

2021-2022 EEO Public File for Keystone Broadcasting, Inc.

The purpose of this EEO Public File Report (Annual EEO Report) is to comply with section 73.2080(c)(6) of the FCC's Equal Employment Rules.

This Annual EEO Report summarizes the relevant hiring and EEO outreach conducted by the following stations, which collectively form a single station employment group or unit for EEO Rules. This EEO Public File report is filed in Stations KICM FM, KHKC FM, KZRC FM, KZIG FM operating under the company of Keystone Broadcasting Inc, public inspection file pursuant to Section 73.2080©(6) of the Federal Communications Commission's ("FCC") rules.

This report prepared by Bill Countryman and placed into the Public File on February 1st, 2022. During the twelve month period beginning February 1, 2021 and ending on January 31, 2022.

Keystone Broadcasting Company filled the following full-time vacancies.

- A list of all full-time vacancies filled by the Station(s) during the Applicable time period.
NONE •

For each vacancy, the recruitment source utilized to fill the vacancy including any sources that have asked to receive information from the stations about any possible job openings. NONE •

The Recruitment source that referred the Hiree for each full-time vacancy filled during the applicable period. NONE •

Total data of applications received and or total number of persons interviewed during the period for full-time vacancies. NONE •

A list of the community outreach activities not directly connected to or related to the job openings or positions available, contacted by the stations during the applicable period.

EEO 2021-

(0) Full Time Account Executive hired

(0) Fulltime On-Air hired

Following are recruitment sources / posting locations:

Recruitment Source Address/Contact/Tele.

Total of applications received (4)

American Broadcasting School: (1)
4511 SE 29th St, Oklahoma City, OK 73115
Phone:(405) 672-6511, dc@radioschool.com

East Central University (0)
Chris Shofner cshofner@ecok.edu

Southeastern OK University (1)
Kay Barber
1405 N 4th Ave, Durant, OK 74701
Station A, Durant, OK 74701 (580) 745-2000

Career Builder careerbuilder.com (0)

Cameron University (0)
Jacob Johnson, student_development@cameron.edu
Career Services / Jobs posting

Oklahoma Assoc. of Broadcasters (1)
6520 N. Western, #104 Oklahoma City, OK 73116
Nancy Struby 405-858-0771

Workforce Oklahoma (0)
P.O. Box 1467, Ardmore, OK 73402 0 580-223-3291,

Murray State College (0)
Murray Campus, Tishomingo, OK

Northeastern State (0)
Anderson@nsuok.edu

First Baptist Church (1)
225 1st Ave. SW, Ardmore, OK 73401

Rodgers State Univ. (0)
Kim Lopez, hirehillcats@rsu.edu

ALL ACCESS [HTTP://WWW.ALLACCESS.COM](http://www.allaccess.com)

BEYOND.COM [HTTP://WWW.BEYOND.COM](http://www.beyond.com)

GLASSDOOR.COM [HTTPS://WWW.GLASSDOOR.COM](https://www.glassdoor.com)

INDEED.COM [HTTPS://WWW.INDEED.COM](https://www.indeed.com)

LINKEDIN [HTTPS://LINKEDIN.COM](https://linkedin.com)

YEARLY RECRUITMENT INITIATIVES

1. Internship

Keystone Broadcasting-KICM 97.7 FM participated in the Chickasaw Nation Student Work Internship Training program August 2021 through December 2021. KICM 97.7 FM “hosted” Deon Knight at the KICM 97.7 FM location. Deon Knight interned for 5-months at KICM 97.7 FM. Deon learned day to day radio commercial recordings, Adobe Audition functions and operations, how to voice and produce commercials, and how to record audio segments LIVE over the air. Deon also answered incoming phone calls, assisted with giving out prizes to listeners, and assisted the Traffic / Billing Dept with monthly billing duties.

Mignon Grisham

Career Counselor

The Chickasaw Nation

School-to-Work Program

2341 N. Commerce Suite B, Ardmore, OK 73401

Office: 580-222-2839

Cell: 580-220-0337

2. Job Fair

Keystone Broadcasting’s Bill Countryman participated in a One-day Job Fair hosted by Ardmore high School in April 2021. There were 26 students in attendance. Bill Countryman was the Keystone Broadcasting HR contact staff involved.

Josh Newby

Ardmore High School

580/221-3052

EEO Statement:

Keystone Broadcasting is always attempting to improve our recruitment measures in our efforts to recruit, and hire and promote current employees and staff by identifying and evaluating any issues while abiding by EEO rules and guidelines.

