EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

GENERAL POLICY

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

It is also our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the requirements of the FCC, we have adopted an Equal Employment Opportunity Program which includes the following elements:

RESPONSIBILITY FOR IMPLEMENTATION

Gary McKenney, General Manager, is our EEO Officer, who is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to the recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

POLICY DISSEMINATION

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts are made:

- 1. We keep our EEO Officer familiar with Federal, state and local EEO laws applicable to our station, by having him or her attend EEO-related seminars and subscribe to EEO-related publications.
- 2. The station's employment application form contains a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, state or Federal agency if they believe they have been the victims of discrimination.
- 3. The station's newsletter and letterhead contain a statement that the station is an Equal Opportunity Employer.
- 4. Appropriate notices are posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state or Federal agency if they believe they have been the victims of discrimination.

- 5. All of our printed advertisements and our over-the-air job announcements state that we are art Equal Opportunity Employer.
- 6. We periodically announce over the air that the station is an Equal Opportunity Employer.
- 7. We regularly distribute a memo reminding employees of the station's EEO Policy and Program, and asking for their help in recruiting, hiring and promoting consistent with the Policy and Program.
- 8. Because we have non-English speaking employees, or our station is located in a community with a significant non-English speaking populations we post notices in the appropriate alternate language as well as in English.
- 9. We include a copy of our EEO Policy and Program in personnel manuals, employee handbooks and orientation materials.
- 10. We remind our staff of our EEO Policy at staff meetings and discuss our EEO Program at these meetings.
- 11. We conduct training sessions to familiarize supervisors with their responsibilities in implementing the station's EEO Policy and Program.
- 12. We seek the cooperation of unions, if represented at the station, to help implement our EEO Program, and all union contracts contain a nondiscrimination clause.

RECRUITMENT

To ensure non-discrimination in relation to minorities and women, and to foster their full consideration whenever job vacancies occur, we utilize the following recruitment procedures:

- 1. We contact a variety of minority and women's organizations on a systematic basis, both orally and in writing, to encourage the referral of qualified minority and women applicants whenever job vacancies occur.
- 2. In addition to the organizations noted above, which specialize in minority and women candidates, we deal only with employment services, including state employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex.
- 3. When we recruit prospective employees from educational jfl₅titutiOflS, such recruitment efforts include schools and colleges with minority and women enrollments.
- 4. When we place employment advertisements with newspapers and other print media, some are placed in media which have significant circulation among, or are of particular interest to, minorities and women.
- 5. We encourage current employees to refer qualified minority and women candidates for existing and future job openings.

SELF-ASSESSMENT

To ensure that our EEO Program is effective in providing equal employment opportunity, we utilize the following procedures every six months.

- 1. We evaluate the productivity of each of our recruitment sources and eliminate those which have been unsuccessful in providing qualified minority and female applicants. We also supplement our sources with new organizations and other recruitment sources, as needed.
- 2. We review our job hires to see whether minorities and women were included in the applicant pool for every job opening.
- 3. We review our hiring, promotion and seniority practices and results for consistency with our EEO Program.