

THARRINGTON, SMITH & HARGROVE
ATTORNEYS AT LAW
RALEIGH, NORTH CAROLINA

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1887-1980

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WASHINGTON OFFICE
2000 L STREET, N. W., SUITE 200
WASHINGTON, D. C. 20036

TELEPHONE
(202) 452-9271

FEB 11 1993

December 9, 1992

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Stop Code - 1170
Washington, D.C. 20554

Dear Ms. Searcy:

On behalf of Voyager Communications V, Inc., licensee of Radio Stations WELP(AM) and WLWZ-FM, Easley, South Carolina, it is respectfully requested, pursuant to Section 73.3550 of the Rules, that the call sign of Radio Station WELP(AM) be changed to WLWZ(AM).

WLWZ (FM) → WLWZ-FM
WELP (AM) → WLWZ *eff: 12/20/92*
verbally

This change should be made effective December 20, 1992.

Enclosed is an FCC Form 155 and a check in the amount of \$55.00 to cover the requisite filing fee.

Notification of the grant of this request should be made to:

Mark J. Prak
Counsel to
Voyager Communications V, Inc.
Post Office 1151
Raleigh, North Carolina 27602
Telephone: (919) 821-4711

3201 Glenwood Ave., #301
Raleigh, NC 27612

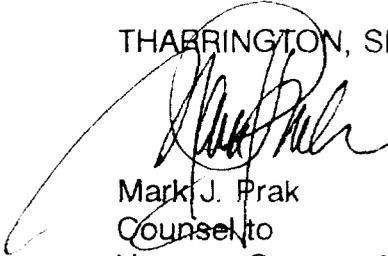
THARRINGTON, SMITH & HARGROVE

Ms. Donna R. Searcy
December 9, 1992
Page 2.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with this office.

Very truly yours,

THARRINGTON, SMITH & HARGROVE



Mark J. Prak
Counsel to
Voyager Communications V, Inc.

MJP/mt

Enclosures

cc: Alma Hughes, FCC Call Sign Desk, Rm. 701

ANTI-DRUG ABUSE ACT CERTIFICATION

/By checking yes, the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 853a, or, in the case of a non-individual applicant (e.g. corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits pursuant to that section. For the definition of a "party" for these purposes, see 47 C.F.R. § 1.2002(b).

Yes

No

Name of Applicant	Signature
Voyager Communications V. Inc.	<i>[Handwritten Signature]</i>
Date	Title
12/8/92	Vice President of Engineering

AM BRANCH

FEB 11 1993

DEC 11 1992

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

IN REPLY REFER TO:

8700

Call Letters: WELP (AM) & WLWZ (FM)
Date Granted: **JAN 6 1989**
File Number(s): BAL-881108HD & BALH-881108HE

VOYAGER COMMUNICATIONS III, INC.
201 GLENWOOD AVENUE
RALEIGH, NC 27612

NOTICE TO ASSIGNEE

Enclosed is FCC Form 732 notifying you of Commission consent to the assignment of the construction permit and/or license of the station(s) therein described. Voluntary assignments are required to be completed within sixty (60) days of the date granted.

In addition to the filing of the below mentioned FCC Form 323, you are required to immediately notify this office (8700), by letter, as to the exact date of the consummation; that is, the date on which the acts necessary to affect the assignment were completed.

Within thirty (30) days after the consummation of the assignment it will be necessary for you to submit an Ownership Report (FCC Form 323) reporting all changes as required by Section 1.615 of the Rules. Where applicable, a separate Ownership Report should also be completed and submitted for any holding company (25% or greater ownership interest) of the licensee/permittee. Contractual information required by Section 1.613 should be reported for the assignee in Item 6, page one of the Ownership Report and copies of each instrument should be submitted with the report. If this is an involuntary assignment that was the result of a death or court action, an Ownership Report must be filed to determine that all requirements of the Rules have been met and reported.

In the event the assignee is the licensee/permittee of another station and has a current Ownership Report on file, you may complete and file only page one of FCC Form 323 to reflect the acquisition of the station(s) listed above. FCC Form 323 is enclosed for your convenience in filing. Instructions for completing the report are on the reverse side.

