

Alaska Broadcasting Company, Inc. Anchorage, AK



April 24, 2009

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

Re: Requested Response Information Regarding 2009 EEO Audit

Please find attached information you requested from Alaska Broadcasting Company, Inc. regarding its EEO efforts for the two-year period beginning September 21, 2006 to September 20, 2008.

The attached material includes:

- FCC Response to previous EEO Audit covering the period: October 1, 2003 to September 30, 2005.
- Deficiencies and discrepancies noted in this review
- KTVA's web site address
- KTVA on-line EEO Report posting
- Number of full-time employees
- Anchorage, Alaska population
- Number of initiatives to be performed
- Summary of pending or resolved complaints regarding discrimination
- Description of management responsibility
- Description of unit's effort to analyze program and effectiveness
- Description of unit's efforts to examine discrimination in the areas of pay, promotion and other work benefits.

- EEO Report for September 21, 2006 – September 20, 2007
 - EEO Report containing total number of interviewees, number of interviewees and referral sources by vacancy.
 - Copies of all documents relating to full-time vacancies
 - Documentation of initiative performance

- EEO Report for September 21, 2007 – September 20, 2008
 - EEO Report containing total number of interviewees, number of interviewees and referral sources by vacancy.
 - Copies of all documents relating to full-time vacancies
 - Documentation of initiative performance

Thank you and please let me know if you have any questions.

Regards,

A handwritten signature in black ink, appearing to read 'Jerry Bever'.

Jerry Bever
Vice President / General Manager
Alaska Broadcasting Company, Inc. / KTVA-TV

Alaska Broadcasting Company, Inc.
Anchorage, AK



Discrepancies / Deficiencies Noted In This Review

The following discrepancies / deficiencies were noted in compiling this report:

For the period ending September 20, 2007

- For 3 positions, Alaska Broadcasting Company, Inc. listed in its annual EEO Report several additional EEO recruitment sources that it did not use for those positions. It did however use a previous EEO referral list to disseminate information regarding these vacant positions. Alaska Broadcasting expanded its EEO referral list in January 2007 and this list was used for the purposes of compiling the 2007 Report. The 3 positions noted were filled in November and December of 2006. The positions were Business Manager, Chief Editor and Sales Assistant.
- Alaska Broadcasting Company, Inc. did not retain copies of job vacancy notices that it sent to some sources.
- Alaska Broadcasting Company, Inc. did not retain backup documentation for several positions in which it used commercial vendors for vacancy announcements in addition to its distribution to normal EEO referral list and recruitment methods.
- Alaska Broadcasting Company, Inc. initially recruited for an Anchor/Managing Editor, but later changed the position title to Assistant News Director. While Alaska Broadcasting sent an original vacancy notice to its EEO referral list under the title of Anchor/Managing Editor, it neglected to update the listing when the title changed to Assistant News Director.

For the period ending September 20, 2008

- Alaska Broadcasting Company, Inc. has noted that there is some confusion from its EEO Referral List and email addresses (Ex: State of Alaska Division of Vocational Rehab; noted as Vocational Rehab on email addresses). There are also on-line partnerships such as the Anchorage Daily News / CareerBuilder.com that cause confusion. Alaska Broadcasting will reconcile its title procedures.
- Alaska Broadcasting Company, Inc. had 2 positions that were not posted on its website.
- Several discrepancies were noted with the Promotions Assistant vacancy. The annual EEO Report showed that AnchorageHelpWanted.com source produced 2 interviewees and 1 hire; this should have been attributed to Anchorage Daily News, with AnchorageHelpWanted.com producing no interviews or hires. The other discrepancy was that 4 sources reported utilized on the annual EEO Report were not actually used for this position. These sources were: UAA, MediaNews Group, Employee Referrals and Other referrals.

