



NORTHWEST
PUBLIC BROADCASTING

A community service of Washington State University

September 14, 2021

EEO Staff
Investigations & Hearings Division, Enforcement Bureau
Federal Communications Commission
45 L Street, N.E.
Washington, D.C. 20554

Re: **Response to EEO Audit Letter**
Washington State University
Station KZUU(FM), Pullman, WA (Facility ID 71036)

EEO Staff:

Washington State University (“WSU”) hereby responds to an FCC audit letter dated September 6, 2021 requesting information concerning the EEO program of noncommercial educational radio station KZUU(FM), Pullman, Washington. The KZUU employment unit (the “Unit”), which also includes co-owned NCE stations KWSU-TV, KWSU(AM), and KJEM(FM) in Pullman, Washington, employs more than five full-time employees, and WSU therefore provides the following information in response to the audit request.

Item # 2(b)(i). WSU encloses copies of the Unit’s annual EEO public file reports for the periods covering (i) October 1, 2019 to September 30, 2020, and (ii) October 1, 2018 to September 30, 2019 as Attachment 1.

WSU’s Northwest Public Broadcasting web site is available at: <https://www.nwpb.org>. The annual EEO public file report is posted at: <https://www.nwpb.org/about-us#publicfiles>.

Item # 2(b)(ii). The dates of hire for the positions filled during the periods covered by the 2018-2019 and 2019-2020 annual EEO public file reports are as follows:

Job Title	Date of Hire
Producer Editor Director – 128295	10/01/2019
Telecommunications System Engineer – 128451	11/16/2019
Regional Multi-Media Journalist - 119918	02/01/2020
Development Coordinator – 128858	07/15/2019
Bilingual News Reporter - 129089	08/01/2019

WSU encloses, at Attachment 2, documentation of advertisements, bulletins, letters, faxes, e-mails, and other communications announcing the positions filled during the period covered by the two annual EEO public file reports noted above (for the 2018-2019 and 2019-2020 annual reporting periods). No organizations notified WSU that they want to be notified of the Unit’s job openings.

Item # 2(b)(iii). The total number of interviewees for each vacancy and the referral source for each interviewee for the full-time vacancies for the periods covered by the 2018-2019 and 2019-2020 reports are as follows:

Job Title	Referral Source	# of interviewees
Producer Editor Director – 128295	Washington State University	0
	Higher Education Recruitment Consortium	0
	WorkSource/US Jobs	0
	Twitter @careersWSU	0
	Indeed.com	1
	LinkedIn	0
	WorkplaceDiversity	0
	Word of Mouth, Personal Contact Referral	1
	Inside Higher Ed.	0
	Glassdoor.com	0
	Total	2
	Telecommunications System Engineer – 128451	Washington State University
Higher Education Recruitment Consortium		0
WorkSource/US Jobs		0
Twitter @careersWSU		0
Indeed.com		0
LinkedIn		0
WorkplaceDiversity		0
Word of Mouth, Personal Contact Referral		1
Inside Higher Ed.		0
Total		1
Regional Multi-Media Journalist - 119918	Washington State University	1
	Higher Education Recruitment Consortium	0
	WorkSource/US Jobs	0
	Twitter @careersWSU	0
	Facebook	1
	Indeed.com	1
	LinkedIn	0
	WorkplaceDiversity	0
	Corporation for Public Broadcasting	3
	Current	0
	Word of Mouth, Personal Contact Referral	3
	Inside Higher Ed.	0
	National Association of Black Journalists	0
	JournalismJobs.com	0
	NWPB.org	0
National Association of Broadcasters (NAB)	0	
Glassdoor.com	0	

	Total	9
Development Coordinator – 128858	Washington State University	1
	Higher Education Recruitment Consortium	0
	WorkSource/US Jobs	0
	Twitter @careersWSU	0
	Indeed.com	1
	LinkedIn	0
	WorkplaceDiversity	0
	Corporation for Public Broadcasting	0
	Word of Mouth, Personal Contact Referral	1
	Inside Higher Ed.	0
	NWPB.org	0
	Glassdoor.com	0
	Total	3
Bilingual News Reporter - 129089	Washington State University	0
	Higher Education Recruitment Consortium	0
	WorkSource/US Jobs	0
	Twitter @careersWSU	0
	Indeed.com	0
	LinkedIn	1
	WorkplaceDiversity	0
	Corporation for Public Broadcasting	0
	Word of Mouth, Personal Contact Referral	1
	Inside Higher Ed.	0
	National Association of Hispanic Journalists	0
	JournalismJobs.com	0
	Society of Professional Journalist SPJ	0
	NWPB.org	0
	SimplyHired.com	0
	Total	2

Item # 2(b)(iv). WSU encloses documentation of recruitment initiatives performed during the periods covered by the 2018-2019 and 2019-2020 public file reports as Attachment_3. The personnel involved in the recruitment activities are identified below. The total number of full-time employees in the Unit is twenty-two. The market for the Unit has a population of fewer than 250,000. Based on these factors, WSU is required to perform two (2) initiatives during each two-year period.

