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April 13, 2017

Marlene Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

RE: Equal Employment Opportunity, MB Dockets 98-204 and 16-410

Dear Ms. Dortch:

This letter reports on a telephone call I had on Tuesday, April 11 with David Grossman, Chief of Staff and Media Policy Advisor to Commissioner Mignon Clyburn, concerning the above-referenced proceeding. I made these points regarding MMTC's position on the internet recruitment issue that is the subject of Docket 16-410:

- MMTC generally endorses the proposal to allow broader credit for use of the internet for EEO recruitment. Virtually all broadcast applicants are reasonably expected to know how to access the internet because it is a job requirement in the industry. Further, people of color over-index in the use of mobile broadband for job search. Free internet postings usually have a wider reach than paid print advertising. The use of on-air advertising for job recruitment is an appropriate means by which broadcasters use their spectrum to serve the public interest.
- Despite the ubiquity of internet postings and widespread use of internet for job search by people of color, most jobs still are filled through relationships. Therefore, licensees should not be allowed to fulfill their EEO obligations by simply posting openings online and doing no other recruitment. Rather, internet recruitment should be viewed as a supplement to, but not a substitute for, the maintenance of recruitment relationships with local sources, including educational institutions as well as job training programs such as those operated by the National Urban League and LULAC.
- The internet recruiting issue is but one of numerous pending EEO policy issues that have awaited FCC action since 2004 in Docket 98-204. April 24, 2017 will mark the 50<sup>th</sup> Anniversary of the filing of the United Church of Christ's Petition for Rulemaking to establish what became the EEO Rule. The Commission should mark this occasion by pledging to complete the Docket 98-204 proceeding by the close of 2017, thereby improving EEO enforcement by targeting discriminators, putting an end to the punishing of non-discriminating broadcasters who recruit primarily by word of mouth but from highly diverse workforces, and embracing EEO best practices that hold out the greatest promise for enhancing diversity across all technological platforms.

Sincerely,

*David Honig*

David Honig  
President Emeritus and Senior Advisor

cc: David Grossman, Esq.