

June 7, 2010

EEO Staff
Policy Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Television Station KNVA(TV)
Austin, Texas
Facility ID No. 144**

Dear Sir or Madam:

KXAN, Inc. ("LIN"), licensee of Station KXAN-TV, Austin, Texas ("KXAN") and satellite station KBVO(TV), Llano, Texas, and the broker of KNVA(TV), Austin, Texas, hereby provides the information requested by the Federal Communications Commission in a letter dated April 19, 2010, from the Media Bureau (the "EEO Audit Letter"). This response is timely filed pursuant to an extension of time granted on May 25, 2010 (attached as Attachment C hereto).

As requested in the EEO Audit Letter, LIN Television provides information for the applicable Station Employment Unit, which consists of KXAN-TV, KBVO(TV), KNVA(TV) and various low power stations listed in Attachment E hereto (the "Stations" or the "Employment Unit" or "Unit").

In making this response, LIN relied upon an examination of its files and records and due inquiry of current employees who are knowledgeable of employment-related issues at the Employment Unit. The responses below correspond to paragraphs as they are set forth in the EEO Audio Letter.

Paragraph 3: Audit Data Requested

Paragraph 3(a):

The Employment Unit's two most recent EEO Public File Reports are attached hereto as Attachment A. The Employment Unit's websites are as follows:

The KXAN and KBVO website is www.kxan.com and the annual EEO report can be found at www.kxan.com/subindex/About_Us/EEO_Reports and at <http://myaustintv.clientmediaserver.com/about.html>. The KNVA website, for which LIN is the broker, can be found at www.thecwaustin.com and the annual EEO report can be found at www.thecwaustin.com/suindex/about_us.

The chart included in Attachment A provides the date of hire of each position referenced on the last two annual EEO public file reports.

Paragraph 3(b):

During the period covered by the EEO Public File Reports, the Employment Unit filled 41 vacancies. Copies of notifications, postings and advertisements (collectively, “notifications”) announcing the full-time positions filled during the period covered by the two most recent EEO Public File Reports are attached hereto as Attachment B.

The notifications sent to recruitment sources are organized by vacancy and generally appear in the order set forth in the EEO Public File Reports. In this period, the Employment Unit did not receive a request to receive job notifications – as described in § 73.2080(c)(1)(ii) – from any local organizations.

Paragraph 3(c):

The total number of interviewees for each full-time vacancy and the referral source for each such interviewee during the period covered by the EEO Public File Reports are reflected in the cover sheets included for each position in Attachment B.

Paragraph 3(d):

As of the date of this response, the Employment Unit employed more than ten full-time employees and is located in a market with more than 250,000 people. The Employment Unit therefore must complete four long-term initiatives in each two year period.

The EEO Public File Reports located in Attachment A describe the Employment Unit’s long-term initiatives Unless stated otherwise in the annual public file reports, Rachel Steading, the Employment Unit’s business administrator (who has substantial authority in the hiring process), managed each long-term recruitment initiative.

Paragraph 3(e):

There has been one complaint filed during the Employment Unit’s current license term before any body having competent jurisdiction under federal, state, territorial or local law, alleging unlawful discrimination in the employment practices of the Employment Unit on the basis of race, color, religion, national origin or sex.

Shannon Powell filed her Charge of Discrimination with both the Federal EEOC and Austin Equal Employment/Fair Housing Office on February 9, 2010. The EEOC charge number is 36A-2010-00220. The Austin Equal Employment/Fair Housing Office charge number is 650-10-231. In the Charge, Ms. Powell complains of race

discrimination, age discrimination and retaliation. The matter remains pending in the investigatory stage. The local Austin office is handling the investigation.

Paragraph 3(f):

The Employment Unit's General Manager has ultimate responsibility for ensuring that the Employment Unit's EEO policy is followed for each vacancy. The Employment Unit also has an EEO Coordinator, Rachel Steading, who works with appropriate managers when a vacancy occurs to ensure that the Unit's EEO policy, including all proper recruitment procedures, is followed. The EEO Coordinator's responsibilities also include ensuring the Stations fulfill all supplemental recruitment initiatives over each two-year period, preparing the Employment Unit's annual EEO Public File Report, and conducting annual self-assessment of recruitment efforts at the Stations.

The Employment Unit informs job applicants that it is an equal opportunity employer on all job postings and on its job application. Newly hired employees are given information regarding the Employment Unit's EEO policy during their training orientation. These new employees receive the LIN No Harassment Policy. Employees also receive revised copies of this policy when it is revised. Employees have continuous access to the LIN No Harassment Policy, which includes the Employment Unit's EEO policies, at anytime via the LIN online intranet site. Notice to employees of key employment rights, including instructions about how to submit a discrimination claim, is conspicuously posted on the Employment Unit's employee bulletin board. In addition to these measures, all management-level employees, the EEO Coordinator, the Corporate Vice President of Human Resources and the General Manager are available to discuss the Employment Unit's EEO policies at any time with job applicants and employees.

Paragraph 3(g):

The Employment Unit has taken proactive steps to enhance the effectiveness of its recruitment efforts. For example, the EEO Coordinator reviews the compliance of hiring managers and regularly interacts with hiring managers to measure and develop consistency in EEO recruitment and reporting. As a result of this analysis, the EEO Coordinator has centralized more functions at the EEO Coordinator level that previously were performed by hiring managers. This centralization of functions allows the EEO Coordinator to better implement the Stations' EEO policies in a consistent manner.

As part of the EEO Coordinator's continuing review of the Stations' recruitment practices, the EEO Coordinator has suggested potential recruitment sources to hiring managers and is in the process of implementing a standardized recruitment outreach process. The Stations hope that these efforts will enable the Stations to better synchronize recordkeeping and documentation functions in the hiring process.

Paragraph 3(h):

For each job hire and promotion at the Employment Unit, the applicable pay rate or pay increase is reviewed and approved by at least two levels of management. Pay rates, benefits, promotions, seniority practices and selection techniques are reviewed annually by the General Manager and department heads and decisions are made based on performance without regard to race, color, religion, national origin or sex to assure equal opportunity and the absence of discriminatory effect. In promotion situations, all candidates are evaluated equally based on their qualifications and the requirements of the position. Outside candidates applying for positions with the Employment Unit are evaluated in the same manner. LIN's Vice President of Human Relations, in consultation with other members of the LIN management team, regularly reviews the company's pay rates, benefits, promotions, seniority practices and selection techniques independent of the General Manager's local review. The Stations have no union agreements.

Paragraph 3(i):

LIN is not a religious broadcaster; therefore this paragraph is not applicable.

Paragraph 4:

As described above, LIN received the audit letter from 54 Broadcasting, Inc.

Should any questions arise regarding this information, please contact the undersigned by telephone at 401-457-9525 or e-mail at Joshua.Pila@linmedia.com.

Respectfully submitted,

KXAN, Inc.

By: _____



Joshua N. Pila, Esq.

Regulatory Counsel and Assistant Secretary

Attachments