Federal Communications Commission
Washington, D.C. 20554

March 23, 2009

General Manager/ KTVA-TV ID 49632/Anchorage Alaska
Alaska Broadcasting Company Inc.
1007 W. 32nd Avenue
Anchorage, Alaska 99503

Dear Licensee:

1. In accordance with the provisions of 47 C.F.R. § 73.2080(f)(4) of the Commission's Equal Employment Opportunity ("EEO") rules, the station employment unit (the "Unit") that includes your above-referenced station (the "Station") has been randomly selected for an audit of its EEO program. (A copy of Section 73.2080 of the Commission's rules is enclosed for your reference.)

2. If the Unit is not required under our rules to have an EEO recruitment program due to the size of its full-time workforce (having fewer than five full-time employees, defined as employees regularly assigned to work 30 hours a week or more), you must still respond to this audit letter. However, in your response, you must provide only a list of the Unit's full-time employees, noted by job title and the number of hours each is regularly assigned to work per week, and a response to Question 3(e) below. Also, in formulating your response, please see Questions 4(a) and (b) below regarding brokers and brokered stations, for instructions in situations in which the applicable employment unit has fewer than five full-time employees.

3. **Audit Data Requested.** If the Unit employs five or more full-time employees, provide the following information in your response to this letter, including an explanation regarding any requested information that you are unable to provide:

(a) The Unit's two most recent EEO public file reports, described in 47 C.F.R. § 73.2080(c)(6). For any stations in the Unit that have websites, provide each web address. If the Unit's most recent EEO public file report is not included on or linked to each of these websites, in violation of that subsection, indicate each station involved and provide an explanation of why the report is not so posted or linked. In accordance with 47 C.F.R. § 73.2080(c)(5)(vi), provide the date of each full-time hire listed in each report.

(b) For each Unit full-time position filled during the period covered by the above EEO public file reports, or since your acquisition of the Station, if after that period, dated copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing the position, as described in 47 C.F.R. § 73.2080(c)(5)(iii). Include copies of all job announcements sent to any organization (identified separately from other sources) that has notified the Unit that it wants to be notified of Unit job openings, as described in 47 C.F.R. § 73.2080(c)(1)(ii).

(c) In accordance with 47 C.F.R. § 73.2080(c)(5)(v), the total number of interviewees for each vacancy and the referral source for each interviewee for all full-time Unit vacancies filled during the period covered by the above-noted EEO public file reports.

(d) Documentation demonstrating performance of Unit recruitment initiatives described in 47 C.F.R. § 73.2080(c)(2) during the periods covered by the above-noted EEO public file reports, such as

participation at job fairs, mentoring programs, and training for staff. Specify the Unit personnel involved in each such recruitment initiative. Also, provide the total number of full-time employees of the Unit and state whether the population of the market in which the stations included in the Unit operate is 250,000 or more. Based upon these two factors, determine and state whether the Unit is required to perform two or four initiatives within a two-year period, pursuant to 47 C.F.R. §§ 73.2080(c)(2) and (e)(3).

(e) Disclose any pending or resolved complaints involving the Station filed during the Station'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 Unit on the basis of race, color, religion, national origin, or sex. For each such complaint, provide: (1) a brief description of the allegations and issues involved; (2) the complainant and other persons involved; (3) the date of the complaint's filing; (4) the court or agency before which it is pending or was resolved; (5) the file or case number; and (6) the disposition and date thereof or current status. Note that all complaints must be reported, regardless of their status or disposition.

(f) In accordance with 47 C.F.R. § 73.2080(b), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the responsibilities of each level of Unit management to ensure enforcement of Unit EEO policies and describe how the Unit has informed employees and job applicants of its EEO policies and program.

(g) In accordance with 47 C.F.R. § 73.2080(c)(3), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) 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 of such analysis.

(h) In accordance with 47 C.F.R. § 73.2080(c)(4), for the period from March 10, 2003 (or from the first day of the Station's current license term, if after that date) until the date of this letter, describe the Unit's efforts to analyze periodically its measures taken to examine pay, benefits, seniority practices, promotions, and selection techniques and tests to ensure that they provide equal opportunity and do not have a discriminatory effect, and if the Unit has one or more union agreements, describe how the Unit cooperates with each union to ensure EEO policies are followed for the Unit's union-member employees and job applicants.

