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<u>Federal Communications Commission</u>	
Docket No. _____	Exhibit No. _____
Presented by _____	
Disposition	Identified 6/20/94
	Received 6/20/94
	Rejected _____
Reporter _____	
Date _____	

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MAY 12 1992

MASS MEDIA BUREAU  
EXHIBIT NO. 6

ARNOLD & PORTER

1200 NEW HAMPSHIRE AVENUE, N. W.

WASHINGTON, D. C. 20036

(202) 872-6700

CABLE: "ARFOPO"

TELECOPIER: (202) 872-6720

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Federal Communications Commission  
Office of the Secretary

1700 LINCOLN STREET

DENVER, COLORADO 80203

(303) 863-1000

PARK AVENUE TOWER  
65 EAST 55TH STREET

NEW YORK, NEW YORK 10022-3219

(212) 750-5050

REED MILLER

DIRECT LINE: (202) 872-6826

May 12, 1992

Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
1919 M Street, N. W.  
Washington, D. C. 20554

Re: KFUC/KFUC-FM, Clayton, Missouri -  
Response to Request for Information

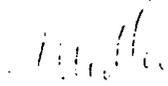
Dear Mr. Wolfe:

This will refer to your letter of April 22, 1992, addressed to The Lutheran Church--Missouri Synod, licensee of KFUC-AM and FM, Clayton, Missouri, requesting additional information with regard to minority employment by the stations.

Enclosed herewith, in triplicate, is the response to your request. In accordance with your instructions, a copy of the response has also been sent by United States mail, postage prepaid, to opposing counsel, as noted below.

Should any question arise in connection with this matter, please communicate with the undersigned.

Very truly yours,

  
Reed Miller

Enclosures

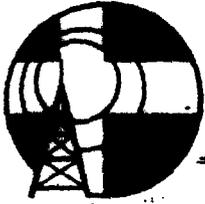
cc: With enclosures  
David E. Honig, Esq.  
Herbert H. Henderson, Esq.

1

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MAY 12 1992

Federal Communications Commission  
Office of the Secretary



**KFUO** 850 AM 99.1 FM  
**lutheran radio**

85 FOUNDERS LANE, ST. LOUIS, MO 63105

(314) 725-3030

May 12, 1992

Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau

Federal Communications Commission  
Washington, D.C. 20554

Dear Mr. Wolfe:

Enclosed is the response from radio stations KFUO/KFUO FM in regard to your letter dated April 22, 1992.

As requested, we will forward a copy of this document to David Honig, counsel for the NAACP.

If more information is needed, please be in touch.

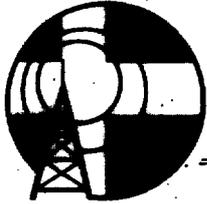
Sincerely,

Dennis Stortz  
General Manager, KFUO/KFUO FM

2

RECEIVED

MAY 12 1992



**KFUO** 850 AM 99.1 FM  
**lutheran radio**

85 FOUNDERS LANE, ST. LOUIS, MO 63105

Federal Communications Commission  
Office of the Secretary

(314) 725-3030

To: Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau

From: KFUO/KFUO FM Radio Stations, St. Louis

RE: Request for more information regarding EEO programs on pending applications for renewal of license for above stations.

1. Specific information detailing when recruitment sources were contacted and for what positions.

Following is a description of the various recruitment sources that KFUO has used during its license period, along with a listing of when each source was contacted and for which specific positions. As noted in our "Opposition to Petition to Deny and Response to Inquiry", we do not use outside recruitment sources for every opening at the stations (although we have used them increasingly in recent years in an effort to increase our minority employment, and with good results -- see Section Three, below). This is due to the fact that the religious and classical music formats of our stations attract numerous unsolicited applications from prospective employees around the country with a particular interest/expertise in these areas; in addition, our reciprocal arrangement with the Concordia Lutheran Seminary (which provides our office and studio space rent-free) requires that we make special efforts to employ Seminary students who have obtained the required knowledge of the religious format without resort to outside recruitment sources.

Following is a listing and description where necessary of the recruitment sources used:

page 2

Lutheran Church - Missouri Synod, St. Louis, Missouri,  
International Headquarters.

