

**A PRIMER ON
EEO COMPLIANCE**

Prepared by:

**FLETCHER, HEALD & HILDRETH, P.L.C.
1300 N. 17th Street, 11th Floor
Arlington, VA 22209
Phone: 703-812-0400 Fax: 703-812-0486
e-mail: office@fhhlaw.com**

August, 2004

**A PRIMER ON
EEO COMPLIANCE**

August, 2004

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
Introduction	1
EEO Rules and Policies	2
I. General EEO Policy	2
II. EEO Program Requirements	2
III. Recruitment Compliance Methods	3
A. Prong 1. Recruit for All Full-Time Vacancies	3
B. Prong 2. Notification to Community Groups	3
C. Prong 3. Menu Options	3
IV. Record Keeping and the Public File.	5
A. Record Keeping.	6
B. Public File.	6
V. Filings with the FCC.	8
A. Broadcast Equal Employment Opportunity Report.	8
B. Broadcast Mid-Term Report.	8
C. Broadcast Equal Opportunity Model Program Report.	8
VI. Outreach Requirements of Religious Broadcasters.	9
VII. Enforcement	9
A. Third-Party Submissions	9
B. Random Audits/Inquiries	10
C. Licensee-Submitted Reports	10
D. Sanctions	11
Other Regulatory Considerations.	11
Legal Eligibility for Employment	12
Sexual Harassment	12

ATTACHMENTS:

- A. EEO Public File Report
- B. EEO Report Form – Internal Use
- C. Hirings Form
- D. Applicant Interviews
- E. New Hire Report
- F. List of Recruitment Sources
- G. Renewal Schedules
- H. Model Sexual Harassment Statement

INTRODUCTION

On November 20, 2002, the Federal Communications Commission (FCC) released its revised broadcast equal employment opportunity (EEO) rules and policies. These revised rules and policies became effective on March 10, 2003, and are presently in effect, although they may be modified upon further agency or court review.

The new rules impose on broadcasters intrusive and burdensome record keeping and filing requirements throughout the license term. Compliance with these rules may be a factor considered in connection with renewal applications. Since the new rules are now in effect, broadcasters should familiarize themselves with the rules and implement procedures to assure compliance as soon as possible.

August, 2004

EEO RULES AND POLICIES

I. **General EEO Policy:** All licensees and permittees of commercial or non-commercial radio or television stations, regardless of size, must afford the opportunity for employment to all qualified persons and cannot discriminate in hiring because of race, color, religion, national origin or sex. Religious broadcasters can establish religious belief or affiliation as a legitimate qualification for all employment opportunities but cannot otherwise discriminate.

II. **EEO Program Requirements:** Every broadcast station with five or more full-time employees must have a general program to accomplish the following:

A. Define responsibility of each level of management to ensure enforcement of EEO policies and establish a procedure for review and control of management performance;

B. Inform employees and recognized employee organizations of the station's EEO policies and programs and enlist their cooperation;

C. Communicate its EEO program and policies to sources of qualified applicants and solicit their recruitment assistance on a continuing basis;

D. Conduct a continuing program to exclude all unlawful forms of prejudice or discrimination in its personnel policies, procedures and working conditions; and

E. Conduct a continuing review of job structure and employment practices and adopt positive recruitment, job design, and other measures to ensure EEO compliance at all levels and areas of job opportunities.

III. Recruitment Compliance Methods: All station employment units¹ with five or more full-time employees² must comply with the following three-prong outreach recruitment requirements:

- A. PRONG 1. Recruit for All Full-Time Vacancies. Station employment units must widely disseminate information concerning each full-time (30 hours or more)³ job vacancy. This requirement does not apply to temporary or part-time hires⁴ or vacancies or full-time hires that are (a) filled in exigent circumstances or; (b) filled by internal promotion; and
- B. PRONG 2. Notification to Community Groups. Station employment units must provide notification of all full-time job openings to any organization that distributes employment opportunities to job seekers or refers job seekers to potential employers and has requested to be notified⁵; and
- C. PRONG 3. Menu Options. Station employment units must engage in a specified number of activities selected from a menu of options. Station employment units must complete two (for employment units with five to ten full-time employees or smaller market stations⁶) or four (for employment units

¹ A "station employment unit" is defined by the Commission as a station or group of stations commonly owned in the same market that share at least one employee. Station employment units that have fewer than five full-time or more employees are exempted from these outreach provisions. Under the new EEO rules, station employment units with five to ten full time employees and those in small markets would be required to perform only two, rather than four, outreach activities during a two year period.

² For purposes of EEO, except in situations where there is a 51% or greater single owner, owners holding a 20% or greater voting interest are not considered as "employees".

