

# EEO Regulations for Broadcasters

*A Primer  
on  
Current FCC Requirements*



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# **EEO REGULATIONS FOR BROADCASTERS**

## *A Primer on Current FCC Requirements*

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### **OVERVIEW**

The FCC's current equal employment opportunity rules emphasize broad outreach and recruitment. Previous EEO rules attempted to assess the hiring process and the proportion of minorities and women in station staffs, but those approaches were invalidated as unconstitutional schemes that encouraged race-based hiring decisions. The Commission's present method couples a ban on discrimination with specific outreach, record-keeping and reporting requirements. Its premise is that employment opportunity will result from filling full-time jobs only after soliciting candidates from the full community.

This primer is intended to summarize the Commission's EEO rules as they now stand. We also provide worksheets to help organize the information to be collected and placed in the public file, as well as copies of the forms upon which EEO information is to be submitted to the Commission. Please be sure to discuss with communications counsel the application of these requirements to your specific situation. Since the Commission may modify or substantially interpret its rules in the future, you also need to be in a position to become aware of such changes and their impact.

### **ANTI-DISCRIMINATION**

As in the past, the Commission's EEO rules prohibit discrimination on the basis of race, color, religion, national origin or gender. The only exception permits religious radio broadcasters to establish religious belief or affiliation as a job qualification for all of their station employees. The Commission will continue to defer resolution of individual complaints of employment discrimination to the Equal Employment Opportunity Commission, courts and state and local governmental agencies. However, the Commission reserves the right to take its own action "where the facts of a particular case so warrant."

### **SCOPE OF THE EEO RULES**

The Commission's EEO rules apply to all broadcast "station employment units" with five or more full-time employees. A station employment unit includes all commonly-owned stations in the same market if they share even a single employee. Full-time employees are those whose regular work schedule is 30 hours or more per week. Although employment units having fewer than five full-time employees are not subject to

formal outreach and recruitment requirements, they still must comply with the anti-discrimination policy noted above. In most circumstances, the rules apply only to full-time positions, although, as noted in the next section, they may also apply to certain promotions of temporary or part-time employees to full-time positions. Licensees and brokers of time-brokered stations each must apply the Commission's EEO requirements with respect to their own employees.

## **RECRUITMENT**

Broadcasters must recruit for nearly all full-time vacancies. There are only two recognized exceptions. The first is for exigent circumstances, generally limited to the need to replace immediately an employee who departs without notice where his or her duties cannot be fulfilled, even briefly, by other staff, or where a preferred hiree has a talent so unique and exceptional that no comparable candidate is likely to be found. The Commission has cautioned that such circumstances should be quite rare. The other exception is for internal promotions and for temporary employees (defined as emergency replacements for absent regular employees or those hired to perform a particular job for a limited period of time). However, if an employee is promoted, a temporary employee is moved into a permanent slot or a part time employee is made full-time, then recruitment either must have been undertaken upon initial hiring or at the time of such a promotion.

Broadcasters are required to develop and use recruitment sources sufficient to ensure wide dissemination of information about each full-time job opening throughout the entire community. The Commission affords broadcasters substantial discretion to define the relevant recruitment "community" in light of the station's technical coverage, marketing and advertising practices, listenership and the flow of requests for job vacancy notices from area groups. The choice of particular recruitment sources is not prescribed, and need not necessarily be targeted specifically to minorities, women or any other group, so long as, when taken as a whole, the sources used are reasonably calculated to reach the entire community. Sources oriented toward the local community may be supplemented with regional and national sources as well as joint recruitment efforts. Licensees may also rely upon a pool of previously recruited candidates for similar positions and a certain degree of word-of-mouth. However, while Internet access is increasing, the Commission does not yet consider on-line job databases to suffice as a station's only recruitment sources. In addition, exclusive reliance upon on-air advertising may require extraordinary justification.

## **NOTIFICATION UPON REQUEST**

Employers must provide information of full time job vacancies upon the request of any organization involved in assisting job seekers. This is intended as a "safety valve" to ensure that no segment of the community is inadvertently overlooked in recruitment efforts. To become eligible, an organization merely must provide a broadcaster with its

name and contact information. The Commission expects broadcasters to publicize their interest in receiving notification requests so that qualified groups are able to learn of the procedure. Beyond individual publicity efforts, including website notices, newspaper ads, press releases and on-air spots, the Commission recognizes the value of joint announcements by area broadcasters or state associations.

## **SUPPLEMENTAL INITIATIVES**

Broadcasters are required to engage in a specified number of recruitment initiatives within each two year period. Two activities are required for employment units with five to 10 full-time employees or if they are located in a smaller market. Four activities are required for all others. A station is in a “smaller market” if it is located in a county outside of all metropolitan areas (as defined by the Office of Management and Budget) or in a metropolitan area with a population under 250,000. The relevant two-year period begins on the due date for a station’s renewal application, and every two years thereafter. Activities may be prorated for a period during which a station is acquired, if less than two years.

