

EXHIBIT 18

By this application, WBOC, Inc. (“WBOC”) seeks Commission consent to the assignment of radio station WOCQ(FM), Berlin, Maryland (Facility ID 47107), FM Translator W282AW, Salisbury, Maryland (Facility ID 152275) and FM Translator W286BB, Ocean Pines, Maryland (Facility ID 150318) from Adams Radio of Delmarva to WBOC, Inc. This exhibit demonstrates that, following the proposed assignment, WBOC will continue to comply with the Commission’s local radio ownership rule.

Under Section 73.3555(a)(1) of the Commission’s rules, the FCC uses a tiered approach, as described below, to determine whether a combination of commonly-owned radio stations comply with the local radio ownership limits for any particular market.¹

Full-Power Commercial and Non-Commercial Stations in the Market	Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest	Maximum Number of Stations in the Same Service
45 or More Stations	8 Radio Stations	5
Between 30 and 44 Stations	7 Radio Stations	4
Between 15 and 29 Stations	6 Radio Stations	4
14 or Fewer Stations	5 Radio Stations (provided that no entity may have an interest in more than 50% of the stations in the market)	3

To determine the number of stations in a market, the Commission relies on one of three methodologies:

1. **Nielsen Methodology:** When more than one commonly-owned radio station is licensed to a community within a Nielsen Audio Market, the FCC counts the number of commercial and noncommercial radio stations that are either “home” to the Nielsen market or are licensed to a community within that market (the “Nielsen Methodology”).²

2. **Contour Methodology:** For combinations that are licensed to communities outside a Nielsen market, the Commission defines the market as the area where the principal community contours of the commonly-owned stations overlap. To determine the number of stations in that market, the Commission counts all stations whose principal community contours overlap that of at least one of the commonly-owned stations. The Commission, however, excludes all stations whose transmitters are greater than 92 kilometers from the mutual overlap area and any commonly owned stations that are not included already in the market (the “Contour Methodology”).³

3. **Nielsen-Contour Hybrid Methodology:** The FCC requires an analysis under both the Nielsen Methodology and the Contour Methodology in two situations: (i) if at least one of the commonly-owned stations is “home” to a Nielsen market but it is licensed to a community outside that market or (ii) if a station is licensed to a community within a Nielsen market but its principal community contour overlaps that of another commonly-owned station that is not licensed to a community within any Nielsen market (the “Nielsen-Contour Hybrid Methodology”).⁴

¹ See 47 C.F.R. 73.3555(a)(1).

² See *Broadcast Ownership Rules – 2002 Biennial Ownership Review*, 18 FCC Rcd 13620, 13727-728 ¶ 280 (2003).

³ See *id.* at 13729-730 ¶ 285.

⁴ See *id.* at 13730 ¶ 286 n.606.

Salisbury-Ocean City, Maryland

WBOC's proposes to acquire WOCQ(FM), which is home to the Salisbury-Ocean City market. WBOC also is the licensee of WBOC-FM, Princess Anne, Maryland; WZBH(FM), Millsboro, Delaware; and WGBG-FM, Fruitland, Maryland, each of which is home to the Salisbury-Ocean City market, and four stations – WAAI(FM), Hurlock Maryland; WTDK(FM), Federalsburg, Maryland; WCEM(AM), Federalsburg, Maryland; and WCEM-FM, Cambridge, Maryland – that fall outside of all Nielsen audio markets.⁵ Thus, upon grant of the instant application, WBOC will hold an attributable interest in eight radio stations, four of which are in the Salisbury-Ocean City market and four of which are not assigned to a Nielsen Audio market.⁶

The Nielsen-Contour Hybrid Methodology is appropriate for this application. While each of the stations WBOC seeks to acquire are home to the Salisbury-Ocean City market, three of its stations are in nearby adjacent areas that are not part of the market, and, while WAAI(FM) is home to the Salisbury-Ocean City market, its community of license is outside of all Nielsen markets. Accordingly, WBOC herein demonstrates compliance with the local radio ownership rule using the Nielsen-Contour Hybrid Methodology.

Nielsen Methodology. The BIA Media Access Pro Database identifies 40 full-power commercial and noncommercial AM and FM radio stations as “home” to or licensed within the Salisbury-Ocean City, MD market.⁷ Accordingly, under the Nielsen Methodology, WBOC may hold an attributable interest in up to seven full-power, commercial radio stations, of which four may be in the same service (AM or FM). Following consummation of the instant transaction, WBOC will have an attributable interest in four radio stations in the Salisbury-Ocean City market, all of which will be in the FM service. As such, WBOC's proposed ownership interests comply with the local ownership limits with respect to this market.

