

## **EEO PUBLIC FILE REPORT**

### **Instructions:**

This report must be prepared annually on the anniversary date a station is due to file its renewal of license application. Complete the information in Sections 1 – 7 regarding the jobs filled, the recruitment efforts made and the recruitment initiatives undertaken in the prior twelve (12) months and place the report in your station's public inspection file and on your website (if you have one) on or before that due date.

This report covers full time vacancy recruitment data for the period February 1, 2011 – January 31, 2012.

### **1) Employment Unit: El Dorado, Arkansas**

**2) Unit Members (Stations and Communities of License):** KLAZ – Hot Springs, AR  
KZHS – Hot Springs, AR  
KIXV – Malvern, AR  
KBHS – Hot Springs, AR  
KBOK – Malvern, AR  
KHRK – Bismarck, AR

### **3) EEO Contact Information for Unit Member:**

<b>Mailing Address:</b>  P. O. Box 22265 Hot Springs, AR 71903	<b>Telephone Number: (501) 525-4600</b>
	<b>Contact Person: Rob Pratt</b>
	<b>E-mail Address: <a href="mailto:robpratt@klaz.com">robpratt@klaz.com</a></b>

### **4) List all Full-Time Job Vacancies Filled by Each Station in the Employment Unit:**

<b>Job Title</b>	<b>Recruitment Source Referring Hire</b>
1. General Manager	The Sentinel Record
2. On-Air Personality	Promoted from Within
3. Account Executive	The Sentinel Record
4. Account Executive	Promoted from Within
5. Program Director	All-Access
6. Account Executive	Walk-In

TAKE ONE FOR EVERY JOB VACANCY

1) Job Title: General Manager

Hire Date **March 23, 2011**

Referral Source(s) of Hire: The Sentinel Record

<u>Name of Organization Notified of Job Vacancy</u>	<u>Contact Person</u>	<u>Address</u>	<u>Phone Number</u>	<u># of Interviews Referred</u>	<u>Did Recruitment Source Request Notification? (Yes or No)</u>
Connecticut School of Broadcasting		5605 North MacArthur Blvd Ste 220 Irving, TX 75038			NO
NAACP	Elmer Beard	407 Whittington Hot Springs, AR 71901	501-623-5323		NO
UAPB Placement Director	Mary Jones	P.O. Box 4975 Pine Bluff, AR 71611	870-543-8000		NO
The Spa City .com	Heather Canterbury	202 West 19 <sup>th</sup> St. El Dorado, AR 71730	870-862-0202		NO
ARK. Broadcasters Association	Jim McCall	2024 Arkansas Valley Dr Ste. 403 Little Rock, AR 72212	501-227-7564	<b>4</b>	NO
Quapaw Community Center	Nina Mitchell	500 Quapaw St. Hot Springs, AR 71901	501-623-9922		NO
South Ark. Comm. College	Andrea Turtillo	306 Southwest Ave. EL Dorado, AR 71730	870-862-5131		NO
Entre NOUS Club	Carolyn Smith	869 Akers Rd. Hot Springs, AR 71901	501-262-2661		NO
Moon Glow Club	Ludelia Benson	218 Cottrell St. Hot Springs, AR 71901	501-624-2749		NO
Rosettes Club	Valda Jackson	111 Palmetto Hot Springs, AR 71901	501-623-6815		NO
United Women Clubs of The City	Nina Webb	413 Cedar Wood Hot Springs, AR 71901	501-262-3007		NO
Ark. Work Force Center	Janet Edgar	2254 Albert Pike Hot Springs, AR 71913	501-525-3450		NO
KLAZ	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600		NO
The Sentinel Record		300 Spring Street Hot Springs, AR 71902	501-623-2300	<b>1</b>	NO

