

**EEO PUBLIC FILE REPORT  
WBLS 107.5 FM & WLIB 1190AM  
ICBC BROADCAST HOLDINGS, INC.  
For the Period 02-01-09 to 01-31-10**

**\*\*As Revised on March 10, 2010\*\***

This report covers the following employment unit:

| Station    | Type of Station | Location<br>(City, State) |
|------------|-----------------|---------------------------|
| WBLS 107.5 | FM              | New York, NY              |
| WLIB 1190  | AM              | New York, NY              |

The following is a list of all vacancies for full-time jobs and the recruitment source which provided the hiree for that position during the previous 12 months:

| Job Title              | Recruitment Source (RS)<br>Used to Fill Vacancy | Date of<br>Opening | Date Filled | Number of Candidates<br>Interviewed |
|------------------------|---|--------------------|-------------|-------------------------------------|
| Board Operator-1       | Referral  | 02/04/2009         | 02/20/2009  | 1                                   |
| Board Operator-2       | <a href="http://www.wbls.com">www.wbls.com</a>  | 02/09/2009         | 02/20/2009  | 3                                   |
| Board Operator-3       | <a href="http://www.wbls.com">www.wbls.com</a>  | 02/09/2009         | 02/20/2009  | 3                                   |
| Account Executive      | Closed  | 05/15/2009         | N/A         | N/A                                 |
| Promotions Assistant-1 | <a href="http://www.wbls.com">www.wbls.com</a>  | 05/28/2009         | 07/14/09    | 2                                   |
| Promotions Assistant-2 | Referral  | 05/28/2009         | 09/29/2009  | 1                                   |
| Producer- WLIB         | Remains Open                                    | 12/02/2009         | N/A         | 3                                   |
| Continuity Coordinator | Remains Open                                    | 01/16/2010         | N/A         | 2                                   |

| Source                   | Address   | Contact Information  | Phone          | Total<br>Interviewee<br>Referrals |
|--------------------------|---|--|----------------|-----------------------------------|
| WBLS-FM                  | <a href="http://www.wbls.com">www.wbls.com</a>  | Ad placed online   | (212) 447-1000 | 5                                 |
| WLIB-AM                  | <a href="http://www.wlib.com">www.wlib.com</a>  | Ad placed online   | (212) 447-1000 | 3                                 |
| Entertainment<br>Careers | <a href="http://EntertainmentCareers.net">EntertainmentCareers.net</a><br>914 S. Barrington Avenue<br>Los Angeles, CA 90049 | <a href="mailto:Support@entertainmentcareers.net">Support@entertainmentcareers.net</a> | (310) 441-9963 | 0                                 |
| Job Vertise              | <a href="http://www.Jobvertise.com">www.Jobvertise.com</a>  | Ad placed online   | N/A            | 0                                 |

|                                    |   |                  |     |   |
|------------------------------------|---|------------------|-----|---|
| Learn 4 Good                       | <a href="http://www.learn4good.com">www.learn4good.com</a>  | Ad placed online | N/A | 0 |
| Today's Classified                 | <a href="http://www.Todays-classifieds.com">www.Todays-classifieds.com</a><br>aka<br><a href="http://www.job-ad-venture.com">www.job-ad-venture.com</a> | Ad placed online | N/A | 0 |
| Traffic Directors Guild of America | <a href="http://www.tdga.org">www.tdga.org</a>  | Ad placed online | N/A | 2 |

| Job Title              | Recruitment Source(s) Utilized   |
|------------------------|--|
| Board Operator         | <ul style="list-style-type: none"> <li>• <a href="http://www.entertainmentcareers.net">www.entertainmentcareers.net</a></li> <li>• <a href="http://www.todays-classifieds.com">www.todays-classifieds.com</a></li> <li>• <a href="http://www.wbls.com">www.wbls.com</a></li> <li>• <a href="http://www.jobvertise.com">www.jobvertise.com</a></li> </ul>                           |
| Account Executive      | <ul style="list-style-type: none"> <li>• <a href="http://www.wlib.com">www.wlib.com</a></li> </ul>   |
| Promotions Assistant   | <ul style="list-style-type: none"> <li>• <a href="http://www.entertainmentcareers.net">www.entertainmentcareers.net</a></li> <li>• <a href="http://www.learn4good.com">www.learn4good.com</a></li> <li>• <a href="http://www.wbls.com">www.wbls.com</a></li> <li>• <a href="http://www.wlib.com">www.wlib.com</a></li> </ul>   |
| Producer- WLIB         | <ul style="list-style-type: none"> <li>• Internal Posting</li> </ul>   |
| Continuity Coordinator | <ul style="list-style-type: none"> <li>• <a href="http://www.learn4good.com">www.learn4good.com</a></li> <li>• <a href="http://www.todays-classifieds.com">www.todays-classifieds.com</a></li> <li>• <a href="http://www.tdga.org">www.tdga.org</a></li> <li>• <a href="http://www.wbls.com">www.wbls.com</a></li> <li>• <a href="http://www.wlib.com">www.wlib.com</a></li> </ul> |