(i) If your entity is a religious broadcaster and any of its full-time employees are subject to a religious qualification as described in 47 C.F.R. § 73.2080(a) of the rules, so indicate in your response to this letter and provide data as applicable to the Unit's EEO program. For example, for full-time hires subject to a religious qualification, only a record of the hire listed by job title and date filled, the recruitment sources used for the opening, and the source of the hiree must be maintained. No other records would be required for those hires. If five or more full-time positions are not subject to a religious qualification, the licensee must maintain all records for such hires and complete the initiatives required under 47 C.F.R. § 73.2080(c)(2). Otherwise, a religious broadcaster is not required to perform these initiatives.

4. **Time Brokerage.**

(a) **Brokered station(s).** If the Unit employs fewer than five full-time employees and any station included in it is subject to a time brokerage agreement, in addition to responding to this letter and providing us a list of the Unit's full-time employees listed by job title (and the number of hours each employee is assigned to work) and a response to question 3(e) above, you must immediately forward a copy of this letter to the broker under each such agreement, which must also respond to Question 4(b) below.

(b) **Brokers.** The broker of any Unit station referenced above must supply the Commission with the information requested herein regarding **the broker's** full-time employees who work at each such brokered station. If this letter is addressed to you requesting data about a station licensed to you, and you also broker a station in another employment unit, you must send us the information requested herein for each of your stations and your full-time employees at each brokered employment unit, if the recruitment data for any such brokered unit is included with that for your own station referenced above. *See* 47 C.F.R. § 73.2080(f)(3). If your employees at your own station(s), combined with your employees at the station(s) you are brokering, total fewer than five full-time employees, however, you need not provide such information. Instead, you must respond to this letter by the deadline described below by providing us with a list of your station unit's full-time employees (listed by job title and number of hours regularly assigned to work per week) and the same type of list for the full-time employees you employ at the brokered station(s), and a response to Question 3(e) above

5. **Procedures.** All responses must be filed with the Commission by May 4, 2009. Extensions of time will be granted only upon a showing of extraordinary circumstances. The response must be in the form of a statement signed by an officer, partner or other principal of the Station licensee or broker or, in the case of a noncommercial educational station, by an officer, member or other principal of the licensee. Send the response to EEO Staff, Policy Division, Media Bureau, Federal Communications Commission, 445 12th Street, S.W., Washington, DC 20554. To knowingly and willfully make any false statement or conceal any material fact in response to this audit is punishable by fine or imprisonment (*see* 18 U.S.C. § 1001; *see also* 47 C.F.R. § 1.17), revocation of any station license or construction permit (47 U.S.C. § 312(a)(1)), and/or forfeiture (47 U.S.C. § 503). Failure to respond to this audit letter by the deadline is also punishable by sanctions in accordance with 47 C.F.R. § 73.2080(g).

6. In accordance with 47 C.F.R. § 73.3526(e)(10) (for commercial stations) and 47 C.F.R. § 73.3527(e)(11) (for noncommercial educational stations), copies of which are also enclosed, you are required to place a copy of this letter and your response in the public inspection file of each affected station. Consequently, your response should not include personal information about individuals, such as social security numbers, home addresses, or other personally identifiable information. We do not require that employment units retain such information in their records, or that such information be provided in response to this letter.

7. If our EEO random audits sent in 2007 or 2008 included the Station, or if the Station's most recent license renewal application was granted, by final order, within the past 18 months, you may not have to provide a response to this letter. If you believe that the Station falls within one of these categories, before responding to this letter, please so state in an e-mail, providing the specifics of the audit or renewal, sent to the undersigned at lewis.pulley@fcc.gov. Upon receipt of this information, we will advise you if a response is necessary under the circumstances. Should you have any questions regarding this matter, please contact the EEO Staff at (202) 418-1450. Thank you for your cooperation.

Sincerely,

Lewis C. Pulley
Assistant Chief, Policy Division
Media Bureau

Enclosures