The purpose of these activities is to create a general interest in broadcast employment, rather than recruitment for specific positions. There are now 16 qualified activity options which are detailed on Page 13. They include job fairs, job banks, internship programs, scholarships, mentoring, employee and management training programs, media trade group listings, assisting outside non-profit career development entities, and a catch-all of “participating in other activities designed by the station employment unit reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.” The activities may be performed on a joint basis with other area broadcasters, state organizations or co-owned stations, so long as each participant has meaningful involvement in the activity. Note that some initiative categories require participation in multiple events of a given type.

## **RECORD-KEEPING REQUIREMENTS**

Employment units must be able to document compliance with the Commission’s EEO requirements. The rules require that the following information be collected:

- The job title and date of all full-time hires;
- The name, address, contact person and telephone number of each recruitment source used to fill each full-time vacancy (including all organizations entitled to automatic notification);
- Dated copies of all advertisements, bulletins, letters, faxes, emails or other communications announcing full-time vacancies;

- Documentation necessary to demonstrate performance of supplemental outreach initiatives, including full disclosure of the nature of the activity, the scope of the station's participation and station personnel involved; and
- The total number of interviewees for each full-time vacancy and the referral source for each interviewee and hiree.

All these materials are to be retained until after grant of the next renewal application after the vacancy was filled or the activity occurred. However, records for activity prior to a license assignment or transfer of control need not be kept by the new entity (unless specifically required under the terms of a grant). Except as noted below, records need not be submitted routinely to the FCC, but must be available upon Commission request.

## **PUBLIC FILE**

On each anniversary of the date of filing a renewal application, broadcasters must place in their local public inspection files (and post on their websites, if they have one) the following information covering hiring and activities during the preceding year:

- The job title of all full-time hires;
- The name, address, contact person and telephone number of each recruitment source used to fill each vacancy (including each organization entitled to automatic notification);
- The recruitment source that referred each full-time hiree;
- The total number of interviewees for each full-time vacancy and the number of interviewees referred by each recruitment source; and
- A list and brief description of each outreach initiative undertaken.

These materials are to be maintained in the public file until grant of the next renewal or license assignment.

Note that the FCC allows public file reports to be based upon activity concluding up to ten days prior to the filing deadline, provided that reportable information between the cutoff date and the filing deadline be included in the report for the following year. Thus, as an example, the annual report of a California radio station that is due October 1 can cover a period from September 21 of the prior year through September 20 of the current year.

## **FCC REPORTS AND FILINGS**

All applications for new stations, license assignments and transfers of control include a prospective EEO program on FCC Form 396-A. License renewal applications require a report on FCC Form 396 describing all pending or resolved EEO complaints and, for stations having five or more full-time employees, the name and title of the person

responsible for implementation, a narrative statement of the station's efforts to achieve broad and inclusive outreach during the previous two years, and a copy of the two most recent annual EEO public file reports. On the fourth anniversary of their renewal filing, employment units having 11 or more full-time employees must submit mid-term reports on FCC Form 397 including their two most recent public file reports and the name and title of the person responsible for EEO implementation.

The Commission has not reinstated its former annual employment report (FCC Form 395-B), which had required the race and gender of each full- and part-time employee according to job category. However, the Commission is considering using this or a similar form, ostensibly only in order to compile industry-wide statistics rather than to assess an individual entity's degree of compliance.

## **MONITORING AND ENFORCEMENT**

Upon receipt of information as to possible violations, the Commission may launch targeted investigations. In addition, each year it selects five percent of radio and television licensees for random audits which entail submission of documentation of recruitment efforts beyond the material required for the public file. Actionable violations or deficiencies include a lack of required supporting paperwork, engaging in employment discrimination, failing to file reports or comply with the Commission's EEO requirements or attempting to evade FCC requirements through token or sham efforts. Sanctions and remedies range from admonishments to reporting conditions, forfeitures, short term renewals and hearing designation seeking renewal denial or license revocation. Although remedies and sanctions have been imposed only rarely so far, they are determined on a case-by-case basis, and are expected to be most severe in cases involving recidivism, continuous non-compliance or intentional discrimination.

## **EFFECTIVE DATE**

The new rules became effective March 10, 2003. Records of activities undertaken prior to that time are not required. Grant of a license renewal or assignment generally presents the licensee with a clean slate going forward.

## SUMMARY OF RECRUITMENT RESPONSIBILITIES

- ***Upon beginning operation of a new station, or upon acquiring a station (especially if the prior licensee's efforts were inadequate)*** – Begin publicity to notify organizations in the community that they may request notification of job vacancies.
  - o Attach documentation of notification efforts to the Documentation of Publicity of New Notification Procedure cover sheet (Page 11).
  - o Each time an organization responds with a request for notifications, complete a Record Sheet of Organizations Requesting Notice of Job Vacancies (Page 12).
  
- ***Upon beginning operation of a new station, upon acquiring a station, or at the beginning of a license term*** – Plan supplemental outreach efforts.
  - o Specify your choices on the Election of Supplemental Outreach Initiatives worksheet (Page 13).
  - o Keep documentation of chosen supplemental outreach efforts as each progresses and is accomplished; attach such documentation to the Description of Supplemental Outreach Initiatives worksheet (Page 14).
  