³ For purposes of EEO, the FCC defines "full-time employee" as a permanent employee whose regular work schedule is thirty hours or more per week.

⁴ For purposes of EEO, the FCC defines "part-time hires" as a permanent employee whose regular work schedule is less than thirty hours per week.

⁵ To be entitled to such notices, a requesting organization must provide the station with its name, mailing address, email address (if applicable), telephone number, and contact person, and identify the category of vacancies of which it requests notice (an organization may request notice of all vacancies).

⁶ The FCC defines "smaller market" stations for this purpose as any station employment unit consisting solely of a station or stations licensed to a community that is

with more than ten full-time employees located in larger markets) longer-term recruitment initiatives within a two-year period.

These menu options include:

(1) participation in at least four job fairs by employment unit personnel who have substantial responsibility in making hiring decisions;

(2) hosting at least one job fair;

(3) co-sponsoring job fairs with women's and minority groups in the business and professional community;

(4) participation in at least four events sponsored by community groups active in broadcast employment issues, including conventions, career days, workshops and similar activities;

(5) establishment of an internship program designed to assist members of the community to acquire skills needed for broadcast employment;

(6) participation in general outreach efforts through job banks, Internet programs, and similar programs;

(7) participation in scholarship programs directed to students interested in pursuing a career in broadcasting;

(8) the establishment of training programs designed to enable employment unit personnel to acquire skills that could qualify them for higher level positions;

(9) the establishment of mentoring programs designed to enable employment unit personnel to acquire skills that could qualify them for higher level positions;

(10) participation in at least four events or programs relating to career opportunities in broadcasting sponsored by educational institutions;

(11) sponsorship of at least two events in the community designed to inform the public as to employment opportunities in broadcasting;

located in a county that is outside all metropolitan areas, as defined by the Federal Office of Management and Budget, or is located in a metropolitan area that has a population of fewer than 250,000 persons.

(12) listing each upper-level opening in a job bank or newsletter of a media trade group with broad based membership, including participation of women and minorities;

(13) providing assistance to outside non-profit entities in the maintenance of web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting;

(14) providing training to management level personnel as to the methods of ensuring equal employment opportunity and preventing discrimination;

(15) providing training to personnel of outside non-profit recruitment organizations that would enable them to better refer job candidates for broadcast positions; and

(16) participation in activities other than the fifteen above-listed options that the licensee has designed to further the goal of disseminating information about employment opportunities in broadcasting to job candidates who might otherwise be unaware of such opportunities.

The Commission expects licensees to periodically review and analyze the methods they have selected and make changes if they perceive any problem with the effectiveness of the program.

IV. Record Keeping and the Public File: All station employment units with five or more full-time employees must retain documentation concerning their compliance with the three recruitment prongs. This documentation need not be routinely submitted to the Commission or placed in the station's public file, but must, however, be provided to the Commission upon request in the event of an investigation or audit. This documentation is the basis for the station's EEO public file report which stations are required to prepare annually. As explained below, the EEO public file report must be placed in the station's public inspection file and must be routinely submitted to the Commission.

A. Record Keeping: As part of the EEO rules, all station employment units with five or more full-time employees must retain documentation concerning their compliance with the three recruitment prongs. This documentation must be retained by the station, but need not be routinely submitted to the FCC. This documentation should include the following:

- (1) listings of all full-time jobs filled, identified by job title;
- (2) the recruitment sources used to fill each vacancy, including any organizations which requested notification;
- (3) the address, contact person and telephone number of each recruitment source used to fill each position;
- (4) dated copies of all advertisements, letters, e-mails, faxes, etc. used to fill each vacancy;
- (5) documentation necessary to demonstrate performance of the prong 3 options, e.g., job fairs, mentoring programs;
- (6) the total number of interviewees for each vacancy and the referral source for each interviewee; and
- (7) the date each job was filled and the recruitment source that referred the hiree.

B. Public File and EEO Public File Report: Using the above-referenced documentation, all station employment units with five or more full-time employees must prepare an EEO public file report.⁷ Annually, on the

⁷ If a station is subject to a time brokerage agreement (or local marketing agreement), the licensee's EEO public file report should include data concerning only its own recruitment efforts to fill full-time jobs and not the efforts of the broker. If a licensee is also a broker of another station or stations in the same market in which it is a licensee (a "licensee-broker"), the licensee's EEO public file report should include data concerning its EEO efforts at both the owned and brokered station. If a licensee-broker is not the licensee of a station in the same market as the brokered station, then it must include information concerning its EEO efforts at the brokered station in the EEO public file report

anniversary of the date that its renewal application is due to be filed,⁸ this EEO public file report must be placed in the station's public file and on the station's web site, if they have one. These reports must be retained in the public file until final action has been taken on the station's next renewal application. However, not all EEO public file reports need to be maintained on the station's website. The requirement to post a station's EEO public file report on its website only extends to the current report. The EEO public file report must include the following information:

- (1) a list of all full-time job vacancies filled during the previous year, identified by job title;
- (2) a list of the recruitment sources used to fill each vacancy, including the address, contact person and telephone number of each recruitment source;
- (3) a list of the recruitment sources that referred the people hired for each full-time vacancy;
- (4) data reflecting the total number of persons interviewed for full-time vacancies during the preceding year and, for each recruitment source used in connection with any such vacancies, the total number of interviewees referred by each recruitment source; and
- (5) a list and description of any prong 3 menu options implemented during the preceding year.