TAKE ONE FOR EVERY JOB VACANCY

Hire Date **April 1, 2011**

2) Job Title: On-Air Personality

Referral Source(s) of Hiree: **Part-time Promoted from Within**

<u>Name of Organization Notified of Job Vacancy</u>	<u>Contact Person</u>	<u>Address</u>	<u>Phone Number</u>	<u># of Interviews Referred</u>	<u>Did Recruitment Source Request Notification? (Yes or No)</u>
Connecticut School of Broadcasting		5605 North MacArthur Blvd, Ste 220 Irving, TX 75038			NO
NAACP	Elmer Beard	407 Whittington Hot Springs, AR 71901	501-623-5323		NO
UAPB Placement Director	Mary Jones	P.O. Box 4975 Pine Bluff, AR 71611	870-543-8000		NO
The Spa City .com	Heather Canterbury	202 West 19 <sup>th</sup> St. El Dorado, AR 71730	870-862-0202		NO
ARK. Broadcasters Association	Jim McCall	2024 Arkansas Valley Dr Ste. 403 Little Rock, AR 72212	501-227-7564		NO
Quapaw Community Center	Nina Mitchell	500 Quapaw St. Hot Springs, AR 71901	501-623-9922		NO
South Ark. Comm. College	Andrea Turtillo	306 Southwest Ave. EL Dorado, AR 71730	870-862-5131		NO
Entre NOUS Club	Carolyn Smith	869 Akers Rd. Hot Springs, AR 71901	501-262-2661		NO
Moon Glow Club	Ludelia Benson	218 Cottrell St. Hot Springs, AR 71901	501-624-2749		NO
Rosettes Club	Valda Jackson	111 Palmetto Hot Springs, AR 71901	501-623-6815		NO
United Women Clubs of The City	Nina Webb	413 Cedar Wood Hot Springs, AR 71901	501-262-3007		NO
Ark. Work Force Center	Janet Edgar	2254 Albert Pike Hot Springs, AR 71913	501-525-3450		NO
KLAZ	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>3</b>	NO
Walk-In	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>1</b>	NO
Part-Time Employee Promoted from within	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>1</b>	NO
The Sentinel Record		300 Spring Street Hot Springs, AR 71902	501-623-2300		NO

TAKE ONE FOR EVERY JOB VACANCY

Hire Date **April 19, 2011**

3) Job Title: Account Executive #1

Referral Source(s) of Hiree: **The Sentinel Record**

<u>Name of Organization Notified of Job Vacancy</u>	<u>Contact Person</u>	<u>Address</u>	<u>Phone Number</u>	<u># of Interviews Referred</u>	<u>Did Recruitment Source Request Notification? (Yes or No)</u>
Connecticut School of Broadcasting		5605 North MacArthur Blvd, Ste 220 Irving, TX 75038			NO
NAACP	Elmer Beard	407 Whittington, Hot Springs, AR 71901	501-623-5323		NO
UAPB Placement Director	Mary Jones	P.O. Box 4975, Pine Bluff, AR 71611	870-543-8000		NO
The Spa City .com	Heather Canterbury	202 West 19 <sup>th</sup> St., El Dorado, AR 71730	870-862-0202		NO
ARK. Broadcasters Association	Jim McCall	2024 Arkansas Valley Drive, Ste. 403, Little Rock, AR 72212	501-227-7564		NO
Quapaw Community Center	Nina Mitchell	500 Quapaw St., Hot Springs, AR 71901	501-623-9922		NO
South Ark. Comm. College	Andrea Turtillo	306 Southwest Ave., EL Dorado, AR 71730	870-862-5131		NO
Entre NOUS Club	Carolyn Smith	869 Akers Rd., Hot Springs, AR 71901	501-262-2661		NO
Moon Glow Club	Ludelia Benson	218 Cottrell St., Hot Springs, AR 71901	501-624-2749		NO
Rosettes Club	Valda Jackson	111 Palmetto, Hot Springs, AR 71901	501-623-6815		NO
United Women Clubs of The City	Nina Webb	413 Cedar Wood, Hot Springs, AR 71901	501-262-3007		NO
Ark. Work Force Center	Janet Edgar	2254 Albert Pike, Hot Springs, AR 71913	501-525-3450		NO
KLAZ	Rob Pratt	208 Buena Vista Rd, Hot Springs, AR 71913	501-525-4600	<b>3</b>	NO
Walk-In	Rob Pratt	208 Buena Vista Rd, Hot Springs, AR 71913	501-525-4600	<b>2</b>	NO
The Sentinel Record		300 Spring Street, Hot Springs, AR 71902	501-623-2300	<b>5</b>	NO

