

**Exhibit 18
FCC Form 314
Section III, Item 6**

Multiple Ownership

This Application seeks the Commission's consent to assign the licenses of one television station and two radio stations — KFMB-TV, KFMB(AM), and KFMB-FM (the "Stations") — from Midwest Television, Inc. ("Assignor") to KFMB-TV, LLC ("Assignee," and together with Assignor, the "Applicants") (such assignment, the "Transaction"). All three of the Stations are licensed to San Diego, California. Assignee has no attributable interest in any other broadcast station in the market or in any daily newspaper.

Pursuant to the Commission's Local Radio Ownership Rule, a party may hold an attributable interest in up to seven commercial stations in any radio market with between 30 and 44 full-power commercial and noncommercial radio stations. *See* 47 C.F.R. § 73.3555(a)(1)(iii). The San Diego Nielsen Audio market has 37 full-power commercial and noncommercial radio stations, representing 22 independent media voices both before and after the Transaction. *See* Attachment A attached hereto. Accordingly, as Assignee will acquire attributable interests in only two radio station licenses in the market, the Transaction complies with this rule.

Additionally, the Commission's Radio-Television Cross-Ownership Rule permits an entity to directly or indirectly control up to two commercial television and six commercial radio stations in a market if at least twenty independently owned media voices would remain in the market post-transaction. *See* 47 C.F.R. § 73.3555(c)(2)(i)(A). As shown in Attachment A, the Transaction complies with the rule because the San Diego market after the Transaction would include 30 independently owned media voices (six television, 22 radio, and one newspaper, in addition to one voice for cable television), the same as prior to the Transaction.¹

The Transaction also would comply with the National Television Multiple Ownership Rule. The rule prohibits the assignment of a commercial television broadcast station if such assignment would result in the acquirer having a cognizable interest in television stations with an aggregate national audience reach exceeding 39 percent of U.S. television households. The Transaction complies with the rule because TEGNA Inc. ("TEGNA"), Assignee's parent company,

¹ On November 16, 2017, the Commission adopted an order eliminating the Radio/Television Cross-Ownership Rule, which will take effect 30 days after the order's publication in the Federal Register. *See 2014 Quadrennial Regulatory Review*, Order on Reconsideration and Notice of Proposed Rulemaking, MB Docket No. 14-50 *et al.*, FCC 17-156, at ¶¶ 49, 156 (Nov. 16, 2017) ("*Broadcast Ownership Recon Order*").

would have a post-Transaction national television audience reach of approximately 28.08 percent, calculated in accordance with the Commission's existing standards.²

Finally, Assignee does not hold any attributable interest in any daily newspaper, and thus the Newspaper/Broadcast Cross-Ownership rule does not apply.³

² See 47 C.F.R. § 73.3555(e)(2)(i). TEGNA's post-Transaction national television audience reach without application of the UHF discount would be 33.12 percent, still well below the 39 percent cap.

³ See 47 C.F.R. § 73.3555(d). Applicants note that, in any case, the Commission's repeal of this rule is scheduled to take effect 30 days after publication of the *Broadcast Ownership Recon Order* in the Federal Register. *Broadcast Ownership Recon Order* ¶¶ 8, 156.

Attachment A
Post-Transaction Media Voice Count

TV Voices

Full-Power, Commercial and Non-Commercial TV Stations in the San Diego, CA DMA
 (Source: TV & Cable Factbook 2017, FCC CDBS Database and BIA Kelsey Station Search)

Station Count	Station Call Sign (FCC Facility ID)	Community of License	Licensee (Parent Company)
1	KFMB-TV (42122)	San Diego, CA	KFMB-TV, LLC (TEGNA Inc.)
2	KNSD (35277)	San Diego, CA	Station Venture Operations, LP (NBCUniversal LLC)
3	KUSI-TV (10238)	San Diego, CA	Channel 51 of San Diego Inc. (Texas Television Inc.)
4	KGTV (40876)	San Diego, CA	Scripps Broadcasting Holdings LLC (The E. W. Scripps Co.)
5	KSWB-TV (58827)	San Diego, CA	KSWB LLC (Tribune Broadcasting Co.)
6	KPBS (6124)	San Diego, CA	Board of Trustees, California State U. for San Diego State U. (California State U. for San Diego State U.)