- All new employees or potential prospects are notified of EEO Rules.
- We are a small radio broadcasting company / unit. But review and monitor pay for all employees to ensure they are fair and equal. Review pay rates and fringe benefits having the

same duties, and eliminate any inequities based upon race, national origin, color, religion, age, or sex.

- Review to ensure that all job postings will contain non-indication either explicit or implicit of a preference for one race, national origin, color, religion, age, or sex discrimination.
- Annual training, job postings, reviews performed by Bill Countryman

EEO POLICY-Keystone Broadcasting EEO narrative

General Policy procedures-It is Keystone Broadcasting's policy to promote equal employment opportunities through a positive and continuing program of specific practices designed to ensure the full realization of equal employment opportunity regardless of race, color, religion, national origin, and sex.

It is Keystone Broadcasting's policy to communicate our equal employment policy and employment needs to sources of qualified applicants, without regard to race, color, religion, national origin, age, or sex and to solicit their recruitment assistance on a continuing basis.

It is our policy to conduct a continuing program to exclude all unlawful forms of prejudice or discrimination based upon race, color, religion, national origin, age or sex from our personnel policies and practices and working conditions. To make this policy effective and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements-

Responsibility for Implementation - Bill Countryman, General Manager, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policies and programs are adhered to and that no person is discriminated against in employment based upon race, color, religion, national origin, age or sex. It is our policy to ensure a positive application, managerial, and supervisory performance in the administration of our equal employment opportunity policies.

Policy Dissemination-It is our policy to disseminate our equal employment opportunity policies to job applicants, employees, and those with whom we regularly do business with to assure compliance with this requirement, Keystone Broadcasting:

- 1) Post notices in our offices informing employees and applicants for employment, of their equal employment opportunity rights, that we are an equal employment opportunity employer: that discrimination based upon race, color, religion, national origin, age or sex is

prohibited: and that they have the right to notify an appropriate local, State or Federal agency if they believe they have been discriminated against:

- 2) Place a notice in bold type on our employment application informing prospective employees that discrimination based upon race, color, religion, national origin, age or sex is prohibited and that they may notify an appropriate local, State or Federal agency if they believe they have been discriminated against.

Recruitment-It is policy to conduct a meaningful program of recruitment involving broad outreach in recruitment to all qualified job candidates. To assure compliance with this requirement, Keystone Broadcasting

- 1) Widely disseminates information about each full-time job opening in our company operation to recruitment sources for the purposes of obtaining referrals for the available position and otherwise comply with FCC requirements applicable to the recruitment / outreach process
- 2) Communicate to recruitment sources that we are an EEO employer:
- 3) Analyze Keystone Broadcasting's recruitment program on an ongoing basis to ensure that it is effective in achieving broad outreach to potential applicants, and address any problems found as a result of our analysis.

Promotion and Advancement-It is our policy to offer promotions of employees in a nondiscriminatory fashion without regard to race, color, religion, national origin, age or sex to positions of greater responsibility. To assure compliance with this requirement, Keystone Broadcasting

- 1) Instruct those who make decisions on placement and promotion that all employees are to be considered without discrimination, and that there should be ongoing review to ensure compliance with this requirement:
- 2) Give all employees equal opportunity for positions which lead to higher positions. Inquire as to the interests and skills of lower-paid employees with respect to any of the higher paid positions, following by assistance, counseling, and effective measures to enable employees with interest and potential to qualify themselves for such positions:
- 3) Provide opportunity to perform overtime work on a nondiscriminatory basis.
- 4) Analysis of Equal Employment Opportunity Efforts
- 5) It is our policy to analyze the results of the measures undertaken by us to recruit, hire, and promote individuals and to identify and evaluate any difficulties encountered in implementing our equal employment opportunity program with the goal of improving our program to the extent necessary. To assure compliance with this requirement, we periodically analyze measures taken to:
 - 6) 1. Disseminate the station's equal employment opportunity program to job applicants and employees;
 - 7) 2. Review seniority practices to ensure that such practices are nondiscriminatory;

- 8) 3. Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, national origin, color, religion, age, or sex discrimination;
- 9) 4. Utilize media for recruitment purposes in a manner that will contain non indication, either explicit or implicit, of a preference for one race, national origin, color, religion, age, or sex discrimination;
- 10) 5. Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;
- 11) 6. Where union agreements exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of race, national origin, color, religion, age, or sex, and include an effective nondiscrimination clause in new or renegotiated union agreements; and
- 12) 7. Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, national origin, color, religion, age, or sex.