



Eagle Radio EEO Compliance Report

June 1, 2009

A PRIMER ON

EEO COMPLIANCE



ATTACHMENT A
(EEO PUBLIC FILE REPORT)

EEO PUBLIC FILE REPORT

For the 12-month Period Ending May 31, 2009

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	Hancock, 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>
1. Account Executive/Sales FT	06-01-2009	12-22-08
2. Account Executive/Sales FT	06-01-2009	01-12-09
3. Account Executive/Telemarketer	07-16-08	Not filled
4. On-Air Announcer	07-23-08	Not filled
5. Sales Manager	08-12-08	Not filled
6. Board Operator FT	08-12-08	09-15-08
7. Board Operator FT	11-04-08	Not filled
8. General Manager FT	04-22-09	Intvs sched 6-4-09

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	Pauline Spruce Personnel Director	906-353-6623
2.	Tribal Employment Rights Office	16429 Beartown Road Baraga, MI 49908	Robin Chosa TERO Director	906-353-6623
3.	Michigan Works	Houghton, MI 49931	Gerry Michaelson	906-482-6916
4.	Michigan Works	Marquette, MI 49855		906-228-3075
5.	Eagle Radio	805B US 41 S. Baraga, MI 49908	Todd Overbeek Interim General Manager	906-353-9287
6.	L'Anse Sentinel	202 N. Main L'Anse, MI 49946	Joe Schutte 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	Thomas Chosa IT Manager	906-353-6623
10.	Michigan Association Of Broadcasters	819 N. Washington Ave Lansing, MI 48906	mab@michmab.com	517-484-7444
11.	Ohio Center for Broadcasting	9000 Sweet Valley Drive Cleveland, OH 44125	Dan Smith	216-447-9117

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

<u>Job Title</u>	<u>Recruitment Source</u>
1. Account Executive/Sales FT	Eagle Radio / KBIC
2. Account Executive/Sales FT	Eagle Radio / KBIC
4. On-Air Announcer FT	Eagle Radio / KBIC
5. General Manager FT	Intvs sched 6-4-09

D. During the previous 12 months, there were a total of 10 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>
1.	Eagle Radio	3 (On-Air Announcer)
2.	Eagle Radio/KBIC/MI Works	4 (Board Operator)
3.	Mining Gazette/Eagle Radio/ KBIC/MI Works	3 (Account Executive/Sales)

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 11 referral sources listed in Section B of this report. Position announcements also distributed to representatives and/or career offices of 8 colleges, and 23 Tribal/Inter-Tribal organizations.

- Prong 2 Michigan Works, Tribal Employment Rights Office, local college Career Development offices, see item #1.

- Prong 3 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/On Air Announcer, Sales Manager, Board Operator, Account Executive/Sales, Account Executive/Telemarketer, General Manager, Registered Nurses, Licensed Practical Nurses, Public Health Nurse/Case Manager, Summer College Interns, Census Worker recruitment, Youth Programs & Facility Attendant, Cleaning Person, Receptionist/Clerical Worker. (menu item 6)

Hosted local Cub Scouts, who toured the station and were given information about the way radio stations work, and what kind of careers are available. (menu item 6)

"Keep It In The U.P." program on WGLI hosted Eric Smith from Northern Michigan University, who discussed the broadcasting program at NMU, and career paths in broadcasting. Audio from the program was also posted on our website. (menu item 6)

Our membership in the Michigan Association of Broadcasters supports their job bank, and the information they disseminate about careers in broadcasting. Our job postings were listed on the MAB job bank. (menu item 6i)

Interim General Manager serves as Alumni Advisory Board for the School of Broadcasting at Central Michigan University, and participated in a mentorship program and a career guidance seminar for students. (menu item 6)

Supports and accepts interested youth participating in the KBIC Summer College Student Intern Program and Summer Youth Employment Program, to learn skills of the radio business and broadcasting. (menu items 5 & 9)

Name of Respondent: Pauline Knapp Spruce

Signed:



Typed Name: Pauline Knapp Spruce

Title: Personnel Director, Keweenaw Bay Indian Community

Date: 6-1-2009

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.