It is of the utmost importance that all Commission correspondence come to the immediate attention of the permittee or licensee. Only one mailing address can be maintained for each station. Unless we hear from you to the contrary, the above address will be used as your permanent mailing address.

If the assignor has any applications pending before the Commission, these applications must be amended to reflect the name of the assignee. Upon consumation of the assignment, amendments to each application must be filed by the assignee, in triplicate, signed by the proper party (see Section 1.513 of the Rules). Further processing of these applications will be withheld pending receipt of the amendment.

Chief, FM Branch
Mass Media Bureau

Enclosure

UNITED STATES OF AMERICA
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

File No.(s): BAL-881108HD
BALH-881108HE

Class of station(s): AM, FM, & AUX

<input checked="" type="checkbox"/> CONSENT TO ASSIGNMENT: <input type="checkbox"/> CONSENT TO TRANSFER CONTROL: <input type="checkbox"/> CONSENT TO TRANSFER STOCK: Whereby of Control by is effected.	FROM AMERICAN COMMUNICATIONS OF GREENVILLE, SC
	TO VOYAGER COMMUNICATIONS III, INC.
Licensee/Permittee: (for transfer only)	

<u>CALL SIGN(s)</u>	<u>STATION LOCATION(s)</u>	<u>AUXILIARY STATION(s) (for assignments only)</u>
WELP AM WLWZ FM	EASLEY, S.C. EASLEY, S.C.	ALL CURRENTLY AUTHORIZED AUXILIARY SERVICES

Under authority of the Communications Act of 1934, as amended, the consent of the Federal Communications Commission is hereby granted to the transaction indicated above.

The Commission's consent to the above is based on the representations made by the applicants that the statements contained in, or made in connection with, the application are true and that the undertakings of the parties upon which this transaction is authorized will be carried out in good faith.

The actual consummation of voluntary transactions shall be completed within 60 days from the date hereof, and notice in letter form thereof shall promptly be furnished the Commission by the buyer showing the date the acts necessary to effect the transaction were completed. Upon furnishing the Commission with such written notice, this transaction will be considered completed for all purposes related to the above described station(s).

FCC Form 323 (Ownership Report), must be filed within 30 days after consummation, by the licensee/permittee or assignee.

ADDITIONAL REQUIREMENTS FOR ASSIGNMENTS ONLY:

Upon consummation the assignor must deliver the permit/license, including any modifications thereof to the assignee.

It is hereby directed that, upon consummation, a copy of this consent be posted with the station authorization(s) as required by the Commission's Rules and Regulations.

The assignee is not authorized to construct nor operate said station(s) unless and until notification of consummation in letter form has been forwarded to the Commission.

Dated: JAN 06 1989 Michael P. Wagner
(for) CHIEF, FM BRANCH
AUDIO SERVICES DIVISION
MASS MEDIA BUREAU

FEDERAL
COMMUNICATIONS
COMMISSION



FCC 732
March 1983

L I C E N S E R E N E W A L A U T H O R I Z A T I O N

RUN DATE: 06-89-01

THIS IS TO NOTIFY YOU THAT YOUR
APPLICATION FOR RENEWAL OF
LICENSE WAS GRANTED ON 01-06-89
FOR A TERM EXPIRING ON 12-01-95
FREQUENCY: 1360KHZ

THIS IS YOUR LICENSE RENEWAL
AUTHORIZATION FOR STATION
WELP
EASLEY SC

AMERICAN COMMUNS. OF GREENVILLE, SC
WELP AM STATION
CROSSHILL & MULBERRY RD
EASLEY, SC 29640

THIS ALSO IS THE RENEWAL
CERTIFICATE FOR YOUR CURRENTLY
AUTHORIZED AUXILIARY SERVICES.

THIS CARD MUST BE POSTED WITH THE
STATION'S LICENSE CERTIFICATE AND
ANY SUBSEQUENT MODIFICATIONS.

AM

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

880729VF

EEU

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

1. Name of Applicant American Communica tions of Greenville, SC Inc.		Mailing Address PO Box 1947, Easley, SC 29641	
Call Letters WELP-AM	City Easley,	State SC	ZIP Code 29640

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?
 Yes 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?
 Yes No If No, give the following information:
 Date last ownership report was filed: _____
 Call letters of the renewal application with which it was filed: _____

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 electromagnetic spectrum 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 authority to be granted in 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 were made in good faith.