- ***Each time a full-time vacancy occurs*** – Widely disseminate information to the community.
  - o Save copies of tearsheets of newspaper advertisements, letters, e-mails and faxes sent to organizations and employment agencies, and orders for on-air job spots, as applicable, for every vacancy.
  - o Compile the List of Recruitment Sources to Fill Each Vacancy (Page 17).
  
- ***After each interview or hire*** – Complete the Interviewee/Hiree Record Sheet (Page 15) for every person interviewed for each vacancy.
  
- ***On an ongoing basis for each full time vacancy*** – Use the Interviewee/Hiree Record Sheet (Page 15) to compile the Tally of Interviewee Sources For Each

Full-Time Vacancy (Page 18). Add the job to the List of All Full-Time Jobs Filled (Page 16).

- ***Determine the renewal filing due date for your station from the charts on pages 19-21. On each anniversary (or, if it falls on a weekend or legal holiday, then the next business day):***
  - Complete the Yearly Total Number of Interviewees and Total Number of Interviewees Referred by Each Recruitment Source (Page 19) for the preceding year using the Tally of Interviewee Sources For Each Full-Time Vacancy (Page 18).
  - Use the Description of Supplemental Outreach Initiatives worksheets (Page 14) to compile the Summary Description of Supplemental Outreach Initiatives (Page 20).
  - Place the following EEO materials into the station's local public file and post on the station's website, if applicable:
    - List of All Full-Time Jobs Filled (Page 16)
    - List of Recruitment Sources Used to Fill Each Vacancy (Page 17)
    - Description of Supplemental Outreach Initiatives (Page 14)
    - Yearly Total Number of Interviewees and Total Number of Interviewees Referred by Each Recruitment Source (Page 19)
    - Summary Description of Supplemental Outreach Initiatives (Page 20).

**EEO WORKSHEETS**

The attached EEO worksheets are designed to assist broadcast stations in complying with the Commission's current EEO rules, policies, and record-keeping requirements. By incorporating the use of these, or similar, worksheets into your station's operating procedures, you should be able to compile the data necessary to comply with the Commission's EEO rules and policies.

- Documentation of Publicity of New Notification Procedure (Page 11)
- Record Sheet of Organizations Requesting Notice of Job Vacancies (Page 12)
- Election of Supplemental Outreach Initiatives (Page 13)
- Description of Supplemental Outreach Initiatives (Page 14)
- Interviewee/Hiree Record Sheet (Page 15)
- List of All Full-Time Jobs Filled (Page 16)
- List of Recruitment Sources Used to Fill Each Vacancy (Page 17)
- Tally of All Interviewee Sources for Each Full-Time Vacancy (Page 18)
- Yearly Total Number of Interviewees and Total Number of Interviewees Referred by Each Recruitment Source (Page 19)
- Summary Description of Supplemental Outreach Initiatives (Page 20)

**DOCUMENTATION OF PUBLICITY OF  
NEW NOTIFICATION PROCEDURE**

*Attach to this cover sheet dated documentation of notices sent to organizations to inform them of the new notice procedures for receiving notification of job vacancies (e.g., text of announcements broadcast on-air, newspaper and/or other periodical advertisements, web pages, e-mails, faxes). **This is for your own records and for an FCC audit or inspection, if requested – do NOT place in your public file.***

**RECORD SHEET OF ORGANIZATIONS  
REQUESTING NOTICE OF JOB VACANCIES**

*Complete this worksheet every time an organization requests notification of job vacancies*

Name of Organization: \_\_\_\_\_

Date of Initial Request: \_\_\_\_\_

Type of Notifications Requested: \_\_\_\_\_

All Jobs

Specific Jobs (indicate which) \_\_\_\_\_

Name of Contact: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Phone Number: \_\_\_\_\_ Fax Number: \_\_\_\_\_

E-mail address (optional): \_\_\_\_\_

Form Prepared By: \_\_\_\_\_ Date: \_\_\_\_\_

*Attach dated copies of notices provided to organizations each time there is a station job vacancy (e.g., letters, e-mails, faxes, etc), and keep in station files (NOT local public file) for FCC inspection, if requested.*

