



# Eagle Radio EEO Compliance Report

## June 1, 2019



ATTACHMENT A  
(EEO PUBLIC FILE REPORT)

EEO PUBLIC FILE REPORT

For the 12-month Period Ending May 31, 2019

Prepared By: Keweenaw Bay Indian Community  
(License/Permittee)

This report covers the following employment unit:

<u>Call Sign</u>	<u>Facility ID Number</u>	<u>Type of Station</u>	<u>Location City, State</u>	<u>LMA</u>
WCUP	36092	FM Station	Baraga, MI	
WGLI	38128	FM Station	Baraga, MI	

A. The following is a list of all vacancies for full-time jobs during the previous 12 months:

<u>Job Title</u>	<u>Date of Opening</u>	<u>Date Filled</u>
Account Executive/ Sales	06/01/2018	Open Continuous

B. During the previous 12 months, the following recruitment sources were contacted as vacancies for full-time jobs opened. Those with an asterisk (\*) were organizations that requested to be contacted as job openings occurred:

<u>Recruitment Source</u>	<u>Address</u>	<u>Person</u>	<u>Contact Telephone Number</u>
1. Keweenaw Bay Indian Community	16429 Beartown Road Baraga, MI 49908	Beth Fish Personnel Director	906-353-6623

2.	Tribal Employment Rights Office	16429 Beartown Road Baraga, MI 49908	Debra Picciano TERO/Workforce Director	906-353-6623
3.	Michigan Works	Ironwood, MI 49938	Brian Haanpaa	906-280-2861
4.	Michigan Works	Marquette, MI 49855		906-228-3075
5.	Eagle Radio	805B US 41 S. Baraga, MI 49908	Ed Janisse/ General Manager	906-353-9287
6.	L'Anse Sentinel	202 N. Main L'Anse, MI 49946	Barry Drue Advertising Manager	906-524-6194
7.	Mining Gazette	206 Shelden Houghton, MI 49931	Ray Gronveldt Account Executive	906-482-1500
8.	Mining Journal	249 W. Washington Marquette, MI 49855	Joe Drozd Account Executive	906-228-2500
9.	KBIC Web Site	16429 Beartown Road Baraga, MI 49908	David Zasandyj IT Manager	906-353-6623
10.	Michigan Association Of Broadcasters	819 N. Washington Ave Lansing, MI 48906	<a href="mailto:mab@michmab.com">mab@michmab.com</a>	517-484-7444

B. The following is a list of the sources for full-time jobs shown in Section A above and the recruitment source which provided the hire for that position:

<u>Job Title</u>	<u>Recruitment Source</u>
Internal Sales Specialist	1,2,3,4,5,6,9
Account Executive/Sales	1,2,3,4,5,6,7,8,9
On-Air Announcer	1,2,3,4,5,6,9

During the previous 12 months, there were a total of 1 people interviewed for vacancies for full-time positions. The following is a list of the total number of interviewees referred by each recruitment source shown in Section B above:

<u>Recruitment Source</u>	<u>Total No. of Interviewees</u>
5	1

E. During the last 12 months, the station employment unit engaged in the following (menu option) initiatives (provide full details, including an explanation if not such initiatives were conducted during the period involved):

Prong 3 Menu Option

- Prong 1      Position announcements distributed to 10 referral sources listed in Section B of this report. Position announcements also distributed to representatives and/or career offices of 5 universities, and KBIC Facebook page.
- Prong 2      Michigan Works, Tribal Employment Rights Office, local college Career Development offices, see item #1.
- Prong 3      N/A

Our membership in the Michigan Association of Broadcasters supports their job bank and information disseminated about careers in broadcasting. (*menu item 6*)

Our upper-level job postings are listed on the MAB job bank when they become available. (*menu item 12*)

Outreach through Michigan Works, Tribal Employment Rights Office. (menu item 6)

Advertisement and assisted in recruitment of a number of job postings for Board Operator, Account Executive/Sales, Internal Sales Specialist. (menu item 6)

FCC Form 396  
**Exhibit 3 – Narrative Statement**

It is the policy of The Keweenaw Bay Indian Community and WCUP / WGLI Eagle Radio to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin, age, sex, marital status, disability, military status, citizenship, or any other legally protected status in accordance with applicable local, state, and federal law.

WCUP / WGLI Eagle Radio widely disseminates information on each of our vacancies to outlets which will reach a diverse audience of qualified individuals. All applications are

carefully reviewed by the of The Keweenaw Bay Indian Community Human Resources Department for information that could reveal age, race, religion, national origin, color, marital status, disability, military status, or citizenship before the applications are provided to management. For each vacancy at WCUP / WGLI Eagle Radio Stations, management reviews applications and choose applicants to interview. Interviews are performed both in a group setting and individually.