TAKE ONE FOR EVERY JOB VACANCY

Hire Date **April 19, 2011**

4) Job Title: Account Executive #2

Referral Source(s) of Hire: **Part Time Promoted from Within**

<u>Name of Organization Notified of Job Vacancy</u>	<u>Contact Person</u>	<u>Address</u>	<u>Phone Number</u>	<u># of Interviews Referred</u>	<u>Did Recruitment Source Request Notification? (Yes or No)</u>
Connecticut School of Broadcasting		5605 North MacArthur Blvd, Ste 220 Irving, TX 75038			NO
NAACP	Elmer Beard	407 Whittington Hot Springs, AR 71901	501-623-5323		NO
UAPB Placement Director	Mary Jones	P.O. Box 4975 Pine Bluff, AR 71611	870-543-8000		NO
The Spa City .com	Heather Canterbury	202 West 19 <sup>th</sup> St. El Dorado, AR 71730	870-862-0202		NO
ARK. Broadcasters Association	Jim McCall	2024 Arkansas Valley Drive Ste. 403 Little Rock, AR 72212	501-227-7564		NO
Quapaw Community Center	Nina Mitchell	500 Quapaw St. Hot Springs, AR 71901	501-623-9922		NO
South Ark. Comm. College	Andrea Turtillo	306 Southwest Ave. EL Dorado, AR 71730	870-862-5131		NO
Entre NOUS Club	Carolyn Smith	869 Akers Rd. Hot Springs, AR 71901	501-262-2661		NO
Moon Glow Club	Ludelia Benson	218 Cottrell St., Hot Springs, AR 71901	501-624-2749		NO
Rosettes Club	Valda Jackson	111 Palmetto Hot Springs, AR 71901	501-623-6815		NO
United Women Clubs of The City	Nina Webb	413 Cedar Wood Hot Springs, AR 71901	501-262-3007		NO
Ark. Work Force Center	Janet Edgar	2254 Albert Pike Hot Springs, AR 71913	501-525-3450		NO
KLAZ	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>3</b>	NO
Walk-In	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>1</b>	NO
Part-Time Employee Promoted from within	Rob Pratt	208 Buena Vista Rd, Hot Springs, AR 71913	501-525-4600	<b>1</b>	NO
The Sentinel Record		300 Spring Street Hot Springs, AR 71902	501-623-2300	<b>5</b>	NO

5) Job Title: Program DirectorReferral Source(s) of Hiree: **ALL ACCESS**

<u>Name of Organization Notified of Job Vacancy</u>	<u>Contact Person</u>	<u>Address</u>	<u>Phone Number</u>	<u># of Interviews Referred</u>	<u>Did Recruitment Source Request Notification? (Yes or No)</u>
NAACP	Elmer Beard	407 Whittington Hot Springs, AR 71901	501-623-5323		NO
UAPB Placement Director	Mary Jones	P.O. Box 4975, Pine Bluff, AR 71611	870-543-8000		NO
The Spa City .com	Heather Canterbury	202 West 19 <sup>th</sup> St. El Dorado, AR 71730	870-862-0202		NO
ARK. Broadcasters Association	Jim McCall	2024 Arkansas Valley Drive Ste. 403, Little Rock, AR 72212	501-227-7564		NO
Quapaw Community Center	Nina Mitchell	500 Quapaw St. Hot Springs, AR 71901	501-623-9922		NO
South Ark. Comm. College	Andrea Turtillo	306 Southwest Ave. EL Dorado, AR 71730	870-862-5131		NO
Entre NOUS Club	Carolyn Smith	869 Akers Rd. Hot Springs, AR 71901	501-262-2661		NO
Moon Glow Club	Ludelia Benson	218 Cottrell St. Hot Springs, AR 71901	501-624-2749		NO
Rosettes Club	Valda Jackson	111 Palmetto Hot Springs, AR 71901	501-623-6815		NO
United Women Clubs of The City	Nina Webb	413 Cedar Wood Hot Springs, AR 71901	501-262-3007		NO
Ark. Work Force Center	Janet Edgar	2254 Albert Pike, Hot Springs, AR 71913	501-525-3450		NO
KLAZ	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600		NO
All Access	Rob Pratt	Allaccess.com		7	NO

