
Memorandum to Broadcast Clients

March 7, 2003

Important Date - March 10, 2003

March 10th is an important date for most broadcast stations. It is the date upon which compliance must commence with the FCC's new EEO rules. Stations in areas with low minority workforce populations are no longer exempt from EEO efforts as they were previously. Only station employment units with fewer than five full time employees are exempt from most EEO requirements.

- Commencing on March 10th, for each full-time vacancy filled, a broadcast station must widely disseminate to its community information about the job availability.
- Commencing on March 10th, each broadcast station must publicize to its community that community organizations may ask to be individually notified each time a station job vacancy occurs.
- Commencing March 10th, each broadcast station must keep records of its dissemination of job vacancy information.
- Commencing March 10th, each broadcast station must keep records of each job vacancy, the source of each interviewee, and the source of each hire.
- Commencing on March 10th, each broadcast station must engage in two or four supplemental EEO efforts during every two year time period.

EEO COMPLIANCE CANNOT BE DONE IN ARREARS. IF A STATION DOES NOT WIDELY DISSEMINATE INFORMATION TO ITS COMMUNITY FOR AN OPENING AND IT MAKES A HIRE, IT CANNOT DO THE REQUIRED EEO EFFORTS AFTER THE FACT.

Womble Carlyle has authored a comprehensive EEO booklet with easy to use forms for planning and documenting EEO compliance. It is available on our website under the "Practice Areas - Telecommunications Law - Memos - Broadcast" heading at www.wcsr.com. It can also be accessed directly at the link: <http://john.garziglia.com/documents.html>.

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