All employment openings are posted at this location. Their  
minority staffing level is 11%.

Lutheran Witness - National monthly magazine distributed to  
Lutherans.

Positions advertised: General Manager, 1983, both stations  
General Manager, 1987, both stations  
Program Director, 1988, KFUA AM  
General Manager, 1989, KFUA AM

St. Louis Lutheran - Monthly St. Louis area newspaper of Lutheran  
news.

Positions advertised: Secretary/Receptionist, January, 1990  
Maintenance Worker, January, 1990

Broadcasting - National weekly magazine for broadcasters

Positions advertised: General Manager, 1983, both stations  
Sales Manager, 1987, KFUA FM  
General Manager, 1987, KFUA FM

St. Louis Post Dispatch - Largest St. Louis daily newspaper

Positions advertised: Bookkeeper, 1985, both stations  
Sales Manager, 1987, KFUA FM  
Receptionist/Secretary, January, 1990  
Maintenance Worker, January, 1990

St. Louis Sun - St. Louis daily newspaper(now out-of-business)

Positions advertised: Receptionist/Secretary, January, 1990  
Maintenance Worker, January, 1990

St. Louis Broadcasting Center - Only full-time broadcasting  
school in St. Louis.

Positions advertised: Announcer, 1987, KFUA AM  
Sales position: 1987, KFUA FM

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page 3

Part-time announcer, 1989, KFUD FM  
Announcer, 1991, KFUD AM

Lutheran Employment Project - a Lutheran social service  
for minority employment

Positions contacted: Sales position, 1989, KFUD FM  
Secretary, 1989, KFUD FM  
Secretary/Receptionist, January 1990  
Maintenance worker, January, 1990  
Secretary, 1991, KFUD FM

St. Louis American - Black owned/targeted weekly newspaper

Positions advertised: Secretary/Receptionist, January, 1990  
Maintenance worker, January 1990

St. Louis Argus - Black owned/targeted weekly newspaper

Positions advertised: Secretary/Receptionist, January, 1990  
Maintenance worker, January 1990

Metro Sentinel - Black owned/targeted weekly newspaper

Positions advertised: Secretary/Receptionist, January, 1990  
Maintenance worker, January, 1990

A letter was sent to the following companies and institutions on  
July 18, 1989, seeking qualified minority referrals for any  
openings that may occur.

Snelling & Snelling Employment Agency  
Roth Young Personnel  
Sales Recruiters Irvin-Edwards  
St. Louis Community Colleges  
Washington University - St. Louis  
Lindenwood College - St. Louis  
Southern Illinois University - Edwardsville, Illinois  
Broadcast Center - St. Louis  
University of Missouri - St. Louis

As stated in original filing, these letters resulted in no direct  
minority referrals from either the companies or the colleges. It

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page 4

did allow the colleges to call us requesting placement of radio interns, a practice we do not utilize. In addition, the employment companies occasionally call us attempting to place office and clerical workers, however we have not had openings when calls were received.

Recognizing that utilization of these employment agencies and colleges were not successfully helping us achieve our goals, we took the following steps: continued association with the Lutheran Employment Project for Minorities; advertising in newspapers directed toward the Black community. These efforts were successful in identifying minority candidates, and eventual employment.

2. Minority employees not appearing on 1983, 1984, and 1985 annual employment reports.

The FCC's April 22, 1992 letter states that we had advised in earlier filings that there were four minorities employed at the station who do not appear in our 1983, 1984 and 1985 annual employment reports. In fact, we had advised that a total of five minority employees did not appear in relevant employment reports. None of the five appeared in reports in years in which they were hired; two of the five did not appear in any employment reports at all. This was due to the fact that the employees were hired subsequent to the annual employment reporting date for the year in which they were hired; in the two cases in which no reporting occurred at all, the employees also left our employment prior to the next year's employment reporting period. The relevant years were 1984, 1985, 1988, and 1989.

Following is the information requested with respect to each of the five employees:

Ruth Clerkly (Did not appear in 1984 employment report).  
Date of hire: 7/30/84  
Position: Secretary (Office and clerical)  
Termination: 12/26/86  
The position did not require theological or classical music

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page 5

knowledge.

Helen Richardson (Did not appear in any employment report).