Contour Methodology: As shown in the attached engineering exhibit from Joseph M. Davis, P.E., WBOC's attributable interest in WOCQ(FM) also complies with the local radio ownership rule under the Contour Methodology.⁸ Accordingly, based on the foregoing, WBOC respectfully submits that its

⁵ In March, 2021, Nielsen informed WBOC that between June 19, 2019 and March 1, 2021, Nielsen incorrectly classified WTDK(FM) and WCEM-FM as home to the Salisbury-Ocean City Metro. Subsequently, Nielsen informed WBOC that between June 19, 2019 and June 10, 2021, Nielsen also incorrectly classified WCEM(AM) and WAAI(FM) as home to the Salisbury-Ocean City Metro. Nielsen has corrected these errors, which error were not due to any change in the geographic boundaries of the Salisbury-Ocean City Metro (the communities of license for WTDK(FM), WCEM-FM, WCEM(AM), and WAAI(FM) stations have always been and remain outside those boundaries) or any request by WBOC for changes to the home classification for any of the stations. As a result, BIA has removed these stations from its listing of stations that are home to the Salisbury-Ocean City Metro and does not consider either WTDK(FM), WCEM-FM, WCEM(AM), or WAAI(FM) to have been previously classified as home to that market. See Attachment 1 (BIA Financial Network “FCC Geographic Market Definition, Salisbury-Ocean City, MD,” Nov. 29, 2021, *available at* BIA Media Access Pro Database).

⁶ WBOC's application for Commission approval of the acquisition of the licenses for WZBH(FM) and WGBG-FM identified WCEM(AM) and WAAI(FM) as home to the Salisbury-Ocean City Metro based on BIA's market report provided for that application, which did not reflect the changes associated with Nielsen's mistake with respect to WZBH(FM) and WGBG-FM. See LMS File No. 0000150604, WBOC-Multiple Ownership Exhibit, Attachment 1 (BIA Financial Network “FCC Geographic Market Definition, Salisbury-Ocean City, MD,” June 15, 2021, *available at* BIA Media Access Pro Database).

⁷ See Attachment 1.

⁸ See Attachment 2.

proposed application seeking consent to the assignment of the Stations complies fully with the Commission's local radio ownership rule.

ATTACHMENT 1

Salisbury-Ocean City, Maryland Market Overview Printout from BIA's "FCC Geographic Market
Definition for Salisbury-Ocean City, Maryland"

