

Bustos Media of Eastern Washington License, LLC  
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Sacramento, California 95815  
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May 8, 2009

EEO Staff  
Policy Division, Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: KZTA(FM), Facility ID No. 36006  
Naches, Washington  
Random EEO Audit Response

Dear Sir or Madam:

The following is the response of Bustos Media of Eastern Washington License, LLC (“Bustos”), which is the licensee of Station KZTA(FM), Facility Identification Number 36006, Jackson, California, to the letter of the Assistant Chief, Policy Division, Media Bureau, dated March 23, 2009 (the “EEO Audit Letter”).<sup>1</sup> This response also includes the other stations in the same employment unit, which are KZTB(FM), Facility Identification Number 953, Milton-Freewater, Oregon; KULE(AM), Facility Identification Number 4041, Ephrata, Washington; KULE-FM, Facility Identification number 4042, Ephrata, Washington; and KZML(FM), Facility Identification Number 15137, Quincy, Washington. The lettered responses below correspond to the enumerated information requests set forth in the EEO Audit Letter, paragraph 3.

a) Attached at Exhibit A are copies of the station’s EEO Public File Reports for 2006-2007 and 2007-2008. The latest EEO Public File Report is posted on the website at <http://www.lakebuena.com>.

b) Please see attached documentation at Exhibit B. No organization has notified the employment unit that it wants to be notified of job openings. Please note that for purposes of the EEO public file reports, and opening is considered to occur when the prior employee leaves. Accordingly, when the departing employee gives notice of his or her upcoming departure, advertising for a replacement may start before the position would be listed as “open” on the public file report. Please also note that for the Promotions position, opening number 8, exigent circumstances required a quick hiring without the opportunity for substantial recruitment. In that instance, a prior employee left without the customary notice, and a replacement was needed

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<sup>1</sup> Pursuant to an informal e-mail response from the Assistant Chief, Policy Division, dated May 1, 2009, the time for responding to the EEO Audit Letter was extended to May 11, 2009.

immediately. The opening occurred on Friday, July 20, and the next business day, July 23, a suitable candidate came into the station seeking a position. Accordingly, he was hired at once.

c) Please see the attached copies of the employment unit's EEO Public File Reports, which provide this information.

d) The employment unit has a total of 15 full-time employees. The employment unit stations are all located in metropolitan statistical areas with a populations of less than 250,000 people. Accordingly, the employment unit was required to complete two outreach initiatives within a two year period. Please also note that, due to the timing of the EEO Audit Letter in relation to the licensee's renewal cycle, each public file report covers one year of a different two-year period. The employment unit's Mid-Term EEO Report will be due by October 1, 2009. As reflected in the attached EEO public file reports, the employment unit completed a number of outreach activities over the past two years. Attached hereto as Exhibit D is documentation of some of these efforts. These included the following:

1) Attendance at job fairs, including the Latino Business, Consumer and Career Expo for 2008 and the Expo North West for 2008. While Bustos understands that four job fairs are necessary for them to be counted as one outreach activity, the employment unit will participate in two additional job fairs prior to the end of the employment unit's reporting period this year. Thus, the employment unit will have participated in four job fairs within a two-year period. The licensee's \_\_\_\_\_ participated in this activity.

2) Community outreach efforts including offering tours to school and other youth groups to show young people possible media careers. The \_\_\_\_\_ participated in this activity.

3) The Station Manager held monthly meetings with the staff to select initiatives for the employment unit and to plan strategies to accomplish them. During the monthly meetings, managers and full-time employees are given the opportunity to raise and discuss concerns, including job opportunities within the station, promotion and salary policies, and the like. These meetings also address employment procedures in order to ensure that all FCC and company policies are clearly understood and carried out.

4) The employment unit posts internal announcements of all job openings. Current employees are encouraged to apply for promotions as well as to refer others. Given that the employment unit is made up of Spanish-language stations, the referrals obtained in this manner are likelier to reflect a more diverse background than typical in the broadcasting business. The business manager was involved in these matters.

5) A licensee-designed generalized outreach effort through national, on-air advertisements for personnel in the sales and general management fields. While some of these announcements were used to recruit applicants for a specific position, others aired in connection with a job that was filled by internal promotion. Those advertisements thus serve to alert the public to employment opportunities in broadcasting generally, with emphasis on general

manager and general sales manager positions. The parent company's chief operating officer oversaw this activity.

6) During the 2006-07 reporting period, the employment unit conducted an internship program, which sought interns to learn about the broadcasting business.

e) There are no pending or resolved complaints that were filed during the current license term.

f) The responsibilities of the employment unit's management personnel with regard to EEO matters are as follows. The station general managers and the business manager are responsible for overall implementation of EEO policies and ensuring compliance. They work to make sure that anyone with input into hiring decisions has a clear understanding of the unit's employment and benefits policies as set for the in the employee handbook. The general manager undertakes the preparation of job descriptions and interviews candidates for open positions. The business manager and other managers are responsible for recruitment efforts, including the placement of advertising, preparation of documentation demonstrating recruitment efforts, and maintaining the files pertaining to EEO matters. The company's EEO policies are communicated to employees and job applicants through notices placed in the break room, the employee manual given to each employee immediately following hiring, statements in employment recruitment advertisements, and a statement on the stations' website. A copy of the employment unit's EEO policy is attached hereto as Exhibit F.

g) Each month, the Station Manager holds a meeting with other managers and staff to select initiatives for the employment unit and to plan strategies for accomplishing the goals set. Among the topics discussed are job opportunities within the station and employment procedures. These monthly meetings provide the opportunity to analyze and discuss what has worked and what has not with previous employment/recruitment initiatives and to address any problems that may have arisen.

h) Corporate human resources provides guidance regarding pay and benefits so that internal equity can be maintained. All full-time employees receive the same benefits. Review of pay, benefits, seniority practices and selection techniques is undertaken on a yearly basis. As set forth above, however, the station manager holds monthly meetings at which any concerns, including such matters, are discussed. These meetings provide a regular forum to address pay, benefits, seniority, and hiring practices, with participation from all station management personnel as well as staff. In addition these practices are reviewed at a corporate level in connection with periodic updates of the employee handbook. There are no unions represented at the employment unit.

(i) N/A

Respectfully submitted,

BUSTOS MEDIA OF CALIFORNIA LICENSE, LLC

By: \_\_\_\_\_  
Amador Bustos  
President of Bustos Media Enterprises, LLC,  
Ultimate Parent Company of Licensee