Date of hire: 3/26/85

Position: Receptionist (Office and clerical)

Termination: 8/31/85

The position did not require theological or classical music knowledge.

Lisa Harrison (Did not appear in any employment report).

Date of hire: 8/28/85

Position: Secretary (Office and clerical)

Termination: 1/10/86

The position did not require theological or classical music knowledge.

Caridad Perez (Did not appear in 1988 employment report).

Date of hire: 3/7/88

Position: Sales

Termination: 1/31/89

The position did not require theological training, however classical music knowledge is important and desired for sales people.

Cynthia Blades (Did not appear in 1989 employment report).

Date of hire: 11/1/89

Position: Secretary (Office and clerical)

Termination: 4/20/90

The position did not require theological or classical music knowledge.

page 6

3. Positions filled between November 1, 1989, and January 31, 1990.

Sharisse Bush

- A. Account Executive
- B. KFUD FM.
- C. Sales Worker
- D. Full-time position
- E. Filled 10/30/89
- F. St. Louis Broadcast Center contacted for sales people.
- G. No interviews. Standing resume on file.
- H. White female.
- I. Walk-in
- J. The position did not require theological training, however classical music knowledge is important and desired for sales people.

Cynthia Blades

- A. Secretary
- B. KFUD FM
- C. Office and clerical
- D. Full-time position
- E. Filled 11/1/89
- F. The referral source used was the Lutheran Employment Project for recruiting and placing minorities.
- G. Three Black females were interviewed.
- H. A Black female was chosen.
- I. Lutheran Employment Project.
- J. No theological or classical music training required.

Jason Cashmer

- A. Part-time announcer.
- B. KFUD AM
- C. Professional
- D. Part-time
- E. Filled 11/1/89
- F. Referred from Concordia Seminary for student employment
- G. Two people were interviewed

page 7

- H. White male
- I. Concordia Seminary
- J. The position required theological training.

Gertrude McClees

- A. Secretary
- B. KFUD AM
- C. Office and clerical
- D. Part-time
- E. Position filled 11/14/89
- F. This employee was referred to us by a St. Louis area Lutheran Church, (KFUD AM/FM gets regular applications and referrals from employees of area Lutheran Churches), in association with Senior Citizen retraining efforts.
- G. Only person interviewed.
- H. White female
- I. St. Louis area Lutheran Churches.
- J. No theological training required, however familiarity with Lutheran Church was a desired attribute. This is because direct contact has to be made to the Churches to arrange church-related interviews and potential funding drives.

5. John Obermann

- A. Associate Director of Development
- B. KFUD AM
- C. Professional
- D. Full-time
- E. 1/2/90
- F. None: Mr. Obermann had been employed by the radio station as a consultant in the development/fund raising area. He made a proposal to the radio station to convert to a full-time employee, and was accepted.
- G. No other interviews were conducted.
- H. White male
- I. No referral source was used
- J. Theological knowledge and background was required.

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page 8

**Todd Wilken**

- A. Part-time announcer
- B. KFUD AM
- C. Professional
- D. Part-time
- E. Filled 1/20/90
- F. Referred from Concordia seminary for student employment.
- G. Two people were interviewed.
- H. White male
- I. Concordia Seminary
- J. The position required theological training.

**Bridget Williams**

- A. Secretary/Receptionist
- B. KFUD AM
- C. Office and clerical
- D. Full-time
- E. 1/30/90
- F. Referral services: St. Louis Post Dispatch, St. Louis Sun, Metro Sentinel newspaper, St. Louis American newspaper.
- G. 4 females interviewed. 3 were Black.
- H. Black Female
- I. St. Louis Post Dispatch.
- J. Position did not require theological or musical training.

**Timothy Meeks**

- A. Maintenance
- B. KFUD AM & FM, shared position
- C. Service worker.
- D. Full-time position.
- E. 1/31/90
- F. Referral services: St. Louis Post Dispatch, St. Louis Sun, Metro Sentinel newspaper, St. Louis American newspaper.

page 9

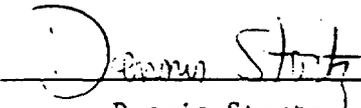
- G. 6 males interviewed. Five were Black.
- H. Black male.
- I. St. Louis American newspaper.
- J. The position did not require theological or musical training.