**Name of Respondent:** Urban Radio I, LLC  
 WLIB (AM)/WBLS (FM)  
**Printed Name:** Catrice Allen  
**Title:** Benefits Administrator  
**Date:** March 10, 2010

## EEO STATEMENT OF URBAN RADIO I, LLC

Urban Radio I, LLC, the licensee of WLIB(AM) and WBLS(FM), New York, New York, is one of the Inner City Broadcasting Corporation (“Inner City”) group of radio broadcasting subsidiaries. The ownership structure of Inner City and its subsidiaries is a matter of record before the Commission, including in its ownership reports filed shortly before the instant submission in connection with the license renewal applications of WLIB and WBLS.

Inner City was founded approximately 37 years ago by civil rights attorney and activist Percy Sutton as one of the first African America owned and operated broadcasting companies in the United States. Today, Inner City is one of the best known and most respected African American broadcasting groups in the country. The vast majority of Inner City’s shareholders, senior management, and its employees throughout its group of broadcasting companies are minorities and women. Inner City conservatively estimates that women and minorities comprise at least 90% of all of its voting shareholders and employees, including senior management. Inner City and its principles were founders of the National Association of Black Owned Broadcasters (“NABOB”).

It is based upon Inner City’s history of minority ownership and advance of diversity in media that Inner City has established its employment and recruitment outreach practices, a summary of which follows.

### GENERAL EEO POLICY

It is the policy and practice of Inner City to offer equal employment opportunities (“EEO”) to all qualified persons; that no person shall be discriminated against in employment because of race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, sexual orientation, or any other characteristic protected by applicable federal, state or local law; and that positive recruitment, job design and other reasonable measures will be pursued to ensure genuine equality of opportunity (“EEO Policy”).

The Inner City EEO Policy applies to all areas of employment, including recruitment, hiring, training and development, promotion, seniority practices, transfer, termination, layoff, compensation, benefits, and all other terms, conditions, responsibilities and privileges of employment. Inner City will not tolerate any form of discrimination based on any of the aforementioned factors. Inner City’s EEO Policy is communicated and provided to all applicants and new employees in writing and by notices posted in Inner City broadcast station and cable television studios and offices. It is communicated to all recognized employee organizations, including unions, represented at Inner City stations.

In support of Inner City’s commitment to ensuring equal employment opportunities for all applicants, Inner City has established a recruitment program which includes wide dissemination of notices of all full-time job vacancies to recruitment sources used by minorities and women, unless such vacancies are to be filled through internal promotion, or on a temporary or emergency basis. All internal promotions will be fulfilled without discrimination based on race, color, age, religion, national origin, gender, marital status, disability, except

when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, sexual orientation, or any other characteristic protected by applicable federal, state or local law.

## GENERAL EEO GUIDELINES

Management of Inner City has the responsibility for overseeing that its EEO Policy is fulfilled. The General Manager of each broadcast station, or consolidated group of stations, and each cable television system, is responsible to ensure that the EEO Policy is fulfilled. In connection with EEO matters, each General Manager reports directly to Lois E. Wright, Esq., Inner City Executive Vice President. Attorney Wright is responsible for fulfilling Inner City's EEO Policy at Inner City's corporate offices and to oversee and coordinate EEO matters among all Inner City subsidiaries. (Collectively, the General Managers and Attorney Wright are Inner City's "EEO Team.") The EEO Team will make its best efforts to ensure that:

- Employees, applicants, employee organizations, and recruitment sources are informed of Inner City's EEO Policy;
- An internal program is maintained to ensure that no employment discrimination based on race, color, age, religion, national origin, gender, marital status, disability, except when the disability is a *bona fide* occupational disqualification, veteran status, citizenship, sexual orientation, or any other characteristic protected by applicable federal, state or local law exists within Inner City;
- Review on a regular basis, and no less often than annually, Inner City's procedures to effectively ensure fulfillment of its EEO Policy. At the time any full-time position is filled, the General Manager of the hiring subsidiary, or Attorney Wright if the position is in the corporate offices, shall review the effectiveness of the process and recruitment sources which contributed to the individual hiring decision, and determine that all relevant records have been properly maintained. Such individual hiring reviews will be part of the EEO Team's company-wide regular review process.

