

### EEO Program Report Narrative Statement

As an initial matter, please note that the employment unit recently has been the subject of an EEO random audit, as WMFD-TV, a station in the employment unit, was selected for audit in the Commission's "Public Notice," *Enforcement Bureau Commences 2020 EEO Audits*, DA 20-131, released February 6, 2020.

As noted elsewhere in this report, the employment unit consists of two full-service radio stations, a television station, a Class A television station, and several FM translators which rebroadcast the radio stations, all located in and around the community of Mansfield, Ohio. Mansfield is a relatively small city located midway between Columbus and Cleveland, Ohio. The Mansfield Metropolitan Statistical Area (MSA) had a U.S. Census population of only 124,475, and the city of Mansfield itself had an estimated 2019 population of only 46,599. Because of Mansfield's status as a small city located outside of and between larger metropolitan areas, it often is difficult to attract job applicants from outside the area to consider moving to Mansfield. This difficulty has been one of the employment unit's challenges in attracting applicants with divergent backgrounds from outside the stations' service areas.

Nonetheless, the employment unit has consistently reached out to recruit diverse applicants by utilizing the sources noted in the EEO public file reports attached hereto, as well as by advertising on its own stations, and generally on multiple stations in the employment unit. Since the two radio stations have different formats, and since the television station, by its nature, serves a more general audience which includes many segments of the local population, the employment unit stations taken together are designed to reach the broadest possible cross-section of the market. Because of these factors, all of the stations considered together reach a substantial portion of the market and would attract a diverse group of listeners. The stations' online presence further expands their audience reach.