During the periods covered by the 2018-2019 and 2019-2020 reports, WSU completed the following initiatives, involving station personnel as indicated:

Internship Program

- The Northwest Public Broadcasting – Television (NWPB-TV) Internship program is designed to give staff the opportunity to involve themselves more deeply in training of student and part-time employees and gain knowledge to perform at a higher level. The program is based on that of another noncommercial educational station, which provides a model for this type of two-way training that is so valuable in broadcasting, especially in a small market where recruiting and retention of qualified individuals is difficult and poses a significant challenge. Examples of internship projects include working as crew

members for many on and off campus projects supported by NWPB-TV; working as program producer and production assistant; assistance with maintaining NWPB-TV web site, creating content for our social media platforms; and editing of programs for use on-air and off. During the period between October 1, 2019 and September 30, 2020, NWPTV had 10 interns. During the period between October 1, 2018 and September 30, 2019, NWPTV had 10 interns.

- Northwest Public Broadcasting – Radio (NWPB-R) operations has an active internship program. The staff of NWPB-R regularly participates in area college and high school career days in our broadcast region. Students learned more about public broadcasting, received information on how to get involved, and what internship opportunities exist. During the period from October 1, 2019 to September 30, 2020, NWPB-R had internship positions filled including internships in News Production, Marketing, Broadcast Operations and Programming. During the period from October 1, 2018 to September 30, 2019, NWPB-R had internship positions filled including internships in News Production, Marketing, Broadcast Operations and Programming.
- *Station personnel involved:* Scott Leadingham, News Director; Gillian Coldsnow, Program Director; Greg Mills, Production Editor

Hosting of Job Fair

- In April 2019, WSU sponsored the Murrow Symposium Career Day which featured: Meet the Pros. Students and faculty of the College were encouraged to attend workshops, including résumé critiques, and a discussion on the future of the communication industry. Professionals from the fields of broadcast, marketing and print media were available to answer questions and provide employment feedback and opportunities for career connections.
- *Station personnel involved:* Kerry Swanson, Station Manager; Marvin Marcello, General Manager

Training Programs for Stations Personnel/Mentorship Program

- WSU is determined to strengthen its program in the television area, by promoting the idea to staff and by creating specific job descriptions for the student-mentoring positions. In addition to enabling staff to “teach” others, we also have a policy that allows employees to take up to 6 credits of university credits per semester under a tuition-waiver program. The licensee supports this as a way of recruiting qualified individuals to this rural area and to retain and retrain current employees in order to advance. The organization continues to reap the benefits of this mentoring program.
- Northwest Public Broadcasting – Radio is committed in encouraging personnel to continue with job training by attending conferences which will help them acquire skills that could qualify them for higher level positions.
- *Station personnel involved:* Marvin Marcel, General Manager; Kerry Swanson, Station Manager.

Community Events to Inform and Educate Public as to Employment Opportunities in Broadcasting

- The station regularly hosts tours and open houses for community groups, volunteers, and general public to visit the station. NWPB-R staff routinely speak in front of students in

classroom or special presentations about careers in public broadcasting in general and opportunities at Northwest Public Broadcasting specifically. NWPB-R is also involved in local community events, musical performances and fairs and distributes information about the station and opportunities with members of the public at these events. The staff of NWPB-R serve on many community groups such as Wenatchee Downtown Association, Rotary and Kiwanis, within these organizations and their activities, NWPB-R staff are recognized and invited to work with youth and community volunteers.

- In April 2019, NWPB-R staff participated in WSU's Murrow College symposium panels and activities geared toward talking with students about experience and careers in broadcasting.
- In April 2019, NWPB staff gave a presentation for the American Association of University Women / Walla Walla about the history of public media and the future of broadcasting.
- In July 2019, NWPB-R staff met with several communities on a listening tour. During the presentations and discussions, among other topics, NWPB outlined the opportunities and paths in career and involvement with the station.
- In August 2019, NWPB-R participated in recruitment activities at the Washington State University All Campus Picnic where students learned about employment opportunities in radio, television, and news media.
- *Station personnel involved:* Marvin Marcel, General Manager; Kerry Swanson, Station Manager; Anna King, Regional Reporter.

