June 1985

	File No.		
SECTION I UNITED STATES OF AMERICA FEDERAL COMMUNICATIONS COMMISSION	1. Name of applicant (See Instruction	on D)	
APPLICATION FOR RENEWAL OF AN INTERNATIONAL, OR EXPERIMENTAL BROADCAST STATION LICENSE	Street Address		
APPLICANT SHOULD NOT USE THIS BOX	City	State	ZIP Code
	Telephone (include Area Code)		
INSTRUCTIONS	 Name and address of person to whif different from item 1 	nom communicati	ons should be sent,
A. This form is to be used in all cases when applying for Renewal of an international or Experimental Broadcast Station License. This form consists of this part, Section 1, and Section VI.	Name		
	Street Address		
 Prepare an original and two copies of this form and all exhibits with the Federal Communications Commission, Washington, D.C. 20554. 	City	State	ZIP Code
C. Number exhibits serially in the space provided in the body of the form and list each exhibit in the space provided on page 3 of this form. Date each exhibit.	Telephone (include Area Code)		
D. The name of the applicant must be stated exactly as it appears on the current license.	3. Renewal requested for following f	acilities	
E. Information called for by this application which is already on file with the Commission need not be refiled in this application provided (1) the	Type of station (See instructions)		Call sign
information is now on file in another application or FCC form filed by or on behalf of this applicant; (2) the information is identified fully by reference to the file number (if any), the FCC form number, and the filing date of the application or other form containing the information and the page or paragraph referred to, and (3) after making the refer-	Transmitter Location		
ence, the applicant states: "No change since date of filing." Any such reference will be considered to incorporate into this application all information, confidential or otherwise, contained in the application or the confidential or otherwise, contained in the application or	Frequency	Antenna input	power
other form referred to. The incorporated application or other form will thereafter, in its entirety, be open to the public.	Hours of Operation		
F. This application shall be personally signed by the applicant, if the applicant is an individual; by one of the partners, if the applicant is a partnership; by an officer, if the applicant is a corporation; by a mem-	4. When reference is made to inform instruction E), give proper referen	nation filed in pri-	or application (see
ber who is an officer, if the applicant is an unincorporated association; by such duly elected or appointed officials as may be competent to do so under the laws of the applicable jurisdiction, if the applicant is an eligible governmental entity; or by the applicant's attorney in case of the applicant's physical disability or of her/his absence from the United States. The attorney shall, in the event she/he signs for the applicant, separately set forth the reason why the application is not signed by the applicant. In addition, if any matter is stated on the basis of the attorney's belief only (rather than knowledge) she/he shall separately set forth her/his reasons for believing that such statements are true.	Paragraph No. File or	Form No.	Date Filed
G. BE SURE ALL NECESSARY INFORMATION IS FURNISHED AND ALL PARAGRAPHS ARE FULLY ANSWERED. IF ANY PORTIONS OF THE APPLICATION ARE NOT APPLICABLE, SPECIFICALLY SO STATE. DEFECTIVE OR INCOMPLETE APPLICATIONS MAY BE RETURNED WITHOUT CONSIDERATION.	Have there been any substantial chathe information incorporated in this by reference in this paragraph?		Yes □ No □
			FCC 311 (IBFS)

