immersed in production of quality religious programming for both radio and television there. So I do not say that I am uncomfortable with church services because I do not appreciate religious broadcasts! Instead, I know from years of religious broadcasting, that church services are not very good radio. There are long silences. There are visual elements geared to those present. The list goes on, but basically it is worship. And worship is a corporate, in-the-flesh activity. It's hard to worship through radio waves.

In short, the radio transmission of church services is not broadcasting at all, but rather what I like to call "narrow-casting."

If I were given the mandate to reach more KFUC-FM listeners with the Gospel of Jesus Christ, the first item of business would be to go to the Chapel of the Cross and challenge them to drop their live church service broadcast, and sponsor and help produce a program of carefully chosen classics which would be interspersed with brief spot-like messages and phone numbers for help and more information. The program would be tasteful and totally consistent with the format of KFUC-FM.

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We cannot be too didactic with our listeners. They are intelligent, wealthy, professional people who will scoff, tune out or demand equal time in response to a very "preachy" message. We need to reach them through brief, but intelligent conversation about life and its problems.

You probably are aware that Advent and Lent are very special seasons on CLASSIC 99/KFUC-FM. It is at that time that we can be unabashedly

Christian in our focus. I like to think that you won't find more beautiful Christmas music anywhere than on our station. We aren't ashamed to play the carols! We program them over and over again. But we also go out of our way to schedule some of the less popular music of the season which captures the awe and wonder of the Christmas Miracle.

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The same is true with Lent, Good Friday, and Easter. There is much richness in music for those seasons written by some of the most famous composers. I take a great personal interest in presenting programming of this nature, and I love to do the commentary for much of it.

We are always open to suggestions as to how to maintain the consistency of the classical format, yet fulfill some of the other purposes for our stations at the same time. Bear in mind, however, that just as KFUC-AM no longer "contributes to the quality of life...through cultural and fine arts offerings," neither should KFUC-FM have to fulfill all parts of our statement of purpose by itself, nor justify its existence by some token programming out of context. The fact that KFUC-FM's programming is "compatible and consistent" with the doctrines and teachings of the LCMS should be more than enough to justify continued investment in it.