

**SECTION I UNITED STATES OF AMERICA  
FEDERAL COMMUNICATIONS COMMISSION**

**APPLICATION FOR RENEWAL OF AN INTERNATIONAL, OR  
EXPERIMENTAL BROADCAST STATION LICENSE**

**APPLICANT SHOULD NOT USE THIS BOX**

**INSTRUCTIONS**

A. This form is to be used in all cases when applying for Renewal of an International or Experimental Broadcast Station License. This form consists of this part, Section I, and Section VI.

B. Prepare an original and two copies of this form and all exhibits with the Federal Communications Commission, Washington, D.C. 20554.

C. Number exhibits serially in the space provided in the body of the form and list each exhibit in the space provided on page 3 of this form. Date each exhibit.

D. The name of the applicant must be stated exactly as it appears on the current license.

E. Information called for by this application which is already on file with the Commission need not be refiled in this application provided (1) the information is now on file in another application or FCC form filed by or on behalf of this applicant; (2) the information is identified fully by reference to the file number (if any), the FCC form number, and the filing date of the application or other form containing the information and the page or paragraph referred to, and (3) after making the reference, the applicant states: "No change since date of filing." Any such reference will be considered to incorporate into this application all information, confidential or otherwise, contained in the application or other form referred to. The incorporated application or other form will thereafter, in its entirety, be open to the public.

F. This application shall be personally signed by the applicant, if the applicant is an individual; by one of the partners, if the applicant is a partnership; by an officer, if the applicant is a corporation; by a member who is an officer, if the applicant is an unincorporated association; by such duly elected or appointed officials as may be competent to do so under the laws of the applicable jurisdiction, if the applicant is an eligible governmental entity; or by the applicant's attorney in case of the applicant's physical disability or of her/his absence from the United States. The attorney shall, in the event she/he signs for the applicant, separately set forth the reason why the application is not signed by the applicant. In addition, if any matter is stated on the basis of the attorney's belief only (rather than knowledge) she/he shall separately set forth her/his reasons for believing that such statements are true.

G. **BE SURE ALL NECESSARY INFORMATION IS FURNISHED AND ALL PARAGRAPHS ARE FULLY ANSWERED. IF ANY PORTIONS OF THE APPLICATION ARE NOT APPLICABLE, SPECIFICALLY SO STATE. DEFECTIVE OR INCOMPLETE APPLICATIONS MAY BE RETURNED WITHOUT CONSIDERATION.**

File No.

1. Name of applicant (See Instruction D)

World Christian Broadcasting Corporation

Street Address

605 Bradley Ct

City

Franklin

State

TN

ZIP Code

37067

Telephone (include Area Code)

615-371-8707

2. Name and address of person to whom communications should be sent, if different from item 1

Name

Amado Abenojar

Street Address

605 Bradley Ct

City

Franklin

State

TN

ZIP Code

37067

Telephone (include Area Code)

615-371-8707

3. Renewal requested for following facilities

Type of station (See instructions)

Shortwave (HF) Station

Call sign

KNLS

Transmitter Location

1609 STERLING HWAY, Anchor Point,  
Kenai Borough, AK 99556

Frequency

HF band

Antenna input power

100 KW

Hours of Operation

UNLIMITED

4. When reference is made to information filed in prior application (see instruction E), give proper reference:

Paragraph No.

File or Form No.

Date Filed

Have there been any substantial changes in the information incorporated in this application by reference in this paragraph?