	SECTION I		
	(X yes or no)	Yes	No
5.	Is applicant, or any person directly or indirectly controlling applicant, party to a suit in any Federal Court involving the monopolizing, or an attempt to monopolize radio communication directly or indirectly through control of the manufacture or sale of radio apparatus, by exclusive traffic arrangement or by any other means, or of using unfair methods of competition? (If "Yes", attach as EXHIBIT a full description of the proceeding, identifying the court and showing where records of the proceeding may be obtained. See Sec. 313 of the Communications Act of 1934.)		•
6.	Have there been any changes in ownership since the filing of the last application for construction permit or renewal of license, or in the case of an International Station, is the information shown in applicant's Ownership Reports, now on file with the Commission, true and correct as of this date? (If "No", attach as EXHIBIT an Ownership Report supplying full information to bring such data up to date.)	Trans	
7.	Has there been any change in the citizenship of the applicant?		
8.	Is the applicant a representative of an alien or foreign government?		
9.	Are there any documents, instruments, contracts or understandings relating to ownership, management, use or control of the station or facilities, or any right or interest therein? (If "Yes", attach as EXHIBIT copies of all such documents, instruments or contracts and state the substance of oral contracts or understandings.)		
10.	Attach as EXHIBIT a complete report of experimentation conducted during the present license period includin number of hours of operation, full data on research and experimentation conducted including the type of transmitting any) equipment used and their mode of operation, data on expense of research and operation during the period covere measurements, tests, or observations conducted and description of the apparatus employed, estimated degree of public (solicited or unsolicited), complete details of any reported interference and steps taken to eliminate such interference, tentative and final, program for further research experimentation requiring additional time and estimate of additions to complete the experimentation and terminate operation, and full details of developments and major changes in equiquired of International Broadcast Stations.)	and sto d, data partici conclus	ndio (if on any pation ions, equired
	In what respect, if any, does the apparatus, antenna, or operation differ from that described in the last application for renewal of license? THE APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 30)	of the Unit	
Comm	nunkations Act of 1934). THE APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying dury other application with which it may be in conflict.		nation
	THE APPLICANT acknowledges that all the statements made in this application and attached exhibits are consideresentations, and that all the exhibits are a material part hereof and are incorporated herein as if set out in full in the	ed mate applica	rial ition.
	CERTIFICATION		
	I certify that the statements in this application are true, complete, and correct to the best of my knowledge and believe in good faith.	ef, and a	re
Sign	ned and dated this day of		
	(Name of applicant)		
	WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. U.S. CODE, TITLE 18, SECTION 1001.		
	Title		
	FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT		
resp you Red ADI gov prov	have estimated that each response to this collection of information will take 2 hours. Our estimate includes the time to read the ructions, look through existing records, gather and maintain the required data, and actually complete and review the form or sonse. If you have any comments on this burden estimate, or on how we can improve the collection and reduce the burden it causes, please e-mail then to prace for a send them to the Federal Communications Commission, AMD-PERM, Paperwork uction Project (3000-1035), Washington, DC 20554. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS DRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the erment may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to vide you with this notice. This collection has been assigned an OMB control number of 3060-1035. E FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1995, 44 U.S.C. 3507.		

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	SECTION I					
EXHIBITS	furnished as required b	y this form:	ER SHARMAN AND AND AND AND AND AND AND AND AND A			
Exhibit No.	Paragraph Number requiring Exhibit	Name of officer or employee (1) by whom or (2) under whose direction exhibit was prepared (show which)	Official title			
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•	FEDERAL	COMMUNICATIONS COMMISSION	SECTION VI
EQUAL EMPL	OYMENT OPPORTUNITY	NAME OF APPLICANT	
CALL SIGN	CITY AND STATE	WHICH STATION IS LICENSED TO SERVE	· alter
	TANK	STRUCTIONS TO SECTION VI	

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, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, a license renewal applicant who employes five or more full-time station employees must file a program designed to assure equal employment opportunity for women and minority.

groups (that is Hispanics). If program for m significant per	s, Blacks not of Hispanic origin, Asians or Pacific Islanders. American Indians or Alaskan Natives, and minority group representation in the available labor force is less than five percent (in the aggregate), a inority group members need not be filed. However, a program must be filed for women since they comprise a centage of virtually all area labor forces. If an applicant employs fewer than five full-time employees, no EEO comen or minorities need be filed.
NOTE: Check	appropriate box, sign the certification below, and return to the FCC:
	Station employs fewer than 5 full-time employees; therefore no written program is being submitted.
	Station employs 5 or more full-time employees. Our 10-point program is attached; (FCC Form 396).
	CERTIFICATION
I certify the	at the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are aith.
Signed and dat	ed this, 19,
Signature:	
Title:	
	STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT. E 18, SECTION 1001.