CO= N575131
 U= H079491

EQUAL EMPLOYMENT OPPORTUNITY
 2008 EMPLOYER INFORMATION REPORT
 INDIVIDUAL ESTABLISHMENT REPORT - TYPE 4

SECTION B - COMPANY IDENTIFICATION

1. MEDIA NEWS GROUP INC CONSOLIDATED
 101 W COLFAX
 SUITE 1100
 DENVER, CO 80202

SECTION C - TEST FOR FILING REQUIREMENT

2.a. ALASKA BROADCASTING COMPANY INC
 3330 ARTIC BOULVARDE STE 206
 ANCHORAGE, AK 99503

1-Y 2-Y 3-N DUNS NO.:

ANCHORAGE COUNTY
 c. Y

SECTION E - ESTABLISHMENT INFORMATION

NAICS: 511110 Newspaper Publishers

SECTION D - EMPLOYMENT DATA

JOB CATEGORIES	HISPANIC OR LATINO		NOT-HISPANIC OR LATINO										OVERALL TOTALS					
	MALE	FEMALE	***** MALE *****					***** FEMALE *****										
			WHITE	BLACK OR AFRICAN AMERICAN	NATIVE HAWAIIAN OR PACIFIC ISLANDER	ASIAN	AMERICAN INDIAN OR ALASKAN NATIVE	TWO OR MORE RACES	WHITE	BLACK OR AFRICAN AMERICAN	NATIVE HAWAIIAN OR PACIFIC ISLANDER	ASIAN		AMERICAN INDIAN OR ALASKAN NATIVE	TWO OR MORE RACES			
EXECUTIVE/SR OFFICIALS & MGRS	0	0	1	0	0	0	0	0	0	0	0	2	1	0	0	0	0	4
FIRST/MID OFFICIALS & MGRS	0	0	5	0	1	0	0	0	0	0	0	3	0	0	0	0	0	10
PROFESSIONALS	0	0	24	1	1	0	0	1	0	0	0	7	1	0	1	1	0	37
TECHNICIANS	0	0	1	0	0	0	0	2	0	0	0	1	0	0	0	0	0	4
SALES WORKERS	0	0	2	0	0	0	0	0	0	0	0	3	1	0	0	0	1	7
ADMINISTRATIVE SUPPORT	0	0	3	0	0	0	0	0	0	0	0	2	1	0	0	0	0	6
CRAFT WORKERS	0	0	2	0	0	0	1	0	0	0	0	2	0	0	0	0	0	6
OPERATIVES	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LABORERS & HELPERS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
SERVICE WORKERS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	0	0	38	1	2	1	1	4	0	0	0	20	4	0	1	1	2	74
PREVIOUS REPORT TOTAL	2	0	41	0	2	0	2	0	2	0	0	22	6	0	1	1	0	77

SECTION F - REMARKS

CO= N575131
 U= H079491

SECTION B - COMPANY IDENTIFICATION

1. MEDIA NEWS GROUP INC CONSOLIDATED
 101 W COLFAX
 SUITE 1100
 DENVER, CO 80202

INDIVIDUAL ESTABLISHMENT REPORT - TYPE 4

SECTION C - TEST FOR FILING REQUIREMENT

2.a. ALASKA BROADCASTING COMPANY INC
 1007 W 32ND AVE
 ANCHORAGE, AK 99503

1-N-2-Y 3-N DUNS NO.:

c. Y ANCHORAGE COUNTY

SECTION E - ESTABLISHMENT INFORMATION

NAICS: 511110 Newspaper Publishers

SECTION D - EMPLOYMENT DATA

JOB CATEGORIES	HISPANIC OR LATINO		NOT-HISPANIC OR LATINO										OVERALL TOTALS			
	MALE	FEMALE	WHITE	BLACK OR AFRICAN AMERICAN	NATIVE HAWAIIAN OR PACIFIC ISLANDER	ASIAN	AMERICAN INDIAN OR ALASKAN NATIVE	TWO OR MORE RACES	WHITE	BLACK OR AFRICAN AMERICAN	NATIVE HAWAIIAN OR PACIFIC ISLANDER	ASIAN		AMERICAN INDIAN OR ALASKAN NATIVE	TWO OR MORE RACES	
EXECUTIVE/SR OFFICIALS & MGRS	0	0	2	0	0	0	0	0	0	0	0	0	0	0	0	7
FIRST/MID OFFICIALS & MGRS	1	0	1	0	0	0	0	0	0	0	0	0	0	0	0	2
PROFESSIONALS	0	0	11	0	1	0	0	1	0	0	0	0	1	0	0	22
TECHNICIANS	0	0	3	0	0	0	0	0	0	0	0	0	0	0	0	3
SALES WORKERS	1	0	18	0	0	0	0	0	0	0	0	0	0	0	0	29
ADMINISTRATIVE SUPPORT	0	0	1	0	0	0	0	0	0	0	0	0	0	0	0	4
CRAFT WORKERS	0	0	4	0	1	0	0	0	0	0	0	0	0	0	0	7
OPERATIVES	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
LABORERS & HELPERS	0	0	1	0	0	0	0	1	0	0	0	0	0	0	0	3
SERVICE WORKERS	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
TOTAL	2	0	41	0	2	2	0	2	0	22	6	0	1	1	0	77
PREVIOUS REPORT TOTAL	2	0	37	0	0	0	0	2	0	22	5	0	3	1	0	72

SECTION F - REMARKS

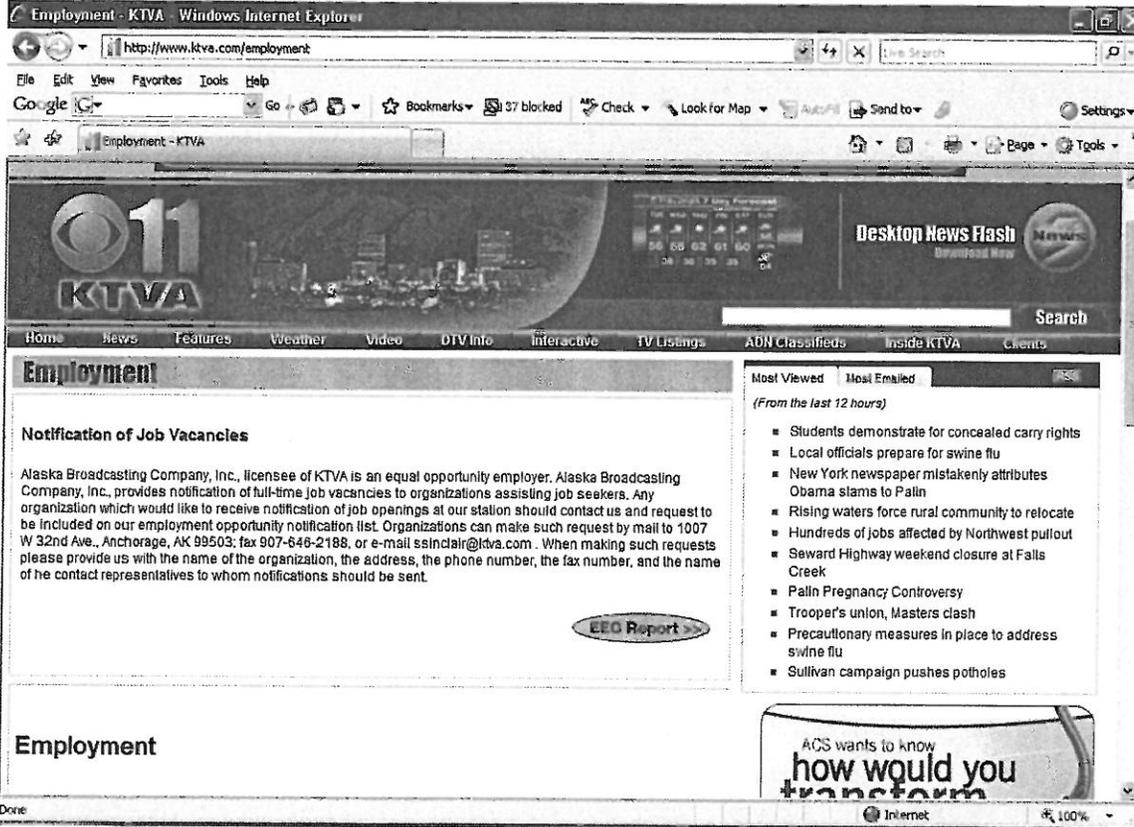
Alaska Broadcasting Company, Inc. Anchorage, AK



Other Requested Information

KTVA Website: www.ktva.com

KTVA maintains an employment section on their website where a link to the most current EEO Report can be found. (screenshot below)



Number of full time employees as of April 24, 2009 payroll: 65

The 2000 census population for the Anchorage Municipality, Alaska is 260,283.

