

Broad and Inclusive Outreach Narrative Statement

The Employment Unit consists only of WLKY, Louisville, Kentucky (“WLKY”). The Employment Unit is dedicated to providing equal employment opportunities and preventing discrimination. Notwithstanding the extraordinary and unusual circumstances presented by the COVID-19 national and international pandemic—which has made accomplishing and conducting certain outreach activities difficult if not unhealthy and potentially dangerous since mid-March 2020, which is approximately 50 percent of the period covered by the two annual EEO public file reports accompanying this filing—the Employment Unit has achieved broad and inclusive outreach in the following ways:

- Job openings are made available to a wide variety of recruitment sources, such as sources that have requested notifications, media-based trade organizations (including those that have substantial participation by women and minorities), and internet websites.
- The Employment Unit maintains a database of recruitment sources that contains numerous broadcast- and nonbroadcast-related recruiting sources throughout the community, including media-related trade associations with substantial participation by women and minorities. The station periodically reviews and modifies its recruitment source database. Notices concerning job openings are sent to these recruitment sources.
- The Employment Unit maintains multiple training programs to assist employees in learning new skills to help qualify them for higher level positions.
- The Employment Unit conducts training to assist hiring managers and other management with ensuring equal employment opportunity and preventing discrimination.
- WLKY has historically and consistently maintained an internship program in recent years, and—although the COVID-19 pandemic required WLKY to temporarily suspend the in-person program (for health and safety reasons) during the COVID pandemic—the Employment Unit expects to offer internships again when conditions safely permit. In addition, station personnel also regularly participate in job fairs, activities sponsored by community organizations with an interest in broadcast employment, and activities sponsored by educational institutions that are intended to further the exposure of members of the public and students to opportunities for careers in broadcasting and journalism. While these activities have become more difficult since COVID-19 was declared an international pandemic in the first quarter of 2020, WLKY continues to try to engage in these types of activities even if they have now become more “virtual” than “in person.”

It is also worth noting that WLKY was the subject of a random EEO audit during the license term. That random audit was commenced by letter dated February 24, 2016, and WLKY received a “no further action” letter dated October 2, 2017. Additional information concerning the Employment Unit’s outreach activities is contained in WLKY’s Public File Reports.

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