**ELECTION OF SUPPLEMENTAL OUTREACH INITIATIVES**

***Complete this form every second year following your renewal due date.***

Form Prepared By: \_\_\_\_\_ Date: \_\_\_\_\_

	1. Participation in at least four job fairs by station personnel who have substantial responsibility in the making of hiring decisions
	2. Hosting of at least one job fair
	3. Co-sponsoring at least one job fair with organizations in the business and professional community whose memberships include substantial participation of women and minorities
	4. Participation in at least four events sponsored by community groups active in broadcast employment issues (conventions, career days, workshops and similar activities)
	5. Establishment of an intern program designed to assist members of the community to acquire skills needed for broadcast employment
	6. Participation in job banks, internet programs and other programs designed to promote outreach generally (programs not primarily directed to providing notification of specific job vacancies)
	7. Participation in scholarship programs designed to assist students interested in pursuing a career in broadcasting
	8. Establishment of training programs designed to enable station personnel to acquire skills that could qualify them for higher level positions
	9. Establishment of a mentoring program to enable station personnel to improve their skills to qualify for higher positions
	10. Participation in at least four events or programs sponsored by educational institutions relating to career opportunities in broadcasting
	11. Sponsorship of at least two events in the community designed to increase public awareness as to employment opportunities in broadcasting
	12. Listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities
	13. Provision of assistance to unaffiliated non-profit entities and the maintenance of websites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting.
	14. Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination.
	15. Provision of training to personnel of unaffiliated non-profit organizations interested in broadcast employment opportunities that would enable them to better refer job candidates for broadcast positions.
	16. Participation in other activities designed by the station employment unit that are reasonably calculated to further the goal of disseminating information as to employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities

***This form is for internal use only. Use it to select activities for which a "Description of Supplemental Outreach Activities" worksheet (Page 14) will be compiled.***

**DESCRIPTION OF SUPPLEMENTAL OUTREACH INITIATIVES**

*Complete this form for every event or program established by, sponsored by, or participated in by the station employment unit as part of each Supplemental Outreach Initiative (Page 13) elected.*

Date(s) of Initiative Event(s): \_\_\_\_\_

Describe Nature of Initiative: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Describe Scope of Broadcasters' Participation (including names of any other sponsoring or participating organizations): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Names of Station Personnel Involved in Initiative: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Form Prepared By: \_\_\_\_\_ Date: \_\_\_\_\_

*Attach copies of documentation demonstrating performance of chosen initiatives (e.g., pamphlets, advertisements, letters, e-mails, faxes) .*

*Use these worksheets to compile the annual Summary Description of Supplemental Outreach Initiatives (page 20).*

**INTERVIEWEE/HIREE RECORD SHEET**

*Complete this worksheet for every applicant interviewed for any full time vacancy.*

Name of Interviewee/Hiree: \_\_\_\_\_

Date(s) of Interview(s): \_\_\_\_\_

Job Title of Vacancy: \_\_\_\_\_

Recruitment Referral Source: \_\_\_\_\_

Hired?        YES \_\_\_        NO \_\_\_

If YES, Date of Hire: \_\_\_\_\_

Form Prepared By: \_\_\_\_\_ Date: \_\_\_\_\_

*Use this worksheet to compile Tally of Interviewee Sources For Each Full-Time Vacancy (Page 18).*

*Keep in station's internal files to document compliance if required by the FCC.*

**LIST OF ALL FULL-TIME JOBS FILLED  
FOR THE 12 MONTH PERIOD OF \_\_\_\_\_, 20\_\_ through \_\_\_\_\_, 20\_\_**

*Complete this worksheet continuously every time a vacancy is filled*

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

Job Title: \_\_\_\_\_ Date Filled: \_\_\_\_\_

*Place in station's local public file annually on the anniversary date of the renewal filing due date. Post on station's website, if applicable.*







**SUMMARY DESCRIPTION OF  
SUPPLEMENTAL OUTREACH INITIATIVES**

*Complete this form to summarize the activities compiled on the Description of Supplemental Outreach Initiatives worksheets (page 18). Stations required to engage in four initiatives should use an additional sheet to include remaining initiatives.*

**2/4 YEAR PERIOD BEGINNING \_\_\_\_\_, 20\_\_ AND ENDING \_\_\_\_\_, 20\_\_**

Specify First Initiative: \_\_\_\_\_

\_\_\_\_\_

Describe activities undertaken to fulfill that initiative:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Specify Second Initiative: \_\_\_\_\_

\_\_\_\_\_

Describe activities undertaken to fulfill that initiative:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

*Place in the public file and post on the station's website annually on the anniversary of the renewal filing date.*