A number of forms that may be useful in keeping track of the required information are included as Attachments A through F.

for its own station that is geographically closest to the brokered station.

⁸ A list of the renewal filing dates for radio and television stations is included as Attachment G.

V. Filings with the FCC: The FCC has adopted the following forms relating to the Commission's EEO outreach requirements which must be routinely submitted to the Commission by broadcast station employment units with five or more full-time employees:

- A. Broadcast Equal Employment Opportunity Report (FCC Form 396): At the time of filing the station's license renewal application, the Broadcast Equal Employment Opportunity Report (FCC Form 396) must be filed. Copies of the EEO public file reports covering the two-year period preceding the filing of a renewal application must be submitted as an attachment to FCC Form 396, and will be the FCC's basis for review of the broadcaster's EEO compliance at renewal time.

- B. Broadcast Mid-Term Report (FCC Form 397): Television stations with five or more full-time employees and radio stations with more than ten full-time employees are subject to a mid-term review. Thus, four years after the date the station's most recent license renewal application was due to be filed, the station must file with the Commission a Broadcast Mid-Term Report (FCC Form 397) and copies of their EEO public file reports for the two years preceding the mid-term review as an attachment to FCC Form 397. This filing will be the basis for mid-term reviews. It must also be placed in the station's public file.

- C. Broadcast Equal Opportunity Model Program Report (FCC Form 396-A): At the time of filing an application for the construction of a new broadcast station or for the assignment or transfer or control of an existing broadcast

station, a Broadcast Equal Opportunity Model Program Report (FCC Form 396-A) must also be filed. In the case of the sale or transfer of control of a station, the entity required to file FCC Form 396-A is the entity seeking to acquire the station.

VI. Outreach Requirements for Religious Broadcasters: Religious broadcasters which elect to apply a religious qualification to all of their employees are not required to comply with the broad outreach recruitment requirements or Prong 3 menu options, although they are still required to keep records and prepare a public file report. Among the potential applicants who are qualified based on their religious belief or affiliation, religious broadcasters must make reasonable good faith efforts to recruit without regard to race, color, national origin or gender. This requirement also applies to religious broadcasters electing to establish a religious qualification for some, but not all, of their positions. For positions that are subject to religious qualification, religious broadcasters need to retain documentation as to the full-time vacancies filled, the recruitment sources used, the date each vacancy was filled and the recruitment sources of the hires. For positions that are not subject to a religious qualification, religious broadcasters must comply with Prongs 1 and 2 and associated record keeping requirements. However, a religious broadcaster that treats five or more of its full-time positions as non-religious is comparable to a broadcaster with no religious qualification and must comply with the Prong 3 menu options. A religious broadcaster electing to treat none of its positions as subject to a religious qualification would also be required to comply with all three prongs.

VII. Enforcement: FCC enforcement of the EEO rules will be based upon information derived from broadcasters themselves during their mid-term review and at renewal time, as well as the following:

- A. Third-Party Submissions: Petitions to deny, informal objections, other petitions or complaints will be considered by the Commission from all sources if they provide documented allegations of failure to comply with the Commission's EEO rules. Unlike the prior rules, the FCC will not wait until a station's renewal application is filed but will conduct an investigation immediately when it decides that an adequate showing of non-compliance has been made. Stations would then be required to provide responses to inquiries and may even be subject to on-site inspections.
- B. Random Audits/Inquiries: The Commission has indicated that it intends to send written inquiries and conduct on-site inspections of stations throughout the year. Specifically, the Commission has said that it will randomly select for audit approximately five percent of all licensees in the radio and television services. Initially, the inquiry may request the contents of the station's public file. Further inquiry or inquiries may require the submission of documentation of the station's recruitment efforts that is not in the station's public file. Based on the individual circumstances of the case, the inquiry could potentially include, but is not limited to: (1) a request for data covering any period of time during the license term; and (2) interviews of witnesses, including any complainant and present or former employees.

