

Licensee: Southern Oregon University

Stations: See station chart in Exhibit

Schedule 396 EEO

Exhibit 3 EEO Outreach Narrative (Updated-Oregon Stations)

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 regions 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 regional 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, Palo Cedro, CA (86670)
KAGI, Grants Pass, OR (61334)	KHEC, Crescent City, CA(176094)

SOU SEU EEO Reports and Filings - Transition. SOU is an Oregon government educational entity and the main studio for its network is located in Ashland, OR. Although it also holds licenses for California stations, SOU has opted to file EEO Annual Public File Reports for its complete SEU in accordance with the Commission's filing schedule for Oregon radio stations, on or before October 1, and has consistently adhered to that schedule since the FCC's EEO Rule 73.2080 went into effect. However, since SOU's California stations were required to file their license renewal applications on or before August 1, 2021, SOU filed those applications, along with a Schedule 396 EEO Program Report, in accordance with the FCC CA radio filing schedule, on July 27, 2021. That EEO Program Report (File #0000154021) was filed on an interim basis, detailing recruitment and outreach information that had been prepared and uploaded as of that date, in connection with the license renewal applications for SOU's 12 California stations ("August 2021 EEO Program Report"). That August EEO Program Report also included, as uploaded exhibits, SOU's EEO Annual Public File Reports for license years 2018-19 and

2019-20, since these were the two most recent SOU EEO Annual Reports as of late July/August 1, 2021.

SOU also prepared at that time an interim EEO Outreach Narrative exhibit covering those same two license years, 10/1/2018 through 9/30/2020, and uploaded it to the August 2021 EEO Program Report. That Outreach Narrative explained that, on or before October 1, 2021, SOU would prepare and file an updated Schedule 396 EEO Program Report (“October 2021 EEO Report”) with updated exhibits, in connection with the license renewal applications of its stations in Oregon. SOU is now preparing and filing its updated Schedule 396 EEO Program Report in connection with its applications for license renewal of its Oregon stations. This updated EEO Outreach Narrative, covering the period from 10/1/2019 through 9/30/2021, is one of the EEO exhibits that SOU has uploaded to its October 2021 EEO Program Report, along with the EEO Annual Public File Reports for license years 2019-20 and 2020-21.

Recruitment and Outreach, 2019-2021

During the two-year license period encompassing **2019-20 and 2020-21**, the 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). SOU employment policies, including hiring, recruitment, retention, compensation, benefits, diversity, and EEO policies, apply to station employees and job applicants on the same basis as 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 radio and all other 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. Recruitment of new employees by the SOU SEU takes place in coordination with HRS staff to maintain compliance with both FCC Rule 73.2080 and the rigorous state-imposed guidelines that govern all SOU recruitment.

During the 2019-21 license years, the SOU SEU had a single job opening, and therefore recruited for and hired only one new employee, a Broadcast Engineer, as indicated in detail on the Vacancies Charts and Recruitment Sources Charts found on pages 1 and 2 of **Exhibit 1, the EEO Annual Public File Report for 2019-20 and Exhibit 2, the EEO Annual Public File Report for 2020-21**. The SOU SEU engaged in broad and extensive recruitment for this single opening, utilizing more than 15 recruitment sources and community referral organizations. The recruitment sources produced a total of five interviewees. The source for the hiree was *Indeed*, an online employee-recruitment platform. The SOU SEU had no job openings in license year **2020-21**, so no recruitments were conducted.

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. 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 of license 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 to ten activities during 2019-21, including the following:

Internship/Volunteer Program (Initiative #5) (offered both years): During both the 2019-20 and 2020-21 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, and maintaining relationships with educational institutions. This program typically has five to eight participants per year.

Programs in Cooperation with an Educational Institution (Initiative Activities #5, #7 and #10) During 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 has hired several **Work-Study** students both years, three of whom were in 2019-20, as well as four **PEAK** students in 2020-21.

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 2020, and another intern for ten weeks during the summer of 2021, 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 educational programs, the SEU contributed funding for student scholarship opportunities. SOU SEU management considers these programs quite effective in developing candidates for careers in the broadcast industry. The internships and programs described above are supervised by Liam Moriarty, News Director, and Eric Teel, Director of FM Programming.

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.