

Red Rock Broadcast Group

FCC EEO Narrative Statement

Since its inception, Red Rock Broadcast Group ("the Company") has been an equal opportunity employer. This Company-wide policy is set forth in our Employee Manual. It states:

The Company is an Equal Opportunity Employer. We are committed to a policy of equal opportunity for all qualified individuals without regard to race, color, religion, national origin, sex, age, sexual orientation, physical or mental disability, or conditions specifically prohibited by federal, state and local legislation.

This non-discrimination policy has been widely distributed to all employees and managers and has been placed in the public inspection file as well as here on this website.

The Employee Manual also states with respect to its anti-harassment policy that:

Throughout its history, the Company has adopted an on-going management policy to oversee and insure that all personnel policies and practices and working conditions are free from all unlawful forms of employment discrimination. Within the Company, managers work closely with all employees to increase equality of opportunity to fully integrate them into all organizational entities and levels of responsibility. The Company has continually scrutinized its pay scale and employment benefits for employees with the same duties to eliminate any unjustified disparity based upon an employee's race, national origin, color or sex.

The Company's recruiting and hiring policies have always been and continue to be based upon the first principle that job-related qualifications are the touchstone of the employee selection process and that hiring decisions are entirely free from any explicit or implicit preferences based upon race, national origin, color or sex.

The Company has provided on-site and off-site training to all management officials on the day-to-day practices that underline the primacy of crediting and maintaining our equal employment environment company wide.

The specific features of the Company program include:

Posting of full-time job vacancies on the station's website;

Distribute to Minnesota Broadcasters Association notices of full-time job vacancies with a request that they post the notice on their websites;

Periodically air spots promoting the fact that employment information/job vacancies may be found on its website;

Send notices of job openings to all referral organizations which have asked to be placed on the station's mailing list for its posting and expand the mailing list to include local broadcast organizations;

Advertise the full-time job opening over unaffiliated newspapers and trade publications when practical to do insofar as timing, funding or upon the occasion of an insufficient pool of applicants;

Post job openings on the main office bulletin board so that station employees can compete for openings as well as refer others to the station;

Include applications received within three months prior to the vacancy as part of the review process;

Periodically review recruitment efforts to determine whether selected methodologies and options are effective.

The Company is committed to a community outreach recruitment program that will increase local community and potential applicant awareness of full-time employment opportunities in broadcasting. In this respect, the Company's Employee Manual provides:

In accordance with the FCC's EEO regulations, any organization that distributes information about employment opportunities to job seekers or refers job seekers to employers may request that it be provided notice of KSDM-FM and KGHS-AM job vacancies as they occur.

If your organization would like to be notified of such vacancies, please contact KSDM/KGHS, 519 Third Street, International Falls, MN 56649 or dennis@ksdmradio.com. Each organization that wishes to be given notice of job vacancies must provide its name, mailing address, e-mail address (if applicable), telephone number, contact person, and identify the category or categories of vacancies of which it requests notice. (An organization may request notice of all vacancies.)

EMPLOYMENT VACANCIES:

Vacancies will be posted as they become available.

WORKPLACE DISCRIMINATION, HARASSMENT AND RETALIATION POLICY

Employer will not tolerate any behavior that constitutes unlawful discrimination against, harassment of, or retaliation against any member of Employer community because of his or her gender, race, color, religion, national origin, age, disability, handicap or any other legally protected characteristic or activity. Employer is committed to ensuring a work environment free of sexual and other unlawful harassment; such harassment is prohibited and will not be tolerated. Any person who engages in or encourages any act constituting discrimination, retaliation, or harassment, including sexual harassment, will be subject to disciplinary action up to and including discharge.

EEO Public File Report

Stations: International Falls, MN

KGHS-AM and KSDM-FM

Period covered: November 30, 2010 to November 29, 2011

A. All full-time vacancies filled: none

Full-time Positions Filled by Job	Total Number of People Interviewed	Recruitment Source that Referred
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Full-time Positions Filled by Job Title	Total Number of People Interviewed	Recruitment Source that Referred the Hiree
Office & Traffic Manager	0	KSDM/KGHS
Sales Representative	0	0
Sales Representative	0	0
Sales Representative	0	0