TAKE ONE FOR EVERY JOB VACANCY

Hire Date: September 1, 2011

6) Job Title: Account Executive #3

Referral Source(s) of Hiree: WALK-IN

<u>Name of Organization Notified of Job Vacancy</u>	<u>Contact Person</u>	<u>Address</u>	<u>Phone Number</u>	<u># of Interviews Referred</u>	<u>Did Recruitment Source Request Notification? (Yes or No)</u>
NAACP	Elmer Beard	407 Whittington Hot Springs, AR 71901	501-623-5323		NO
UAPB Placement Director	Mary Jones	P.O. Box 4975 Pine Bluff, AR 71611	870-543-8000		NO
The Spa City .com	Heather Canterbury	202 West 19 <sup>th</sup> St. El Dorado, AR 71730	870-862-0202		NO
ARK. Broadcasters Association	Jim McCall	2024 Arkansas Valley Drive Ste. 403 Little Rock, AR 72212	501-227-7564	<b>1</b>	NO
Quapaw Community Center	Nina Mitchell	500 Quapaw St., Hot Springs, AR 71901	501-623-9922		NO
South Ark. Comm. College	Andrea Turtillo	306 Southwest Ave. EL Dorado, AR 71730	870-862-5131		NO
Entre NOUS Club	Carolyn Smith	869 Akers Rd. Hot Springs, AR 71901	501-262-2661		NO
Moon Glow Club	Ludelia Benson	218 Cottrell St. Hot Springs, AR 71901	501-624-2749		NO
Rosettes Club	Valda Jackson	111 Palmetto Hot Springs, AR 71901	501-623-6815		NO
United Women Clubs of The City	Nina Webb	413 Cedar Wood Hot Springs, AR 71901	501-262-3007		NO
Ark. Work Force Center	Janet Edgar	2254 Albert Pike Hot Springs, AR 71913	501-525-3450		NO
KLAZ	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>2</b>	NO
Walk-In	Rob Pratt	208 Buena Vista Rd Hot Springs, AR 71913	501-525-4600	<b>1</b>	NO
The Sentinel Record	Merry	300 Spring Street, Hot Springs, AR 71902	501-623-2300	<b>3</b>	NO

**6) Total # of interviewees referred:** For the period from February 1, 2011 through January 31, 2012, this Employment Unit interviewed 44 interviewees for full time positions.

**7) Supplemental Recruitment Initiatives:** List and briefly describe the Supplemental Recruitment Initiatives undertaken during the preceding twelve (12) months.

**(A) Initiative:** Internship Program

Description of the initiative, including the nature of the activity, the scope of participation by the station (include station personnel involved by name and title) and specific date/time/place information.

See Attached

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**(B) Initiative:** Upper Level EEO Training Management Training

Description of the initiative, including the nature of the activity, the scope of participation by the station (include station personnel involved by name and title) and specific date/time/place information.

See Attached

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**(C) Initiative:** Listing of Upper Level Job Categories

Description of the initiative, including the nature of the activity, the scope of participation by the station (include station personnel involved by name and title) and specific date/time/place information.

All Upper Level jobs were listed with The Arkansas Broadcasters Association website all of which have substantial female and minority participation.

## **INTERNSHIP PROGRAM**

KLAZ, KZHS, KIXV, KBHS, KBOK, KHRK

Our Internship Program is designed to give high school and college students the opportunity to learn about and gain practical experience in the radio broadcasting industry. It has proven to be very successful as a means of reaching out to young people interested in the broadcasting field in training and teaching them about radio broadcasting.