ATTACHMENT A

Guidelines to the Model EEO Program

The model EEO program, which was adopted by the Commission in Docket No. 20550, provides comprehensive and clearly-defined practices to assist the non-exempt broadcast applicant in developing an effective EEO program for its proposed or existing station. The EEO program designed for a particular station should be reasonably responsive to the elements of the model program to the extent they are appropriate in terms of station size, location and the like. However, the data requirements, which are set forth in Sections IV, VI, VII and VIII of the model, are essential for self-evaluation and must be part of whatever program is devised by the broadcast applicant. While the most current information available should be used in responding to these elements, statements of policy and general descriptions of a station's EEO practices, which were set forth in earlier-filed EEO program, can be incorporated by reference where the applicant does not intend to augment or otherwise modify its program in that respect during the forthcoming license term. 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 minorities and women in the relevant available labor force.

II. Responsibility For Implementation

This section calls for the name and title of the official designated by the licensee with responsibility for implementation of the station's program.

III. Policy Dissemination

The purpose of this section is to disclose the manner in which the station's EEO policy is communicated to employees and prospective employees. In this respect, the applicant's program should disclose whether it: (a) utilizes 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) posts a notice which informs job applicants and employees that the licensee is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) where applicable, seeks the cooperation of labor unions represented at the station in the implementation of its EEO program and in the inclusion of non-discrimination provisions in union contracts. The applicant should also set forth any other methods it utilizes in conveying its EEO policy (e.g., orientation materials, on air announcements, station newsletter) to employees and prospective employees.

IV. Recruitment

In this section, the applicant should set forth the recruitment sources and other techniques it uses to increase the pool of minority and female job applicants. Additionally, the applicant should list all minority and female applicant referral sources which the station has contacted in the previous 12 months and the number of individuals who were referred from each named source. Note: Not all of the categories of recruitment sources listed in the model program need be utilized if there are a sufficient number of minority and females applying for positions at the station. The purpose of the listing is to determine whether the specialized referral sources are producing the desired results. Sources which prove to be non-productive in terms of qualified minority and female applicants should not be relied on and new sources should be sought.

V. Training

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether a training program is feasible and would assist it in its effort to increase the pool of available minority and female applicants. Also, where an applicant already has employee training programs, the information reported in this element of the model program should enable it to ascertain whether minority and female employees have the same opportunity to participate as other employees. Information submitted with respect to any training programs utilized should include a report covering at least the 12 month period prior to the filing of the application, but may encompass the entire license period, if so desired.

Additionally, the applicant may set forth any other assistance to students, schools or colleges which is designed to be of benefit to minorities and wemen interested in entering the broadcasting field. The beneficiary of such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in work/study programs, and the like.

VI. Availability Survey

Pursuant to this section the applicant should state the percentages of women, Blacks not of Hispanic origin, Asian or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics in the station's labor recruitment area. Generally speaking, where a station is located in a Standard Metropolitan Statistical Area, the S.M.S.A. should be considered as the labor recruitment area. Where a station is not located in an S.M.S.A., the city of license or county figures should be used. The necessary data may be obtained from state employment agencies "Manpower Information for Affirmative Action Programs," which is available in most localities, or other publications such as "General Population Characteristics" and "General Social and Economic Characteristics," obtainable from any Department of Commerce Field Office.

Note: The inclusion of this data is designed to assist the applicant in evaluating the effectiveness of its station's EEO program. The availability survey produces a means to determine whether the station's work force percentages bear some reasonable relationship to those reflected in the relevant available labor force.

VII. Current Employment Survey

Applicants of stations with less than 50 full-time employees are required to state whether there has been any change in their employment profile from the payroll period covered by the station's most recently filed Annual Employment Report (FCC Form 395). If there has been no change of any kind with respect to either full-time or part-time employees, the sentence to this effect should be checked. If there has been a change in the station's profile, the applicant must submit an updated Form 395 that identifies all employees under each job category by sex and race. The updated employment profile should cover the payroll period as close to the filing of the application as possible. The payroll period chosen must be specified.