Yes ☐ No ☒

## SECTION I

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | (X yes or no) | Yes | No |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----|----|
| 5. Is applicant, or any person directly or indirectly controlling applicant, party to a suit in any Federal Court involving the monopolizing, or an attempt to monopolize radio communication directly or indirectly through control of the manufacture or sale of radio apparatus, by exclusive traffic arrangement or by any other means, or of using unfair methods of competition? (If "Yes", attach as EXHIBIT _____ a full description of the proceeding, identifying the court and showing where records of the proceeding may be obtained. See Sec. 313 of the Communications Act of 1934.)                                                                                                                                                                                                                                                                                                                                                                                                   |               |     | X  |
| 6. Have there been any changes in ownership since the filing of the last application for construction permit or renewal of license, or in the case of an International Station, is the information shown in applicant's Ownership Reports, now on file with the Commission, true and correct as of this date? (If "No", attach as EXHIBIT _____ an Ownership Report supplying full information to bring such data up to date.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |     | X  |
| 7. Has there been any change in the citizenship of the applicant?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |               |     | X  |
| 8. Is the applicant a representative of an alien or foreign government?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |               |     | X  |
| 9. Are there any documents, instruments, contracts or understandings relating to ownership, management, use or control of the station or facilities, or any right or interest therein? (If "Yes", attach as EXHIBIT _____ copies of all such documents, instruments or contracts and state the substance of oral contracts or understandings.)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |               |     | X  |
| 10. Attach as EXHIBIT _____ a complete report of experimentation conducted during the present license period including therein the number of hours of operation, full data on research and experimentation conducted including the type of transmitting and studio (if any) equipment used and their mode of operation, data on expense of research and operation during the period covered, data on any measurements, tests, or observations conducted and description of the apparatus employed, estimated degree of public participation (solicited or unsolicited), complete details of any reported interference and steps taken to eliminate such interference, conclusions, tentative and final, program for further research experimentation requiring additional time and estimate of additional time required to complete the experimentation and terminate operation, and full details of developments and major changes in equipment. (Not required of International Broadcast Stations.) |               |     |    |
| 11. In what respect, if any, does the apparatus, antenna, or operation differ from that described in the last application for license or renewal of license?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |               |     |    |

THE APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934).

THE APPLICANT represents that this application is not filed for the purpose of impeding, obstructing, or delaying determination on any other application with which it may be in conflict.

THE APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations, and that all the exhibits are a material part hereof and are incorporated herein as if set out in full in the application.

## CERTIFICATION

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 3<sup>rd</sup> day of December 2024 10 AMADO ABENOSAR  
(Name of applicant)

WILLFUL FALSE STATEMENTS MADE ON THIS FORM  
ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.

Signed by

Amado Abenogar

Title

Chief Engineer

## FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

We have estimated that each response to this collection of information will take 2 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain the required data, and actually complete and review the form or response. If you have any comments on this burden estimate, or on how we can improve the collection and reduce the burden it causes you, please e-mail them to [pia@fcc.gov](mailto:pia@fcc.gov) or send them to the Federal Communications Commission, AMD-PERF, Paperwork Reduction Project (3060-1035), Washington, DC 20554. Please DO NOT SEND COMPLETED APPLICATIONS TO THIS ADDRESS. Remember - you are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-1035.

THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.

## SECTION I

EXHIBITS furnished as required by this form:

| Exhibit No. | Paragraph Number<br>requiring Exhibit | Name of officer or employee (1) by whom or (2) under<br>whose direction exhibit was prepared (show which) | Official title |
|-------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------|----------------|
|             |                                       |                                                                                                           |                |

## FEDERAL COMMUNICATIONS COMMISSION

SECTION VI

EQUAL EMPLOYMENT OPPORTUNITY

NAME OF APPLICANT

AMADO ABENOJAR

CALL SIGN

KNLS

CITY AND STATE WHICH STATION IS LICENSED TO SERVE

INTERNATIONAL

## INSTRUCTIONS TO SECTION VI

Broadcast station licensees are required to afford equal employment opportunity to all qualified persons and to refrain from discriminating in employment and related benefits on the basis of race, color, religion, national origin or sex. See Section 73.2080 of the Commission's Rules. Pursuant to these requirements, a license renewal applicant who employs five or more full-time station employees must file a program designed to assure equal employment opportunity for women and minority groups (that is, Blacks not of Hispanic origin, Asians or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics). If minority group representation in the available labor force is less than five percent (in the aggregate), a program for minority group members need not be filed. However, a program must be filed for women since they comprise a significant percentage of virtually all area labor forces. If an applicant employs fewer than five full-time employees, no EEO program for women or minorities need be filed.

NOTE: Check appropriate box, sign the certification below, and return to the FCC:



Station employs fewer than 5 full-time employees;  
therefore no written program is being submitted.



Station employs 5 or more full-time employees.  
Our 10-point program is attached; (FCC Form 396).

CERTIFICATION

I certify that the statements made herein are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 3rd day of December, 19 2024

Signature: Amado Abenjar

Title: Chief Engineer

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.  
U.S. CODE, TITLE 18, SECTION 1001.