Signed and dated this 28 day of July 19 88

Name of Applicant American Communica
of Greenville, SC, Inc.

By Signature [Signature]

Title President

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

FEE NO: 08010514

RECEIVED MRY

FEE AMT: 88072930.00

FCC 07

FEE SECTION

Question-by-Question Guidelines (FCC Form 303-S)

1. The name of the applicant should be stated exactly as it appears on the station's existing license. The current street address or post office box used by the applicant for receipt of Commission correspondence should be set forth.
2. Every station with five or more full-time employees must file an employment report on or before May 31 of each year. That report is to be available locally for public inspection.
A current and complete ownership report should be submitted with the licensee's renewal application and the question answered affirmatively. However, if the ownership report submitted with a station's last renewal application is "up-to-date" and has not been amended, a new report need not be filed with the current renewal application. The applicant should answer the question negatively and should supply the call letters of the station and the filing date of the renewal application with which the ownership report was submitted. An "up-to-date" ownership report is one that is current for each question on that report.
3. Aliens, foreign governments and corporations, and corporations of which any officer or director is an alien or of which less than 80% of the capital stock is owned or voted by U.S. citizens, are prohibited from holding a broadcast station license. Where a corporate licensee is directly or indirectly controlled by another corporation, of which any officer or more than 25% of the directors are aliens or of which less than 75% of that corporation's stock is owned or voted by U.S. citizens, the Commission must consider whether denial of renewal would serve the public interest. Licensees are expected to employ reasonable, good faith methods to ensure the accuracy and completeness of their citizenship representations.
4. This question is limited to adverse actions and judgments adjudicated or entered into within the preceding license term. Reportable activities consist of judgments or decrees, including settlement, consent, and like agreements, where the misconduct occurred either in the operation of the station for which renewal is requested or in the conduct of the other broadcast and non-broadcast activities of the renewal applicant and parties to that application, such as all partners and all corporate officers, directors, and stockholders with a 10% or more ownership interest in the applicant.
5. A licensee must maintain certain documents pertaining to its station in a file which should be kept at the station's main studio or other accessible place in the community of license. The file must be available for inspection by anyone during regular business hours. The documents to be maintained include applications for a construction permit and for license renewal, assignment or transfer of control; ownership and employment reports; and annual lists of local problems and responsive programming broadcast in the preceding twelve months. A complete listing of the required documents and their mandatory retention periods is set forth in Rules 73.3526 and 73.3527.

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

The solicitation of personal information requested in this application is authorized by the Communications Act of 1934, as amended. The principal purpose for which the information will be used is to determine if the benefit requested is consistent with the public interest. The staff, consisting variously of attorneys, accountants, engineers, and application examiners, will use the information to determine whether the application should be granted, denied, dismissed, or designated for hearing. If all the information requested is not provided, the application may be returned without action having been taken upon it or its 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 obtain authority.

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

LAW OFFICES
DOW, LOHNES & ALBERTSON

ORIGINAL

ONE RAVINIA DRIVE
SUITE 1300
ATLANTA, GEORGIA 30346
TELEPHONE (404) 395-8800
TELECOPIER (404) 395-8874
CABLE "DOWATL"
TELEX 4995255

WRITER'S DIRECT DIAL NO.

(202) 857-2788

1255 TWENTY THIRD STREET
SUITE 500
WASHINGTON, D.C. 20037

TELEPHONE (202) 857-2500
TELECOPIER (202) 659-0059
CABLE "DOWLA"
TELEX 425546

475 PARK AVENUE SOUTH
NEW YORK, NEW YORK 0016
TELEPHONE (212) 685-2150
TELECOPIER (212) 686-1926
TELEX 277-265

91 CATHEDRAL STREET
ANNAPOLIS, MARYLAND 21401
TELEPHONE (301) 263 0043

July 29, 1988

H. Walker Feaster, III
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Station WELP(AM)
Easley, South Carolina

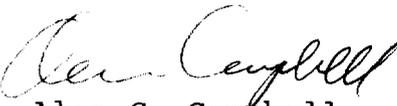
Dear Mr. Feaster:

Transmitted herewith and filed in duplicate on behalf of American Communications of Greenville, S.C., Inc. is the Renewal Application for Station WELP(AM), Easley, South Carolina. Also submitted on FCC Form 396 is the Broadcast Equal Employment Opportunity Program Report for the station.