- C. Licensee-Submitted Reports: As discussed above, the FCC has adopted reporting forms relating to the Commission's EEO outreach requirements. Broadcast stations or units with five or more full-time employees must routinely submit these forms to the Commission. These reports will be used by both the Commission's staff and others to point out alleged discrepancies in the station's compliance with the EEO rules and policies.
- D. Sanctions: Should the FCC determine that a station has violated its EEO rules, licensees will be subject to a variety of sanctions and remedies, depending on the seriousness of the violation. Some examples of violations or deficiencies include: (1) engaging in employment discrimination in hiring or promotions; (2) failure to file a mid-term report when due; (3) failure to file an EEO public file report when due; (4) failure to file a Broadcast Equal Opportunity Program Report (FCC Form 396) when due; (5) misrepresentation of outreach efforts or other information; and (6) non-responsiveness or evasion in responding to a written Commission inquiry.

Sanctions and remedies that may be issued by the Commission for deficiencies in a licensee's EEO compliance include: (1) written admonishments; (2) FCC imposed reporting conditions; (3) forfeitures; (4) short-term renewal of license; or (5) designation for hearing for possible revocation of license or denial of renewal. The appropriate sanction or remedy will be determined on a case-by-case basis. Sanctions will be greater in cases involving recidivism, continuous EEO non-compliance, or intentional discrimination.

OTHER REGULATORY CONSIDERATIONS

In addition to the FCC's EEO rules, broadcasters should familiarize themselves with other regulatory issues regarding the employment of station personnel. One such employment related issue broadcasters must be familiar with when recruiting is a potential hiree's legal eligibility for employment under the immigration laws. In addition, station personnel must familiarize themselves with the sexual harassment laws and should implement their own sexual harassment policy.

LEGAL ELIGIBILITY FOR EMPLOYMENT

It is unlawful for an employer in the United States to (1) knowingly hire an alien who is not properly authorized to work in the United States or (2) deny employment because of national origin or citizen status. There have been significant changes in the immigration laws since September 2001 and there are still a number of changes pending. If questions arise, we recommend that you consult with an attorney who specializes in immigration law.

SEXUAL HARASSMENT

Sexual harassment is an important employment issue which must be addressed by licensees. Licensees should adopt a strong policy statement clearly delineating prohibited conduct and the measures which will be taken against violators. It is recommended that a formal complaint channel be established to provide a readily accessible means for employees to complain or express displeasure about alleged misconduct. It is advisable to hold meetings at the managerial/supervisory level to inform high level staff of company policies and procedures. In turn, the supervisory staff should have formal meetings with subordinates to ensure that all are familiar with company

policies and procedures. Management and staff must be "sensitized" as to the feelings of other employees and as to the type of conduct found to be offensive.

Supervisory staff must be attentive to possible problems and act effectively to stop problems before they become unmanageable. All complaints of sexual harassment, regardless of their apparent truth, should be fully investigated. Action should never be taken against an employee because he or she has made a complaint. Sanctions must be enforced against supervisory staff members who knowingly allow harassment by others.

The model sexual harassment policy included as Attachment H is appropriate for adoption by licensees. Compliance with this policy will prevent potential problems, and even where such problems arise, will serve as evidence of a good faith attempt by the employer and management to ensure that the work environment is free of harassment.

ATTACHMENT A
(EEO PUBLIC FILE REPORT)

EEO PUBLIC FILE REPORT

For the 12-month Period Ending _____

Prepared by: _____
(Licensee/Permittee)

This report covers the following employment unit:

<u>Call Sign</u>	<u>Facility ID Number</u>	<u>Type of Station</u>	<u>Location City, State</u>	<u>LMA</u>

A. The following is a list of all vacancies for full-time jobs during the previous 12 months:

	<u>Job Title</u>	<u>Date of Opening</u>	<u>Date Filled</u>
1.			
2.			
3.			
4.			
etc.			

(Attachment A)

B. During the previous 12 months, the following recruitment sources were contacted as vacancies for full-time jobs opened. Those with an asterisk (*) were organizations that requested to be contacted as job openings occurred:

	<u>Recruitment Source</u>	<u>Address</u>	<u>Contact Person</u>	<u>Telephone Number</u>
1.				
2.				
3.				
4.				
5.				
6.				
7.				
etc.				

C. The following is a list of the sources for full-time jobs shown in Section A above and the recruitment source which provided the hiree for that position:

	<u>Job Title</u>	<u>Recruitment Source</u>
1.		
2.		
3.		
4.		
5.		
6.		
7.		
etc.		

(Attachment A)

D. During the previous 12 months, there were a total of _____ people interviewed for vacancies for full-time positions. The following is a list of the total number of interviewees referred by each recruitment source shown in Section B above:

<u>Recruitment Source</u>	<u>Total No. of Interviewees</u>
1.	
2.	
3.	
4.	
5.	
6.	
etc.	

