

**Licensee: Southern Oregon University**  
**Stations: See chart in Exhibit**  
**Schedule 396 EEO Report**  
**EEO Exhibit 3 Outreach Narrative**

Licensee Southern Oregon University (SOU) holds the licenses for, and maintains within its SEU, the following NCE full-service stations, which are listed below with their respective facility I.D. number and community of license. These stations are operated as Jefferson Public Radio, an NCE public radio regional network of main stations and full-service satellite stations, along with various translator stations, located throughout rural areas of Southern Oregon and Northern California. The column on the left lists the twelve (12) NCE AM or FM SOU stations located in Oregon, and the column on the right lists the twelve (12) NCE AM or FM SOU stations located in California. Together, these stations constitute a single SOU SEU, managed and operated from the main studio headquarters in Ashland, OR, as an NCE public radio network under the name Jefferson Public Radio (JPR).

**Stations Licensed to Southern Oregon University**

KSOR, Ashland, OR (50622)	KMJC, Mt. Shasta, CA, (60024)
KTBR, Roseburg, OR (33247)	KPMO, Mendocino, CA (31596)
KSMF, Ashland, OR (63022)	KSYC Yreka, CA (15313)
KSJK, Talent, OR (62157)	KNHM, Bayside, CA (12486)
KOOZ, Myrtle Point, OR (33248)	KNSQ, Mt. Shasta, CA (62957)
KSBA, Coos Bay, OR (50616)	KLDD, McCloud, CA (61355)
KSRS, Roseburg, OR (62158)	KJPR, Shasta Lake City, CA (129174)
KSRG, Ashland, OR (62105)	KNHT, Rio Dell, CA (17412)
KZBY, Coos Bay, OR (88257)	KNCA, Burney, CA(50621)
KSKF, Klamath Falls, OR (62071)	KNYR, Yreka, CA (62967)
KLMF, Klamath Falls, OR (83854)	KWCA, Redding, CA (86670)
KAGI, Grants Pass, OR (61334)	KHEC, Crescent City, CA (176094)

**SOU EEO Annual Public Inspection Reports (“EEO Annual Reports”).** SOU has opted to file the EEO Annual Public File Reports for its SEU on October 1, the license renewal application due date for Oregon radio stations, and has consistently adhered to that decision since FCC EEO Rule 73.2080 went into effect. However, since SOU’s 12 California stations must file their license renewal applications on or before 8/1/2021, SOU is filing this Schedule 396 EEO Report, on an interim basis on behalf of its California stations. We have attached as exhibits the two most recent EEO Annual Public File Reports for 2018-19 and 2019-20, the two most recent license-year Annual Reports for its CA stations, and prepared this interim EEO Narrative. On or before October 1, 2021 SOU will prepare and file a Schedule 396 EEO Report form in connection with the license renewal applications for its Oregon stations, at which time we will attach as an exhibit the SEU’s EEO Annual Public File Report for the 2020-21 license year.

During the two-license-year period encompassing **2018-19 and 2019-20**, SOU SEU achieved broad and inclusive outreach in the following manner:

**SOU Human Resources and SOU EEO Policies:** SOU is a public university of the State of Oregon. **Recruitment, outreach, and hiring** of employees for the SOU SEU are conducted in coordination with SOU's Human Resources Services (HRS) Department. SOU employment policies, including hiring, recruitment, retention, compensation, benefits, diversity, and Equal Employment Opportunity policies, apply to all JPR station employees and job applicants on the same basis as all other SOU employees and job applicants. Both SOU and its SEU are committed to diversity, broad outreach, and recruitment practices that provide employment opportunities for all persons. The Employment section of the SOU website, where job applicants can learn about job vacancies and fill out an online employment application, carries a prominent statement of SOU's Employment and Recruitment Guidelines. In addition to the Commission's EEO rule and policies, these guidelines govern recruitment of all new employees within the SOU SEU, which takes place in coordination with HR staff to maintain compliance with FCC Rule 73.2080.

**During the 2018-20 license years**, the SOU SEU recruited for and hired five new employees, as indicated in detail on the Vacancies Charts and the Recruitment Sources Charts found on pages 1 and 2 of **Exhibits 1 and 2, the 2018-19 and 2019-20 EEO Public File Reports**: two broadcast engineers, two reporters, and one news director. The SOU SEU engaged in broad and extensive recruitment for all positions it filled during that period. For each of the listed recruitments, between 10 and 20 recruitment sources were utilized, including several community referral organizations. These recruitments produced a total of thirteen interviewees, including some existing employees competing for possible promotion to some of these openings. The asterisks among the various interviewee sources indicate the source for the respective 2018-20 hirees. SOU SEU management has analyzed its mix of local, regional, national, and online sources, in cooperation with its licensee's HRS, and believes that it has achieved broad and inclusive outreach in recruitment.