## ATTACHMENT A

Guidelines to the Model EEO Program

The model EEO program, which was adopted by the Commission in Docket No. 20550, provides comprehensive and clearly-defined practices to assist the non-exempt broadcast applicant in developing an effective EEO program for its proposed or existing station. The EEO program designed for a particular station should be reasonably responsive to the elements of the model program to the extent they are appropriate in terms of station size, location and the like. However, the data requirements, which are set forth in Sections IV, VI, VII and VIII of the model, are essential for self-evaluation and must be part of whatever program is devised by the broadcast applicant. While the most current information available should be used in responding to these elements, statements of policy and general descriptions of a station's EEO practices, which were set forth in earlier-filed EEO program, can be incorporated by reference where the applicant does not intend to augment or otherwise modify its program in that respect during the forthcoming license term. The specific elements which should be addressed are as follows:

**I. General Policy**

The first section of the program should contain a statement by the applicant that it will afford equal employment opportunity in all personnel actions without regard to race, color, religion, national origin or sex, and that it has adopted an EEO program which is designed to fully utilize the skills of minorities and women in the relevant available labor force.

**II. Responsibility For Implementation**

This section calls for the name and title of the official designated by the licensee with responsibility for implementation of the station's program.

**III. Policy Dissemination**

The purpose of this section is to disclose the manner in which the station's EEO policy is communicated to employees and prospective employees. In this respect, the applicant's program should disclose whether it: (a) utilizes an employment application form which contains a notice informing job applicants that discrimination is prohibited and that persons who believe that they have been discriminated against may notify appropriate governmental agencies; (b) posts a notice which informs job applicants and employees that the licensee is an equal opportunity employer and that they may notify appropriate governmental authorities if they believe that they have been discriminated against; and (c) where applicable, seeks the cooperation of labor unions represented at the station in the implementation of its EEO program and in the inclusion of non-discrimination provisions in union contracts. The applicant should also set forth any other methods it utilizes in conveying its EEO policy (e.g., orientation materials, on-air announcements, station newsletter) to employees and prospective employees.

**IV. Recruitment**

In this section, the applicant should set forth the recruitment sources and other techniques it uses to increase the pool of minority and female job applicants. Additionally, the applicant should list all minority and female applicant referral sources which the station has contacted in the previous 12 months and the number of individuals who were referred from each named source. Note: Not all of the categories of recruitment sources listed in the model program need be utilized if there are a sufficient number of minority and females applying for positions at the station. The purpose of the listing is to determine whether the specialized referral sources are producing the desired results. Sources which prove to be non-productive in terms of qualified minority and female applicants should not be relied on and new sources should be sought.

#### **V. Training**

Training programs are not mandatory. Each applicant is expected to decide, depending upon its own individual situation, whether a training program is feasible and would assist it in its effort to increase the pool of available minority and female applicants. Also, where an applicant already has employee training programs, the information reported in this element of the model program should enable it to ascertain whether minority and female employees have the same opportunity to participate as other employees. Information submitted with respect to any training programs utilized should include a report covering at least the 12 month period prior to the filing of the application, but may encompass the entire license period, if so desired.

Additionally, the applicant may set forth any other assistance to students, schools or colleges which is designed to be of benefit to minorities and women interested in entering the broadcasting field. The beneficiary of such assistance should be listed, as well as the form of assistance, such as contributions to scholarships, participation in work/study programs, and the like.

#### **VI. Availability Survey**

Pursuant to this section the applicant should state the percentages of women, Blacks not of Hispanic origin, Asian or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics in the station's labor recruitment area. Generally speaking, where a station is located in a Standard Metropolitan Statistical Area, the S.M.S.A. should be considered as the labor recruitment area. Where a station is not located in an S.M.S.A., the city of license or county figures should be used. The necessary data may be obtained from state employment agencies' "Manpower Information for Affirmative Action Programs," which is available in most localities, or other publications such as "General Population Characteristics" and "General Social and Economic Characteristics," obtainable from any Department of Commerce Field Office.

**Note:** The inclusion of this data is designed to assist the applicant in evaluating the effectiveness of its station's EEO program. The availability survey produces a means to determine whether the station's work force percentages bear some reasonable relationship to those reflected in the relevant available labor force.

#### **VII. Current Employment Survey**

Applicants of stations with less than 50 full-time employees are required to state whether there has been any change in their employment profile from the payroll period covered by the station's most recently filed Annual Employment Report (FCC Form 395). If there has been no change of any kind with respect to either full-time or part-time employees, the sentence to this effect should be checked. If there has been a change in the station's profile, the applicant must submit an updated Form 395 that identifies all employees under each job category by sex and race. The updated employment profile should cover the payroll period as close to the filing of the application as possible. The payroll period chosen must be specified.

Stations with 50 or more full-time employees are required to prepare and submit a list of all job titles within each Form 395 job category, with part-time and full-time status indicated. Each job title must show the number of incumbents that are male, female, Black not of Hispanic origin, Asian or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics. In other words, under each applicable job category, (i.e., Officials and Managers, Professionals, Technicians, etc.,) the applicant should list each job title it includes in the category on the Form 395 and identify the number of incumbents by sex and race. This showing should reflect the station's employment profile for the payroll period as close to the filing of the application as possible. The payroll period chosen must be specified.