E. During the last 12 months, the station employment unit engaged in the following (menu option) initiatives (provide full details, including an explanation if no such initiatives were conducted during the period involved):

Prong 3 Menu Option

- 1.
- 2.
- 3.

4.

etc.

Name of Respondent: _____

Signed: _____

Typed Name: _____

Title: _____

Date: _____

Telephone No.
(include area code): _____

ATTACHMENT B
(EEO REPORT FORM – INTERNAL USE)

EEO REPORT FORM

Dear Applicant:

We sincerely appreciate your interest in employment with our company. Your application is being considered.

The Federal Communications Commission requires broadcast licensees to keep records and file reports regarding employment applications and inquires and resumes received.

To assist us in fulfilling that requirement, would you please take a moment to fill out the brief questionnaire below and return it to us. This information is voluntary and is strictly for our required reporting purposes. It has no bearing whatsoever on your qualifications for employment and will not result in any adverse personnel action against you. THIS INFORMATION WILL NOT BE ATTACHED TO YOUR APPLICATION FOR EMPLOYMENT OR RESUME AND WILL NOT BE AVAILABLE TO THOSE EMPLOYEES WHO WILL BE CONSIDERING YOU FOR EMPLOYMENT.

We would appreciate your assistant. If this form has been mailed to you, a self-addressed return envelope is enclosed for your convenience.

Please fill out this portion and return it to us. Thank you.

Please print or type.

Name: _____

Address: _____

Position sought: _____

Referred by: _____

This information is for required Federal Communications Commission reporting purposes only and has no bearing on your qualifications for employment.

(Attachment B)

ATTACHMENT C
(HIRINGS FORM)

HIRINGS FORM

Date: _____

Circle Appropriate Response: **Hiring** **Full-Time** **Part-Time**

Job Title _____ FCC Job Category _____

Person Hired _____ Date Hired _____

Referral Source _____

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

- | | | |
|-----|-------|-----------------------|
| 1. | _____ | Referral Source _____ |
| 2. | _____ | Referral Source _____ |
| 3. | _____ | Referral Source _____ |
| 4. | _____ | Referral Source _____ |
| 5. | _____ | Referral Source _____ |
| 6. | _____ | Referral Source _____ |
| 7. | _____ | Referral Source _____ |
| 8. | _____ | Referral Source _____ |
| 9. | _____ | Referral Source _____ |
| 10. | _____ | Referral Source _____ |
| 11. | _____ | Referral Source _____ |
| 12. | _____ | Referral Source _____ |
| 13. | _____ | Referral Source _____ |

Other Referral Sources Contacted _____; _____;

_____;

ATTACHMENT D
(APPLICANT INTERVIEWS)

APPLICANT INTERVIEWS

<u>Position</u>	<u>Name of Applicant</u>	<u>Date Job Posted</u>	<u>Responded/ Interviewed</u>	<u>Referral Source</u>	<u>Disposition</u>

(Attachment D)

ATTACHMENT E
(NEW HIRE REPORT)

NEW HIRE EEO REPORT

PERSON HIRED: _____

DATE: _____ POSITION: _____

STATUS: _____ FULL-TIME _____ PART-TIME _____

DATE JOB POSTED: _____

APPLICANTS INTERVIEWED:

Total Number: _____

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

____ Newspaper (Specify) _____

____ Recruitment Organizations (Specify) _____

____ Referral from Employees _____

____ Recruitment Educational Institutions (Specify) _____

____ Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: _____

Name: _____

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name	Organization/Company
------	----------------------

Prepared by: _____ Date: _____

Reviewed by: _____ Date: _____

(Attachment E)

ATTACHMENT F
(LIST OF RECRUITMENT SOURCES)

LIST OF RECRUITMENT SOURCES

Date list last reviewed: _____

Recruitment Source
& Address

Contact
Person

Telephone/
Fax Number

Date
Listed

Did Source
Request to
be Listed

1.

2.

3.

4.

5.

etc.

ATTACHMENT G
(RENEWAL SCHEDULES)

STATE-BY-STATE LIST: RENEWAL APPLICATION AND PETITION TO DENY FILING DEADLINES AND LICENSE EXPIRATION DATES FOR AM, FM, FM TRANSLATOR AND LPFM STATIONS