Radio Voices
Full-Power, Operational and Independently-Owned Radio Stations
Licensed to Communities in the San Diego, CA Nielsen Audio Market
(Sources: BIA Kelsey and FCC CDBS Database)

Voice Count	Call Sign	AM/FM	Community of License	Licensee (Parent Company)
1	KBZT (58816)	FM	San Diego, CA	Entercom San Diego License, LLC (Entercom Communications Corp.)
	KSON (30832)	FM	San Diego, CA	Entercom San Diego License, LLC (Entercom Communications Corp.)
	KXSN (34589)	FM	San Diego, CA	Entercom San Diego License, LLC (Entercom Communications Corp.)
	KEGY	FM	San Diego, CA	Entercom San Diego License, LLC (Entercom Communications Corp.)
	KYXY 51671	FM	San Diego, CA	CBS Radio Stations Inc. (Entercom Communications Corp.)
2	KCBQ (13509)	AM	San Diego, CA	New Inspiration Broadcasting Company, Inc. (Salem Media Group, Inc.)
	KPRZ (54461)	AM	San Marcos-Poway, CA	New Inspiration Broadcasting Company, Inc. (Salem Media Group, Inc.)
3	KCEO (67666)	AM	Vista, CA	Immaculate Heart Media, Inc. (Immaculate Heart Media Inc)
4	KECR (20977)	AM	El Cajon, CA	Family Stations, Inc. (Family Stations Inc.)
5	KFMB (42120)	AM	San Diego, CA	KFMB-TV, LLC (TEGNA Inc.)

Voice Count	Call Sign	AM/FM	Community of License	Licensee (Parent Company)
	KFMB-FM (42117)	FM	San Diego, CA	KFMB-TV, LLC (TEGNA Inc.)
6	KFSD (49205)	AM	Escondido, CA	North County Broadcasting Corporation (Aries Communications, Inc.)
7	KGB-FM (34454)	FM	San Diego, CA	Citicasters Licenses, Inc. (iHeartMedia)
	KHTS-FM (20697)	FM	El Cajon, CA	Citicasters Licenses, Inc. (iHeartMedia)
	KIOZ (13504)	FM	San Diego, CA	Citicasters Licenses, Inc. (iHeartMedia)
	KMYI (58821)	FM	San Diego, CA	Citicasters Licenses, Inc. (iHeartMedia)
	KOGO (51514)	AM	San Diego, CA	Citicasters Licenses, Inc. (iHeartMedia)
	KSSX (67664)	FM	Carlsbad, CA	Citicasters Licenses, Inc. (iHeartMedia)
8	KKJD (172590)	FM	Borrego Springs, CA	Borrego Springs Christian Center (Borrego Springs Christian Center)
9	KKSM (51506)	AM	Oceanside, CA	Palomar Community College District (Palomar Community College District)
10	KLNV (51515)	FM	San Diego, CA	Univision Radio Stations Group, Inc. (Univision Communications Inc.)
	KLQV (51164)	FM	San Diego, CA	Univision Radio Stations Group, Inc. (Univision Communications Inc.)
11	KLSD (34452)	AM	San Diego, CA	Citicasters Licenses, Inc. (iHeartMedia)
12	KLVI (51503)	FM	Encinitas, CA	Educational Media Foundation (Educational Media Foundation)
	KPRI (49854)	FM	Julian, CA	Educational Media Foundation (Educational Media Foundation)

Voice Count	Call Sign	AM/FM	Community of License	Licensee (Parent Company)
	KSOQ-FM (49206)	FM	Escondido, CA	Educational Media Foundation (Educational Media Foundation)
	KYDO (63471)	FM	Campo, CA	Educational Media Foundation (Educational Media Foundation)
13	KNSJ (172605)	FM	Descanso, CA	Activist San Diego (Activist San Diego)
	NEW CP (176023)	FM	Ramona, CA	Activist San Diego (Activist San Diego)
14	KNSN (30831)	AM	San Diego, CA	Kiertron, Inc. (Donald B. Crawford)
15	KOPA (173244)	FM	Pala, CA	Pala Band Of Mission Indians (Pala Band Of Mission Indians)
16	KPBS (6124)	FM	San Diego, CA	The Board. Of Trustees, California State University (San Diego State University Board of Trustees)
17	KSDO (51166)	AM	San Diego, CA	Hi-Favor Broadcasting, LLC (Daisy Publishing Company)
19	KSDS (58818)	FM	San Diego, CA	San Diego Community College District (San Diego Community College District)
20	KSDW (52141)	FM	Temecula, CA	Calvary Chapel Of Costa Mesa, Inc. (Calvary Chapel of Costa Mesa)
21	KSSD (35139)	FM	Fallbrook, CA	Entravision Holdings, LLC (Entravision Communications Corp)
22	KURS (54257)	AM	San Diego, CA	El Sembrador Ministries (El Sembrador Ministries)

Newspaper Voices
Daily Newspaper Published in San Diego, CA DMA

The San Diego Union-Tribune