B. Total number of people interviewed for all full-time vacancies: 15

C. Total number of interviewees referred by each recruitment source:

Recruitment Source (name, address, telephone, contact person)	Total Number of Interviewees From This Source During this Period	Full-time Positions for which this source was utilized.
Rainy River Community College 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sheila Demenge	0	Office & Traffic Manager
	0	Sales Representative
MN Chippewa Tribe 205 Third Street International Falls, MN 56649 218-283-4744 Pam Hughes	0	Office & Traffic Manager
	0	Sales Representative
MN Work Force Center 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sue Fraik	0	Office & Traffic Manager
	0	Sales Representative
Daily Journal 1602 Highway 71 International Falls, MN 56649 218-285-7411	0	Office & Traffic Manager
	0	Sales Representative
KGHS -AM & KSDM- FM 519 Third Street International Falls, MN 56649 218-283-3481 Dennis Martin	0	Office & Traffic Manager
	0	Sales Representative

Outreach Initiative Record Keeping Worksheet

On Wednesday, March 17th, 2010, I represented KSDM FM, International Falls, MN at a Job Fair.

The International Falls Chamber of Commerce, the MN WorkForce Center and several other businesses sponsored the event. The Job Fair was held at the Backus Community Center at 900 5th Street in International

Falls from 11 am to 2 pm. There were a total of 33 businesses and organizations represented.

A total of 147 job seekers attended the fair including several high school and college students. I discussed our business with several attendees and took applications from a total of two people. The applications are now on file at 519 3rd Street, International Falls, MN 56649.

Outreach Initiative Record Keeping Worksheet

On Wednesday, March 24th, 2010, I represented KSDM FM at a job fair that was held at Central Lakes College, Brainerd, MN. The job fair was held from 9am-12 noon.

A total of 54 people stopped by our booth. 11 applications were handed out. 1 application and 11 resumes were given to us from those actively seeking employment in the radio industry.

A copy of the applications and resumes received have been placed in the public file of KKIN radio, 37208 U.S. Highway 169, Aitkin, MN.

Outreach Initiative Record Keeping Worksheet

On Saturday, July 17th, 2010 I represented KSDM-FM at the Upper Midwest Communications Conclave Career Fair in St. Louis Park, Minnesota. The Career Fair was held from 9am-12 noon.

A total of 37 people came by our booth and 22 applications were handed out. We received 24 resumes given to us by those seeking employment in the Radio industry.

A copy of those Resumes received and completed applications have been placed in our Stations' Public File located at 328 100th Street, Amery, Wisconsin 54001.

E. EEO Contact:

Contact Person: Don Welch
Mailing Address: 16880W U.S. Hwy. 63
Hayward, WI 54843
Telephone Number: 888-404-9555
E-mail address: donwelch202@yahoo.com

F. Number of Community Organizations requesting notice of full-time vacancies: 2 (two)

Brown College
1440 Northland Drive
Mendota Heights, MN 55120
Telephone: 1-800-627-6966

Fax: 651-905-3550
 Website: www.browncollege.edu
 Contact Person: Karol Baumeister

Minnesota Broadcasters Association
 3033 Excelsior Blvd., Suite 301
 Minneapolis, MN 55416
 Telephone: 612-926-8123
 Fax: 612-926-9761
 Contact Person: Jim du Bois, Executive Director

EEO Public File Report
Stations: International Falls, MN
KGHS-AM and KSDM-FM
Period covered: November 18, 2008 to November 19th, 2009

A. All full-time vacancies filled: None

Full-time Positions Filled by Job Title	Total Number of People Interviewed	Recruitment Source that Referred the Hiree
Office & Traffic Manager	0	0
Sales Representative	0	0
Sales Representative	0	0
Sales Representative	0	0

B. Total number of people interviewed for all full-time vacancies: None

C. Total number of interviewees referred by each recruitment source:

Recruitment Source (name, address, telephone, contact person)	Total Number of Interviewees From This Source During this Period	Full-time Positions for which this source was utilized.
Rainy River Community College 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sheila Demenge	0	Office & Traffic Manager
	0	Sales Representative
MN Chippewa Tribe 205 Third Street International Falls, MN 56649 218-283-4744 Pam Hughes	0	Office & Traffic Manager
	0	Sales Representative
MN Work Force Center		

1501 Highway 71 International Falls, MN 56649 218-283-9427 Sue Fraik	0 0	Office & Traffic Manager Sales Representative
Daily Journal 1602 Highway 71 International Falls, MN 56649 218-285-7411	0 0	Office & Traffic Manager Sales Representative
KGHS -AM & KSDM- FM 519 Third Street International Falls, MN 56649 218-283-3481 Dennis Martin	0 0	Office & Traffic Manager Sales Representative

C. Outreach initiatives during the time period: (below)

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) April 23, 2009

Participating employees: Dennis Martin, General Manager of KSDM/KGHS Radio, International Falls, MN

Host/Sponsor of activity: International Falls Chamber of Commerce & the MN Workforce Center

Brief description of activity and station participation: The Job Fair was held at the Rainy River Community College from 12pm to 3pm and there were 20 businesses represented. A total of 193 job seekers attended the fair. I discussed our business and took applications from a total of 6 people. The applications are now on file at 519 3rd Street, International Falls, MN 56649.

