## Permian Basin Public Telecommunications, Inc. P.O. Box 8940 Midland, TX 79708

March \_\_\_\_, 2020

- To: KPBT-TV FCC Online Public File
- Re: EEO Audit Response for Permian Basin Telecommunications, Inc. Station KPBT-TV, Odessa, TX Facility ID 50044

Below are the FCC requested EEO Audit data for KPBT-TV as required in the letter dated February 6, 2020 from Mr. Lewis C. Pulley, Assistant Chief, Investigations & Hearings Division, Enforcement Bureau, of the Federal Communications Commission.

3(a) and 3(b)

The link to the station's website is: <u>https://www.basinpbs.org/</u>, and the link on the website to the most recent Annual EEO report is: <u>https://www.basinpbs.org/about/publicdocuments/</u>. For the most recent EEO Annual Public File reports, see attached Exhibit A - KPBT Annual EEO Reports 2017-2018 and 2018-2019.

Full-Time Position	Date of Hire	Sources that Received	Exhibit with
		Job Announcements	Attached Ad Copies
Administrative	June 5, 2017	Non-Profit Mgmt Center	Exhibit B -
Assistant		Website (nmc-	Administrative
		pb.org/areajobs)	Assistant Ads June
			2017
Administrative	August 27, 2018	Non Profit Mgmt Center	Exhibit C -
Assistant		Website (nmc-	Administrative
		pb.org/areajobs)	Assistant Ads August
			2018
Corporate	January 7, 2019	Non Profit Mgmt Center	Exhibit D - Corporate
Underwriter		Website (nmc-	Underwriter Ads
		pb.org/areajobs)	January 2019
General	October 15, 2018	Non Profit Mgmt Center	Exhibit E - General
Manager/Chief		Website (nmc-	Manager/Chief
Executive Officer		pb.org/areajobs)	Executive Officer
			Ads October 2018
Executive Assistant	April 23, 2018	Non Profit Mgmt Center	Exhibit F - Executive
		Website (nmc-	Assistant Ads April
		pb.org/areajobs)	2018.
Corporate	February 15,	Non Profit Mgmt Center	Exhibit G - Corporate
Underwriter	2019	Website (nmc-pb.org/area	Underwriter Ads
		jobs), Indeed.com	February 2019

<b>Full-Time Position</b>	Date of Hire	Sources that Received	Exhibit with
		Job Announcements	Attached Ad Copies
Development	December 10,	Non Profit Mgmt Center	Exhibit H -
Director	2018	(nmc-pb.org/area jobs)	Development
			Director Ads
			December 2018
Membership	January 4, 2019	Non-profit mgmt. center	Exhibit I -
Coordinator		(nmb-pb.org/areajobs)	Membership
			Coordinator Ads
			January 2019

KPBT-TV has retained copies of all notices sent to all sources used. There were no on-air ads aired for these job announcements. The Nonprofit Management Center and BasinPBS.org notified KPBT-TV they wanted to be notified of KPBT-TV job openings.

3(c)

The chart below includes the number of interviewees for each full-time position filled and the referral sources for each interviewee.

Full-Time Position	Total Number of Interviewees	Recruitment Source	<mark>Number of</mark> Interviewees Referred
Administrative Assistant (June 2017)	5	Non-Profit Management Center	2
		Permian Basin PBS Website LinkedIn.com	2
Administrative Assistant (August 2018)	2	Non-Profit Management Center	2
Corporate Underwriter	2	Non-Profit Management Center	1
General Manager/Chief Executive Officer	2	Non-Profit Management Center	2
Executive Assistant	2	Non Profit Management Center	2
Corporate Underwriter	3	Non Profit Management Center	2
Development Director	2	Non Profit Management Center	0
Membership Coordinator	2	Non Profit Mgmt Center	1

3(d)

KPBT-TV has 5 full-time employees and the station operates in a market with a population size that is smaller than 250,000. The employment unit is required to perform two initiatives within a two-year period. The Annual EEO Reports list all of the recruitment initiatives the employment unit has conducted during the last two years.

Exhibits J and K have documentation for Education Director and Sexual Harassment Training Results.

3(e) There are no pending or resolved complaints involving KPBT-TV filed during the station's current license term alleging unlawful discrimination in the employment practices of the station on the basis of race, color, religion, national origin, or sex.

3(f) Describe the responsibilities of each level of the station's management responsible for implementing the station's EEO policies and describe how the station has informed employees and job applicants of its EEO policies and program.

Basin PBS has always adhered to strong EEO Policies, both in promoting open positions as well as with employees. In Basin PBS's employee handbook, there is a specific section on EEO Policies that cover policies and sexual discrimination and harassment. Each employee is given a copy of the handbook upon hiring and it is referenced at least 1 time per year (employee handbook attached). When posting jobs, we specifically state that we are an EEO Employer.

3(g) Describe the station's efforts to analyze its EEO recruitment program to ensure it is effective and to address any problems found as a result of such analysis.

The EEO Recruitment Program was analyzed in late 2019 and it was decided to increase our areas of advertising job postings. While we have relied on the Non Profit Management Center's job bank as our primary advertising method (and we still do) we have now branched out to include Zip Recruiter and Indeed.com. In addition, we will utilize our website more often and post on social.

3(h) - Describe the stations' 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.

Basin PBS uses the Non Profit Management Centers Partners Salary and Benefits Summary Report. This is an annual report that outlines Non-Profit salaries and benefits across all Agencies in West Texas. All positions at Basin PBS fall within the salary "norms" in this report. In addition, there is a yearly performance review given whereas some salary increases are granted. With such a small staff, promotions are handled on a case-by-case basis, as we don't have a lot of opportunity for advancement. We do, however, offer training in both soft skills (leadership, etc..) and technical (software training, etc..).

3(i) Not applicable

I certify under penalty of perjury that the foregoing is true and correct based on information provided to me by station management. Please contact me by email at <u>lwolf@basinpbs.org</u> or by telephone at 432-563-5728 with any questions.

Laura Wolf General Manager/Chief Executive Officer Permian Basin Public Telecommunications, Inc.