STATE	RENEWAL APPLICATION FILING DEADLINE**	PETITION TO DENY FILING DEADLINE **	LICENSE EXPIRATION DATE
ALABAMA	DEC 1, 2011	MAR 1, 2012	APR 1, 2012
ALASKA	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
AMERICAN SAMOA	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
ARIZONA	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
ARKANSAS	FEB 1, 2012	MAY 1, 2012	JUN 1, 2012
CALIFORNIA	AUG 1, 2013	NOV 1, 2013	DEC 1, 2013
COLORADO	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
CONNECTICUT	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
DELAWARE	APR 1, 2014	JULY 1, 2014	AUG 1, 2014
DISTRICT OF COLUMBIA	JUN 1, 2011	SEPT 1, 2011	OCT 1, 2011
FLORIDA	OCT 3, 2011*	JAN 2, 2012*	FEB 1, 2012
GEORGIA	DEC 1, 2011	MAR 1, 2012	APR 1, 2012
GUAM	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
HAWAII	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
IDAHO	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
ILLINOIS	AUG 1, 2012	NOV 1, 2012	DEC 1, 2012
INDIANA	APR 2, 2012*	JUL 2, 2012*	AUG 1, 2012
IOWA	OCT 1, 2012	JAN 2, 2013*	FEB 1, 2013
KANSAS	FEB 1, 2013	MAY 1, 2013	JUN 1, 2013
KENTUCKY	APR 2, 2012*	JUL 2, 2012*	AUG 1, 2012

* When the filing deadline falls on a Saturday, Sunday, or Federal holiday, the application or petition to deny is due on the next business day. See 47 C.F.R. § 1.4(j).

** Filing deadline refers to the date by which the application or petition to deny must be **received** by the Commission. See 47 C.F.R. § 1.7.

STATE	RENEWAL APPLICATION FILING DEADLINE**	PETITION TO DENY FILING DEADLINE **	LICENSE EXPIRATION DATE
LOUISIANA	FEB 1, 2012	MAY 1, 2012	JUN 1, 2012
MAINE	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
MARIANA ISLANDS	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
MARYLAND	JUN 1, 2011	SEPT 1, 2011	OCT 1, 2011
MASSACHUSETTS	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
MICHIGAN	JUN 1, 2012	SEPT 4, 2012*	OCT 1, 2012
MINNESOTA	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
MISSISSIPPI	FEB 1, 2012	MAY 1, 2012	JUN 1, 2012
MISSOURI	OCT 1, 2012	JAN 2, 2013*	FEB 1, 2013
MONTANA	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
NEBRASKA	FEB 1, 2013	MAY 1, 2013	JUN 1, 2013
NEVADA	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
NEW HAMPSHIRE	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
NEW JERSEY	FEB 3, 2014*	MAY 1, 2014	JUN 1, 2014
NEW MEXICO	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
NEW YORK	FEB 3, 2014*	MAY 1, 2014	JUN 1, 2014
NORTH CAROLINA	AUG 1, 2011	NOV 1, 2011	DEC 1, 2011
NORTH DAKOTA	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
OHIO	JUN 1, 2012	SEPT 4, 2012*	OCT 1, 2012
OKLAHOMA	FEB 1, 2013	MAY 1, 2013	JUN 1, 2013
OREGON	OCT 1, 2013*	JAN 2, 2014*	FEB 1, 2014
PENNSYLVANIA	APR 1, 2014	JULY 1, 2014	AUG 1, 2014

* When the filing deadline falls on a Saturday, Sunday, or Federal holiday, the application or petition to deny is due on the next business day. See 47 C.F.R. § 1.4(j).

** Filing deadline refers to the date by which the application or petition to deny must be **received** by the Commission. See 47 C.F.R. § 1.7.

STATE	RENEWAL APPLICATION FILING DEADLINE**	PETITION TO DENY FILING DEADLINE **	LICENSE EXPIRATION DATE
PUERTO RICO	OCT 3, 2011*	JAN 2, 2012*	FEB 1, 2012
RHODE ISLAND	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
SAIPAN	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
S. CAROLINA	AUG 1, 2011	NOV 1, 2011	DEC 1, 2011
S. DAKOTA	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
TENNESSEE	APR 2, 2012*	JULY 2, 2012*	AUG 1, 2012
TEXAS	APR 1, 2013	JULY 1, 2013	AUG 1, 2013
UTAH	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
VERMONT	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
VIRGIN ISLANDS	OCT 3, 2011*	JAN 2, 2012*	FEB 1, 2012
VIRGINIA	JUN 1, 2011	SEPT 1, 2011	OCT 1, 2011
WASHINGTON	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
WEST VIRGINIA	JUN 1, 2011	SEPT 1, 2011	OCT 1, 2011
WISCONSIN	AUG 1, 2012	NOV 1, 2012	DEC 1, 2012
WYOMING	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013

* When the filing deadline falls on a Saturday, Sunday, or Federal holiday, the application or petition to deny is due on the next business day. See 47 C.F.R. § 1.4(j).

** Filing deadline refers to the date by which the application or petition to deny must be **received** by the Commission. See 47 C.F.R. § 1.7.