EEO Regulations state that units with more than 10 full-time employees located in markets with a population of more than 250,000 must engage in at least 4 initiatives during each two-year period as outlined by the commission.

Stations in Anchorage with more than 10 full-time employees would need to engage in at least 4 initiatives during each two-year period.

Alaska Broadcasting Company, Inc. Anchorage, AK



Summary of Complaints

Alaska Broadcasting Company, Inc.
KTVA-TV

Since February 1997 Alaska Broadcasting Company, Inc. (f.k.a. Northern Television, Inc.) KTVA-TV has had two complaints filed against it. Attached are state agency responses to complaint inquiries conducted in February 2006. Since that time there have been no further complaints. Below is a description of these complaints.

Respondent's Name: Northern Television, Inc.
Complainant's Name: Daniel Heppard
Docket No: C-97-025
Status: Closed – December 28, 2000
Finding: Not Substantial Evidence

Description: Complainant alleged he was terminated because he had a disability. Subsequent investigation and testimony determined that there was not substantial evidence to support claim and that complainant was terminated for violation of work rules.

Respondent's Name: KTVA-TV
Complainant's Name: Annette R. Falwell
Docket No: C-00-192
Status: Closed – April 16, 2002
Finding: Not Substantial Evidence

Description: Complainant alleged she was subjected to different terms and conditions of employment and was laid off based on her race, her sex, her marital status, and upon a perceived physical disability. Subsequent investigation and testimony determined that there was not substantial evidence to support these claims and the case was dismissed. EEOC adopted the findings of the state agency.

STATE OF ALASKA

HUMAN RIGHTS COMMISSION

February 16, 2006

FRANK H. MURKOWSKI, GOVERNOR

800 A STREET, SUITE 204
ANCHORAGE, ALASKA 99501-3669
PHONE: (907) 274-4692 / 276-7474
TTY/TDD: (907) 276-3177
FAX: (907) 278-8588

VIA FAX: (907) 646-2166

Mr. Jerry Bever
Vice President/General Manager
Alaska Broadcasting Company, Inc.
1007 West 32nd Avenue
Anchorage, AK 99503

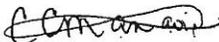
Re: **Audit of Northern Television, Inc.**

As per your request, I have researched the commission's records to determine how many complaints were filed and/or how many investigations were in process with this agency against Northern Television, Inc. from February 1997 to the present.

The following case is listed pursuant to this request:

Respondent's Name	:	Northern Television, Inc.
Complainant's Name	:	Daniel F. Happeard
Docket No.	:	C-97-025
Status	:	Closed – December 28, 2000
Finding	:	Not Substantial Evidence

Sincerely,


Corazon C. Manaois
Docket Officer

STATE OF ALASKA

HUMAN RIGHTS COMMISSION

FRANK H. MURKOWSKI, GOVERNOR

800 A STREET, SUITE 204
ANCHORAGE, ALASKA 99501-3669
PHONE: (907) 274-4692 / 276-7474
TTY/TDD: (907) 276-3177
FAX: (907) 278-8588

February 15, 2006

VIA FAX: (907) 646-2188

Mr. Jerry Bever
Vice President/General Manager
Alaska Broadcasting Company, Inc.
1007 West 32nd Avenue
Anchorage, AK 99503

Re: ***Audit of Northern Television, Inc., KTVA, and Alaska Broadcasting Company, Inc.***

As per your request, I have researched the commission's records to determine how many complaints were filed and/or how many investigations were in process with this agency against the companies below from February 1997 to the present. Please note that AS 18.80.115 prohibits the public release of parties' identities. I will need additional information regarding your company's affiliation with Northern Television, Inc., before I can respond to your request about that entity.

