

Federal Communications Commission Washington, D.C. 20554  <p style="text-align: center;"><b>FCC 396-A</b></p>	Approved by OMB 3060-0120 (February 2003)  FOR FCC USE ONLY
<p><b>BROADCAST EQUAL EMPLOYMENT OPPORTUNITY MODEL PROGRAM REPORT</b></p> <p>Read INSTRUCTIONS Before Filling Out Form</p>	FOR COMMISSION USE ONLY FILE NO. B396A - 20070925ABR

**Section 1**

CUMULUS LICENSING LLC		
Mailing Address 3535 PIEDMONT ROAD BUILDING 14, SUITE 1400		
City ATLANTA	State or Country (if foreign address) GA	ZIP Code 30305 - 4601
Telephone Number (include area code) 4049490700	E-Mail Address (if available)	
Facility ID Number 31912	Call Sign WZNN	
<input type="radio"/> Application for Construction Permit for New Station <input type="radio"/> Application for Assignment of License <input checked="" type="radio"/> Application for Transfer of Control <input type="radio"/> Amendment to pending application		
a. Service Type:	FM	
b. Community of License:	City: ALLOUEZ State: WI	

**INSTRUCTIONS**

Applicants seeking authority to construct a new commercial, noncommercial or international broadcast station, applicants seeking authority to obtain assignment of the construction permit or license of such a station, and applicants seeking authority to acquire control of an entity holding such construction permit or license are required to afford equal employment opportunity to all qualified persons and to refrain from discrimination in employment and related benefits on the basis of race, color, religion, national origin or sex. See 47 C.F.R. Section 73.2080. Pursuant to these requirements, an applicant who proposes to employ five or more full-time employees must establish a program designed to ensure equal employment opportunity. This is submitted to the Commission as the Model EEO Program. For purposes of this form, a station employment unit is a station or a group of commonly owned stations in the same market that share at least one employee.

**Guidelines for a Model EEO Program and a Model EEO Program are attached.**

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

- Station employment unit will employ fewer than 5 full-time employees; therefore no written program is being submitted.
- Station employment unit will employ 5 or more full-time employees. Our Model EEO Program is attached. (You must complete all sections of this form.)

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	Name of Respondent LEWIS W. DICKEY, JR.
Title CEO	Date 9/25/2007

WILLFUL FALSE STATEMENTS ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT  
 (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT  
 (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

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## MODEL EQUAL EMPLOYMENT OPPORTUNITY PROGRAM

### I. GENERAL POLICY

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

It will also be 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 adopted an Equal Employment Opportunity Program which includes the following elements:

### II. RESPONSIBILITY FOR IMPLEMENTATION

Name: GREG JESSEN	Title: MARKET MANAGER
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**will be responsible for the administration and implementation of our Equal Employment Opportunity Program. It will also be the responsibility of all persons making employment decisions with respect to the 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 ensure 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 will be made:

- The station's employment application forms will contain 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 will be 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 victims of discrimination.
- We will seek the cooperation of unions, if represented at the station, to help implement our EEO program and all union contracts will contain a nondiscrimination clause.

Other (specify)

[Exhibit 1]

### IV. RECRUITMENT

To ensure that information concerning each full-time vacancy is widely disseminated, we propose to use the following list of recruitment sources consistent with the requirements of 47 C.F.R. Section 73.2080:

[Exhibit 2]

**FCC NOTICE TO INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT**

The FCC is authorized under the Communications Act of 1934, as amended, to collect the personal information we request in this report. We will use the information you provide to determine if the benefit requested is consistent with the public interest. If we believe there may be a violation or potential violation of a FCC statute, regulation, rule or order, your request may be referred to the Federal, state or local agency responsible for investigating, prosecuting, enforcing or implementing the statute, rule, regulation or order. In certain cases, the information in your request may be disclosed to the Department of Justice or a court or adjudicative body when (a) the FCC; or (b) any employee of the FCC; or (c) the United States Government, is a party to a proceeding before the body or has an interest in the proceeding. In addition, all information provided in this form will be available for public inspection. If you owe a past due debt to the federal government, any information you provide may also be disclosed to the Department of Treasury Financial Management Service, other federal agencies and/or your employer to offset your salary, IRS tax refund or other payments to collect that debt. The FCC may also provide this information to these agencies through the matching of computer records when authorized. We have estimated that each response to this collection of information will average 5 hours. Our estimate includes the time to read the instructions, look through existing records, gather and maintain required data, and actually complete and review the form or response. If you have any comments on this estimate, or on how we can improve the collection and reduce the burden it causes you, please write the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0120), Washington, D. C. 20554. We will also accept your comments via the Internet if you send them to [jboley@fcc.gov](mailto:jboley@fcc.gov). 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 3060-0120.

**THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, P.L. 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3), AND THE PAPERWORK REDUCTION ACT OF 1995, P.L. 104-13, OCTOBER 1, 1995, 44 U.S.C. 3507.**

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## Exhibits

### Exhibit 1

**Description:** STATIONS COVERED BY REPORT

THIS REPORT IS BEING FILED IN CONJUNCTION WITH AN FCC FORM 315 FOR A TRANSFER OF CONTROL AND INCLUDES THE FOLLOWING STATIONS, ALL LICENSED TO CUMULUS LICENSING LLC:

WJLW(FM), ALLOUEZ, WI, FAC. ID # 31912  
WDUZ-FM, BRILLION, WI, FAC. ID # 6861  
WPCK(FM), DENMARK, WI, FAC. ID # 119  
WDUZ(AM), GREEN BAY, WI, FAC. ID # 25119  
WQLH(FM), GREEN BAY, WI, FAC. ID # 25121  
WOGB(FM), KAUKAUNA, WI, FAC. ID # 89

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### Attachment 1

### Exhibit 2

**Description:** RECRUITMENT SOURCES

THIS FCC 396-A MODEL EEO PROGRAM REPORT ACCOMPANIES AN FCC 315 APPLICATION SEEKING THE COMMISSIONS CONSENT TO THE TRANSFER OF CONTROL OF CUMULUS LICENSING LLC. THE LICENSEE HAS AN EEO PROGRAM IN PLACE, WHICH WILL CONTINUE TO PERTAIN TO THE ABOVE-REFERENCED STATION EMPLOYMENT UNIT AFTER CONSUMMATION OF THE PROPOSED TRANSACTION. AS THE LICENSEE HAS DONE IN THE PAST, IT WILL USE A VARIETY OF RECRUITMENT SOURCES DESIGNED TO INFORM QUALIFIED JOB APPLICANTS IN THE COMMUNITY OF THE AVAILABILITY OF FULL-TIME VACANCIES AT THE STATIONS. THE SPECIFIC RECRUITMENT SOURCES USED VARY DEPENDING UPON THE POSITION TO BE FILLED. THE LICENSEE WILL USE THE LOCAL NEWSPAPER, AREA COLLEGES AND UNIVERSITIES, MINORITY ORGANIZATIONS, AND STATE AND LOCAL EMPLOYMENT AGENCIES, WHERE APPROPRIATE. JOBS REQUIRING SPECIALIZED SKILL MAY BE ADVERTISED IN PROFESSIONAL AND TRADE JOURNALS. THE LICENSEE MAY USE THE STATIONS AND THE STATIONS WEBSITES TO ADVERTISE JOB VACANCIES. THE LICENSEE MAY ALSO USE JOB-RELATED WEBSITES.

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### Attachment 2