STATE-BY-STATE LIST: RENEWAL APPLICATION AND PETITION TO DENY FILING DEADLINES AND LICENSE EXPIRATION DATES FOR TV, CLASS A, LPTV, AND TV TRANSLATOR STATIONS

STATE	RENEWAL APPLICATION FILING DEADLINE	PETITION TO DENY FILING DEADLINE	LICENSE EXPIRATION DATE
ALABAMA	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
ALASKA	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
AMERICAN SAMOA	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
ARIZONA	JUN 2, 2014*	SEPT 2, 2014*	OCT 1, 2014
ARKANSAS	FEB 1, 2013	MAY 1, 2013	JUN 1, 2013
CALIFORNIA	AUG 1, 2014	NOV 3, 2014*	DEC 1, 2014
COLORADO	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
CONNECTICUT	DEC 1, 2014	MAR 2, 2015*	APR 1, 2015
DELAWARE	APR 1, 2015	JULY 1, 2015	AUG 1, 2015
DISTRICT OF COLUMBIA	JUN 1, 2012	SEPT 4, 2012*	OCT 1, 2012
FLORIDA	OCT 1, 2012	JAN 2, 2013*	FEB 1, 2013
GEORGIA	DEC 3, 2012*	MAR 1, 2013	APR 1, 2013
GUAM	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
HAWAII	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
IDAHO	JUN 2, 2014*	SEPT 2, 2014*	OCT 1, 2014
ILLINOIS	AUG 1, 2013	NOV 1, 2013	DEC 1, 2013
INDIANA	APR 1, 2013	JULY 1, 2013	AUG 1, 2013
IOWA	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
KANSAS	FEB 3, 2014*	MAY 1, 2014	JUN 1, 2014

* When the filing deadline falls on a Saturday, Sunday, or Federal holiday, the application or petition to deny is due on the next business day. See 47 C.F.R. § 1.4(j).

** Filing deadline refers to the date by which the application or petition to deny must be **received** by the Commission. See 47 C.F.R. § 1.7.

STATE	RENEWAL APPLICATION FILING DEADLINE	PETITION TO DENY FILING DEADLINE	LICENSE EXPIRATION DATE
KENTUCKY	APR 1, 2013	JULY 1, 2013	AUG 1, 2013
LOUISIANA	FEB 1, 2013	MAY 1, 2013	JUN 1, 2013
MAINE	DEC 1, 2014	MAR 2, 2015*	APR 1, 2015
MARIANA ISLANDS	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
MARYLAND	JUN 1, 2012	SEPT 4, 2012*	OCT 1, 2012
MASSACHUSETTS	DEC 1, 2014	MAR 2, 2015*	APR 1, 2015
MICHIGAN	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
MINNESOTA	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
MISSISSIPPI	FEB 1, 2013	MAY 1, 2013	JUN 1, 2013
MISSOURI	OCT 1, 2013	JAN 2, 2014*	FEB 1, 2014
MONTANA	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
NEBRASKA	FEB 3, 2014*	MAY 1, 2014	JUN 1, 2014
NEVADA	JUN 2, 2014*	SEPT 2, 2014*	OCT 1, 2014
NEW HAMPSHIRE	DEC 1, 2014	MAR 2, 2015*	APR 1, 2015
NEW JERSEY	FEB 2, 2015*	MAY 1, 2015	JUN 1, 2015
NEW MEXICO	JUN 2, 2014*	SEPT 2, 2014*	OCT 1, 2014
NEW YORK	FEB 2, 2015*	MAY 1, 2015	JUN 1, 2015
NORTH CAROLINA	AUG 1, 2012	NOV 1, 2012	DEC 1, 2012
NORTH DAKOTA	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
OHIO	JUN 3, 2013*	SEPT 3, 2013*	OCT 1, 2013
OKLAHOMA	FEB 3, 2014*	MAY 1, 2014	JUN 1, 2014

* When the filing deadline falls on a Saturday, Sunday, or Federal holiday, the application or petition to deny is due on the next business day. See 47 C.F.R. § 1.4(j).

** Filing deadline refers to the date by which the application or petition to deny must be **received** by the Commission. See 47 C.F.R. § 1.7.