**Outreach Activities and Initiatives.** At the present time, the total number of SOU SEU full-time employees is 12, the average number of FT employees in the SEU. In addition, none of the stations in the SEU serve a market population greater than 250,000 persons. The JPR Network covers approximately 60,000 square miles in remote rural counties of Southern Oregon and Northern California. Within this area, each community meets the definition of "small market" under section 73.2080(c)(2) of the rules. The SEU is, therefore, required to perform at least two recruitment initiatives during each two-year period. The SEU has, however, sponsored or participated in three to five recruitment initiatives each year, resulting in a total of six or more activities during the 2018-20 period, including the following:

**Internship/Volunteer Program** (Initiative #5) (offered both years): During both the 2018-19 and 2019-20 reporting periods, the Licensee conducted its Internship/Volunteer Program at the Unit. The program provides opportunities for students and community members to learn skills which prepare them for employment in the broadcasting industry. The SEU reaches out broadly

for participants and publicizes the program throughout its network using a combination of methods: broadcasting on-air announcements, posting information on the JPR website [www.ijpr.org](http://www.ijpr.org), and maintaining relationships with educational institutions. This program typically has five to eight participants.

**Programs in Cooperation with an Educational Institution (Initiative Activities #5, #7 and #10)** For both license years, the SEU participated in two distinct programs involving students of its licensee SOU, the **Work Study Program** and the **PEAK Scholarship Program**. The **Work Study Program** provides hands-on opportunities for SOU undergraduate and graduate students interested in pursuing careers in broadcasting. The **PEAK Scholarship Program** provides students with on-campus employment opportunities that encourage rich relationships with faculty and staff, foster professional competency, and engender a sense of substantive contribution to the community. The SEU hired several **Work-Study** students both years, as well as 3 **PEAK** students during 2018-19 and another 3 during 2019-20.

**Program in Cooperation with an Educational Institution (Initiative Activities #5, #7 and #10): the University of Oregon Charles Snowden Internship for Excellence in Journalism Program** (offered both years). The SEU hosted an intern in its newsroom for a ten-week period during the summer of 2019, and another intern for ten weeks during the summer of 2020, as part of the University of Oregon's program to develop the next generation of journalists. The intern received extensive training and hands-on experience in news writing, journalistic standards and practices, and producing and editing audio.

In each of the three above programs, the SEU contributed funding for student scholarship opportunities.

**Staff involved:** The above programs are supervised by senior SEU personnel including Liam Moriarty, JPR News Director, and Eric Teel, JPR Director of FM Programming. These programs have been effective in developing candidates for positions in the broadcasting industry.

**Managers and Employees EEO and Diversity Training** (Initiative #14) (offered both years) SOU, the stations' Licensee, has established a comprehensive approach to training its managers and employees on how to report, investigate, and appropriately respond to allegations of discrimination and harassment. Every SEU employee must complete this course, which raises awareness about harassment and discrimination by explaining how to respond to and report misconduct. All search committee members who recruit for the SEU also receive EEO training. Paul Westhelle, Executive Director, oversees participation in this program by SEU employees. SOU and its SEU management regularly analyze the SEU's recruitment and outreach programs for inclusiveness and efficacy.

**Self-assessment.** On at least an annual basis, Mr. Westhelle, Executive Director, and Soleil Mycko, Business Manager, review the EEO recruitment and outreach policies and practices with the SEU's communications counsel in order to conduct a self-assessment of the implementation

of these policies over the past year. At that time, recruitment sources are reviewed for effectiveness, options to improve performance are evaluated, compliance-related questions are considered, and new options of Outreach Activities are discussed for future implementation. Following the most recent such self-assessment process, it was determined that, at the present time, the SEU's EEO recruitment program continues to be effective. Even though the SEU typically has very low turnover, it nevertheless has a diverse workforce and its recruitment program has been able to attract new female and minority applicants. This self-assessment process helps identify several factors which continue to characterize the SEU's recruitment and outreach efforts: (1) The intern/volunteer outreach program has been effective in training and recruiting applicants for job vacancies, many of whom have gone on to become successful employees in the broadcast industry; (2) There has been an ongoing effort to increase the number and effectiveness of recruitment sources. Although the SEU has relatively few job vacancies, it recruits widely throughout its region, statewide, and nationally. The most effective sources appear to be the websites for the SEU and its Licensee. The SEU has been pleased with the response it has received since adding the Oregon Employment Department Job Board as a community referral source; (3) The SEU has had success in developing a diverse workforce and recruiting female and minority candidates; (4) The SEU seeks creative ways to reach out, such as its recent decision to utilize the job banks of national and regional organizations whose membership includes significant numbers of women or members of minority groups.

In conclusion, SEU management notes that all employees in the SEU are employees of the Licensee, SOU. As a public university of the State of Oregon, SOU is subject to federal and Oregon EEO statutes and regulations. SOU has developed extensive internal policies and guidelines that govern recruitment and outreach with respect to all SOU employees and applicants for employment. SOU policies require managers to avoid discrimination in recruitment, appointment, promotion, payment, training, or other employment practices against anyone because of race, ethnic origin, sex, sexual orientation, color, creed, religion, age, political belief, or national origin, and to create a work environment free from all forms of discrimination. These internal and external regulations, policies, and guidelines apply equally to SEU broadcast employees.