Our Interns are exposed to the various operations of a radio station which may include some combination of on-air work, show production, remote broadcasts, commercial production and board operation, depending to some extent upon the interests of the intern and the needs of the station. It is our goal that interns obtain a well rounded view of the opportunities available in the radio broadcast industry, and develop an interest in pursuing broadcasting as a course of study and as an avocation. We also hope that interns who complete the program will leave Noalmark with invaluable business and professional work experience that will assist them in their careers, even should they choose to enter another profession.

All applicants are interviewed by the General Manager or a department head and are selected based on various factors including their academic success and their interest in the field of radio broadcasting.

Over the years we have established and maintained a working relationship with Henderson State University, which has a broadcasting program and a radio station, as a means of recruiting interns. We have also established relationships with area high schools and National Park Community College in Hot Springs. In the past eleven years, we have recruited many students into our Internship Program. Three former interns have gone on to become full time employees with us upon graduation. Others have used their association with our stations to establish references for other employment. During the last year we have had two interns in our program, both of whom are female. One intern has gained radio knowledge so quickly and proven so valuable to us that we have recently employed her on a regular part time basis.

Those involved in administering the Internship Program are Rob Pratt, General Manager; Curtis Hitchcock, Program Director; and Jeri Rowe, Office Manager. Other station personnel are utilized as needed.

## **EEO and Discrimination Training for Upper Level Management**

On Sunday, October 23, 2011 an EEO and anti-discrimination training session was held at Mountain Harbor, Arkansas during the annual budget and planning meeting of Noalmark's upper level management. The Rules and Regulations of the FCC relating to EEO and anti-discrimination in hiring and employment were the primary purposes of the session. William Nolan, President of Noalmark and a practicing attorney for over thirty-five years including employment law and communications law, was the instructor, assisted by his partner in the law firm of Nolan & Alderson, Edwin Alderson, Jr.

Those present for Noalmark were Harry Harlan, General Manager of Noalmark's Hobbs stations, Aaron Forrester, Sales Manager of the stations, and Al Lobeck, General Manager of the Hobbs Bender Street Group of the stations; Sandy Sanford, Noalmark Vice President and General Manager of Noalmark's El Dorado, Arkansas stations; Ken Sibley, General Manager of Noalmark's Magnolia, Arkansas stations; Rob Pratt, General Manager of Noalmark's Hot Springs, Arkansas stations; and Kevin Bonner, General Manager of Noalmark's Roswell, New Mexico stations and Daryl Burkfield, Sales Manager of the stations.

Mr. Nolan and Mr. Alderson reviewed in detail the FCC's rules regarding EEO including the prohibition on discrimination, the record keeping requirements, the preparation and content of the EEO Annual Report that each station must file, the prong three initiatives and requirements, as well as the self assessment requirements. The Commission's EEO audit process was also discussed, highlighting the need to keep adequate records so that a timely and accurate response may be made to an audit request. In his presentation Mr. Nolan noted that all licensees shall afford equal opportunity in employment and that licensees must establish, maintain and carry out a continuing program of specific practices designed to ensure equal opportunity and non-discrimination at their stations. There next ensued a lengthy discussion among the participants about the various requirements with numerous questions being asked. Instruction was given on how to practically apply the FCC requirements on an everyday basis.

Mr. Nolan then reviewed with the participants Noalmark's corporate EEO Policy Statement, which goes beyond current FCC rules. He emphasized that they are expected to be familiar with it and to implement its principles in operating their stations. (A copy of the Policy is attached.) The attorneys next reviewed with the participants Noalmark's Sexual Harassment Policy as well as the current state of the law in this area. This has become a high profile issue in the work place. Examples of what might, and what might not, constitute harassment were presented and discussed in order to help each manager identify what type of actions and behavior constitute harassment. It was stressed that every allegation should be taken seriously and investigated in accordance with the Policy. We should follow our Policy in each instance, no matter how trivial it might seem. We want to make certain that the outcome of any charge is fair to all involved, and that if harassment is present, that it is rectified immediately.

Mr. Nolan then reviewed, and there was discussion of, the other important policies of the Company that the managers are expected to be familiar with and to comply with. The meeting adjourned approximately three hours after it started.

