

Exhibit 18 Multiple Ownership

The proposed assignee KBJR License, LLC is the licensee of KBJR-TV, Superior, WI, and satellite station KRII, Chisholm, MN,⁴ which are in the same Nielsen Designated Market Area (“DMA”) as KDLH.

The proposed assignment complies with the Local Television Ownership Rule, 47 C.F.R. § 73.3555(b), recently modified by the Commission in *2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, Order on Reconsideration and Notice of Proposed Rulemaking, FCC 17-156 (rel. Nov. 20, 2017) (“*Order on Reconsideration*”).

Under the Local Television Ownership Rule currently in effect,⁵ an entity may directly or indirectly own, operate, or control two television stations licensed in the same DMA if the noise limited service contours do not overlap, *or* at the time of the application to acquire or construct the station is filed, at least one of the stations is not ranked among the top four stations in the DMA, based on the most recent all-day (9 am-midnight) audience share as measured by Nielsen (the “Top Four Prohibition”).⁶

KBJR-TV and KDLH have overlapping noise limited service contours. Therefore, the assignee must comply with the Top Four Prohibition or make a request and showing that the Top Four Prohibition should not apply based on the specific circumstances of the market or the transaction.

The most recent (February 2018) Nielsen all-day audience share data for full-power stations in the Duluth-Superior DMA demonstrate that only one of the stations in the proposed combination, KBJR-TV, is among the top-four ranked stations in the DMA. According to February 2018 Nielsen data, KBJR-TV (three program streams affiliated with NBC, CBS, and MNT/H&I, respectively) is ranked number one in the DMA, as measured by audience share. KDLH (affiliated with CW) is ranked fifth in the DMA. As noted, KBJR-TV is an affiliate of NBC, which broadcast Olympics coverage during February 2018 and, as such, its share was elevated in February due to this programming. Therefore, it is appropriate to consider November 2017 data, which is more

⁴ The Commission granted KRII continuing satellite status in connection with its assignment to KBJR License, LLC. See *Quincy Newspapers, Inc.*, Letter Decision, DA 15-1026 (rel. Sept. 15, 2015), at pp. 5-7. The Local Television Ownership Rule does not apply to satellite stations. See 47 C.F.R. § 73.3555 Note 5. Accordingly, KRII is not required to be and has not been addressed in this analysis.

⁵ See *Prometheus Radio Project et al. v. FCC*, Order, Case Nos. 17-1107 and 18-1092 (3d Cir. rel. Feb. 7, 2018) (order denying request for stay of *Order on Reconsideration*); 83 FR 733.

⁶ See *Order on Reconsideration*, at ¶¶ 69, 78-82; 47 C.F.R. § 73.3555(b)(1).

typical of viewing patterns in the Duluth-Superior DMA. November 2017 data demonstrate that KBJR-TV was still the number one ranked station, although with a considerably lower audience share, while KDLH was the number five ranked station.⁷ Accordingly, using either share data, the proposed transaction complies with the Commission's Local Television Ownership Rule, 47 C.F.R. § 73.3555(b). Common ownership of KBJR-TV and KDLH will not materially impact concentration of viewing shares in the market. As the Top Four Prohibition does not present an obstacle to the proposed transaction, there is no need to request a finding that the Top Four Prohibition should not apply to this specific transaction.⁸

* * * * *

⁷ Nielsen data have not been submitted because the data are confidential and proprietary to Nielsen. The assignee will pursue with Nielsen disclosure of the data to Commission Staff upon request.

⁸ See 47 C.F.R. § 73.3555(b)(2) (describing circumstances when the Top Four Prohibition shall not apply).