AFFIDAVIT OF DENNIS STORTZ

My name is Dennis Stortz, I am General Manager of KFUD AM & FM. I have held this position since 1991. I was Operations Manager from 1975 - 1991.

In my capacity of General Manager I have prepared the foregoing information regarding EEO programs at KFUD & KFUD-FM.

All of the facts stated therein are true and correct to the best of my knowledge and belief.

  
Dennis Stortz

Dated: May 11, 1992

  
GLORIA J. SCHERMAN  
NOTARY PUBLIC STATE OF MISSOURI  
ST. LOUIS COUNTY  
MY COMMISSION EXPIRES AUG 17, 1995

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<u>Federal Communications Commission</u>	
Docket No. _____	Exhibit No. _____
Presented by _____	
Disposition	Identified ✓ 6/20/94
	Received ✓ 6/20/94
	Rejected _____
Reporter _____	
Date _____	

MASS MEDIA BUREAU  
EXHIBIT NO. 7  
~~ARNOLD & PORTER~~

1200 NEW HAMPSHIRE AVENUE, N. W.

WASHINGTON, D. C. 20036

(202) 872-6700

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(303) 863-1000

PARK AVENUE TOWER

65 EAST 55TH STREET

NEW YORK, NEW YORK 10022-3219

(212) 750-5050

REED MILLER

DIRECT LINE: (202) 872-6826

May 19, 1992

Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
1919 M Street, N. W.  
Washington, D. C. 20554

Re: KFUC/KFUC-FM, Clayton, Mo. -  
Supplement to Response to Request  
For Information

Dear Mr. Wolfe:

This will refer to my letter to you of May 12, 1992 submitting the response from KFUC/KFUC-FM, Clayton, Missouri, to your letter of April 22, 1992 requesting additional information in regard to the minority employment by those stations.

Thereafter, on May 13, 1992, I received a telephone call from Lisa M. Higginbotham, Esq. of your office requesting clarification of one matter in KFUC's May 12th response; namely, the specific date in 1989 when the sales position at KFUC-FM, (listed at the top of page 3 of the 5/12/92 response under "Positions contacted") was filled for which the station contacted the Lutheran Employment Project as a minority employment source.

Enclosed herewith, in triplicate, is a letter, dated May 14, 1992, from KFUC responding to Ms. Higginbotham's inquiry. Copies of this letter and the enclosure have been hand delivered to Ms. Higginbotham and mailed to opposing counsel as listed below.

Should any further question arise in connection

ARNOLD & PORTER

Glenn A. Wolfe

May 19, 1992

Page 2

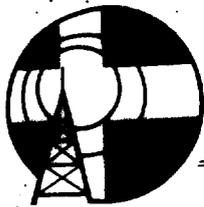
with this matter, please contact the undersigned.

Very truly yours,



Reed Miller

cc: With enclosure  
Lisa M. Higginbotham, Esq.  
David E. Honig, Esq.  
Herbert H. Henderson, Esq.



**KFUO** 850 AM 99.1 FM  
**lutheran radio**

85 FOUNDERS LANE, ST. LOUIS, MO 63105

(314) 725-3030

May 14, 1992

Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
Washington, D.C. 20554

Dear Mr. Wolfe:

This letter is in response to a request for more information regarding KFUO/KFUO FM, Clayton, MO., May 12th filing of additional information on the stations' EEO program.

It relates specifically to a question from page 3 of the May 12th report, on which position was filled from contacting the Lutheran Employment Project for a sales position in 1989.

The question we were asked to answer was "specific information detailing when recruitment sources were contacted and for what positions." As indicated in other areas of the report, not all agencies contacted resulted in direct employment. In this case, the Lutheran Employment Project was asked if they would refer qualified sales people to the stations, for possible employment when openings would occur. No sales person was hired as a result of any referral from the Lutheran Employment Project.

Please let me know if this does not fully answer your question, or, if you need any further information.