A check in the amount of \$30 payable to the Federal Communications Commission is attached to cover the required filing fee.

Should you have any questions concerning this matter, please contact the undersigned.

Very truly yours,


Alan C. Campbell

ACC/jml
Enclosure

RECEIVED

880729

FCC
FEE SECTION

674
RECEIVED

OCT 3 1988

DOW, LOHNE & ALBERTSON

ATTORNEYS AT LAW

1255 TWENTY-THIRD STREET

WASHINGTON, D. C. 20037

ORIGINAL
RECEIVED

SEP 30 1988

TELEPHONE (202) 857-2500

ALAN C. CAMPBELL

DIRECT DIAL NO.

857-2788

Federal Communications Commission

TELETYPE UNIT (202) 418-6000

CABLE "DOWLA"

TELEX 425546

September 30, 1988

H. Walker Feaster, III
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Station WELP(AM)
Easley, South Carolina

Dear Mr. Feaster:

Transmitted herewith and filed in triplicate on behalf of American Communications of Greenville, S.C., Inc. is an amendment to the pending renewal application of WELP(AM), Easley, South Carolina. The amendment supplies the RF Radiation Certification for the station.

Should you have any questions concerning this matter, please contact the undersigned.

Very truly yours,



Alan C. Campbell

ACC/jml
Enclosure

Handwritten note: 10/1/88

RECEIVED

SEP 20 1988

Federal Communications Commission
Office of the Secretary

Renewal Application
WELP(AM)
Easley, SC

RF Radiation Compliance Certificate

The undersigned certifies that Station WELP(AM), Easley, South Carolina, meets guidelines as adopted by the FCC using the methods outlined in OST Bulletin No. 65. RF radiation which exceeds ANSI guidelines occurs only at locations immediately adjacent to the radiating tower. Public access to these areas is restricted, so there is no significant effect on the human environment with regard to exposure of the general public. The station has adopted procedures that protect workers from harmful exposure to radiation during periods when repair or maintenance work is required in areas where RF radiation levels exceed the ANSI guidelines.

Station WELP(AM)

Date: 9/26/88

By: [Signature]

Title: [Signature]

RECEIVED

OCT 3 1988

DOW, LOHNES & ALBERTSON

ATTORNEYS AT LAW

1255 TWENTY-THIRD STREET

WASHINGTON, D. C. 20037

RECEIVED

SEP 30 1988

Federal Communications Commission
Office of the Secretary

TELEPHONE (202) 857-2500

TELECOPIER (202) 659-0059

ALAN C. CAMPBELL

DIRECT DIAL NO.

857-2788

CABLE "DOWLA"
TELEX 425546

September 30, 1988

H. Walker Feaster, III
Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Station WELP(AM)
Easley, South Carolina

Dear Mr. Feaster:

Transmitted herewith and filed in triplicate on behalf of American Communications of Greenville, S.C., Inc. is an amendment to the pending renewal application of WELP(AM), Easley, South Carolina. The amendment supplies the RF Radiation Certification for the station.

Should you have any questions concerning this matter, please contact the undersigned.

Very truly yours,



Alan C. Campbell

ACC/jml
Enclosure

RECEIVED

SEP 30 1988

Federal Communications Commission
Office of the Secretary

Renewal Application
WELP(AM)
Easley, SC

RF Radiation Compliance Certificate

The undersigned certifies that Station WELP(AM), Easley, South Carolina, meets guidelines as adopted by the FCC using the methods outlined in OST Bulletin No. 65. RF radiation which exceeds ANSI guidelines occurs only at locations immediately adjacent to the radiating tower. Public access to these areas is restricted, so there is no significant effect on the human environment with regard to exposure of the general public. The station has adopted procedures that protect workers from harmful exposure to radiation during periods when repair or maintenance work is required in areas where RF radiation levels exceed the ANSI guidelines.