Once hired, The Keweenaw Bay Indian Community Human Resources Department and WCUP / WGLI Eagle Radio Stations provide professional development and advancement opportunities to its employees by allowing them the opportunity to attend classes at The Keweenaw Bay Ojibwa Community College, which is owned by the Keweenaw Bay Indian Community. The Keweenaw Bay Indian Community Human Resources Department focuses on excellence in job performance, responsiveness to The Keweenaw Bay Indian Communities Strategic Plan along with the communities' goals and vision. The Keweenaw Bay Indian Community Human Resources Department provides new and/or continuing refresher Management training sessions in all aspects of Safety, Administrative, Employee and Professional development. WCUP / WGLI Eagle Radio also provide career counseling and coaching to station staff.

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#### EEO Outreach 2018 – 2019 Period

#### **Date: 3-18-19 KBOCC Career Fair**

Keweenaw Bay Ojibwa Community College (KBOCC) cordially invited Eagle Radio to participate in their 2019 Career Fair on Friday, March 15, 2019. The event was held from 10:00am-2:00pm at the KBOCC Wabanung Campus, 770 N. Main Street, L'Anse, MI.

This was a FREE event hosting numerous employers/agencies promoting their summer jobs, internships and permanent career opportunities to students and community members in a variety of fields. An Indian Taco lunch was available for \$5 in the Three Sisters Café.

From 10:00am-2:00pm – Sales Staff members John Preston and Gina Nygord interviewed potential employees who were interested in a career in radio. We also provided an opportunity for the numerous other businesses there to chat with us LIVE ON THE AIR to encourage our listeners to apply at their booths if they were interested in employment in a field other than Radio Broadcasting. This was an open fair format for student/community traffic and interviewing

\*\*\*\*\*

Name of Respondent: Beth A Fish

Signed:

Typed Name: Beth A. Fish

Title: Personnel Director, Keweenaw Bay Indian Community

Date: 6-1-2019

Telephone No. 906-353-6623, ext.4140

ATTACHMENT B  
(EEO REPORT FORM - INTERNAL USE)



# EEO REPORT FORM

## Information for Applicants for EAGLE RADIO

Dear Applicant:

We sincerely appreciate your interest in employment with Eagle Radio, owned and operated by the Keweenaw Bay Indian Community.

The Federal Communications Commission requires broadcast licensees to keep records and file reports regarding employment applications and inquires of resume's received.

To assist us in fulfilling that requirement, would you please take a moment to fill out the brief questionnaire below and return it to us. This information is voluntary and is strictly for our required posting purposes. It has no bearing whatsoever on your qualifications for employment and will not result in any adverse personnel action against you. THIS INFORMATION WILL NOT BE ATTACHED TO YOUR APPLICATION FOR EMPLOYMENT OR RESUME AND WILL NOT BE AVAILABLE TO THOSE EMPLOYEES WHO WILL BE CONSIDERING YOU FOR EMPLOYMENT.

We would appreciate your assistance. If this form has been mailed to you, a self-addressed return envelope is enclosed for your convenience.

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*Please fill out this portion and return to us. Thank you.*

*Please print or type.*

*Name:* \_\_\_\_\_

*Address:* \_\_\_\_\_

*Position sought:* \_\_\_\_\_

*Referred by:* \_\_\_\_\_

*This information is for required Federal Communications Commission reporting purposes and has no bearing on your qualifications for employment.*

ATTACHMENT C  
(HIRINGS FORM)

HIRINGS FORM

Date: 06/01/2018 - Open Continuous

Circle Appropriate Response: Hiring   Full-Time  Part-Time

Job Title Internal Sales Specialist FCC Job Category \_\_\_\_\_

Person Hired No Hire Date Hired N/A

Referral Source N/A

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

1. N/A Referral Source N/A

2. \_\_\_\_\_ Referral Source \_\_\_\_\_

3. \_\_\_\_\_ Referral Source \_\_\_\_\_

4. \_\_\_\_\_ Referral Source \_\_\_\_\_

5. \_\_\_\_\_ Referral Source \_\_\_\_\_

6. \_\_\_\_\_ Referral Source \_\_\_\_\_

7. \_\_\_\_\_ Referral Source \_\_\_\_\_

8. \_\_\_\_\_ Referral Source \_\_\_\_\_

9. \_\_\_\_\_ Referral Source \_\_\_\_\_

10. \_\_\_\_\_ Referral Source \_\_\_\_\_

11. \_\_\_\_\_ Referral Source \_\_\_\_\_

12. \_\_\_\_\_ Referral Source \_\_\_\_\_

13. \_\_\_\_\_ Referral Source \_\_\_\_\_

Other Referral Sources Contacted TERO ; KBIC Website ; MAB

L'Anse Sentinel ; Facebook.