## RENEWAL FILING DATES FOR RADIO AND TELEVISION STATIONS

<i>STATE</i>	<b>RADIO</b>	<b>TELEVISION</b>
<b>ALABAMA</b>	DECEMBER 1, 2011 Last Renewal Filed 12/1/03	DECEMBER 3, 2012 Last Renewal Filed 12/2/04
<b>ALASKA</b>	OCTOBER 1, 2013 Last Renewal Filed 10/1/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>ARIZONA</b>	JUNE 3, 2013 Last Renewal Filed 6/2/05	JUNE 2, 2014 Last Renewal Filed 6/1/06
<b>ARKANSAS</b>	FEBRUARY 1, 2012 Last Renewal Filed 2/1/04	FEBRUARY 1, 2013 Last Renewal Filed 2/3/05
<b>CALIFORNIA</b>	AUGUST 1, 2013 Last Renewal Filed 8/1/05	AUGUST 1, 2014 Last Renewal Filed 8/3/06
<b>COLORADO</b>	DECEMBER 3, 2012 Last Renewal Filed 12/2/04	DECEMBER 2, 2013 Last Renewal Filed 12/1/05
<b>CONNECTICUT</b>	DECEMBER 2, 2013 Last Renewal Filed 12/1/05	DECEMBER 1, 2014 Last Renewal Filed 12/1/06
<b>DELAWARE</b>	APRIL 1, 2014 Last Renewal Filed 4/1/06	APRIL 1, 2015 Last Renewal Filed 4/1/07
<b>DISTRICT OF COLUMBIA</b>	JUNE 1, 2011 Last Renewal Filed 6/1/03	JUNE 1, 2012 Last Renewal Filed 6/3/04
<b>FLORIDA</b>	OCTOBER 3, 2011 Last Renewal Filed 10/2/03	OCTOBER 1, 2012 Last Renewal Filed 10/1/04
<b>GEORGIA</b>	DECEMBER 1, 2011 Last Renewal Filed 12/1/03	DECEMBER 3, 2012 Last Renewal Filed 12/2/04
<b>GUAM</b>	OCTOBER 1, 2013 Last Renewal Filed 10/1/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>HAWAII</b>	OCTOBER 1, 2013 Last Renewal Filed 10/1/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>IDAHO</b>	JUNE 3, 2013 Last Renewal Filed 6/2/05	JUNE 2, 2014 Last Renewal Filed 6/1/06
<b>ILLINOIS</b>	AUGUST 1, 2012 Last Renewal Filed 8/1/04	AUGUST 1, 2013 Last Renewal Filed 8/1/05
<b>INDIANA</b>	APRIL 2, 2012 Last Renewal Filed 4/1/04	APRIL 1, 2013 Last Renewal Filed 4/1/05
<b>IOWA</b>	OCTOBER 1, 2012 Last Renewal Filed 10/1/04	OCTOBER 1, 2013 Last Renewal Filed 10/1/05
<b>KANSAS</b>	FEBRUARY 3, 2013 Last Renewal Filed 2/3/05	FEBRUARY 3, 2014 Last Renewal Filed 2/2/06
<b>KENTUCKY</b>	APRIL 2, 2012 Last Renewal Filed 4/1/04	APRIL 1, 2013 Last Renewal Filed 4/1/05
<b>LOUISIANA</b>	FEBRUARY 1, 2012 Last Renewal Filed 2/1/04	FEBRUARY 1, 2013 Last Renewal Filed 2/3/05
<b>MAINE</b>	DECEMBER 2, 2013 Last Renewal Filed 12/1/05	DECEMBER 1, 2014 Last Renewal Filed 12/1/06

<i>STATE</i>	<b>RADIO</b>	<b>TELEVISION</b>
<b>MARIANA ISLANDS</b>	OCTOBER 3, 2013 Last Renewal Filed 10/1/05	OCTOBER 2, 2014 Last Renewal Filed 10/1/06
<b>MARYLAND</b>	JUNE 1, 2011 Last Renewal Filed 6/1/03	JUNE 1, 2012 Last Renewal Filed 6/3/04
<b>MASSACHUSETTS</b>	DECEMBER 2, 2013 Last Renewal Filed 12/1/05	DECEMBER 1, 2014 Last Renewal Filed 12/1/06
<b>MICHIGAN</b>	JUNE 1, 2012 Last Renewal Filed 6/2/04	JUNE 3, 2013 Last Renewal Filed 6/2/05
<b>MINNESOTA</b>	DECEMBER 3, 2012 Last Renewal Filed 12/2/04	DECEMBER 2, 2013 Last Renewal Filed 12/1/05
<b>MISSISSIPPI</b>	FEBRUARY 1, 2012 Last Renewal Filed 2/1/04	FEBRUARY 1, 2013 Last Renewal Filed 2/3/05
<b>MISSOURI</b>	OCTOBER 1, 2012 Last Renewal Filed 10/1/04	OCTOBER 1, 2013 Last Renewal Filed 10/1/05
<b>MONTANA</b>	DECEMBER 3, 2012 Last Renewal Filed 12/2/04	DECEMBER 2, 2013 Last Renewal Filed 12/1/05
<b>NEBRASKA</b>	FEBRUARY 1, 2013 Last Renewal Filed 2/3/05	FEBRUARY 3, 2014 Last Renewal Filed 2/2/06
<b>NEW HAMPSHIRE</b>	DECEMBER 2, 2013 Last Renewal Filed 12/1/05	DECEMBER 1, 2014 Last Renewal Filed 12/1/06
<b>NEVADA</b>	JUNE 3, 2013 Last Renewal Filed 6/2/05	JUNE 2, 2014 Last Renewal Filed 6/1/06
<b>NEW JERSEY</b>	FEBRUARY 3, 2014 Last Renewal Filed 2/2/06	FEBRUARY 2, 2015 Last Renewal Filed 2/1/07
<b>NEW MEXICO</b>	JUNE 3, 2013 Last Renewal Filed 6/2/05	JUNE 2, 2014 Last Renewal Filed 6/1/06
<b>NEW YORK</b>	FEBRUARY 3, 2014 Last Renewal Filed 2/2/06	FEBRUARY 2, 2015 Last Renewal Filed 2/1/07
<b>NORTH CAROLINA</b>	AUGUST 1, 2011 Last Renewal Filed 8/1/03	AUGUST 1, 2012 Last Renewal Filed 8/1/04
<b>NORTH DAKOTA</b>	DECEMBER 3, 2012 Last Renewal Filed 12/2/04	DECEMBER 2, 2013 Last Renewal Filed 12/1/05
<b>OHIO</b>	JUNE 1, 2012 Last Renewal Filed 6/3/04	JUNE 3, 2013 Last Renewal Filed 6/2/05
<b>OKLAHOMA</b>	FEBRUARY 1, 2013 Last Renewal Filed 2/3/05	FEBRUARY 3, 2014 Last Renewal Filed 2/2/06
<b>OREGON</b>	OCTOBER 1, 2013 Last Renewal Filed 10/2/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>PENNSYLVANIA</b>	APRIL 1, 2014 Last Renewal Filed 4/1/06	APRIL 1, 2015 Last Renewal Filed 4/1/07
<b>PUERTO RICO</b>	OCTOBER 3, 2011 Last Renewal Filed 10/1/03	OCTOBER 1, 2012 Last Renewal Filed 10/1/04
<b>RHODE ISLAND</b>	DECEMBER 2, 2013 Last Renewal Filed 12/1/05	DECEMBER 1, 2014 Last Renewal Filed 12/1/06