Station WELP(AM)

Date: 9/26/88

By: [Signature]

Title: [Signature]

RECEIVED

DEC 23 1988

Federal Communications Commission
Office of the Secretary

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C.

In re Applications of)	
)	
AMERICAN COMMUNICATIONS OF)	
GREENVILLE, SOUTH CAROLINA, INC.)	
)	
For Renewal of License of)	File No. 880729YE
Station WELP(AM))	
Easley, South Carolina)	
)	
For Renewal of License of)	File No. 880729YG
Station WLWZ(FM))	
Easley, South Carolina)	

NO
 2/1/89
 11/1/88

To: Chief, Mass Media Bureau

SUPPLEMENT TO OPPOSITION
OF PETITION TO DENY

American Communications of Greenville, South Carolina, Inc. ("American"), licensee of Stations WELP(AM) and WLWZ(FM), Easley, South Carolina, by its attorneys, hereby supplements its Opposition To Petition To Deny filed on December 1, 1988.

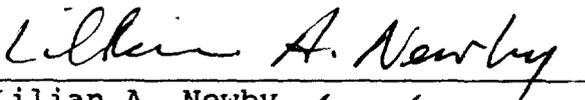
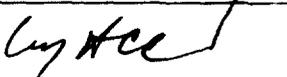
Petitioners (National Black Media Coalition, the South Carolina State Conference of Branches of the NAACP and the Greenville Branch of the NAACP) have filed a letter with the Commission withdrawing their Petition To Deny insofar as Stations WELP(AM) and WLWZ(FM) are concerned. For convenience, a copy of that withdrawal notice is attached hereto.

On November 8, 1988, American filed an application to assign the station licenses to Voyager Communications III, Inc. (BAL-881108HD; BALH-881108HE). Action on the assignment applications must await disposition of the petition and action on the renewal applications. Therefore, we respectfully request that the staff expeditiously complete its review the WELP/WLWZ renewal applications.

Respectfully submitted,

AMERICAN COMMUNICATIONS OF
GREENVILLE, SOUTH CAROLINA, INC.

By: 
Alan C. Campbell

By: 
Lilian A. Newby 

Its Attorneys

Dow, Lohnes & Albertson
1255 23rd Street, N.W.
Suite 500
Washington, D.C. 20037
(202) 857-2788

December 23, 1988

David E. Honig

ATTORNEY AT LAW

*6032 Ocean Pines
Berlin, Maryland 21811*

Telephone (301) 641-8060

Licensed in D. C. only

December 21, 1988

Glenn Wolfe
Chief
EEO Branch
Federal Communications Commission
2025 M Street N.W.
Washington, D.C. 20554

Dear Mr. Wolfe:

RE: Application of American Communications of Greenville, South Carolina, Inc. for renewal of license of stations WELP-AM and WLWZ-FM, Easley, South Carolina

The South Carolina State Conference of Branches of the NAACP, the Greenville Branch of the NAACP and the National Black Media Coalition ("NBMC/NAACP"), petitioners to deny the above-referenced applications, respectfully withdraw the petition to deny filed November 1, 1988 insofar it pertains to WELP-AM and WLWZ-FM.

As a result of discussions among representatives of NBMC/NAACP and the licensee, NBMC/NAACP are now persuaded that the stations did not intentionally disregard the requirements of the Commission's EEO Rule. They believe that the licensee is qualified to operate the stations in the public interest and that it will comply with the Commission's EEO rule.

Therefore, NAACP/NBMC urge the Commission to routinely and promptly grant the applications without conditions.

Respectfully submitted,

David Honig
David Honig
Counsel for Petitioners

cc: Alan Campbell, Esq.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 23rd day of December, 1988, she caused copies of the foregoing to be deposited in the United States Mail, first class postage prepaid (except hand deliveries as indicated below), addressed to the following:

Grover Hankins, Esquire
General Counsel, NAACP
4805 Mt. Hope Drive
Baltimore, Maryland 21215

David Honig, Esquire
6032 Ocean Pines
Berlin, Maryland 21811

- * Mr. Alex D. Felker
Chief, Mass Media Bureau
Federal Communications Commission
1919 M Street, N.W.
Room 314
Washington, D.C. 20554

- * Mr. Larry D. Eads
Chief, Audio Services Division
Federal Communications Commission
1919 M Street, N.W.
Room 302
Washington, D.C. 20554


Janie M. Lewis

* Via Hand Delivery

RECEIVED

DEC 1 1988

Federal Communications Commission
Office of the Secretary

BEFORE THE
Federal Communications Commission

WASHINGTON, D. C.