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM/KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) March 24, 2009

Participating employees: Terry D. Modl, General Manager of KKIN/KFGI Radio, Aitkin, MN

Host/Sponsor of activity: Brainerd Lakes Area Chamber of Commerce & Bridges Career Academies and

workplace connection.

Brief description of activity and station participation: The Job Fair was held at Central Lakes College in Brainerd, Minnesota. The event was held from 1pm to 5pm. There were several businesses represented. Red Rock Radio had 42 people visit it's booth, and we passed out 20 employment applications and 4 resumes were given to us at the fair. A copy of the resumes received and filled out applications were placed on file at the offices of KKIN/KFGI Radio, 37208 US Highway 169, Aitkin, MN

E. EEO Contact:

Contact Person: Don Welch
Mailing Address: 16880W U.S. Hwy. 63
Hayward, WI 54843
Telephone Number: 888-404-9555
E-mail address: donwelch202@yahoo.com

E. Number of Community Organizations requesting notice of full-time vacancies: 2 (two)

Brown College
1440 Northland Drive
Mendota Heights, MN 55120
Telephone: 1-800-627-6966
Fax: 651-905-3550
Website: www.browncollege.edu
Contact Person: Karol Baumeister

Minnesota Broadcasters Association
3033 Excelsior Blvd., Suite 301
Minneapolis, MN 55416
Telephone: 612-926-8123
Fax: 612-926-9761
Contact Person: Jim du Bois, Executive Director

EEO Public File Report
Stations: International Falls, MN
KGHS-AM and KSDM-FM
Period covered: November 23, 2007 to November 17th, 2008

A. All full-time vacancies filled: Four (4)

Full-time Positions Filled by Job	Total Number of People Interviewed	Recruitment Source that Referred
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Title		the Hiree
Office & Traffic Manager	20-December 2007	KSDM / KGHS
Sales Representative	8-November 2007	KSDM / KGHS
Sales Representative	3-December 2007	KSDM / KGHS
Sales Representative	3-July 2008	KSDM / KGHS

B. Total number of people interviewed for all full-time vacancies: 34

C. Total number of interviewees referred by each recruitment source:

Recruitment Source (name, address, telephone, contact person)	Total Number of Interviewees From This Source During this Period	Full-time Positions for which this source was utilized.
Rainy River Community College 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sheila Demenge	0	Office & Traffic Manager
	0	Sales Representative
MN Chippewa Tribe 205 Third Street International Falls, MN 56649 218-283-4744 Pam Hughes	0	Office & Traffic Manager
	0	Sales Representative
MN Work Force Center 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sue Fraik	3	Office & Traffic Manager
	1	Sales Representative
Daily Journal 1602 Highway 71 International Falls, MN 56649 218-285-7411	5	Office & Traffic Manager
	2	Sales Representative
KGHS -AM & KSDM- FM 519 Third Street International Falls, MN 56649 218-283-3481 Dennis Martin	12	Office & Traffic Manager
	9	Sales Representative

C. Outreach initiatives during the time period: (below)

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) April 25, 2008

Participating employees: Dennis Martin, General Manager of KSDM/KGHS Radio, International Falls, MN

Host/Sponsor of activity: International Falls Chamber of Commerce & the MN Workforce Center

Brief description of activity and station participation: The Job Fair was held at the Rainy River Community College from 11am to 3pm and there were 22 businesses represented. A total of 135 job seekers attended the fair. I discussed our business and took applications from a total of 10 people. The applications are now on file at 519 3rd Street, International Falls, MN 56649.

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) March 12, 2008

Participating employees: Terry D. Modl, General Manager of KKIN/KFGI Radio, Aitkin, MN

Host/Sponsor of activity: Brainerd Lakes Area Chamber of Commerce & Bridges Career Academies and workplace connection.