<i>STATE</i>	<b>RADIO</b>	<b>TELEVISION</b>
<b>SAIPAN</b>	OCTOBER 1, 2013 Last Renewal Filed 10/1/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>SAMOA</b>	OCTOBER 1, 2013 Last Renewal Filed 10/1/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>SOUTH CAROLINA</b>	AUGUST 1, 2011 Last Renewal Filed 8/1/03	AUGUST 1, 2012 Last Renewal Filed 8/1/04
<b>SOUTH DAKOTA</b>	DECEMBER 3, 2012 Last Renewal Filed 12/2/04	DECEMBER 2, 2013 Last Renewal Filed 12/1/05
<b>TENNESSEE</b>	APRIL 2, 2012 Last Renewal Filed 4/1/04	APRIL 1, 2013 Last Renewal Filed 4/1/05
<b>TEXAS</b>	APRIL 1, 2013 Last Renewal Filed 4/1/05	APRIL 1, 2014 Last Renewal Filed 4/1/06
<b>UTAH</b>	JUNE 3, 2013 Last Renewal Filed 6/2/05	JUNE 2, 2014 Last Renewal Filed 6/1/06
<b>VERMONT</b>	DECEMBER 2, 2013 Last Renewal Filed 12/1/05	DECEMBER 1, 2014 Last Renewal Filed 12/1/06
<b>VIRGIN ISLANDS</b>	OCTOBER 3, 2011 Last Renewal Filed 10/2/03	OCTOBER 1, 2012 Last Renewal Filed 10/1/04
<b>VIRGINIA</b>	JUNE 1, 2011 Last Renewal Filed 6/1/03	JUNE 1, 2012 Last Renewal Filed 6/3/04
<b>WASHINGTON</b>	OCTOBER 1, 2013 Last Renewal Filed 10/1/05	OCTOBER 1, 2014 Last Renewal Filed 10/1/06
<b>WISCONSIN</b>	AUGUST 1, 2012 Last Renewal Filed 8/1/04	AUGUST 1, 2013 Last Renewal Filed 8/1/05
<b>WEST VIRGINIA</b>	JUNE 1, 2011 Last Renewal Filed 6/1/03	JUNE 1, 2012 Last Renewal Filed 6/3/04
<b>WYOMING</b>	JUNE 3, 2013 Last Renewal Filed 6/2/05	JUNE 2, 2014 Last Renewal Filed 6/1/06

## FCC EEO FORMS

The FCC has adopted the attached forms, which will need to be completed and submitted for each employment unit:

- **FCC Form 396-A – Broadcast Equal Employment Opportunity Model Program Report** – To be completed by applicants for new broadcast stations, assignments of licenses and transfers of control of broadcast licensees or controlling entities.
- **FCC Form 396 – Broadcast Equal Employment Opportunity Program Report** – To be filed with every application for renewal of a broadcast station license.
- **FCC Form 397 – Broadcast Mid-Term Report** – To be completed after the fourth year of each broadcast license term.

**Please note:** Unless a waiver has been obtained, all three forms must be filed electronically. The forms which follow are prototypes approved by the Office of Management and Budget. The online versions require the same substantive information but may not conform to the appearance of the printed prototypes. Be sure to prepare and submit the current online versions of these forms.