In re Applications of)	
)	
AMERICAN COMMUNICATIONS)	
OF GREENVILLE,)	
SOUTH CAROLINA, INC.)	
)	
For Renewal of License of)	File No. 880729YE
Station WELP(AM))	
Easley, South Carolina)	
)	
For Renewal of License of)	File No. 880729YG
Station WLWZ(FM))	
Easley, South Carolina)	

To: Chief, Mass Media Bureau

OPPOSITION TO PETITION TO DENY

American Communications of Greenville, South Carolina, Inc. ("American"), licensee of Stations WELP(AM) and WLWZ(FM), Easley, South Carolina, by its attorneys, hereby submits its Opposition to the Petition to Deny ("Petition") filed on November 1, 1988 by several branches of the NAACP and the National Black Media Coalition ("Petitioners") against American's applications for renewal of the licenses of Stations WELP and WLWZ. The following is submitted in support of this Opposition.

Petitioners, alleging that American has practiced only "token employment for Blacks" at Stations WELP and WLWZ and that American does not have a "meaningful" EEO program, have requested that the Commission deny American's license

renewal applications until there has been a full investigation of American's EEO program.

American has never been charged with discrimination against any of its minority employees or potential minority employees. Furthermore, American has employed two minority on-air personalities since taking over WELP and WLWZ in August, 1985, currently employs a significant number of minority persons in other top-level positions and has been diligent in its efforts to attract minority employees. American also has been an active participant in and promoter of numerous community activities aimed at minority citizens. Contrary to Petitioners' claim that American's efforts have been only "token," American asserts that it has been building a viable program of minority recruitment and advancement since taking charge of WELP and WLWZ approximately three years ago.

Current Employment Profile:

The 1988 Annual Employment Report on FCC Form 395-B filed by American for WELP and WLWZ shows that 6 of the 16 (37.5 percent) full time employees in the top 4 categories were minority employees on the reporting date^{1/} and 6 of the total of 17 (35.3 percent) full time employees were minority.

^{1/} The 395 reporting period used by American is the first pay period in March of each year. The statistics reported on Form 395-B differ from those reported by American on the 1988 Broadcast Equal Employment Opportunity Program Report on FCC Form 396 because the 396 reporting period is for the 12 months beginning July 15, 1987.

Easley is located in the Greenville-Spartanburg, South Carolina MSA. The MSA includes Pickens County, in which Easley is located, and Greenville and Spartanburg Counties. The minority work force figure for the MSA is 14.8 percent; the minority work force for Pickens County was placed at 6.97 percent by the 1980 Census. The statistics which Petitioners show in Table 15 at Page 22 for 1988 for the Stations are inaccurate.^{2/} Also, the statistics cited in Table 15 for 1985 do not apply to American's operation of the Stations. The figures for 1986 cover only seven months of American's operation, or from August, 1985 to the reporting period of March 1-15, 1986.

In addition to the statistics shown in the 1988 Annual Employment Report, other facts demonstrate that American is making an effective and reasonable effort to recruit, train and promote minorities. Station WLWZ adopted an Urban Contemporary format in December, 1987, while Station WELP retained its all-Gospel format. The new format has made WLWZ more popular with minorities, which, in turn, is believed to be helping with minority recruitment. For instance, since the format change approximately a year ago, 9 full time minority employees have been hired for positions in the top 4 categories compared to 6 non-minority employees for a 60 percent minority hiring. Those 9 minority employees

^{2/} Petitioners state at Page 5, n.2 that all employment statistics contained in their Petition are derived from the FCC Form 395 reports.

also represent 53 percent of the total number of 17 full time employees hired since December, 1987. The results are even better insofar as part-time employees are concerned. For instance, 5 minority employees and 1 non-minority have been hired on a part-time basis in the top 4 categories for a minority hiring figure of 83 percent. Presently, 29 percent of the full time employees, or 4 of 14 persons, in the top 4 categories are minority, and 31 percent of all full time employees, or 5 of 16, are minority.^{3/} Of the current part-time employees, 50 percent, or 5 of 10 persons, in the top 4 categories are minority and 45 percent, or 5 of 11, of the total are minority.