FCC Geographic Market Definition for Salisbury-Ocean City, MD

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WAFL	FM	97.7	C	Hot AC		09/12/2019	0	Forever Media Inc	Milford, DE	Kent
WAVD	FM	97.1	C	Clsc Hits	Salisbury-Ocean City, MD	07/02/2003	133	Forever Media Inc	Ocean Pines, MD	Worcester
WBBX	FM	106.1	C	Clsc Hits	Salisbury-Ocean City, MD	07/02/2003	133	VinCo Media, LLC	Pocomoke City, MD	Worcester
WBEY	FM	97.9	C	Country	Salisbury-Ocean City, MD	07/02/2003	133	GSB Media LLC	Crisfield, MD	Somerset
WBOC	FM	102.5	C	AC	Salisbury-Ocean City, MD	07/02/2003	133	Draper Communications Inc	Princess Anne, MD	Somerset
WCHK	FM	101.3	C	Country	Salisbury-Ocean City, MD	07/02/2003	133	Forever Media Inc	Milford, DE	Sussex
WCTG	FM	96.5	C	Adult Hits	Salisbury-Ocean City, MD	09/25/2015	133	Sebago Broadcasting Co LLC	West Pocomoke, MD	Somerset
WDIH	FM	90.3	NC	Gospel	Salisbury-Ocean City, MD	07/02/2003	133	Salisbury Educational Broadcasting Foundation	Salisbury, MD	Wicomico
WESM	FM	91.3	NC	News/Jazz	Salisbury-Ocean City, MD	07/02/2003	133	University of Maryland	Princess Anne, MD	Somerset
WGBG	FM	107.7	C	Clsc Rock	Salisbury-Ocean City, MD	07/02/2003	133	Draper Communications Inc	Fruitland, MD	Wicomico
WGBZ	FM	88.3	NC	ChrsContem	Salisbury-Ocean City, MD	07/06/2010	133	Atlantic Gateway Communications Inc	Ocean City, MD	Worcester
WGMD	FM	92.7	C	Nws/Tlk/Inf	Salisbury-Ocean City, MD	07/02/2003	133	p Datatech Digital LLC	Rehoboth Beach, DE	Sussex
WGOP	AM	540	C	Country	Salisbury-Ocean City, MD	02/06/2004	133	Birach Broadcasting Corporation	Pocomoke City, MD	Worcester
WICO	FM	101.1	C	Country	Salisbury-Ocean City, MD	07/02/2003	133	GSB Media LLC	Snow Hill, MD	Worcester
WJDY	AM	1470	C	News	Salisbury-Ocean City, MD	07/02/2003	133	iHeartMedia Inc	Salisbury, MD	Wicomico
WJKI	AM	1320	C	Clsc Rock	Salisbury-Ocean City, MD	07/02/2003	133	The Voice Radio LLC	Salisbury, MD	Wicomico
WJKI	FM	103.5	C	Clsc Rock	Salisbury-Ocean City, MD	07/02/2003	133	The Voice Radio LLC	Bethany Beach, DE	Sussex
WJWL	AM	900	C	Mexican	Salisbury-Ocean City, MD	07/02/2003	133	The Voice Radio LLC	Georgetown, DE	Sussex
WKDB	FM	95.3	C	Span/CHR	Salisbury-Ocean City, MD	07/02/2003	133	The Voice Radio LLC	Laurel, DE	Sussex
WKHI	FM	94.9	C	Adult Hits	Salisbury-Ocean City, MD	03/03/2017	133	The Voice Radio LLC	Newark, MD	Worcester
WKTT	FM	97.5	C	Urban	Salisbury-Ocean City, MD	07/02/2003	133	Rojo Broadcasting LLC	Salisbury, MD	Wicomico
WKZP	FM	95.9	C	CHR	Salisbury-Ocean City, MD	07/02/2003	133	iHeartMedia Inc	West Ocean City, MD	Worcester
WLBW	FM	92.1	NC	ChrsContem	Salisbury-Ocean City, MD	07/02/2003	133	Educational Media Foundation	Fenwick Island, DE	Sussex
WLSW	FM	105.5	NC	ChrsContem	Salisbury-Ocean City, MD	07/02/2003	133	Educational Media Foundation	Salisbury, MD	Wicomico
WNCL	AM	930	C	Clsc Hits		09/12/2019	0	Forever Media Inc	Milford, DE	Kent
WNKZ	FM	92.5	C	ChrsContem	Salisbury-Ocean City, MD	07/02/2003	133	The Bridge of Hope Inc	Pocomoke City, MD	Worcester
WOCM	FM	98.1	C	AAA	Salisbury-Ocean City, MD	07/02/2003	133	Irie Radio Inc	Selbyville, DE	Sussex
WOCQ	FM	103.9	C	Rhymc/CHR	Salisbury-Ocean City, MD	07/02/2003	133	Adams Radio Group LLC	Berlin, MD	Worcester
WQHQ	FM	104.7	C	AC	Salisbury-Ocean City, MD	07/02/2003	133	iHeartMedia Inc	Ocean City, MD	Worcester
WSBY	FM	98.9	C	HpHop/Rhy	Salisbury-Ocean City, MD	07/02/2003	133	iHeartMedia Inc	Salisbury, MD	Wicomico
WSCL	FM	89.5	NC	Clsc/News	Salisbury-Ocean City, MD	07/02/2003	133	Salisbury University	Salisbury, MD	Wicomico
WSDL	FM	90.7	NC	Nws/Tlk/Ecl	Salisbury-Ocean City, MD	07/02/2003	133	Salisbury University	Ocean City, MD	Worcester
WSUX	AM	1280	C	Mexcn/SpnA	Salisbury-Ocean City, MD	07/02/2003	133	Lopez, Ruby J	Seaford, DE	Sussex
WTGM	AM	960	C	Sports	Salisbury-Ocean City, MD	07/02/2003	133	iHeartMedia Inc	Salisbury, MD	Wicomico

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed

FCC Geographic Market Definition for Salisbury-Ocean City, MD

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WUSX	FM	98.5	C	Country	Salisbury-Ocean City, MD	07/02/2003	133	p Datatech Digital LLC	Seaford, DE	Sussex
WWFG	FM	99.9	C	Country	Salisbury-Ocean City, MD	07/02/2003	133	iHeartMedia Inc	Ocean City, MD	Worcester
WXDE	FM	105.9	C	Talk/News	Salisbury-Ocean City, MD	07/02/2003	133	Forever Media Inc	Lewes, DE	Sussex
WYPO	FM	106.9	NC	NPR	Salisbury-Ocean City, MD	07/02/2003	133	Your Public Radio Corporation	Ocean City, MD	Worcester
WZBH	FM	93.5	C	Rock	Salisbury-Ocean City, MD	07/02/2003	133	Draper Communications Inc	Millsboro, DE	Sussex
WZEB	FM	101.7	C	Urban	Salisbury-Ocean City, MD	07/02/2003	133	The Voice Radio LLC	Ocean View, DE	Sussex

