

Exhibit 18 – Local Radio Multiple Ownership

The Drive LLC is the licensee of KHDR(FM), Lenwood, California (Facility ID No. 89344) and KHRQ(FM), Baker, California (Facility ID. No. 89128). The principal community contours of KHDR(FM) and KHRQ(FM) do not overlap. However, KHWY, Inc. has an attributable membership interest in The Drive LLC and the principal community contours of KHDR(FM) and KHRQ(FM) do separately overlap with certain radio stations that are either licensed to KHWY, Inc., or for which KHWY is the proposed licensee. 1/

KHWY, Inc. is currently the licensee of the following broadcast radio stations:

<u>Call Letters</u>	<u>Community of License</u>	<u>Facility ID No.</u>
KRXV(FM)	Yermo, CA	34554
KHYZ(FM)	Mountain Pass, CA	34555
KHWY(FM)	Essex, CA	34556
KHWZ(FM)	Ludlow, CA	34557

Additionally, KHWY, Inc. is the proposed licensee of KIXF(FM) Baker, California (Facility ID No. 68412) and KIXW-FM, Lenwood, California (Facility ID No. 68413). 2/

1/ Highway Radio, Inc. is merging with and into KHWY, Inc., as part of a stock exchange transaction. An application on FCC Form 314 to assign Highway Radio Inc.'s FCC licenses (*i.e.*, KIXF(FM) Baker, California (Facility ID No. 68412) and KIXW-FM, Lenwood, California (Facility ID No. 68413)) to KHWY, Inc. is being filed simultaneously with this application.

2/ *Id.*

As shown on the attached maps, there is mutual overlap of the principal community contours of KIXW-FM, KRXV(FM) and KHDR(FM). Likewise, there is mutual overlap of the principal community contours of KIXF(FM), KHYZ(FM) and KHRQ(FM).

Accordingly, for the purposes of the Commission's local radio multiple ownership rule, 47 C.F.R. Section 73.3555(a), two separate "radio markets" are created:

- Radio Market "1," defined by the mutually overlapping principal community contours of KIXW-FM, KRXV(FM) and KHDR(FM); and
- Radio Market "2," defined by the mutually overlapping principal community contours of KIXF(FM), KHYZ(FM) and KHRQ(FM).

The FCC's local radio multiple ownership rule permits a party to have attributable interests in three FM stations in a "market" so long as there are at least six commercial radio stations in that market. ^{3/} As demonstrated in the attached maps, there are at least nine commercial radio stations (5 FM and 4 AM) in Radio Market "1" in addition to the subject 3 FM stations and at least 21 commercial radio stations (14 FM and 7 AM) in Radio Market "2" in addition to the subject 3 FM stations.

Accordingly, The Drive will continue to comply with the FCC's local radio multiple ownership rules after the transfer of control proposed in this application.

^{3/} See 47 C.F.R. § 73.3555(a)(1)(iv) (in a radio market with 14 or fewer commercial radio stations, a party may own, operate or control up to five stations, not more than three of which may be in the same service, except that a party may not own, operate or control more than 50 percent of the stations in such market).