

**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.<sup>1</sup>

| <b>Full-Power Commercial and Non-Commercial Stations in the Market</b> | <b>Maximum Number of Stations in Which a Single Entity May Have an Attributable Interest</b>                   | <b>Maximum Number of Stations in the Same Service</b> |
|--|--|---|
| 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”).<sup>2</sup>

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”).<sup>3</sup>

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”).<sup>4</sup>

<sup>1</sup> See 47 C.F.R. 73.3555(a)(1).

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

<sup>3</sup> See *id.* at 13729-730 ¶ 285.

<sup>4</sup> 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.<sup>5</sup> 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.<sup>6</sup>

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.<sup>7</sup> 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.<sup>8</sup> Accordingly, based on the foregoing, WBOC respectfully submits that its

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<sup>5</sup> 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).

<sup>6</sup> 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).

<sup>7</sup> See Attachment 1.

<sup>8</sup> 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         |
| WBEG         | 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/Tik/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/Tik/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 |
|------|----|------|---|---------|--|------------|---|-------------------|------------------|--------|

**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 |
|----------|------|-------|------------|-------------------------|

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.

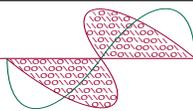
Nielsen Audio Metro Analysis: A separate exhibit is provided by counsel for *WBOC* to show compliance with the count of stations in the Salisbury-Ocean City MD Nielsen Audio Metro.

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