STATE	RENEWAL APPLICATION FILING DEADLINE	PETITION TO DENY FILING DEADLINE	LICENSE EXPIRATION DATE
OREGON	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
PENNSYLVANIA	APR 1, 2015	JULY 1, 2015	AUG 1, 2015
PUERTO RICO	OCT 1, 2012	JAN 2, 2013*	FEB 1, 2013
RHODE ISLAND	DEC 1, 2014	MAR 2, 2015*	APR 1, 2015
SAIPAN	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
S. CAROLINA	AUG 1, 2012	NOV 1, 2012	DEC 1, 2012
S. DAKOTA	DEC 2, 2013*	MAR 3, 2014*	APR 1, 2014
TENNESSEE	APR 1, 2013	JULY 1, 2013	AUG 1, 2013
TEXAS	APR 1, 2014	JULY 1, 2014	AUG 1, 2014
UTAH	JUN 2, 2014*	SEPT 2, 2014*	OCT 1, 2014
VERMONT	DEC 1, 2014	MAR 2, 2015*	APR 1, 2015
VIRGIN ISLANDS	OCT 1, 2012	JAN 2, 2013*	FEB 1, 2013
VIRGINIA	JUN 1, 2012	SEPT 4, 2012*	OCT 1, 2012
WASHINGTON	OCT 1, 2014	JAN 2, 2015*	FEB 1, 2015
WEST VIRGINIA	JUN 1, 2012	SEPT 4, 2012*	OCT 1, 2012
WISCONSIN	AUG 1, 2013	NOV 1, 2013	DEC 1, 2013
WYOMING	JUN 2, 2014*	SEPT 2, 2014*	OCT 1, 2014

* When the filing deadline falls on a Saturday, Sunday, or Federal holiday, the application or petition to deny is due on the next business day. See 47 C.F.R. § 1.4(j).

** Filing deadline refers to the date by which the application or petition to deny must be **received** by the Commission. See 47 C.F.R. § 1.7.

ATTACHMENT H
(MODEL SEXUAL HARASSMENT STATEMENT)

SEXUAL HARASSMENT POLICY STATEMENT

Statement of Philosophy

The Company is proud of its tradition of a collegial work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere which promotes equal opportunities and prohibits discriminatory practices, including sexual harassment. At the Company, sexual harassment, whether verbal, physical or environmental, is unacceptable and will not be tolerated.

Definition of Sexual Harassment

For purposes of this policy, sexual harassment is defined as unwelcome or unwanted conduct of a sexual nature (verbal or physical) when: 1) submission to or rejection of this conduct by an individual is used as a factor in decisions affecting hiring, evaluation, promotion, or other aspects of employment; or 2) this conduct substantially interferes with an individual's employment or creates an intimidating, hostile or offensive work environment.

Examples of sexual harassment include, but are not limited to: unwanted sexual advances; demands for sexual favors in exchange for favorable treatment or continued employment; repeated sexual jokes, flirtations, advances or propositions; verbal abuse of a sexual nature; graphic, verbal commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling, touching, pinching, assault, coerced sexual acts or suggestive insulting, obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures.

This behavior is unacceptable in the workplace itself and in other work-related settings such as business trips and business-related social events.

Individuals Covered Under the Policy

This policy covers all employees (professionals, assistants, support staff) and officers and owners. The Company will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, associates, officers or by outside clients, consultants, contractors or other non-employees who conduct business with the Company. The Company encourages reporting of all incidents of sexual harassment, regardless of who the offender may be.

Reporting a Complaint

Any employee who believes that the actions or words of any Company officer, fellow employee, or other person described above constitute harassment should report the offending action to your immediate supervisor, or to one of the officers appointed to handle sexual harassment complaints, as soon as possible. Currently, the officers

appointed to handle sexual harassment complaints are _____ and _____.

All complaints will be investigated promptly, thoroughly, and in as impartial and confidential a manner as possible.

Investigating a Complaint

All complaints will be investigated by two officers or supervisors or by a single officer and an outside attorney retained by the Company. The investigating officer(s) will generally include at least one of the officers appointed by the Company to handle sexual discrimination complaints. In the interest of impartiality, the officer who receives the complaint may, if warranted, ask the Company to appoint a different officer or officers to investigate the complaint.

The investigating officers will question both sides thoroughly and will interview all witnesses identified by either side. All respondents will be asked to document their responses and the investigating officers will attempt wherever possible to verify the accuracy of responses. In addition, all participants in the investigation will be informed that their cooperation and confidentiality are required.

Investigations will be conducted as discreetly as possible and information about the complaint and the investigation will be considered confidential.

Resolving a Complaint

Once the investigation is completed, the investigating officers will evaluate the evidence and decide in a timely manner whether the alleged conduct occurred and whether the conduct violated the Company's sexual harassment policy. In accordance with this decision, the investigating officers will recommend to the Company proper remedial action.

Proper remedial action includes both disciplinary action when warranted and other actions designed to prevent further occurrences of sexual harassment. Employees found to have engaged in the harassment of other employees will be subject to appropriate disciplinary action, depending on the circumstances, up to and including termination.

A written report of the findings of the investigation and any remedial actions to be taken will be provided to both sides.

Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.