As for the remainder of your request, the following cases are listed:

- a.) Respondent's Name : KTVA – TV
Complainant's Name : Annette R. Falwell
Docket No. : C-00-192
Status : Closed – April 16, 2002
Finding : Not Substantial Evidence
- b.) Respondent's Name : Alaska Broadcasting Company, Inc.
There were no complaints filed or investigations in process with this agency.

Sincerely,



Corazon C. Manaois
Docket Officer

Alaska Broadcasting Company, Inc.
Anchorage, AK



Request: In accordance with Sec. 73.2080(b), from March 10, 2003 until the date of this letter, describe the responsibilities of each level of management to ensure enforcement of unit EEO policies and describe how the unit has informed employees and job applicants of its EEO policies and programs.

Response

General Manager

Oversight and ultimate responsibility of Alaska Broadcasting Company, Inc.'s EEO Program begins with the General Manager. The General Manager is responsible for ensuring that designated individuals within the company understand the EEO Regulations and understand their responsibility in fulfilling established EEO requirements.

Business Manager

Administrative and record keeping tasks are the responsibility of Alaska Broadcasting Company, Inc.'s Business Manager. The Business Manager is designated as the EEO Officer. The Business Manager is responsible for developing and executing the procedures needed to ensure compliance with the EEO Program. Tasks involved would include: Developing lists of community organizations, disseminating vacancy announcements, placing vacancy announcements, record keeping regarding placement, receiving and recording employment applications, retrieving and recording interview information, record keeping of interview information and construction of required reporting.

Department Heads / Supervisors

Front line Department Heads and Supervisors are responsible for adhering to the station's EEO Program, its policies and procedures. In addition, they are responsible for managing in such a manner as to promote a work environment free of discrimination in the areas of selection, hiring, promotion and termination.

Alaska Broadcasting Company, Inc. informs its employees and job applicants of its program and practice in several manners. It provides training to those station personnel responsible for the program as evidenced in its initiatives, it posts Federal EEOC posters within its workplace, it broadcasts an Equal Employment Opportunity announcement on-air and on-line, through its Employee Handbook and in its vacancy announcements.

Alaska Broadcasting Company, Inc.
Anchorage, AK



Request: In accordance with Sec. 73.2080(c)(3), from March 10, 2003 until the date of this letter, describe the unit's efforts to analyze its EEO recruitment program to ensure that it is effective and address any problems found as a result.

Response

Below is a list of Alaska Broadcasting Company, Inc.'s efforts for the period described above.

- General Manager reviews annual EEO reports.
- General Manager consistently examines management and staff composition for evidence of discriminatory practices.
- Due to personnel changes in the Business Manager position (assigned the tasks or position dissemination and record keeping) beginning in 2006, General Manager maintained the EEO process for the station for the period September 21, 2006 through September 20, 2007. Beginning with the period September 21, 2007, General Manager reviewed complete recruitment, FCC Regulation and record-keeping processes with new Business Manager Susan Sinclair as part of assigning job vacancy notice dissemination and record-keeping tasks to the position of Business Manager.
- During this review the EEO Referral List was expanded and a Job Opening Check List was designed and placed into the process (attached).

JOB OPENING CHECK LIST

Position: _____

Contact Info - address, email, website

EOE in ad

Expiration date in ad

Ads placed with:

Date placed

By request:

_____ www.poynter.org user id: ssinclair@ktva.com pw: cbs11
Boxwood - invoice \$50 - 30 days

_____ www.cyberjournalist.net Jobamatic - Amex \$10 - 45 days

_____ <http://jobs.uloop.com/?mc> Uloop.com (not set up yet)

_____ www.tvspy.com user id: ktva pw: cbs11
Vault - invoice \$150 - 14 days

_____ AnchorageHelpWanted.com Jennifer Darby 800-365-8630 x566
Andrew 800-365-8630 x474 call with questions
User id: ssinclair@ktva.com PW: cbs11 \$240 - 30 days

