

April 22, 1982

Concurring Statement of  
FCC Commissioner James H. Quello

In re: License renewal applications of certain broadcast stations  
serving the Baltimore Metropolitan Area.

I am concerned that the Commission here has employed a strict numerical standard in a situation where statistical analysis is inappropriate for several reasons. This order will impose reporting conditions on stations WAMD, Aberdeen, Maryland; WVOB, Bel Air, Maryland; and WYRE, Annapolis, Maryland. These stations each have substantially fewer than 15 full-time employees, and the addition of only one full-time minority employee would bring each station within the Commission's processing guidelines. Further, each of these stations serves a community substantially separate from Baltimore even though it is within the Baltimore Standard Metropolitan Statistical Area. I hope that the Commission will soon revisit its equal employment reporting requirements for such small stations and that it will adopt a policy which focuses strictly on each such station's minority recruitment efforts in conjunction with its size, location, and available resources.

Even under the more suitable standard which I envision for small stations, some Commission action might be appropriate to insure that station WYRE, Annapolis, has improved its minority recruitment efforts. I am convinced, however, that the other two stations made substantial good-faith efforts to employ minorities during the relevant license term. Nevertheless, pending Commission reexamination of its policy of considering the employment profiles of stations with fewer than 15 full-time employees, there is some support for the majority's decision, and therefore I reluctantly concur.