Events with Educational Institutions Relating to Careers in Broadcasting

- NWPB-TV staff made presentations during the first week of several communication classes at Washington State University. The purpose was to inform students of intern opportunities with the station and how it might help them develop career skills in both television and radio. This internship program was also promoted to students on the station's website and on flyers posted in campus buildings. NWPB-TV continues, on an annual basis, to set up a booth at the Family Expo in the Tri-Cities area that allows them the opportunity to talk with children and parents about several topics including a child's "dream" to work in television.
- *College sponsored student organizations and initiatives:* Murrow College sponsors student programs, clubs and scholarship which promote diversity in the communication and broadcast fields. These include the Association for Women in Communications, study abroad opportunities and scholarships directed specifically at under representative groups such as Native Americans, Hispanic and women student scholars.
- *Station personnel involved:* Gillian Coldsnow, Program Director; Scott Leadingham, News Director; Kerry Swanson, Station Manager; Tom Hungate, Program Director.

Item # 2(b)(v). There have been no complaints alleging unlawful discrimination in the employment practices of the Unit on the basis of race, color, religion, national origin, or sex filed during the current license term before any body having competent jurisdiction under applicable law.

Item # 2(b)(vi). Responsibilities of each level of Unit management responsible for implementing the Unit's EEO policies, and the manner in which the Unit has informed employees and job applicants of its EEO policies and program:

Marvin Marcelo, General Manager; Kerry Swanson, Station Manager; and Doug Krehbiel, Director of Administrative Services/AFO are responsible for administering the EEO policy for the Unit. As one of the appointing authorities, Doug Krehbiel oversees the Human Resource policies for NWPB.

When applying for a position with NWPB, the following statement is included in each job posting:

WASHINGTON STATE UNIVERSITY IS AN EQUAL OPPORTUNITY/AFFIRMATIVE ACTION EDUCATOR AND EMPLOYER. Members of ethnic minorities, women, special disabled veterans, veterans of the Vietnam-era, recently separated veterans, and other protected veteran, persons of disability and/or persons age 40 and over are encouraged to apply.

WSU employs only U.S. citizens and lawfully authorized non-U.S. citizens. All new employees must show employment eligibility verification as required by the U.S. Citizenship and Immigration Services.

WSU is committed to providing access and reasonable accommodation in its services, programs, activities, education and employment for individuals with disabilities. To request disability accommodation in the application process, contact Human Resource Services: 509-335-4521 (v), Washington State TDD Relay Service: Voice Callers: 1-800-833-6384; TDD Callers: 1-800-833-6388, 509-335-1259(f), or hres@wsu.edu.

All employees are required to take annual Diversity and Workplace Harassment prevention training either through WSU online training or through the CPB hosted training. Additionally, Murrow College regularly hosts diversity and harassment prevention in-person training provided by WSU Office of Outreach and Education and the Office of Compliance and Civil Rights. The last such training was conducted on September 27, 2018.

Item # 2(b)(vii). Efforts to analyze the Unit's EEO recruitment program to ensure that it is effective and to address any problems found as a result of such analysis:

Managers and supervisors are encouraged to review all hiring, position assignments and personnel decisions as they occur. An EEO discussion is initiated at the start of all new hiring processes to review the Unit's current demographic make up and to set diversity goals for the new hire which shape the recruiting effort.

WSU HRS also supplies the College with an annual consolidated review of the EEO statistics for the year. This report is reviewed by the Dean of the College and the directors of the departments including NWPB.

Item # 2(b)(vii). Efforts to periodically analyze measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect:

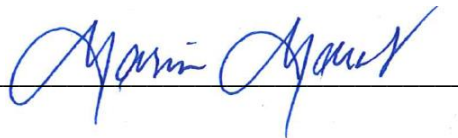
Pay equity is examined for similar positions by managers, college HR officer, the Dean and WSU HR representatives at the time of hire. A market analysis is often conducted at that time. The Unit has established a promotion and pay schema for temporary employees that is based on the state minimum wage and seniority and experience. It is examined and updated annually in January when state minimum wage amounts are set. At the end/beginning of the fiscal year, managers review overall budgets and set goals for pay increases and promotions.

Benefits for the Unit are established by state and university policy. The Unit does not conduct testing during the hiring process nor for promotion or pay increase.

Items # 2(b)(ix), 3, 4(a), 4(b), and 4(c) are not applicable.

WSU through its undersigned authorized officer, hereby certifies under penalty of perjury that the foregoing response is accurate and complete to the best of its knowledge and belief.

Respectfully submitted,
WASHINGTON STATE UNIVERSITY
and NORTHWEST PUBLIC BROADCASTING

By: 

Print Name: Marvin Marcelo

Title: General Manager

Date: September 13, 2021