## EEO PROGRAM PROCEDURES

### Recruitment Program

Inner City will apply all of its recruitment procedures to every opening for a full-time position, *i.e.* employment which requires working 30 or more hours per week, except that recruitment procedures may not be used for jobs to be filled by internal promotion, for temporary employees to be hired for a period of time of six months or less, for part-time employees, for interns, or in the event of exceptional or emergency circumstances necessitating immediate hiring. Inner City will apply its recruitment procedures to fill a temporary position or an intern position being converted into a permanent position.

As defined above, a description of every full-time job opening will be circulated to the recruitment sources and contacts set forth herein in the following "Recruitment Sources" and all applicants will be asked to complete an employment application consistent with the sample form included herein. Employment notices will be directed to every recruitment source on the list as soon as practicable after the decision has been made to fill a full-time opening, and by

the fastest means reasonably available. The job description will include a description of the Inner City's EEO Policy.

Inner City requests race, gender and ethnicity information from each full-time applicant. Inner City will not require the submission of this information as a requirement for consideration for employment. Each applicant's race, gender and ethnicity information will be removed from the employment application and retained for record-keeping and reporting requirements, but will not be presented to the employment decision-makers so that such information cannot influence the hiring process.

At the conclusion of each hiring process, the relevant member of the EEO Team will review the effectiveness of the process by examination of the process by which the qualifications of applicants were considered, the effectiveness of the recruitment sources in providing a flow of applicants, and the records described below, in order to ensure that the Inner City EEO Policy is being fulfilled. This analysis must include a review of the recruitment sources used by Inner City, as well as the race, ethnicity, and gender of the applicants who sought employment with the station as a result of Inner City's recruitment efforts. Recruitment sources and procedures will be deleted, added or modified if, in the reasonable judgment of the relevant General Manager, Attorney Wright, or the EEO Team, that such change would further promote the EEO Policy or make the process more inclusive.

#### Recordkeeping

Inner City maintains a recordkeeping system per broadcast station/group and cable television subsidiary, and for its corporate offices, to maintain EEO information sufficient to fulfill its EEO Policy and to comply with required recordkeeping and reporting requirements. Each broadcast station/group and cable television subsidiary, and its corporate offices, maintain records of:

- Every full-time job vacancy filled;
- The title of full-time job vacancy filled;
- All recruitment sources used to fill each full-time job vacancy filled, noting name, address, contact person, and telephone number of such sources;
- Copies of all advertisements, bulletins, letters, faxes, e-mails, or other communications announcing or advertising job vacancies;
- The recruitment source, gender, race and ethnic origin of each applicant for every full-time job vacancy filled. Inner City will maintain as much of this information as applicants voluntarily disclose.

## URBAN RADIO I, LLC OUTREACH PROGRAM

The following is a summary of some of the recent recruitment and outreach activities of Inner City, including for WLIB and WBLS.

Participation in the following job fairs by station personnel who have substantial responsibility in the making of hiring decisions, all of which have substantial participation by minorities and women;

Riverside Church Career Day  
Harlem Week Job Activities  
National Action Network  
Wall Street Project.  
NYMRAD Events

The WBLS/WLIB Community Liaison Manager attended the Riverside Church, Harlem Week, National Action Network and Wall Street Project events and the WBLS/WLIB Sales Manager attended the NYMRAD events, including as described below.

Hosting and/or co-sponsoring the following job fair (Circle of Sisters, Riverside Church Career Day is an organization whose membership includes substantial participation of women and minorities);

Circle of Sisters, Riverside Church Career Day.

Internship program designed to assist members of the community to acquire skills needed for broadcast employment;

Inner City has its own broadcast internship program which operates all year. Inner City hosted 10 interns in 2009.

Participation in job banks, Internet programs, and other programs designed to promote outreach generally;

The Wall Street Project operated by the Reverend Jesse Jackson.

Participation in scholarship and training programs designed to assist students interested in pursuing a career in broadcasting;

NABOB Telecommunications Development Fund (scholarship and internship program).

Listing of each upper-level category opening in a job bank or newsletter of media trade groups whose membership includes substantial participation of women and minorities;

Website postings, newspapers and colleges.

Provision of assistance to unaffiliated non-profit entities in the maintenance of web sites that provide counseling on the process of searching for broadcast employment and/or other career development assistance pertinent to broadcasting;

Participation through NABOB on this type of project

Provision of training to management level personnel as to methods of ensuring equal employment opportunity and preventing discrimination;

Inner City conducts internal workshops through outside employment counsel.