Sincerely,

*Dennis Stortz*  
Dennis Stortz  
General Manager, KFUO/KFUO FM

cc: David E. Honig, Esquire, NAACP

3

**Federal Communications Commission**

Docket No. \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Presented by \_\_\_\_\_

Disposition	Identified	✓ 6/20/94
	Received	✓ 6/20/94
	Rejected	_____

Reporter: \_\_\_\_\_

Date: \_\_\_\_\_

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8

JUN 26 1992

MASS MEDIA BUREAU  
EXHIBIT NO. 8

Ralph A. Bohman  
President  
The Lutheran Church - Missouri Synod  
85 Founders Lane  
St. Louis, MO 63105

Re: KFUC/KFUC-FM  
Clayton, MO

Dear Mr. Bohman:

This refers to the pending applications for renewal of licenses of Stations KFUC/KFUC-FM, Clayton, MO. On January 2, 1990, the Missouri State Conference of Branches of the NAACP and its respective branch operating within the stations' service area filed a petition to deny alleging that KFUC/KFUC-FM violated the Commission's EEO Rule. On February 26, 1990, you filed an opposition to the petition to deny and a response to a January 4, 1990, Commission letter of inquiry requesting additional information regarding your EEO program. In May 1992, you submitted responses to staff inquiries requesting additional information and clarification regarding the stations' employment practices.

In the stations' 1989 EEO Program Report and its supplement, you state that during the period "October 1, 1988, and ending September 30, 1989, we hired a total of six persons, two white males and four white females." You also state that all of these persons were hired for upper-level positions. Our review of your first inquiry response, however, reveals that during this period the stations hired a total of 14 persons (10 full-time, four part-time). Moreover, one of these hires appears to have been for a lower-level position. No explanation for this discrepancy is offered in any of your filings to date. Please explain.

In addition, we note that in your May 12, 1992 response to our April 22, 1992 inquiry letter, you state that you contacted the St. Louis Post Dispatch and Broadcasting Magazine for a sales manager position filled in 1987. However, your opposition and first inquiry response do not list a sales manager position as filled at any time during the period October 1, 1986, to November 1, 1989. Moreover, you did not provide any information concerning your contacts with Reverend Otis Woodard as requested in our April 22, 1992 inquiry. As we noted, in your opposition and first inquiry response, you stated that you recently began contacting Reverend Woodard, a Black Lutheran minister, who you stated, has referred minority applicants to the stations.

In the interest of making a fair evaluation of your EEO efforts, we request the following additional information:

1. A detailed explanation for the discrepancy in the number of hires reported on your renewal applications and your first inquiry response.
2. For the sales manager position filled in 1987 for which you state that you contacted St. Louis Post Dispatch and Broadcasting Magazine, please provide:
  - a. the specific date the position was filled;
  - b. full or part-time status of the position;
  - c. number of persons interviewed (indicating those that were minority and female);
  - d. race or national origin of the successful applicant (i.e. Hispanic);
  - e. referral source of the successful applicant; and
  - f. whether the position required someone with "theological training" and/or "knowledge of classical music."
3. Specific information detailing when and for what specific positions you contacted the Reverend Otis Woodard during the previous license term ending February 1, 1990. Indicate for which specific positions you received minority referrals from this source.
4. On your 1984 Annual Employment Report, you reported a Black employee in a full-time upper-level position. For that position, please provide:
  - a. date of hire;
  - b. specific position;
  - c. date of termination;
  - d. whether the position required "theological training" and/or "knowledge of classical music."

Your response should be received by this office no later than twenty (20) days from the date of this letter. Should you be unable to provide any of this information, you must submit a written statement explaining this fact. Failure to provide all of the information requested will further delay processing of your renewal applications. Also, please send a copy of your response to David E. Honig, Esquire, counsel for SEACP. Should you have any questions regarding this matter, please contact Lisa M. Higginbotham, Esquire (202) 632-7069.