**BROADCAST EQUAL EMPLOYMENT OPPORTUNITY  
 MODEL PROGRAM REPORT**

Legal Name of the Applicant		
Mailing Address		
City	State or Country (if foreign address)	ZIP Code
Telephone Number (include area code)	E-Mail Address (if available)	
	Facility ID Number	Call Sign

Application for Construction Permit for New Station     
  Application for Assignment of License  
 Application for Transfer of Control  
 a. Service Type:   
  AM   
  FM   
  TV   
  Other (specify) \_\_\_\_\_  
 b. Community of License:   
 

City	State
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**INSTRUCTIONS**

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to assure equal employment opportunity. This is submitted to the Commission as the Model EEO Program. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

**Guidelines for a Model EEO Program and a Model EEO Program are attached.**

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

- Station employment unit will employ fewer than 5 full-time employees; therefore no written program is being submitted.  
 Station employment unit will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must

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

Signed	Name of Respondent
Title	Date

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

## **GUIDELINES TO THE MODEL EEO PROGRAM**

The model EEO program adopted by the Commission for construction permit applicants, assignees, and transferees contains five sections designed to assist the applicant in establishing an effective EEO program for its station. The specific elements which should be addressed are as follows:

### **I. GENERAL POLICY**

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of qualified persons.

### **II. RESPONSIBILITY FOR IMPLEMENTATION**

This section calls for the name (if known) and title of the official who will be designated by the applicant to have responsibility for implementing the station's program.

### **III. POLICY DISSEMINATION**

The purpose of this section is to disclose the manner in which the station's EEO policy will be communicated to employees and prospective employees. The applicant's program should indicate whether it: (a) intends to utilize an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) will post a notice which informs job applicants and employees that the applicant is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) will seek the cooperation of labor unions, if represented at the station, in the implementation of its EEO program and in the inclusion of nondiscrimination provisions in union contracts. The applicant should also set forth any other methods it proposes to utilize in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

### **IV. RECRUITMENT**

The applicant should specify the recruitment sources and other techniques it proposes to use to attract qualified job applicants. The purpose of the listing is to assist the applicant in developing specialized referral sources to ensure wide dissemination of vacancy information as job opportunities occur. Sources which subsequently prove to be nonproductive should not be relied on and new sources should be sought.

## **MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM**

### **I. GENERAL POLICY**

It will be our policy to provide equal employment opportunity to all qualified individuals without regard to race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It will also be 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 adopted an Equal Employment Opportunity Program which includes the following elements:

## II. RESPONSIBILITY FOR IMPLEMENTATION

Name/Title

**will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the 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 ensure 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 will be made:

- The station's employment application forms will contain 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 will be 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 victims of discrimination.
- We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.
- Other (specify)

## IV. RECRUITMENT

To ensure that information concerning each full-time vacancy is widely disseminated, we propose to use the following list of recruitment sources consistent with the requirements of 47 C.F.R. Section 73.2080:

## **FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

We have estimated that each response to this collection of information will take one (1) hour. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0113), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to [pra@fcc.gov](mailto:pra@fcc.gov). Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0113.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.**

## BROADCAST EQUAL EMPLOYMENT OPPORTUNITY PROGRAM REPORT

(To be filed with broadcast license renewal application)

(For FCC Use Only)

Code No.

Legal Name of the Licensee		
Mailing Address		
City	State or Country (if foreign address)	ZIP Code
Telephone Number (include area code)	E-Mail Address (if available)	
	Facility ID Number	Call Sign

**TYPE OF BROADCAST STATION :**

Commercial Broadcast Station

Noncommercial Broadcast Station

- Radio     TV  
 Low Power TV  
 International

- Educational Radio  
 Educational TV

List call sign and location of all stations included on this report. List commonly owned stations that share one or more employees. Also list stations operated by the licensee pursuant to a time brokerage agreement. Indicate on the table below which stations are operated pursuant to a time brokerage agreement. To the extent that licensees include stations operated pursuant to a time brokerage agreement on this report, responses or information provided in Sections I through IV should take into consideration the licensee's EEO compliance efforts at brokered stations, as well as any other stations, included on this form. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

Call Sign	Facility ID Number	Type (check applicable box)	Location (city, state)	Time Brokerage Agreement (check applicable box)
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No

**CONTACT PERSON IF OTHER THAN LICENSEE**

Name		Street Address	
City	State	Zip Code	Telephone No. ( )

**FILING 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, national origin, religion, and sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, a license renewal applicant whose station employment unit employs five or more full-time station employees must file a report of its activities to ensure equal employment opportunity. If a station employment unit employs fewer than five full-time employees, no equal employment opportunity program information need be filed. If a station employment unit is filing a combined report, a copy of the report must be filed with each station's renewal application.

A copy of this report must be kept in the station's public file. These actions are required to obtain license renewal. Failure to meet these requirements may result in sanctions or license renewal being delayed or denied. These requirements are contained in 47 C.F.R. Section 73.2080 and are authorized by the Communications Act of 1934, as amended.

DISCRIMINATION COMPLAINTS. Have any pending or resolved complaints been filed during this license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the station(s)?  Yes  No

If so, provide a brief description of the complaint(s), including the persons involved, the date of the filing, the court or agency, the file number (if any), and the disposition or current status of the matter.

--

Does your station employment unit employ fewer than five full-time employees?  Yes  No  
Consider as "full-time" employees all those permanently working 30 or more hours a week.

