

MIDWESTERN BROADCASTING COMPANY

(WTCM Radio, Inc.; WCCW Radio, Inc.;
WBCM Radio, Inc. and WKJF Radio, Inc.)

Traverse City-Cadillac-Petoskey Market Station Cluster 2020 EEO Narrative Statement

Midwestern Broadcasting Company (MBC) is 100% shareholder in the four subsidiaries listed above which operate a total of seven primary broadcast stations from our studios and offices at 314 East Front Street, Traverse City, Michigan:

- WTCM(AM), Traverse City, Michigan, FIN 70524
- WTCM-FM, Traverse City, Michigan, FIN 70525
- WCCW(AM), Traverse City, Michigan, FIN 20421
- WCCW-FM, Traverse City, Michigan, FIN 20423
- WBCM(FM), Boyne City, Michigan, FIN 71210
- WKLT(FM), Kalkaska, Michigan, FIN 49591
- WJZQ(FM), Cadillac, Michigan, FIN 5207

It is to be noted that WCCW(FM) and WKLT(FM) were selected for EEO audits in the FCC's letter of February 6, 2020. We received an e-mail from the FCC on May 18, 2020 indicating that the FCC had completed its review of our EEO audit submission and that "no further action is required" (see attached).

Grand Traverse County, of which Traverse City is the county seat, has a 2019 U.S. Census estimated population of 93,088. The U.S. Census Bureau reports the following gender and ethnic percentages for Grand Traverse County: Women, 51.1%; Black, 0.7%; American Indian, 1.3%; Asian, 0.8%; and Hispanic, 2.9%.

For full-time job openings for administrative and sales positions at its stations, MBC "casts a wide net" using local print, online and its own airwaves to recruit prospective candidates. For full-time "On-Air" job openings in its Programming Departments, MBC generally seeks experienced "On-Air" personalities through more focused channels. The primary source for

prospective candidates for “on-Air” positions is Specs Howard School of Broadcasting. Many of MBC’s Program Directors/On-Air Talent/Traffic Directors are alumni of Specs Howard, and are placed at MBC directly with the guidance of Dick Kernan, VP of Industry Relations for the Detroit Broadcast School. Upon learning of the pending vacancy in MBC’s “Afternoon Drive On-Air Personality” position, MBC called Mr. Kernan directly to inquire about the school’s recent graduates who may be seeking employment and interested in relocating to Traverse City, Michigan. Broadcasting prospects are also regularly encouraged to visit MBC’s website to learn of job vacancies as they are posted, from time to time.

MBC’s President, Ross Biederman, is a member of the Board of Directors of the Michigan Association of Broadcasters (MAB) Foundation. The MAB Foundation is a 501(c)(3) organization which conducts numerous educational and charitable activities, which include, among other things, providing scholarships. Mr. Biederman was a major financial contributor to the formation of the MAB Foundation. In addition, Mr. Biederman established an endowment with the MAB Foundation (the “Leicenger/Biederman Scholarship Endowment”), created in honor of longtime broadcaster Lee Leicenger, and intended to provide annual scholarships to high school students expressing interest in broadcasting.

Besides informing its employees, MBC notifies recruitment sources of the policy and interest in recruiting qualified minorities and females. MBC continues to:

1. Request referrals of other qualified minorities, females and other protected classes from its current workforce, including, minority and female workers;
2. Seek referrals from school counselors; and,
3. Seek referrals from its newly hired minority and female workforce.

MBC has analyzed its recruitment program and finds no adverse impact against females, minorities and/or any other protected class with respect to recruitment.

MBC's analysis of its EEO program does not reveal any inherent, structural or procedural problems or impediments attributable to the MBC to the pay, benefits, seniority practices, promotions, recruiting or retention of minority or female individuals. Indeed, the only potential barrier to minority placement overall is the general lack of minority population in our local recruitment areas within the eleven counties that comprise the Traverse City-Cadillac-Petoskey radio market. Traverse City is approximately 256 miles by highway from Detroit. MBC has also analyzed its employment decisions and finds no adverse impact against females and/or minorities with respect to hires, promotions, transfers, compensation and/or terminations. MBC has no union agreements.

From: Estella Salvatierra <Estella.Salvatierra@fcc.gov>
Sent: May 18, 2020 5:49 PM
To: Chris Warren <chrisw@wtcmradio.com>
Subject: WCCW(AM), Traverse City, MI (Fac. ID # 20421)

Chris Warren
Secretary
Midwestern Broadcasting Co.
chrisw@wtcmradio.com

Re: WCCW(AM), Traverse City, MI (Fac. ID # 20421)
WCCW-FM, Traverse City, MI (Fac. ID # 20423)
WTCM(AM), Traverse City, MI (Fac. ID # 70524)
WTCM-FM, Traverse City, MI (Fac. ID # 70525)
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WKLT(FM), Kalkaska, MI (Fac. ID # 49591)
WJZQ(FM), Cadillac, MI (Fac. ID # 5207)

Dear Mr. Warren:

We have completed our review of the response of WCCW Radio, Inc., licensee of the above-noted stations, to the February 6, 2020, random audit letter sent to it in accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity (EEO) rules. As a result of our review, we find that no further action is required. In accordance with Section 73.3526(e)(10) of the Commission's rules for commercial stations or Section 73.3527(e)(11) for noncommercial stations, the licensee must place copies of this letter, our audit letter, and its audit response in the online public inspection file of each station. The licensee must maintain these materials in the files until the next grant of the renewal application, by final order, of the license for the station to which the file pertains.

Should you have any questions concerning this matter, you may call the EEO staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley
Assistant Chief, Investigations & Hearings Division
Enforcement Bureau
Federal Communications Commission