**Noalmark Hot Springs  
EEO Narrative Statement  
2012 Public File Report**

On January 5, 2012 Bill Nolan, President of Noalmark, and Rob Pratt, Noalmark Hot Springs General Manager, met to prepare this Narrative in connection with the 2011 EEO Public File Report.

In 2012, the Hot Springs area showed little or no improvement economically. The business and sales of our advertisers were stagnant during the year and consequently they generally did not increase their advertising budgets that are the source of our revenues. Conversely, many of our advertisers cut back on their budgets and some dropped advertising altogether. There continued to be closures of businesses among our advertisers and in those cases we were not paid. As a reaction to stagnant to decreasing revenue and generally escalating costs, we continued to restructure our stations to decrease our own costs wherever possible. This including shrinking our full time employees from nine to seven. Even though we reduced our number of employees, as this report shows we experienced a lot of turnover during the year as we tried to find the right people to move our stations forward. This included changing General Managers early in the year. Going forward, we need to continue to stabilize and reduce expenses even more if we want to remain viable and provide jobs in this market.

As stated above, as of our analysis of December 15, 2011 we have seven full time employees. Our current full time employee compliment consists of four males and three females. Also, we just lost a productive female account executive who took a job in radio sales in the Little Rock market, which is much larger than ours. We are proud of the fact that our three females hold prominent positions at our stations. One is the Manager of one of our stations, one is the Office Manager for the group, and the other is our best performing account executive. All three are among the highest paid persons at the stations. In seeking applicants for our openings we continued to use the local daily newspaper, local female and minority groups, and local web sites in addition to airing announcements over our stations. In all advertising we also make sure we state that we are an equal opportunity employer. While we have contacted the above mentioned groups in connection with our vacancies, we continue to get little or no applicants from them. Most of our applicants came from the local newspaper and web sites. We will review our contact groups again as we do annually to see if they can become more effective. We have continued our Internship Program and we have had two interns in the program during the reporting year. Both interns were female. One intern has done such a good job that she has been hired as a part time employee.

Our annual Self Assessment, which has been completed and is in the station files, shows that we have done a great deal to inform, train and educate both our current and prospective employees about our own EEO Policy and Commission Rules. And as this Report indicates, we take our EEO obligations very seriously. We have held extensive training sessions for our upper level managers annually as well as holding an annual meeting with all employees to review and familiarize them with FCC Rules and our own EEO commitments and obligations. The last such meeting was held on November 10, 2011. In recognition of our commitment to equal employment opportunity, as stated in earlier, our Company has adopted our own EEO Policy that goes beyond the FCC's requirements. A copy of it is attached to this Report. As we try to run our stations in a manner that serves our community and in a way that keeps us economically viable (which has been a real challenge recently!), we will continue to keep upper most in our minds as one of our primary goals the Commission's EEO requirements as well as our own strong commitment to these principals.

## **EEO POLICY STATEMENT**

Noalmark Broadcasting Corporation has adopted an EEO policy applicable to all of its stations in accordance with policies and procedures of the Federal Communications Commission and as embodied in Section 73.2080 of the Code of Federal Regulations.

Our policy is that all persons shall be afforded equal opportunity in employment, and that no person shall be discriminated against in employment because of race, color, religion, national origin or sex. We believe strongly in these principles; so it is also our policy that in order to promote diversity and to ensure equal opportunity, that whenever qualifications are essentially equal we will strongly consider giving preference in hiring and promotions to female and minority persons.

Management of Noalmark stations has been instructed to vigorously enforce this equal opportunity policy, and we seek the cooperation of all employees in its implementation. We have attempted to implement measures in recruitment and employment to ensure equality of opportunity, but we also ask that you communicate with station management, or direct with the corporate office, if you see instances of discrimination or think that you have been discriminated against. The corporate office may be contacted at 202 West 19<sup>th</sup> Street, El Dorado, Arkansas 71730, or by telephone at 870/862-0202. All such communications will be promptly and thoroughly investigated.