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: 6-1-08 to 5-31-09

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Account Executive/Sales FCC Job Category _____

Person Hired LP Date Hired 12-22-08

Referral Source Eagle Radio

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

1. JL Referral Source UNK

2. IH Referral Source Eagle Radio

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 ;

L'Anse Sentinel ; Mining Gazette ; List of 42 recruitment sources.

HIRINGS FORM

Date: 6-1-08 thru 5-31-09

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title Account Executive/Sales FCC Job Category _____

Person Hired IH Date Hired 1-12-09

Referral Source Eagle Radio

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

1. JL Referral Source UNK

2. LP Referral Source Eagle Radio

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 ;

L'Anse Sentinel ; Mining Gazette ; List of 42 recruitment sources.

HIRINGS FORM

Date: 7-16-08 thru 7-30-08

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title On-Air Announcer FCC Job Category _____

Person Hired MP Date Hired 9-15-08

Referral Source Eagle Radio

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

- 1. DH Referral Source MI Works
- 2. JR Referral Source Eagle Radio
- 3. SK Referral Source Family
- 4. TS Referral Source UNK
- 5. MP Referral Source Eagle Radio
- 6. JM Referral Source UNK
- 7. SB Referral Source MI Works
- 8. RN Referral Source Family
- 9. KN Referral Source UNK
- 10. CC Referral Source Eagle Radio
- 11. _____ Referral Source _____
- 12. _____ Referral Source _____
- 13. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ;
L'Anse Sentinel ; Mining Gazette ; List of 42 recruitment sources.

HIRINGS FORM

Date: 4-22-09 thru 5-15-09

Circle Appropriate Response: Hiring Full-Time Part-Time

Job Title General Manager FCC Job Category _____

Person Hired N/A Date Hired Interviews sched 6-4-09*

Referral Source N/A

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

- 1. JM * Referral Source Internet posting
- 2. HD * Referral Source UNK
- 3. KE * Referral Source Newspaper
- 4. DS * Referral Source KBIC
- 5. DP Referral Source Website
- 6. SK Referral Source Classified Ad
- 7. MB Referral Source UNK
- 8. LJ Referral Source UNK
- 9. VS Referral Source UNK
- 10. GK Referral Source UNK
- 11. _____ Referral Source _____
- 12. _____ Referral Source _____
- 13. _____ Referral Source _____

Other Referral Sources Contacted TERO ; KBIC Website ;

L'Anse Sentinel ; Mining Gazette ; List of 42 recruitment sources.

ATTACHMENT D
(APPLICANT INTERVIEWS)

APPLICANT INTERVIEWS

<u>Position</u>	<u>Name of Applicant</u>	<u>Date Job Posted</u>	<u>Responded/ Interviewed</u>	<u>Referral Source</u>	<u>Disposition</u>
Account Executive/ Sales	LP JL IH SP BJ	6-1-08 Intv Intv Intv No Intv No Intv	5 / 3	Eagle Radio UNK Eagle Radio	Hired No hired Hired No hire No hire
On-Air Announcer	MP DH JR SK TS MP JM SB RN KN CC	7-16-08 Intv Intv Intv No Intv No Intv No Intv No Intv No Intv No Intv No Intv No Intv	7 / 3	Eagle Radio MI Works ER Family UNK Eagle Radio UNK MI Works Family UNK Eagle Radio	Hired No hire No hire No hire No hire No hire No hire No hire No hire No hire No hire
Board Operator	MP BB CB AS CN	2-19-09 Intv Intv Intv Intv No Intv	5 / 4	Eagle Radio Eagle Radio KBIC Eagle Radio	Position not filled

ATTACHMENT E
(NEW HIRE REPORT)

NEW HIRE EEO REPORT

Person Hired: LP

Date: 12-22-08 Position: Account Executive/Sales

Status: Active Full-Time: X Part-Time:

Date Job Posted 6-1-08

Applicants Interviewed:

Total Number: 3

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

Newspaper (Specify)