Fulltime positions only:

_____ Anchorage Daily News - Trisha 257-4284
email ad copy; ask for ad verification by email \$144.32 - 7 days

All positions:

_____ Job Opening email distribution list. Listing expires _____

_____ Craigslist User id: ssinclair@ktva.com PW: ktvachannel11

_____ tvjobs.com User id: ssinclair PW: cbs11ktva

_____ medianewsgroup.com

_____ UAA Career user id: ssinclair@ktva.com pw: mngAdmin
User id: jbever@ktva.com PW: tofkanese

_____ email to Cyd - post on bulletin board

_____ email to Hutch (Carl White) - post on website

Full Time positions only

_____ proof of ads placed

_____ resumes

_____ list of individuals interviewed
referral source hired? yes or no

Alaska Broadcasting Company, Inc.
Anchorage, AK



Request: In accordance with Sec. 73.2080(c)(3), from March 10, 2003 until the date of this letter, describe the unit's efforts to analyze periodically measures taken to examine pay, benefits, seniority practices, promotions, and selections techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the unit has a union agreement, describe how the unit cooperates with the union(s) to ensure EEO policies are followed for the unit's union-member employees and job applicants.

Response

Alaska Broadcasting Company, Inc. constantly analyzes its pay, benefits and other associated elements in three manners:

1. All employee benefits are administered per the published Employee Handbook. (included)
2. All pay adjustments and promotions require a Personnel Action form, which the General Manager must authorize before becoming effective. (attached)
3. All annual budgeting for personnel wages and compensation are personally reviewed and approved by the General Manager.

Alaska Broadcasting Company, Inc. does not have any union representation or agreements in its work environment.

Alaska Broadcasting Company, Inc.

: Effective Date: 02-01-99
:
: Revision Date: 02-01-99
:

103 EQUAL EMPLOYMENT OPPORTUNITY

In order to provide equal employment and advancement opportunities to all individuals, employment decisions at ALASKA BROADCASTING COMPANY, INC. will be based on merit, qualifications, and abilities. ALASKA BROADCASTING COMPANY, INC. does not discriminate in employment opportunities or practices on the basis of race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law.

This policy governs all aspects of employment, including selection, job assignment, compensation, discipline, termination, and access to benefits and training.

Any employees with questions or concerns about any type of discrimination or reasonable accommodations in the workplace are encouraged to bring these issues to the attention of their immediate supervisor or the General Manager/Vice President. Employees can raise concerns and make reports without fear of reprisal. Anyone found to be engaging in any type of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

ALASKA BROADCASTING COMPANY, INC.

Personnel Action/Information

Employee Last Name _____ First _____ M.I. _____

SECTION 1	PERSONNEL ACTION	Effective Date		
<input type="checkbox"/> New Hire	<input type="checkbox"/> Termination	<input type="checkbox"/> Salary Change	<input type="checkbox"/> Position Change	<input type="checkbox"/> Status Change
Employment Status	____ Regular	____ Temporary	____ Full Time	____ Part Time
(Check two boxes)				
If status change, note previous employment status _____				
Position Title	_____	Previous Title	_____	
Department	_____	Previous Department	_____	
Salary	_____ per _____	Previous Salary	_____ per _____	
Work Hours	_____ per week	Previous Work Hours	_____ per week	
Comments _____				
Employee Signature _____				Date _____
Supervisor Signature _____				Date _____
Station Manager Approval _____				Date _____

SECTION 2	PERSONAL INFORMATION		
Check appropriate	____ NEW HIRE	____ UPDATE/CHANGE	Date of Change _____
Last Name	_____	First Name	_____ M.I. _____
Home Phone	_____	SSN	_____ D.O.B. _____
Residence	_____	Mailing	_____
Address	_____	Address	_____
EMERGENCY CONTACT:			
Name	_____	Relationship	_____
Address _____			
Home Phone	_____	Work phone	_____
Employee Signature _____		Date _____	