

CITY OF NEW YORK
COMMISSION ON HUMAN RIGHTS

In the Matter of the Complaint of:

THE NEW YORK CITY COMMISSION ON
HUMAN RIGHTS,

VERIFIED COMPLAINT

Complainant,

Complaint No. M-E-Q-25-153408

— against —

SIRIUS XM RADIO LLC,

Respondent.

NATURE OF THE ACTION

The New York City Commission on Human Rights (“Commission”) brings this action against Respondent Sirius XM Radio LLC for violating § 8-107(32) of the Administrative Code of the City of New York, the New York City Human Rights Law (“NYCHRL”). As of November 1, 2022, the NYCHRL requires employers in New York City to include a good faith salary range for every job, promotion, and transfer opportunity advertised. The Commission alleges as follows:

JURISDICTION AND VENUE

The Commission initiates this Complaint pursuant to NYCHRL § 8-109(c). The effects of the alleged unlawful policies and practices described in this complaint occurred in the City of New York.

PARTIES

1. The Commission’s address is 22 Reade Street, New York, NY 10007.
2. Respondent Sirius XM Radio LLC is an employer as defined by NYCHRL § 8-102 and, upon information and belief, employs four (4) or more employees. Respondent’s address for service of process is Sirius XM Radio LLC, c/o Corporation Service Company, 28

Liberty Street, New York, NY, United States, 10005. Its business address is Sirius XM Radio LLC, 1221 Avenue of the Americas, New York, NY 10019.

FACTS

3. Respondent maintains a careers page on its website, <https://www.siriusxm.com> (“Jobs Site”).

4. As of February 19, 2025, the listing on the Jobs Site for the position of “Lead Quality Engineer” in New York City or containing work to be performed in New York City did not display a salary range. *See* Exhibit A (Jobs Site 2-19-25 screenshot).

CHARGE I

5. Complainant incorporates and realleges paragraphs 1 through 4 of this Complaint as though fully set forth herein.

6. The Commission charges that Respondent has unlawfully discriminated against job applicants by failing to include a salary range in job listings for positions in New York City currently on its Jobs Site, in violation of § 8-107(32) of the NYCHRL.

PRAYER FOR RELIEF

WHEREFORE, the Commission respectfully requests judgment against Respondent as follows:

a) Declaring that Respondent’s acts, practices, and omissions complained of herein violate the NYCHRL;

b) Directing Respondent to make all necessary modifications to its policies, practices, and procedures to comply with NYCHRL;

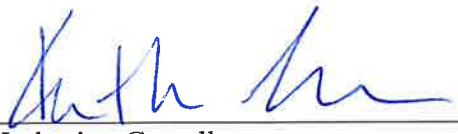
c) Directing Respondent to train all management, agents, and employees on NYCHRL;

- d) Directing Respondent to engage in affirmative relief, including anti-discrimination training, policy revisions, posting and notice to employees, and monitoring.
- e) Awarding such other and further relief as the Commission deems just and proper.

Katherine Carroll, being duly sworn, deposes and says:

I am the Deputy Commissioner of the Law Enforcement Bureau of the New York City Commission on Human Rights, the Complainant herein; I have read the foregoing Complaint and know the content thereof; the same is true of my own knowledge, except as to the matters therein stated on information and belief; and, as to those matters, I believe the same to be true.

Dated: New York, NY
August 29, 2025



Katherine Carroll
Deputy Commissioner
Law Enforcement Bureau
New York City Commission on Human Rights
22 Reade Street, 3rd Floor
New York, NY 10007

Exhibit A

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Lead Quality Engineer

Locations: New York, New York

Categories: Engineering

Employment Type: Regular Employee Full-Time

Req ID: P-2025-04

APPLY



Job Description

Duties: Lead quality engineering initiatives under guidance of full SDLC team manager, leveraging knowledge of software testing to influence better software design, promote best practices, bug prevention strategies, testability, and other advanced quality concepts across products. Review and audit test cases with team members for constructive analysis and feedback to improve product quality and mitigate failure risk. Track and communicate testing efforts, including quality assurance metrics such as defects, defect counts, test results and test status. Identify risks, concerns or challenges with testing efforts, providing alternative options, workarounds or resolution. Adjust and prioritize decisions as projects move through the lifecycle. Engage and work with the appropriate teams for resolutions. Monitor, lead, and support testing efforts across scrum teams. Work closely with analysts and software engineers in the development phase to provide guidance and oversight for test case development. Help identify opportunities for risk-based testing and while maintaining quality levels. Provide guidance and mentoring to less-experienced QA team members.

Requirements: Master’s degree in Computer Science, Applied Computer Science, Computer Information Systems, or Computer Engineering, plus three years of experience in the position offered or a quality assurance engineering position or Bachelor’s degree in Computer Science, Applied Computer Science, Computer Information Systems, or Computer Engineering, plus five years of progressive post-Bachelor’s experience in the position offered or a quality assurance engineering position. All required experience must have included performing consumer software application testing using knowledge of web applications, microservices, and web services architecture; working with Angular front ends; providing oversight and mentorship to QA team members; isolating and troubleshooting technical issues across the full technology stack by leveraging software testing methodologies; and using testing and reporting tools AWS logging, Jira, HP ALM, Confluence, Adobe Target, SQL Server, SOAP UI, Putty and Swagger.

P-2025-04



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