X Recruitment Organizations (Specify) Eagle Radio

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

CP Personal reference/former co-worker

BJ Former co-worker/friend

Prepared By: PKS Date: 12-17-08

Reviewed By: PKS Date: 12-17-08

NEW HIRE EEO REPORT

Person Hired: MP

Date: 9-15-08 Position: On-Air Announcer

Status: Active Full-Time: X Part-Time: _____

Date Job Posted 7-23-08

Applicants Interviewed:

Total Number: 3

CHECK AND LIST RECRUITMENT SOURCES USED FOR THIS POSITION

 Newspaper (Specify) _____

 X Recruitment Organizations (Specify) Eagle Radio

 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

CG Former Supervisor/GM WJMS/WIMI

Prepared By: PKS

Date: 8-18-08

Reviewed By: PKS

Date: 8-18-08

**ATTACHMENT F
(LIST OF RECRUITMENT SOURCES)**

LIST OF RECRUITMENT SOURCES

Date list last reviewed: 8-26-08

Joe Schutte		
Ray Gronveldt	524-6197	L'Anse Sentinel
Gerry Michaelson	1-906-483-2219	Mining Gazette
MQT MI Works	1-906-482-5711	Michigan Works
Joe Drozd	1-906-228-4372	Michigan Works
April Lindala	1-906-228-3273	Mining Journal
Bad River Tribe	1-906-227-1714	Northern MI Univ
Bay de Noc Community College	1-715-682-7118	Human Resources
Bay de Noc Community College	1-906-786-6555	Irene White
Bay Mills Indian Community	1-906-786-8515	Employment Services
Forest County Potawatomi	1-906-284-3876	Human Resources
Finlandia University	1-715-478-7215	Human Resources
GLIFWC	1-906-487-7567	Career Services
Grand Traverse Band	1-715-682-9294	Main Office
Gun Lake Tribe	1-231-534-7715	Human Resources
Hannahville Government	1-616-681-8836	Human Resources
Ho-Chuck Nation	1-906-466-0307	Human Resources
Inter-Tribal Council	1-715-284-9465	Human Resources
Lac Courte Oreilles Tribe	1-906-635-3541	Human Resources
Lac du Flambeau Tribe	1-715-634-4797	Human Resources
Lac Vieux Desert	1-715-588-7930	Human Resources
Lake Superior State University	1-906-358-9858	Human Resources
Lake Superior State University	1-906-635-2111	Career Services
Little River Band of Ottawa	1-906-635-7564	University
Little Traverse Bay	1-231-398-9680	Paul Fenion
Lori Muhlig	1-231-242-1565	Human Resources
NMU Center Native American Studies	1-906-487-3101	Human Resources
Michigan Tech. University	1-906-227-1396	NA Outreach Coord
Michigan Tech Univ Career Ctr	1-906-487-3220	NMU-Ctr Native Studies
MICWA	1-906-487-3317	Career Center
Northern Michigan University	1-517-393-0838	Jobs Area
Nottawaseppi Huron Potawatomi	1-906-227-2807	Job Search Center
Oneida Career Center	1-269-729-5920	Human Resources
Pokagon Band of Potawatomi	1-920-496-7879	Career Center
Sault Tribe	1-269-782-6882	Human Resources
Sag Chips	1-906-635-4918	Human Resources
Sokaogan Chippewa Tribe	1-989-775-5601	Human Resources
St. Croix Tribe	1-715-478-5275	Human Resources
Stockbridge Munsee Tribe	1-715-349-7483	Human Resources
	1-715-793-4380	Human Resources
Broadcasting Only		
Ohio Center for Broadcasting	1-303-973-0386	
Michigan Ass'n of Broadcasters	www.MichMAB.com	Dan Smith
Media Line	www.MediaLine.com	
		Mark Shilstone
		mark@medialine.com
		Shelly Maki
		smaki@specshoward.edu

Updated 8-26-08 (Attachment F)

ATTACHMENT H
(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 **Todd Overbeek, Interim General Manager** and **Pauline Knapp Spruce, Personnel Director**.

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 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.