

Station KBIM AM & KBIM FM is an Equal Opportunity Employer.

Job Title: Sales KBIM AM/FM Referral Source(s) of Hiree: PROGRAMING Referred by NMBA

Date: 01/16/10

Roswell Daily Record	Charles Fischer	2301 N Main St Roswell, NM 88201	575 622 7710	0	no
Character Counts	Clay Avery	P.O. Box 999 Roswell, NM 88202	575 623 1238	0	no
Lulac of Hobbs	Robert Brijalba	508 Taos Hobbs, NM 88240	575 527 2416	0	no
New Mexico Military Institute	Mike Godfrey	101 W. College Roswell, NM 88201	575 624 5633	0	No
African American Cultural	Lovie McGee	P.O. Box 18043 Albuquerque, NM87185	505 299 7910	0	no
Chaves County Community	Sam Parker	P.O. Box 2246 Roswell, NM 88202	575 623 0014	0	no
KBIM AM/FM	Kevin Bonner	P.O. Box 1953 Roswell, NM 88202	575 623 9100	2	no
New Mexico Broadcasters	Paula Maes	8014 Mensual Albuquerque, NM	505 881 4440	6	no
All Access.com	Joel Denver	Broadcasting Website	none	0	no
New Mexico Dept. of Labor	Marcellia Mirando	108 Bland St Roswell, NM 88203	575 623 8543	0	no
Roswell Hispanic Chamber	Juan Espinosa	327 N. Main Roswell, NM 88201	575 624 0889	0	no
NM STATE	Mario Carrasso	1500 University Dr Carlsbad, NM 88220	575 334 4523	0	no
Wesst Corp	Bill Bland	200 W First Roswell NM 88201	575 624 8972	0	No
				0	
ENMU-Roswell	Becky Cole	P.O. Box 6000 Roswell Nm 88202	575 392 6561	0	no
Lulac of New Mexico	Pablo Martinez	P.O. Box 16081 Las Cruces, NM88004	575 765 7710	0	no
Radio Online		Website		10	no
Univ. of New Mexico	Mary Bibeau	1 University of New Mexico Albuquerque NM 87131	505 273 1903	0	no

National Hispanic Media	Antoinette Fontenelle	1201 W 5th St Suite 205 Albuquerque NM 87108	213 534 3026	0	no
Radio TV Jobs	n/a	Website	n/a	0	no
NAACP	Ella Turner	1117 W. Taos Hobbs, NM 88240	575 334 3532	0	no
New Mexico Jr College	Robert Turner	5317 Lovington Hyw Hobbs, NM 88240		0	no
Chaves County NAACP	Florence Hamilton	P.O. Box 194 Roswell, Nm 88202		0	no

6) **Total # of Interviewees Referred:** For the period from June 2009 to May 31, 2010, this Employment Unit interviewed 34 interviewees for full-time job vacancies.

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 Attachment A

(b) **Initiative:** Job Fair

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 Attachment B

*Includes all employee applicant interviews conducted from June 1, 2009 through May 31, 2010 for positions filled or unfilled to date.

(c) Initiative: Job Bank

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 Attachment C

(d) Initiative: EEO Discrimination Training for Upper Management

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 Attachment D

(e) **Initiative:** EEO & Sexual Harassment Staff Meeting.

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 Attachment E

Noalmark Broadcasting Corporation – Roswell, NM – Internship Program

The Noalmark Internship program is designed to give high school and college students the opportunity to experience the careers available in the radio broadcasting industry. The Internship program chooses interns from applicants who express an interest in the radio industry.

The manner in which we notify possible applicants of the program is five fold:

- 1) We announce our programs and the openings over the air on each of our two radio stations. The announcements encourage students to contact their high school guidance counselor or college job placement advisor if they are interested.
- 2) We provide applications to high school guidance counselors asking them to inform students of this opportunity.
Goddard High School
Roswell High School
Dexter High School
Valley Christian
Gateway Christian
- 3) We provided applications to college job placement advisors asking them to inform students of this opportunity.
- 4) We announce our summer internship program through our radio station's official web site at www.kbimradio.com

Once we receive applications, we review them based upon each applicant's aspirations; references, previous work history, grades, college major and what they believe will be their career choices. The General Manager may interview applicants. Once an applicant is deemed qualified and suitable for entry into the internship program, he or she is offered a position with Noalmark Broadcasting Corporation.

Interns are exposed to the various operations of a radio station which may include some combination of on-air work, show production, remote broadcasts, engineering, traffic, billing, administrative assistance, sales, commercial production and board operations, depending to some extent upon the interest of the intern and the needs of the station.

It is our goal that Noalmark Broadcasting interns will obtain a well-rounded view of the opportunities available in the radio broadcast industry, and an interest in pursuing broadcasting as a course of study and 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.