During the 12-month recruitment period beginning July, 1987 and reported on Form 396 with American's renewal applications, American hired 15 new employees. Eleven of them were hired in the top 4 categories, and 6 of the new employees were minority persons, all hired for positions in the top 4 categories.

Promotions:

Along with this record of increased minority hiring, American has an excellent record of assigning minority employees to key positions and of minority employee promotions. Since American took over the Stations on

^{3/} Although 9 minorities have been hired since December, 1987 for top 4 category positions, 5 of them voluntarily resigned their positions, leaving 4 minority employees in those positions currently.

August 30, 1985, minority employees have been promoted from AM drive-time announcer to Program Manager, from mid-day announcer to Music Director and from AM announcer to FM announcer and Director of Minority Relations. Currently, an account executive, four announcers and an assistant news director are minority employees.

Recruitment Efforts:

American also has expanded its minority recruiting sources over the last three years in an effort to improve its ability to hire minority employees. Since taking over the Stations in August, 1985, American has kept several groups informed of available jobs, asking those groups to refer potential minority employees to the Stations. Those groups have included local-area NAACP and Urban League branches, the South Carolina Job Service, South Carolina State College, Benedict College and Allen University. South Carolina State College, Benedict College and Allen University are predominantly Black institutions of higher learning located within approximately 150 miles of Easley. Having received no referrals from these sources during the time it has owned the Stations, American therefore has expanded its recruiting sources to include The Greenville News & Piedmont, The Palmetto Leader, an employment agency and three additional educational and/or technical institutions. American has found that the most prolific source of minority employees has been other minority employees of the Stations. Therefore,

American strongly encourages its minority employees to recruit other minority employees. In addition, American has named one of its well-known on-air personalities, who is a minority, to be the Director of Minority Relations for the Stations.

Petitioners criticize American's recent recruiting successes by implying that American has not seriously attempted to recruit minorities over the long term. Petitioners state that an indication of this is American's failure "to list minority media or educational institutions in its EEO program and the absence of referrals from the minority organizations it claimed to use." Petition at 22. Petitioners again misstate the facts. On the 1988 EEO report on FCC Form 396, which was filed with the renewal applications, American listed The Palmetto Leader, a minority newspaper, as an example of a recruiting source along with Greenville Technical College and Tri County Technical College. Both technical colleges have minority enrollments. Although not listed on the 1988 EEO report, which was intended to be only a representative listing, other educational recruiting sources used by American include South Carolina State College, Benedict College and Allen University, all of which have very high minority enrollments, and Furman University, which has a significant minority enrollment. With respect to an "absence of referrals" from minority organizations such as the NAACP and the Urban

League, both of which are kept abreast by American of job openings, American is not to blame for the fact that these minority organizations have not referred minority employees. In fact, among the reasons for expanding the network of recruiting sources is the lack of expected referrals from traditional minority organizations. It should be noted that Petitioners have not made any specific references to any organizations that American should use as a recruiting source and is not using. The Commission has been critical of this tactic in similar challenges. See, e.g., Carolina Christian Broadcasting, Inc., 3 FCC Rcd 1907, 1908 (1988) (EEO issues involving five stations); Louisiana Mississippi Broadcast Stations, 94 FCC 2d 275, 280 (1983).

Minority Community Involvement:

In addition to the formalized recruiting program, American has attempted to make the Stations better known in and accepted by the minority community by actively participating in or promoting numerous community programs of special interest to the minority community. American also believes its support of these programs serves the public interest. American's support has included activities such as remote broadcasts, public service announcements and the loan of talent. The type of minority community activity supported has included NAACP membership and voter registration drives, the Greenville Urban League's "Equal Opportunity Day Dinner,"