HIRINGS FORM

Date: 06/01/2018 -Open Continuous

Circle Appropriate Response: Hiring Full-Time Part-Time (On-Call)

Job Title Board Operator FCC Job Category

Person Hired N/A Date Hired N/A

Referral Source KBIC Website

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

- 1. N/A Referral Source N/A
2. Referral Source
3. Referral Source
4. Referral Source
5. Referral Source
6. Referral Source
7. Referral Source
8. Referral Source
9. Referral Source
10. Referral Source

Other Referral Sources Contacted TERO ; KBIC Website ; MAB
L'Anse Sentinel ; Facebook .

HIRINGS FORM

Date: 06/01/2018 - Open Continuous

Circle Appropriate Response: Hiring  Full-Time  Part-Time

Job Title Account Executive/Sales FCC Job Category \_\_\_\_\_

Person Hired: \_\_\_\_\_

Date Hired: \_\_\_\_\_

Referral Source N/A

Other Applicants Considered (List all applicants for this opening and use additional sheet if necessary).

1. JP Referral Source Eagle Radio Staff

2 \_\_\_\_\_ Referral Source \_\_\_\_\_

3 \_\_\_\_\_ Referral Source \_\_\_\_\_

4 \_\_\_\_\_ Referral Source \_\_\_\_\_

5 \_\_\_\_\_ Referral Source \_\_\_\_\_

6 \_\_\_\_\_ Referral Source \_\_\_\_\_

7 \_\_\_\_\_ Referral Source \_\_\_\_\_

8 \_\_\_\_\_ Referral Source \_\_\_\_\_

9 \_\_\_\_\_ Referral Source \_\_\_\_\_

10 \_\_\_\_\_ Referral Source \_\_\_\_\_

11 \_\_\_\_\_ Referral Source \_\_\_\_\_

12 \_\_\_\_\_ Referral Source \_\_\_\_\_

13 \_\_\_\_\_ Referral Source \_\_\_\_\_

Other Referral Sources Contacted TERO ; KBIC Website ; MAB

L'Anse Sentinel ; Facebook.





ATTACHMENT D  
(APPLICANT INTERVIEWS)





ATTACHMENT E  
(NEW HIRE REPORT)

NEW HIRE EEO REPORT

Person Hired: JP

Date: \_\_\_\_\_ Position: ACCOUNT EXECUTIVE/SALES

Status: \_\_\_\_\_ Full-Time: X Part-Time: \_\_\_\_\_

Date Job Posted 06/01/2018 - Open Continuous

Applicants Interviewed:

Total Number: 1

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

\_\_\_\_\_ Newspaper (Specify) \_\_\_\_\_

\_\_\_\_\_ Recruitment Organizations (Specify) \_\_\_\_\_

X Referral from Employees Eagle Radio Staff Member

\_\_\_\_\_ Recruitment Educational Institutions (Specify) \_\_\_\_\_

\_\_\_\_\_ Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: N/A

Name: N/A

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name	Organization/Company
<u>N/A</u>	

Prepared By: HEL

Date: 06/01/2019

Reviewed By: HEL

Date: 06/01/2019

NEW HIRE EEO REPORT

Person Hired: \_\_\_\_\_

Date: \_\_\_\_\_ Position: ON-AIR ANNOUNCER

Status: \_\_\_\_\_ Full-Time: \_\_\_\_\_ Part-Time: \_\_\_\_\_

Date Job Posted \_\_\_\_\_

Applicants Interviewed:

Total Number: 0

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

Newspaper (Specify) L'Anse Sentinel

Recruitment Organizations (Specify) Eagle Radio, KBIC Website

Referral from Employees EAGLE RADIO

Recruitment Educational Institutions (Specify) MICHIGAN WORKS

Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: N/A

Name: N/A

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name	Organization/Company
<u>N/A</u>	
_____	_____
_____	_____

Prepared By: HEL

Date: 06/01/2019

Reviewed By: HEL

Date: 06/01/2019

NEW HIRE EEO REPORT

Person Hired: \_\_\_\_\_

Date: \_\_\_\_\_ Position: Youth Board Operator

Status: \_\_\_\_\_ Full-Time: \_\_\_\_\_ Part-Time: X

Date Job Posted \_\_\_\_\_

Applicants Interviewed:

Total Number: 0

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

\_\_\_\_\_ Newspaper (Specify) \_\_\_\_\_

\_\_\_\_\_ Recruitment Organizations (Specify) \_\_\_\_\_

\_\_\_\_\_ Referral from Employees \_\_\_\_\_

\_\_\_\_\_ Recruitment Educational Institutions (Specify) \_\_\_\_\_

\_\_\_\_\_ Internal Applicants

IF AN OFFER WAS MADE TO ANOTHER CANDIDATE WHO TURNED DOWN THE POSITION, PLEASE INDICATE BELOW:

Name: N/A

Name: N/A

LIST BELOW ALL REFERENCES CHECKED ON THE PERSON HIRED:

Name	Organization/Company
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N/A

Prepared By: HEL

Date: 06/01/2019

Reviewed By: HEL

Date: 06/01/2019

ATTACHMENT F  
(LIST OF RECRUITMENT SOURCES)

LIST OF RECRUITMENT SOURCES  
Date list last reviewed: 05/31/2016

1	Barry Drue	1-906-524-6197	L'Anse Sentinel
2	Ray Gronveldt	1-906-482-2726	Mining Gazette
3	Brian Haanpaa	1-906-280-2861	Michigan Works
4	MQT MI Works	1-906-228-4372	Michigan Works
5	Joe Drozd	1-906-228-3273	Mining Journal
6	Western Michigan University	Online-Simplicity	Career Services
7	Michigan Tech University	1-906-487-3220	Career Services
8	Central Michigan University	Online-Simplicity	Career Services
9	Northern Michigan University	Online-Simplicity	Career Services
10	Eastern Michigan University	Online-Simplicity	Career Services
	<b>Broadcasting Only</b>		
11	Michigan Association of Broadcasters	1-517-484-5810	<a href="http://www.michMAB.com">www.michMAB.com</a>

Updated 05/31/2016

(Attachment F)

ATTACHMENT G  
(MODEL SEXUAL HARASSMENT STATEMENT)



## SEXUAL HARASSMENT POLICY STATEMENT

### Statement of Philosophy

The Company is proud of its tradition of a collegial work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere which promotes equal opportunities and prohibits discriminatory practices, including sexual harassment. At the Company, sexual harassment, whether verbal, physical or environmental, is unacceptable and will not be tolerated.

### Definition of Sexual Harassment

For purposes of this policy, sexual harassment is defined as unwelcome or unwanted conduct of a sexual nature (verbal or physical) when; 1) submission to or rejection of this conduct by an individual is used as a factor in decisions affecting hiring, evaluation, promotion, or other aspects of employment; or 2) this conduct substantially interferes with an individual's employment or creates an intimidating, hostile or offensive work environment.

Examples of sexual harassment include, but are not limited to: unwanted sexual advances; demands for sexual favors in exchange for favorable treatment or continued employment; repeated sexual jokes; flirtations, advances or propositions; verbal abuse of a sexual nature; graphic, verbal commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling, touching, pinching, assault, coerced sexual acts or suggestive insulting, obscene comments or gestures; display in the workplace of sexual suggestive objects or pictures.

This behavior is unacceptable in the workplace itself and in other work-related settings such as business trips and business-related social events.

### Individuals Covered Under the Policy

This policy covers all employees (professionals, assistants, support staff) and officers and owners. The Company will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, associates, officers or by outside clients, consultants, contractors or other non-employees who conduct business with the Company. The Company encourages reporting of all incidents of sexual harassment, regardless of who the offender may be.

### Reporting a Complaint

Any employee who believes that the actions or words of any Company officer, fellow employee, or other person described above constitutes harassment should report the offending action to your immediate supervisor, or to one of the officers appointed to handle sexual harassment complaints, as soon as possible. Currently, the officers appointed to handle sexual harassment complaints are **Edmund Janisse, Eagle Radio General Manager** and **Sarah Smith, Chief Executive Officer**.

### Investigating a Complaint

All complaints will be investigated by two officers or supervisors or by a single officer and an outside attorney retained by the Company. The investigating officer(s) will generally include at least one of the officers appointed by the Company to handle sexual discrimination complaints. In

the interest of impartiality, the officer who receives the complaint may, if warranted, as the Company to appoint a different officer or officers to investigate the complaint.

The investigating officers will question both sides thoroughly and will interview all witnesses identified by either side. All respondents will be asked to document their responses and the investigating officers will attempt wherever possible to verify the accuracy of responses. In addition, all participants in the investigation will be informed that their cooperation and confidentiality are required.

Investigations will be conducted as discreetly as possible and information about the complaint and the investigation will be considered confidential.

### Resolving a Complaint

Once the investigation is completed, the investigating officers will evaluate the evidence and decide in a timely manner whether the alleged conduct occurred and whether the conduct violated the Company's sexual harassment policy. In accordance with this decision, the investigating officers will recommend to the Company proper remedial action.

Proper remedial action includes both disciplinary action when warranted and other actions designed to prevent further occurrences of sexual harassment. Employees found to have engaged in the harassment of the other employees will be subject to appropriate disciplinary action, depending on the circumstances, up to and including termination.

A written report of the findings of the investigation and any remedial actions to be taken will be provided to both sides.

Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.