

EXHIBIT # MMB2
DATE 05/10/94
CASE ZIKA DEPO
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SEP 22 1982

ARNOLD & PORTER

1200 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20036
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OFFICE OF THE
SECRETARY
1650 LINCOLN STREET
DENVER, COLORADO 80264
(303) 832-2900

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ELIZABETH ROWE COSTLE
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September 22, 1982

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SEP 22 1982
R & T DIVISION

Mr. William J. Tricarico
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Postcard Renewal for KFUE

Dear Mr. Tricarico:

Enclosed are two copies of the postcard Renewal Application of KFUE, two copies of the Equal Employment Opportunity Program and one copy of the combined Ownership Report for KFUE and KFUE-FM.

If you have any questions regarding these materials, please get in touch with this office.

Respectfully submitted,



Elizabeth R. Costle

Enclosures

APPLICATION FOR RENEWAL OF LICENSE FOR COMMERCIAL AND NONCOMMERCIAL AM, FM OR TV BROADCAST STATION

1. Name of Applicant The Lutheran Church-Missouri Synod		Street Address 500 North Broadway	
Call Letters KFUO	City St. Louis	State Missouri	ZIP Code 63102

2. Have the following reports been filed with the Commission:

(a) The Annual Employment Reports (FCC Form 395) as required by Section 73.3612 of the Commission's rules? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, attach as Exhibit No. ___ an explanation.	(b) The applicant's Ownership Report (FCC Form 323 or 323-E) as required by Section 73.3615 of the Commission's rules? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If No, give the following information: Date last ownership report was filed. _____ Call letters of the renewal application with which it was filed. _____
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3. Is the applicant in compliance with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments?
 Yes No
If No, attach as Exhibit No. ___ an explanation.

4. Since the filing of the applicant's last renewal application for this station or other major application, has an adverse finding been made, a consent decree been entered or final action been approved by any court or administrative body with respect to the applicant or parties to the application concerning any civil or criminal suit, action or proceeding brought under the provisions of any federal, state, territorial or local law relating to the following: any felony; lotteries; unlawful restraints or monopolies; unlawful combinations; contracts or agreements in restraint of trade; the use of unfair methods of competition; fraud; unfair labor practices; or discrimination?
 Yes No If Yes, attach as Exhibit No. ___ a full description, including identification of the court or administrative body, proceeding by file number, the person and matters involved, and the disposition of litigation.

5. Has the applicant placed in its public inspection file at the appropriate times the documentation required by Section 73.3526 or 73.3527 of the Commission's rules?
 Yes No
If No, attach as Exhibit No. ___ a complete statement of explanation.

THE APPLICANT hereby waives any claim to the use of any particular frequency or of the ether as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

THE APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

I certify that the statements in this application are true, complete and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 9th day of September 19 82

Name of Applicant The Lutheran Church-Missouri Synod

By Signature Ralph G. Bohlsman

Title President

FULL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT, U.S. CODE, TITLE 18, SECTION 1001

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SEP 22 1982

FEDERAL COMMUNICATIONS COMMISSION
Equal Employment Opportunity Program

Approved by OMB
3060 - 0113
Expires: 1-31-83

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CALL LETTERS KFUO

SEP 22 1982

NAME OF LICENSEE: The Lutheran Church - Missouri Synod OFFICE OF THE

SECRETARY

CITY AND STATE WHICH STATION IS LICENSED TO SERVE: Clayton, Missouri

SEND NOTICES AND COMMUNICATIONS TO THE FOLLOWING NAMED PERSON AT THE ADDRESS INDICATED BELOW:

NAME Maurice Anderson, General Manager STREET ADDRESS 801 DeMun Avenue

CITY Clayton STATE Missouri ZIP CODE 63105

TELEPHONE NO. (314) 725-3030

INSTRUCTIONS

Broadcast station licensees are required to afford equal employment opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, a license renewal applicant who employs five or more full-time station employees must file a program designed to assure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics). If minority group representation in the available labor force is less than five percent (in the aggregate), a program for minority group members need not be filed. However, a program must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant employs less than five full-time employees, no EEO program for women or minorities need be filed.

NOTE: Check appropriate box, sign the certification below, and return to the FCC:

[] Station employs less than 5 full-time employees; therefore no written program is being submitted. RECEIVED

[X] Station employs 5 or more full-time employees. Our 10-point program is attached. SEP 22 1982

R & T DIVISION

CERTIFICATION

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 9th day of September, 19 82

Signature: Ralph A. Bohleman

Title: President

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE. TITLE 18, SECTION 1001.

**EQUAL EMPLOYMENT OPPORTUNITY
PROGRAM**

MODEL PROGRAM

I General Policy

It is our policy 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

(Name _____ Title), 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.
- () We seek the cooperation of the unions represented at the station to help implement our EEO program and all union contracts contain a nondiscrimination clause.
- () Other (Specify)

EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

I GENERAL POLICY

It is the policy of KFUO and KFUO-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

Maurice Anderson, 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 KFUD and KFUD-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 August 1, 1982 and ending August 15, 1982.

VIII JOB HIRES

During the twelve month period beginning October 1, 1981 and ending September 30, 1982, we hired a total of two persons, one male and one female.

An analysis of our recruitment techniques, job applications, and new hires suggests 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 17 full time employees, 6 or 35% 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 6 female employees is at management level and 2 female employees including 1 black female are at the professional level.

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

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					MINORITY GROUP EMPLOYEES				
				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	6	5	1					5					1
Professionals	5	3	2					3	1				1
Technicians	3	3						3					
Sales workers													
Office and Clerical	3		3										3
Craftsmen (Skilled)													
Operatives (Semi-skilled)													
Laborers (Unskilled)													
Service Workers													
TOTAL	17	11	6					11	1				5
Total employment from previous Report (if any)	14	9	5					9	1				4

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													
Craftsmen (Skilled)													
Operatives (Semi-Skilled)													
Laborers (Unskilled)													
Service Workers													
TOTAL	7	7	0					7					
Total employment from previous Report (if any)	8	7	1					7					1

¹ Refer to Instructions for explanation of all title functions.

² Include "Minority Group Employees" and others. See Instruction 7.