

## EXHIBIT 18

By this application, Ramar Communications, Inc. (“Ramar”) is seeking Federal Communications Commission (“FCC”) grant of the assignment to Ramar of the license of full power television broadcast station KLCW-TV, Wolfforth, Texas (“KLCW”), currently licensed to Woods Communications Corporation (“Woods”). KLCW operates in the Lubbock, Texas Designated Market Area (“DMA”). Ramar is the licensee of KJTV-TV, Lubbock, Texas, also a full power television station operating in the Lubbock DMA. Grant of this application would create common television station ownership in the Lubbock DMA that is compliant with the FCC’s current multiple ownership rules, as amended. See *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*, FCC 17-156, Order on Reconsideration and Notice of Proposed Rulemaking, rel. Nov. 20, 2017 (“*Reconsideration Order*”). Notice of the FCC’s adoption of the *Reconsideration Order* was given in the Federal Register on January 8, 2018, making February 7, 2018 the effective date of the rule changes adopted therein. See <https://www.federalregister.gov/documents/2018/01/08/2017-28329/2014-quadrennial-regulatory-review>

In the *Reconsideration Order*, the Commission amended its multiple ownership rules to **eliminate** the so-called “Eight-Voices Test” (requiring that eight independent full power television station voices must remain in a market if a proposal to combine ownership of two full power stations in that market is to be permitted) and **permit per se** common ownership and control of two television stations in the same DMA so long as one of those two stations is not a “Top-Four” ranked station in the DMA, measured by audience share. See *Reconsideration Order* at ¶¶ 73-82 (proposals to combine two top-four stations in a market are to be considered on a case-by-case basis).

The common ownership of KJTV-TV and KLCW-TV proposed herein is compliant with the new standard adopted in the *Reconsideration Order*. Attached hereto is a report generated on March 15, 2018 by Comscore, the ratings service utilized by Ramar in the Lubbock DMA, showing audience ratings and share data in that DMA from the most recently completed ratings sweeps period (February 2018) measuring All Day (24 hour) audiences. These data show that KLCW-TV, a CW network affiliate, ranks seventh out of seven stations in both rating and share in the Lubbock DMA, well below the market’s “Top-Four” rated stations. Given these facts, the KJTV-TV/KLCW-TV combination proposed herein is fully compliant with current Commission multiple ownership rules, and prompt grant of the instant application is respectfully requested.

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## Multi-Station Trender (Monthly from Feb '18 - Feb '18, Compare To, All Day)

Rtg, % Rtg, Sh, % Sh, AA, % AA, Hrs/V-HH, % Hrs/V-HH, HH, % HH

Rank	Local Affiliate	Feb '18									
		Rtg	% Chg	Sh	% Chg	AA	% Chg	Hrs/V- HH	% Chg	HH	% Chg
1	KCBD (NBC)	6.732	-	22.63	-	10,324	-	53.92	-	128,680	-
2	KLBK (CBS)	1.727	-	5.806	-	2,648	-	16.65	-	106,860	-
3	KAMC (ABC)	1.674	-	5.629	-	2,568	-	17.91	-	96,369	-
4	KJTV (FOX)	0.9727	-	3.270	-	1,492	-	11.41	-	87,892	-
5	KTTZ (PBS)	0.5783	-	1.944	-	887	-	7.50	-	79,432	-
6	KMYL (MyNet)	0.3763	-	1.265	-	577	-	7.23	-	53,629	-
7	KLCW (CW)	0.2753	-	0.9255	-	422	-	4.79	-	59,208	-

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