Brief description of activity and station participation: The Job Fair was held at Central Lakes College in Brainerd, Minnesota. The event was held from 10am to 1pm. There were 36 businesses represented with over 00 attendees. Red Rock Radio passed out 22 employment applications, that when returned, will be place on file in the offices of KKIN/KFGI Radio, 37208 US Highway 169, Aikin, MN

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) March 12, 2008

Participating employees: Jon Detray

Host/Sponsor of activity:

Brief description of activity and station participation: Jon Detray and employee of Red Rock Radio Inc represented KSDM/FM in the 13th Annual Sawyer County/Washburn county, Wisconsin job fair. This event ran from noon to 5pm in the convention center of the LCO Indian Tribal Casino, located in Hayward, Wisconsin. There were 35 businesses represented with more that 100 attendees. Red Rock Radio passed out

25 employment applications that when returned will be placed on file in the offices of WHSM Radio, Hayward, Wisconsin.

E. EEO Contact:

Contact Person: Don Welch
Mailing Address: 16880W U.S. Hwy. 63
Hayward, WI 54843
Telephone Number: 888-404-9555
E-mail address: donwelch202@yahoo.com

F. Number of Community Organizations requesting notice of full-time vacancies: 2 (two)

Brown College
1440 Northland Drive
Mendota Heights, MN 55120
Telephone: 1-800-627-6966
Fax: 651-905-3550
Website: www.browncollege.edu
Contact Person: Karol Baumeister

Minnesota Broadcasters Association
3033 Excelsior Blvd., Suite 301
Minneapolis, MN 55416
Telephone: 612-926-8123
Fax: 612-926-9761
Contact Person: Jim du Bois, Executive Director

EEO Public File Report
Stations: International Falls, MN
KGHS-AM and KSDM-FM
Period covered: November 23, 2006 to November 22, 2007

A. All full-time vacancies filled: Two (2)

Full-time Positions Filled by Job Title	Total Number of People Interviewed	Recruitment Source that Referred the Hiree
Sports Director	10 – April, 2007	Brown College
Office & Traffic Manager	12 - February, 2007	KSDM / KGHS

B. Total number of people interviewed for all full-time vacancies: 22

C. Total number of interviewees referred by each recruitment source:

Recruitment Source (name, address, telephone, contact person)	Total Number of Interviewees From This Source During this Period	Full-time Positions for which this source was utilized.
Rainy River Community College 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sheila Demenge	0 0	Office & Traffic Manager Sports Director
MN Chippewa Tribe 205 Third Street International Falls, MN 56649 218-283-4744 Pam Hughes	0 0	Office & Traffic Manager Sports Director
MN Work Force Center 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sue Fraik	1 0	Office & Traffic Manager Sports Director
Daily Journal 1602 Highway 71 International Falls, MN 56649 218-285-7411	1 0	Office & Traffic Manager Sports Director
KGHS -AM & KSDM- FM 519 Third Street International Falls, MN 56649 218-283-3481 Dennis Martin	8 0	Office & Traffic Manager Sports Director
Minnesota Broadcasters Assn 3033 Excelsior Blvd Ste 440 Minneapolis, MN 55416	0 2	Office & Traffic Manager Sports Director
Brown College Minneapolis, MN	0 6	Office & Traffic Manager Sports Director
Sportscaster Talent Agency Of America	0 2	Office & Traffic Manager Sports Director
Bemidji State University Bemidji, MN	0 0	Office & Traffic Manager Sports Director
Thief River Falls Technical College Thief River, MN	0 0	Office & Traffic Manager Sports Director

C. Outreach initiatives during the time period: (below)

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) January 29, 2007

Participating employees: Dennis Martin, General Manager of KSDM/KGHS Radio, International Falls, MN

Host/Sponsor of activity: KSDM/KGHSRadio

Brief description of activity and station participation: Attended by 28 people interested in exploring a career in broadcasting. A total of 23 people filled out job applications and/or left resumes for the area of business they were interested in - 3 for Sales, 6 for Announcing, 14 for Office Work. Visited with each applicant about the radio business in detail. All of the resumes are on file at the KSDM/KGHS Studios, 519 Third Street, International Falls, MN 56649.

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) December 15, 2006

Participating employees: Terry D. Modl, General Manager of KKIN/KFGI Radio, Aitkin, MN

Host/Sponsor of activity: KKIN/KFGI Radio

Brief description of activity and station participation: A total of eight (8) people attended the job fair. Discussed radio business and interviewed for the open position of Sales Representative. While there are a couple of prospects for Sales Representative, no decision has been made at this time.