**VIII. Job Hires**

Each licensee must state the total number of persons hired for station positions, both full-time and part-time, during the 12-month period preceding the date utilized for the "*Current Employment Survey*." This aggregate hiring information is to also include a breakout of the number of minorities and women hired. Predicated on this data and the recruitment information already compiled for the fourth element of the EEO program, the applicant must determine whether a sufficient number of minorities and women are applying for positions at the station. (The answer to the two parts of this question need not be the same. For example, a representative number of minorities may be applying, whereas the pool of women applicants may be less than sufficient.) Should either minorities or women be inadequately represented among the applicants for available positions, the applicant should analyze its recruitment techniques and referral sources and propose additional methods to expand the applicant pool of minorities and/or women.

**IX. Promotion**

Under this section the applicant should describe any promotional policies and practices which have benefited minority or female employees during the preceding 12 months. (For instance, the licensee might list the number of minorities and/or women elevated from part-time to full-time status, the number of those promoted from a training status, or the number that have advanced to more responsible jobs.) Also, if not listed in the "*Training*" element, the applicant may wish to note any extra effort undertaken to increase promotional opportunities for minorities and women.

**X. Effectiveness of the Affirmative Action Plan**

Under this section the applicant should analyze the results of its efforts to recruit, hire and promote minorities and women and explain any difficulties encountered in implementing its EEO program. One way this can be done is to compare the percentages of minorities and women on the station's current staff with their respective percentages in the relevant available labor force. (See "*Availability Survey*" and "*Current Employment Survey*" of the model program.) If the percentages do not reasonably relate, the disparity may be attributable to deficiencies in the station's recruitment, hiring, placement, training or promotional policies and practices. If so, the applicant should propose alternative policies to correct the deficiency.

ATTACHMENT BModel Equal Employment Opportunity ProgramI. General Policy

It is our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin or sex in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is also our policy to promote the realization of equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin or sex.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Employment Opportunity Program which includes the following elements:

II. Responsibility for Implementation

(Name \_\_\_\_\_ Title), is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program is adhered to and that no person is discriminated against in employment because of race, color, religion, national origin or sex.

III. Policy Dissemination

To assure that all members of the staff are cognizant of our equal employment opportunity policy and their individual responsibilities in carrying out this policy, the following communication efforts are made:

- ( ) The station's employment application form contains a notice informing prospective employees that discrimination because of race, color, religion, national origin or sex is prohibited and that they may notify the appropriate local, state, or federal agency if they believe they have been the victims of discrimination.
- ( ) Appropriate notices are posted informing applicants and employees that the station is an Equal Opportunity Employer and of their right to notify an appropriate local, state, or federal agency if they believe they have been the victim of discrimination.
- ( ) We seek the cooperation of the unions represented at the station to help implement our EEO program and all union contracts contain a nondiscrimination clause.
- ( ) Other (Specify) \_\_\_\_\_  
\_\_\_\_\_

**IV. Recruitment**

To ensure nondiscrimination in relation to minorities and women, and to foster their full consideration in filling job vacancies, we utilize the following recruitment procedures:

- ( ) We attempt to maintain systematic communication, both orally and in writing, with a variety of minority and women's organizations to encourage the referral of qualified minority and female applicants. Examples of such organizations contacted during the past twelve months are:

| Organization/Source | Number of Referrals |
|---------------------|---------------------|
| _____               | _____               |
| _____               | _____               |
| _____               | _____               |
| _____               | _____               |
| _____               | _____               |
| _____               | _____               |
| _____               | _____               |

- ( ) In addition to the organizations noted above, which specialize in minority and women candidates, we deal only with employment services, including state employment agencies, which refer job candidates without regard to their race, color, religion, national origin or sex. Examples of these employment referral services contacted during the past twelve months and the number of referrals are:

|       |       |
|-------|-------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

- ( ) When we recruit prospective employees from educational institutions such recruitment efforts include area schools and colleges with significant minority and female enrollments. Educational institutions contacted for recruitment purposes during the past twelve months and the number of referrals are:

|       |       |
|-------|-------|
| _____ | _____ |
| _____ | _____ |

- ( ) When utilizing media for recruitment purposes, help-wanted advertisements always include a notice that we are an Equal Opportunity Employer and contain no indication, either explicit or implied, of a preference for one sex over another.