Number of Stations in Geographic Market 40

Previous Stations in Geographic Market

WINX	FM	94.3	C	Country		01/01/2015	0	Forever Media Inc	St. Michaels, MD	Talbot
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ATTACHMENT 2

Engineering Statement of Joe Davis, Chesapeake RF Consultants, LLC

Engineering Exhibit
Radio Multiple Ownership
prepared for
WBOC, Inc.

This statement is provided to support an Assignment Application on behalf of *WBOC, Inc.* (“*WBOC*”) which proposes to acquire radio station WOCQ(FM) (Ch. 280A, Fac ID 47107, Berlin MD). WOCQ is located in the same region as the seven other radio stations currently owned by *WBOC*. This statement addresses the proposal’s compliance with the FCC’s radio multiple ownership rules as relevant to the contour overlap method for stations that are not home to a Nielsen market. The *WBOC* commonly-owned existing and proposed radio stations in the region are listed below.

WBOC, Inc. Existing Radio Stations

Call Sign	Ch/Freq.	Fac ID	Location	Nielsen Market Status
WBOC-FM	273B	39894	Princess Anne, MD	Within a Nielsen Market
WGBG-FM	299B1	4107	Fruitland, MD	Within a Nielsen Market
WZBH(FM)	228B	25003	Millsboro, DE	Within a Nielsen Market
WAAI(FM)	265A	2417	Hurlock, MD	Not Home to a Nielsen Market
WCEM(AM)	1240	46939	Cambridge, MD	Not Home to a Nielsen Market
WCEM-FM	292A	46940	Cambridge, MD	Not Home to a Nielsen Market
WTDK(FM)	296A	51149	Federalsburg, MD	Not Home to a Nielsen Market

WBOC, Inc. Proposed Additional Radio Station

WOCQ(FM)	280A	47107	Berlin, MD	Within a Nielsen Market
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The FCC established a means of evaluating radio station multiple ownership issues utilizing existing Nielsen Audio and BIA market data for markets with established geographic boundaries and a separate “interim” means for evaluating radio station multiple ownership issues beyond established radio market geographic boundaries (FCC 03-127, released July 2, 2003). Radio station WOCQ, proposed to be acquired by *WBOC*, is home to and/or licensed to a community within the Salisbury-Ocean City MD Nielsen Audio Metro. Four of *WBOC*’s existing radio stations, WAAI(FM), WCEM(AM), WCEM-FM, and WTDK(FM), are neither home to nor licensed to any Nielsen Audio Metro.

Contour Overlap Analysis: The attached Figure 1 supplies the principal community coverage contours for *WBOC*'s four existing radio stations that are not home to any Nielsen market (WAAI, WCEM, WCEM-FM, and WTDK). The principal community contours of radio station WOCQ that is proposed to be acquired by *WBOC* is also supplied on Figure 1. As demonstrated on Figure 1, there is no principal community contour overlap regarding any of the four existing radio stations that are not home to any Nielsen market (WAAI, WCEM, WCEM-FM, and WTDK) with WOCQ.

Since the proposed station to be acquired is within a Nielsen market and does not have principal community overlap with any of *WBOC*'s stations that are not home to a Nielsen market, no market is created that must be evaluated using the overlapping contour method. Therefore, no further analysis of overlapping principal community contours is required.

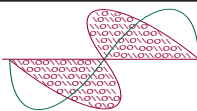
Nielsen Audio Metro Analysis: A separate exhibit is provided by counsel for *WBOC* to show compliance with the count of stations in the Salisbury-Ocean City MD Nielsen Audio Metro.

List of Attachments

Figure 1 Radio Multiple Ownership – Principal Community Contours

Chesapeake RF Consultants, LLC

Joseph M. Davis, P.E.	November 30, 2021	
207 Old Dominion Road	Yorktown, VA 23692	703-650-9600



Chesapeake RF Consultants, LLC
Radiofrequency Consulting Engineers
Digital Television and Radio

Figure 1 Radio Multiple Ownership Principal Community Contours

prepared for
WBOC, Inc.

November, 2021