E. EEO Contact:

Contact Person: Don Welch
Mailing Address: 16880W U.S. Hwy. 63
Hayward, WI 54843
Telephone Number: 888-404-9555
E-mail address: donwelch202@yahoo.com

G. Number of Community Organizations requesting notice of full-time vacancies: 2 (two)

Brown College
1440 Northland Drive
Mendota Heights, MN 55120
Telephone: 1-800-627-6966
Fax: 651-905-3550

Website: www.browncollege.edu

Contact Person: Karol Baumeister

Minnesota Broadcasters Association

3033 Excelsior Blvd., Suite 301

Minneapolis, MN 55416

Telephone: 612-926-8123

Fax: 612-926-9761

Contact Person: Jim du Bois, Executive Director

EEO Public File Report
Stations: International Falls, MN
KGHS-AM and KSDM-FM
Period covered: November 23, 2005 to November 22, 2006

A. All full-time vacancies filled: 1 (One)

Full-time Positions Filled by Job Title	Total Number of People Interviewed	Recruitment Source that Referred the Hiree
Sports Director	7	Sportscaster Talent Agency of America

B. Total number of people interviewed for all full-time vacancies:

C. Total number of interviewees referred by each recruitment source:

Recruitment Source (name, address, telephone, contact person)	Total Number of Interviewees From This Source During this Period	Full-time Positions for which this source was utilized.
Rainy River Community College 1501 Highway 71 International Falls, MN 56649 218-283-9427 Sheila Demenge	0	Sports Director
MN Chippewa Tribe 205 Third Street International Falls, MN 56649 218-283-4744 Pam Hughes	0	Sports Director
MN Work Force Center 1501 Highway 71 International Falls, MN 56649 218-283-9427	0	Sports Director

Sue Fraik		
Daily Journal 1602 Highway 71 International Falls, MN 56649 218-285-7411	0	Sports Director
KGHS -AM & KSDM- FM 519 Third Street International Falls, MN 56649 218-283-3481 Dennis Martin	2	Sports Director
Minnesota Broadcasters Assn.	2	Sports Director
Brown College	13	Sports Director
Sportscaster Talent Agency of America	12	Sports Director
Bemidji State University	0	Sports Director
Thief River Falls Technical College	0	

C. Outreach initiatives during the time period: (below)

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) March 22, 2006

Participating employees: Terry D. Modl, General Manager, KKIN AM & FM, Aitkin, MN

Host/Sponsor of activity: The Brainerd Lakes Chamber of Commerce Workforce Committee at Central Lakes College, 501 West College Drive, Brainerd, MN

Brief description of activity and station participation: Annual event. A total of 47 people visited our booth; 12 people took applications with them to fill out and send back. Twelve (12) resumes were left at our booth, and these will be on file at KKIN/KFGI Radio, 37208 U.S. Hwy. 169, Aitkin, MN.

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) March 23, 2006

Participating employees: Mike Knoll, General Manager of WCMP AM & FM

Host/Sponsor of activity: Brown College at the school in Mendota Heights, MN

Brief description of activity and station participation: Approximately 100 graduates of Brown College attended the job fair. Received 20 applications and resumes, which are on file at WCMP Radio in Pine City, MN.

Outreach Initiative Record Keeping Worksheet

Station(s) Claiming Credit: KGHS-AM & KSDM-FM

Type of activity listed under Outreach Initiative worksheet: Job Fair

Date of station participation: (on date; from date to date) April 12, 2006

Participating employees: Mark Senarighi, General Manager, WKLK/WMOZ Radio in Cloquet, MN

Host/Sponsor of activity: Fond du Lac Tribal and Community College

Brief description of activity and station participation: A total of 22 people visited our booth. Two (2) people took applications with them to be filled out and sent back. One (1) resume was left at our booth and will be on file at WKLK/ WMOZ Radio, 1104 Cloquet Avenue, Cloquet, MN.

E. EEO Contact:

Contact Person: Don Welch
Mailing Address: 16880W U.S. Hwy. 53
Hayward, WI 54843
Telephone Number: 888-404-9555
E-mail address: donwelch202@yahoo.com

H. Number of Community Organizations requesting notice of full-time vacancies: 2 (two)

Brown College
1440 Northland Drive
Mendota Heights, MN 55120
Telephone: 1-800-627-6966
Fax: 651-905-3550
Website: www.browncollege.edu
Contact Person: Karol Baumeister

Minnesota Broadcasters Association
3033 Excelsior Blvd., Suite 301
Minneapolis, MN 55416
Telephone: 612-926-8123
Fax: 612-926-9761
Contact Person: Jim du Bois, Executive Director

EEO Public File Report
Stations: International Falls, MN
KGHS-AM and KSDM-FM
Period covered: November 23, 2004 to November 22, 2005

A. All full-time vacancies filled: One (1)

Full-time Positions Filled by Job Title	Total Number of People Interviewed	Recruitment Source that Referred the Hiree
Account Executive		