Among the interns who have been in our program during the past 12 months are:

KBIM's intern is a sophomore at Dexter High School in Dexter has been accepted in our internship program, and currently is an assistant to the programming department; she started with us in July of 2008. She plans to enter college.

JOB FAIRS

On April 21, 2010 KBIM participated in the New Mexico State Career Fair in Carlsbad on the campus of New Mexico State University.

March 3, 2010 KBIM took part in the 10th annual Eastern New Mexico Spring Job Fair was held at the Eastern New Mexico University campus and attracted a large crowd. KBIM AM/FM participated in

NMBA Virtual Job Fair during the week of October 14 through July 18, 2008. The Job Fair was promoted with on air advertising on KBIM AM/FM

Footnote: During the last reporting period KBIM AM/FM participated in the 9th Annual Eastern New Mexico Spring Job Fair held on Saturday April 1st 2009 and on November 19 KBIM participated in the 2nd Annual Roswell Youth Career Fair. By participating in these four job fairs in the last two reporting periods this qualifies as a Prong 3 Outreach Initiative.

2010 EEO Activities – NMBA Job Bank

As a member station of the New Mexico Broadcasters Association, KBIM AM, and KBIM FM support and participate in the NMBA Job Bank which is maintained on the NMBA's website. Member stations, including those listed above submit all job openings as they occur and list an email address to respond. The Job Bank also encourages minorities and women from around the county to submit their resumes for consideration by New Mexico stations. It was through just such a listing that KBIM successfully found its present Sales Manager Darryl Burkfield in 2008.

EQUAL EMPLOYMENT OPPORTUNITY AND
DISCRIMINATION PREVENTION TRAINING
UPPER LEVEL MANAGEMENT
TUESDAY, NOVEMBER 1, 2009

A training session was held for all upper level management of Noalmark Broadcasting Corporation on Tuesday, November 1, 2009 at Santa Fe, New Mexico in conjunction with the Company's strategic planning and educational annual meeting. This session was primarily to train management personnel as to methods of ensuring equal employment opportunity and preventing discrimination

The managers attending the training session for Noalmark were Paul J. Starr, Vice President in charge of Noalmark's New Mexico stations and General Manager of Noalmark's Hobbs stations, Harry Harlan, Assistant Manager of the stations, Al Lobeck, General Manager of the Bender Group of the stations, and Aaron Forrister, local Sales Manager of the Turner Street stations; Sandy Sanford, General Manager of Noalmark's El Dorado, Arkansas stations and Orlando Garza, Sales Manager of the stations; Ken Sibley, General Manager of Noalmark's Magnolia, Arkansas stations; Jamie Friend, General Manager of Noalmark's Hot Springs, Arkansas are stations; and Kevin Bonner, General Manager of Noalmark's Roswell, New Mexico stations. As in past years, the presenters for the training session were William C. Nolan, Jr. and Edwin B. Alderson, Jr who are partners in the law firm of Nolan & Alderson. Both have been active in corporate and employment law for several decades, and have represented many businesses in these areas.

Mr. Nolan refreshed the participant's understanding of Noalmark's EEO Policy Statement that was adopted by the Company several years ago. It reflects the Company's deep commitment to ensuring equal opportunity in employment and promotions for minorities and females. It was emphasized that this Policy goes beyond current FCC rules by requiring the hiring of minorities and females if their qualifications are equal to the qualifications of others. A copy of this policy is attached here to.

Mr. Nolan and Mr. Alderson then presented to the attendees a detailed review of the FCC's General EEO Policy that equal opportunity in employment shall be afforded to all persons, and that no one shall be discriminated against, regardless of race, color, religion, national origin or sex. Both the general and the specific EEO program requirements under the Rules were presented and discussed. The Prong Three Initiatives were discussed in detail and each Manager was asked to present the activities to date this year. The requirement to periodically assess a station's EEO program and results, and to make changes that might enhance the program was also stressed. The elements of the self-analysis⁰ were discussed. Proper record keeping is very important, and record retention requirements of the FCC were reviewed.

Next, there was a presentation and discussion of the Managers' requirement to prepare an Annual EEO Public File Report. The components of the report were discussed in detail. It was stressed that if each stations fulfilled its requirements on an ongoing basis throughout the year, and kept adequate records, that the Public File Report would be relatively easy to prepare. As stations reach the midpoint of their license term, the requirements that all nonexempt stations file a Mid-term review with the Commission was discussed in detail. As to both the annual and mid-term requirements, each station was encouraged to keep a calendar that would highlight these important dates.

There next ensued a discussion as to how each manager could be more effective in meeting FCC requirements and the Company-s own EEO Policy

After finishing with the EEO presentation, the attorneys reviewed the Company's sexual harassment policy. What constitutes harassment and how to respond to it was discussed in detail with several real life situations presented. If the Company's stations are serious about stopping harassment and if the policy is followed, the result will be fairer treatment of employees.