If your station employment unit employs fewer than five full-time employees, complete the certification below, return the form to the FCC, and place a copy in your station(s) public file. You do not have to complete the rest of this form. If your station employment unit employs five or more full-time employees, you must complete all of this form and follow all instructions.

**CERTIFICATION**

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT  
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT  
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed	Name of Respondent
Title	Telephone No. (include area code)
Date	

**The purpose of this document is to provide broadcast licensees, the FCC, and the public with information about whether the station is meeting equal employment opportunity requirements.**

**GENERAL POLICY**

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

**RESPONSIBILITY FOR IMPLEMENTATION**

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

NAME	TITLE

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

**I. EEO PUBLIC FILE REPORT**

Attach as an exhibit one copy of each of the EEO public file reports from the previous two years. Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.

Exhibit No.
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**II. NARRATIVE STATEMENT**

Provide a statement in an exhibit which demonstrates how the station achieved broad and inclusive outreach during the two-year period prior to filing this application. Stations that have experienced difficulties in their outreach efforts should explain.

Exhibit No.
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**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. If you do not provide the information requested on this report, the report 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. Your response is required to obtain the requested authority. We have estimated that each response to this collection of information will average 1 hour, 30 minutes. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0113), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to jboley@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0113.

**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 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.**

## BROADCAST MID-TERM REPORT

(For FCC Use Only)  
Code No.

Legal Name of the Licensee		
Mailing Address		
City	State or Country (if foreign address)	ZIP Code
Telephone Number (include area code)		E-Mail Address (if available)
FCC Registration Number (FRN)	Facility ID Number	Call Sign

**TYPE OF BROADCAST STATION:**

Commercial Broadcast Station

Noncommercial Broadcast Station

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> Radio         | <input type="checkbox"/> TV             | <input type="checkbox"/> Educational Radio |
| <input type="checkbox"/> Low Power TV  | <input type="checkbox"/> Educational TV |  |
| <input type="checkbox"/> International |   |  |

List call sign and location of all stations included on this report. List commonly owned stations that share one or more employees. Also list stations operated by the licensee pursuant to a time brokerage agreement. Indicate on the table below which stations are operated pursuant to a time brokerage agreement. To the extent that licensees include stations operated pursuant to a time brokerage agreement on this report, responses or information provided in Sections I through III should take into consideration the licensee's EEO compliance efforts at brokered stations, as well as any other stations, included on this form. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

Call Sign	Facility ID Number	Type (check applicable box)	Location (city, state)	Time Brokerage Agreement (check applicable box)
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> AM <input type="checkbox"/> FM <input type="checkbox"/> TV		<input type="checkbox"/> Yes <input type="checkbox"/> No

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

Name		Street Address	
City	State	Zip Code	Telephone No. (   )

**FILING 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, national origin, religion, and sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, a television station employment unit that employs five or more full-time station employees must file a full and complete Broadcast Mid-Term Report. If a television station employment unit employs fewer than five full-time employees, only the first two pages of this report need be filed.

A copy of this Mid-Term Report must be kept in the station's public file. Failure to meet these requirements may result in sanctions or remedies. These requirements are contained in 47 C.F.R. Section 73.2080 and are authorized by the Communications Act of 1934, as amended.

Consider as "full-time" employees all those permanently working 30 or more hours a week.

**SECTION I.**

Does your station employment unit employ fewer than five full-time employees, if television, or fewer than eleven full-time employees, if radio?  Yes  No

If yes, you do not have to file this form with the FCC. However, you have the option to complete the certification below, return the form to the FCC, and place a copy in your station(s) public file. You do not have to complete the rest of this form. If your station employment unit employs five or more full-time employees, if television, or eleven or more full-time employees, if radio, you must complete all of this form and follow all instructions.

**CERTIFICATION**

This report must be certified, as follows:

- A. By licensee, if an individual;
- B. By a partner, if a partnership (general partner, if a limited partnership);
- C. By an officer, if a corporation or an association; or
- D. By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT  
(U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT  
(U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

I certify to the best of my knowledge, information and belief, all statements contained in this report are true and correct.

Signed	Name of Respondent
Title	Telephone No. (include area code)
Date	

## GENERAL POLICY

A broadcast station must provide equal employment opportunity to all qualified individuals without regard to their race, color, national origin, religion or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

## SECTION II.

### RESPONSIBILITY FOR IMPLEMENTATION

A broadcast station must assign a particular official overall responsibility for equal employment opportunity at the station. That official's name and title are:

NAME	TITLE

It is also the responsibility of all persons at a broadcast station making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that no person is discriminated against in employment because of race, color, religion, national origin or sex.

## SECTION III.

### MID-TERM REPORT

Television station employment units with five or more full-time employees and radio station employment units with more than ten full-time employees filing in the middle of the license term must attach a copy of each of the two most recent EEO public file reports (the reports from this year and last year). Stations are required to place annually such information as is required by 47 C.F.R. Section 73.2080 in their public files.

EXHIBIT 1

### FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

We have estimated that each response to this collection of information will average 30 minutes. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0922), Washington, D.C. 20554. We will also accept your comments via the Internet if you send them to PRA@fcc.gov. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0922.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.**