Stations with 50 or more full-time employees are required to prepare and submit a list of all job titles within each Form 395 job category, with part-time and full-time status indicated. Each job title must show the number of incumbents that are male, female, Black not of Hispanic origin, Asian or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics. In other words, under each applicable job category, (i.e., Officials and Managers, Professionals, Technicians, etc.,) the applicant should list each job title it includes in the category on the Form 395 and identify the number of incumbents by sex and race. This showing should reflect the station's employment profile for the payroll period as close to the filing of the application as possible. The payroll period chosen must be specified.

VIII. Job Hires

Each licensee must state the total number of persons hired for station positions, both full-time and part-time, during the 12-month period preceding the date utilized for the "Current Employment Survey." This aggregate hiring information is to also include a breakout of the number of minorities and women hired. Predicated on this data and the recruitment information already compiled for the fourth element of the EEO program, the applicant must determine whether a sufficient number of minorities and women are applying for positions at the station. (The answer to the two parts of this question need not be the same. For example, a representative number of minorities may be applying, whereas the pool of women applicants may be less than sufficient.) Should either minorities or women be inadequately represented among the applicants for available positions, the applicant should analyze its recruitment techniques and referral sources and propose additional methods to expand the applicant pool of minorities and/or women.

IX. Promotion

Under this section the applicant should describe any promotional policies and practices which have benefited minority or female employees during the preceding 12 months. (For instance, the licensee might list the number of minorities and/or women elevated from part-time to full-time status, the number of those promoted from a training status, or the number that have advanced to more responsible jobs.) Also, if not listed in the "Training" element, the applicant may wish to note any extra effort undertaken to increase promotional opportunities for minorities and women.

X. Effectiveness of the Affirmative Action Plan

Under this section the applicant should analyze the results of its efforts to recruit, hire and promote minorities and women and explain any difficulties encountered in implementing its EEO program. One way this can be done is to compare the percentages of minorities and women on the station's current staff with their respective percentages in the relevant available labor force. (See "Availablity Survey" and "Current Employment Survey" of the model program.) If the percentages do not reasonably relate, the disparity may be attributable to deficiencies in the station's recruitment, hiring, placement, training or promotional policies and practices. If so, the applicant should propose alternative policies to correct the deficiency.

ATTACHMENT B

Model Equal Employment Opportunity Program

I. General Policy

It is our policy to provide equal 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 Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

II. Responsibility for Implementation

(Name Title), 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 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 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:

- () 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.
- () 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 victim of discrimination.
- () We seek the cooperation of the unions represented at the station to help implement our EEO program and all union contracts contain a nondiscrimination clause.

()	Other (Specify)
-		

	EQUAL EMPLOYMENT OPPORTUNITY	Section VI, page
7. Recru	itment	
cancies,	To ensure nondiscrimination in relation to minorities and women, and to foster the we utilize the following recruitment procedures:	eir full consideration in filling job
()	We attempt to maintain systematic communication, both orally and in writing, wi organizations to encourage the referral of qualified minority and female applicants tacted during the past twelve months are:	th a variety of minority and women s. Examples of such organizations co
	Organization/Source	Number of Referrals
		·
()	In addition to the organizations noted above, which specialize in minority and won employment services, including state employment agencies, which refer job candids color, religion, national origin or sex. Examples of these employment referral service months and the number of referrals are:	ites without repard to their roce
		•
()	When we recruit prospective employees from educational institutions such recruitm colleges with significant minority and female enrollments. Educational institutions during the past twelve months and the number of referrals are:	ent efforts include area schools an contacted for recruitment purposes