Sincerely,

Clean A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau

cc: Reed Miller, Esquire  
David E. Honig, Esquire

/usr/eec/higginb/broadcast/missouri/lttrkfu

**Federal Communications Commission**

Docket No. \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Presented by \_\_\_\_\_

Disposition { Identified ✓ 6/20/94  
Received ✓ 6/20/94  
Rejected \_\_\_\_\_

Reporter \_\_\_\_\_

Date \_\_\_\_\_

MMBEX 9

MASS MEDIA BUREAU  
EXHIBIT NO. 9

ARNOLD & PORTER

1200 NEW HAMPSHIRE AVENUE, N.W.  
WASHINGTON, D.C. 20036-6885  
(202) 872-6700

399 PARK AVENUE  
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(303) 863-1000  
FACSIMILE: (303) 832-0428

355 SOUTH GRAND AVENUE  
FORTY-FOURTH FLOOR  
LOS ANGELES, CALIFORNIA 90071-3106  
(213) 617-4300

KIOICHO D BUILDING  
3-28, KIOICHO, CHIYODA-KU  
TOKYO 102, JAPAN  
011-813-3221-3690

MARCIA CRANBERG  
DIRECT LINE: (303) 863-2314

July 13, 1992

Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W., Room 7218  
Washington, DC 20554

Re: KFUE/KFUE-FM, Clayton, Missouri -  
Response to Request for Information

Dear Mr. Wolfe:

This will refer to your letter of June 26, 1992, addressed to The Lutheran Church--Missouri Synod, licensee of KFUE-AM and FM, Clayton, Missouri, requesting additional information with regard to minority employment by the stations.

Enclosed herewith, in triplicate, is the response to your request. In accordance with your instructions, a copy of the response has also been sent by United States mail, postage prepaid, to opposing counsel, as noted below.

Should any question arise in connection with this matter, please communicate with the undersigned.

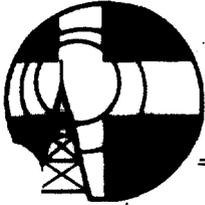
Very truly yours,

*Marcia Cranberg*  
Marcia Cranberg

Enclosures

cc w/ enclosures:

Lisa M. Higginbotham, Esq. (By Hand Delivery)  
David E. Honig, Esq.  
Herbert H. Henderson, Esq.



**KFUO** 850 AM 99.1 FM  
**lutheran radio**

85 FOUNDERS LANE, ST. LOUIS, MO 63105

(314) 725-3030

July 13, 1992

**Glenn A. Wolfe**  
**Chief, EEO Branch**  
**Enforcement Division**  
**Mass Media Bureau**

**Federal Communications Commission**  
**Washington, D.C. 20554**

**Dear Mr. Wolfe:**

Enclosed is the response from radio stations KFUO/KFUO FM in regard to your letter dated June 26, 1992.

As requested, we will forward a copy of this document to David E. Honig, counsel for the NAACP.

If more information is needed, please let me know.

Sincerely,

*Dennis R. Stortz*

Dennis R. Stortz  
General Manager, KFUO AM/FM

2

To: Glenn A. Wolfe  
Chief, EEO Branch  
Enforcement Division  
Mass Media Bureau

From: KFUD/KFUD-FM Radio Stations, St. Louis

Re: June 26, 1992 request for more information  
regarding EEO programs on pending applications  
for renewal of license for above stations.

1. Discrepancy in Number of Hires:

In the EEO Program Report filed with KFUD's 1989 license renewal application, KFUD stated that it had hired six new employees from October 1, 1988 through September 30, 1989. In fact, KFUD had a NET GAIN of six persons during this period; KFUD erroneously referred to this as the number of persons hired, rather than the overall net gain in employees. Relying on this characterization in its renewal application, KFUD mistakenly reiterated the error in the December 29, 1989 supplement to its renewal application.

Once further inquiries were made and a Petition to Deny filed, KFUD discovered and corrected its error. The information as to hiring during the October 1, 1988-September 30, 1989 period contained in Table Three to KFUD's Opposition to Petition to Deny and Response to Inquiry, dated February 23, 1990, is correct.

2. 1987 Sales Manager Position:

In the case of the 1987 advertisements in the St. Louis Post Dispatch and Broadcasting Magazine for a Sales Manager, referenced in KFUD's May 12 response to the Commission's letter of inquiry, the position was never filled. Instead, the KFUD-FM Station Manager, Tom Lauher, performed the tasks of Sales Manager as part of his overall position as Station Manager. Tom Lauher's 1987 hiring by the station was reflected at Table Three of KFUD's Opposition to Petition to Deny and Response to Inquiry.