# EQUAL EMPLOYMENT OPPORTUNITY

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- ( ) When we place employment advertisements in printed media some of such advertisements are placed in media which have significant circulation or are of particular interest to minorities and women. Examples of publications utilized during the past twelve months and the number of referrals are:

Number of Referrals

\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

- ( ) We encourage present employees, particularly minority and female employees, to refer minority and female candidates for existing and future job openings.

## V. Training

- ( ) Station resources and/or needs are such that we are unable or do not choose to institute specific programs for upgrading the skills of employees.

- ( ) We provide on-the-job training to upgrade the skills of employees. Tangible benefits of such training to minority and women employees during the past 12 months may be briefly described as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- ( ) We provide assistance to students, schools or colleges in programs designed to enable minorities and women to compete in the broadcast employment market on an equitable basis:

Schools or Other Beneficiary

Form of Assistance

|       |       |
|-------|-------|
| _____ | _____ |
| _____ | _____ |
| _____ | _____ |

- ( ) Other (Specify)

\_\_\_\_\_  
\_\_\_\_\_

## VI. Availability Survey

Based on information derived from \_\_\_\_\_, the respective minority and female workforce in the station's recruitment area is as follows:

|                                |              |                                                  |                                                |                                                   |                  |
|--------------------------------|--------------|--------------------------------------------------|------------------------------------------------|---------------------------------------------------|------------------|
|                                | <u>Women</u> | <u>Blacks<br/>Not of<br/>Hispanic<br/>Origin</u> | <u>Asians<br/>or<br/>Pacific<br/>Islanders</u> | <u>Am. Indians<br/>or<br/>Alaskan<br/>Natives</u> | <u>Hispanics</u> |
| Percentage in<br>the Workforce |              |                                                  |                                                |                                                   |                  |

# EQUAL EMPLOYMENT OPPORTUNITY

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**NOTE:** The Following To Be Used Only If Workforce Data Is Unavailable.

Based on the information derived from \_\_\_\_\_, the respective minority and female population in the station's recruitment area is as follows:

|                                | <u>Women</u> | <u>Blacks<br/>Not of<br/>Hispanic<br/>Origin</u> | <u>Asians<br/>or<br/>Pacific<br/>Islanders</u> | <u>Am. Indians<br/>or<br/>Alaskan<br/>Natives</u> | <u>Hispanics</u> |
|--------------------------------|--------------|--------------------------------------------------|------------------------------------------------|---------------------------------------------------|------------------|
| Percentage in<br>the Workforce |              |                                                  |                                                |                                                   |                  |

The above information is for: ( ) S.M.S.A. ( ) City ( ) County  
- ( ) Other (Specify)

## **VII. Current Employment Survey**

A. To be completed by stations with less than 50 full-time employees.

- ( ) There has been no change in our employment profile since the filing of our most recent Annual Employment Report.
- ( ) There has been a change in our employment profile since the filing of our last Annual Employment Report. Attached is an updated report identifying the incumbents under each FCC Form 395 job category for the two week period beginning \_\_\_\_\_ and ending \_\_\_\_\_.

B. To be completed by stations with 50 or more full-time employees.

- ( ) Attached as Exhibit No. VII B is a survey of our workforce showing a list of all job titles within each FCC Form 395 category and showing the number of incumbents who are male, female, Blacks not of Hispanic origin, Asian or Pacific Islanders, American Indians or Alaskan Natives, and Hispanics.

## **VIII. Job Hires**

During the twelve month period beginning (Month - Day - Year) and ending (Month - Day - Year), we hired a total of ( ) persons of whom ( ) were minorities and ( ) were women.

- ( ) An analysis of our recruitment techniques, job applications, and new hires suggests that a sufficient number of qualified minorities and women (are) (are not) applying for available positions.
- ( ) We are expanding our recruitment sources to include:

## **IX. Promotion**

It is our policy to provide promotions on a nondiscriminatory basis. Further, to assure that minorities and women are given due consideration for promotional opportunities, special effort is taken to encourage minorities and women to qualify and apply for advancement. During the past twelve months our policy has had the following results:

**X. Effectiveness of Affirmative Action Plan**

(This section should contain a brief narrative discussion of the effectiveness of the station's efforts to ensure Equal Employment Opportunity. For example, the licensee might compare the percentage of minority employees in its own workforce with the percentage of minority persons in the licensee's labor market, also setting forth information which suggests that discrepancies which may exist are not unreasonable. The licensee may also explain any difficulties it has experienced in implementing its affirmative action plan, together with any steps it proposes to take to surmount these difficulties in the future.)