			E	QUAL EMPLOYM	ENT OPPORTUNITY		Section VI, page (vi)
	()	When we place employment adversary have significant circulation or are ing the past twelve months and the	e of particular intere	est to minorities and wo	dvertisements are placed omen. Examples of public Number of Ref	ations utilized dur-
	()	We encourage present employees, for existing and future job openin	particularly minori gs.	ty and female employee	s, to refer minority and	female candidates
v.	T	rain	ing				
	()	Station resources and/or needs are the skills of employees.	e such that we are t	inable or do not choose	to institute specific prog	rams for upgrading
	()	We provide on-the-job training to women employees during the past	upgrade the skills of 12 months may be	of employees. Tangible b briefly described as foll	enefits of such training ows:	to minority and
	(}	We provide assistance to students in the broadcast employment mark	, schools or colleges ket on an equitable	in programs designed t basis:	o enable minorities and	women to compete
			Schools or Other Benficiary	<u>F</u>	orm of Assistance		
	()	Other (Specify)			* 2-	
							700
VI.	A	raila	bility Survey				
			Based on information derived from in the station's recruitment area is		, the	respective minority and	female workforce
				Blacks	Asians	Am. Indians	
			Women	Not of Hispanic Origin	or Pacific Islanders	or. Alaskan Natives	Vionaulas
		age rkfor	in	Origin	Manuera		Hispanics

		EQUAL EMPLOYM	ENT OPPORTUNITY	Sec	ction VI, page (vil
	NOTE: The Following To Be U	Jsed Only If Workforce	Data Is Unavailable.		
	Based on the information deriv			, the respective n	ninority and
female pop	ulation in the station's recruitme	ent area is as follows:			
		Blacks	Asians	Am. Indians	
		Not of	or	or	
	Women	Hispanic	Pacific Islandera	Alaskan	TT* 1
	Women	Origin	Islanders	Natives	Hispanic
				77.70	
Percentage					
the Workfo	orce				
The above	information is for: () S.M.S.A.	() City () Cou	inty		
	() Other (S)	necify)			
	, , , , , , , , , , , , , , , , , , , ,	,			
VII. Curr	ent Employment Survey				
A. To	be completed by stations with le	ess than 50 full-time en	nployees.		
()	There has been no change in o	ur employment profile	since the filing of our m	ost recent Annual Employ	yment Report.
()	There has been a change in our an updated report identifying t	he incumbents under e	ach FCC Form 395 job o	ategory for the two week	port. Attached is period begin-
	ning _	· 	and ending		
B. To	be completed by stations with 5	0 or more full-time em	ployees.		
()	Attached as Exhibit No. VII B category and showing the number Islanders, American Indians or	ber of incumbents who	are male, female, Black	all job titles within each F s not of Hispanic origin, A	FCC Form 395 Asian or Pacific
VIII. Job	Hires				
				NAME OF BOOK AND ADDRESS OF THE PARTY.	
) person	During the twelve month period as of whom () were minorities	I beginning (Month - D and () were women	ay - Year) and ending (N	Month - Day - Year), we h	ired a total of
()	An analysis of our recruitment	techniques, job applica	tions, and new hires sug	ggests that a sufficient nu	mber of
	qualified minorities and women				
()	We are expanding our recruitm	ent sources to include:			
X. Promo	otion				
given due c apply for ac	It is our policy to provide promo onsideration for promotional opp- ivancement. During the past twe	ortunities, special effor	t is taken to encourage :	minorities and women to	nd women are qualify and

					85

EQUAL EMPLOYMENT OPPORTUNITY

Section VI, page (viii)

X. Effectiveness of Affirmative Action Plan

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(This section should contain a brief narrative discussion of the effectiveness of the station's efforts to ensure Equal Employment Opportunity. For example, the licensee might compare the percentage of minority employees in its own workforce with the percentage of minority persons in the licensee's labor market, also setting forth information which suggests that discrepancies which may exist are not unreasonable. The licensee may also explain any difficulties it has experienced in implementing its affirmative action plan, together with any steps it proposes to take to surmount these difficulties in the future.)

FCC 311 (IBFS) (Page 12) June 1985