After a discussion of several other Company policies including the dress code and the computer policy, the meeting was adjourned.

Attachment E

EEO, Sexual Harassment Staff Seminar and Department Head Seminar

On November 19, 2009 a staff seminar was conducted by General Manager Kevin Bonner. During this meeting the entire Noalmark Broadcasting Corporation Equal Employment Opportunity policy Statement was read. Then there was a complete discussion of the policy including examples of how it has applied in the past. For instance, we made certain that employees understand that the company wants references from the staff for prospective minority and female employees. Care was taken to make certain employees understand that Noalmark is not just an Equal Opportunity Employer but an Affirmative Action employer that wants to seek out and find the best prospective women and minority candidates for positions.

On November 19, 2009 a staff seminar was conducted by General Manager Kevin Bonner. During this meeting the entire Noalmark Broadcasting Corporation Sexual Harassment Policy was read. This was followed by a discussion on the forms sexual harassment and the potential consequences, internal and legal, that can follow from such action. Also there was a discussion of how to report sexual harassment to management in Roswell and to our corporate headquarters in El Dorado.

On November 19, 2009 a Department seminar was conducted by General Manager Kevin Bonner. During this meeting the entire Noalmark Broadcasting Corporation Sexual Harassment Policy was read. We discussed what constitutes a **Hostile environment with sexual harassment and that it** can include unwelcome sexual advances, requests for sexual favors or other conduct of a sexual nature or disparaging comments that is sufficiently severe, persistent or pervasive to have the purpose or effect of unreasonably interfering with an individual's work or learning or creating an intimidating, hostile, abusive or offensive work or learning environment. This includes:

- a. **Gender harassment:** generalized sexist statements and behavior that convey insulting or degrading attitudes about women. Examples include insulting remarks, whistling at someone, cat calls, obscene jokes or humor about sex or women in general.
- b. **Seductive behavior:** unwanted, inappropriate and offensive sexual advances. Examples include repeated unwanted sexual invitations, insistent requests for dinner, drinks, or dates, persistent letters, giving personal gifts, phone calls or other invitations.
- c. **Sexual imposition:** gross sexual imposition, such as unwanted touching, feeling, grabbing, hugging, kissing, patting or stroking, neck massage, or sexual assault.
- d. **Sexual favoritism:** awarding grades, providing recommendations, or granting opportunities or benefits because of an individual's submission to sexual advances or requests for sexual favors.
- e. **Sex-related comments or gestures:** comments or gestures with sexual content or sexual implications. Examples include sexual teasing, jokes, remarks or questions, personal questions about sexual life; etc. Also there was a discussion of how to report sexual harassment to management in Roswell and to our corporate headquarters in El Dorado.

**NOALMARK BROADCASTING CORPORATION
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 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 19th Street, El Dorado, Arkansas 71730, or by telephone at 870-862-0202. All such communications will be promptly and thoroughly investigated.

**NOALMARK-ROSWELL
2010 EEO PUBLIC FILE REPORT
NARRATIVE**

The recession has affected Roswell over the last twelve months. Chaves County economically has been affected by main two factors (1) the drastic drop in the price of oil and (2) the increasing cost of operating dairies. The decrease in the price of barrel of a oil has led to layoffs, this coupled with highest price for animal feed and falling prices paid for dairy products has led to a economical slow down and higher unemployment. In order to remain viable, like most businesses we cut expenses and attempted to operate more efficiently wherever possible. As a result, since the last Annual EEO Report we have reduced our full time employees from 7 to 5.

A review of the current employment roster indicates that there are five full time employees at the stations; one of whom is female and one of whom is a minority. The female is our Office Manager and is in charge of the stations when the General Manager is absent. The minority serves as our News Director/Sports Director. These two employees are the second and third most highly compensated employees at the stations. At the present time we have two employees less than in the previous report. We are diligently trying to hire an Operation Manager, which will increase our staff size to six. We would very much like to add a female Operations Manager and will give preference in that area if abilities are equal to that of male applicants.

It is frustrating that we don't get many referrals from the sources that we contacted as we would have expected, or wanted. At the beginning of the year we once again reviewed our contact sources to consider whether to use other groups to try to get more referrals, but have no great reason to be optimistic that it will help very much. Again in this year's reporting period we added new recruiting sources. We have tried hard to interview more people in connection with each job vacancy, and we were able to conduct more interviews.

Our Internship Program and Job Fair participation and other Prong 3 initiatives should help our continuing efforts to recruit females and minorities. We have also performed a thorough self assessment in connection with this Report to make sure that our policies are being followed and that there is no discrimination in practice at the stations in either the hiring process or the employment process.

We're expecting to add one employee in 2010, and we will continue to strive to meet our obligations to the FCC as well as to fulfill the objectives of our own EEO Policy.