

Transferees' Exhibit 18
FCC Form 315, Section IV, Item 8(b)
October 2007

Exhibit 18
Multiple Ownership Analysis

This exhibit is submitted in conjunction with the proposed transfer of control of stations KCFX(FM), Harrisonville, Missouri, KCJK(FM), Garden City, Missouri, KCMO(AM), Kansas City, Missouri, KCMO-FM, Kansas City, Missouri, KCHZ(FM), Ottawa, Kansas, and KMJK(FM), Lexington, Missouri, which are ultimately controlled by Cumulus Media Partners, LLC ("CMP").

Local Radio Ownership Rule Compliance

Attachment A provides information demonstrating CMP's compliance with the Commission's local radio ownership rule as reported in CMP's application to acquire KCHZ(FM), Ottawa, Kansas, FCC File No. BALH-20061010ALQ (the "KCHZ Application"). The applicants have reviewed the data and are not aware of any changes.

Radio- Television Cross Ownership Rule Compliance

Attachment B provides information demonstrating compliance with the Commission's radio-television cross ownership rule as reported in the KCHZ Application. The applicants have reviewed the data and are not aware of any changes.

Exhibit 18
Attachment A

The following local radio ownership analysis is copied from Cumulus Media Partnership, LLC's application to acquire KCHZ(FM), Ottawa, Kansas, FCC File No. BALH-20061010ALQ.

RADIO MARKET ANALYSIS
CMP KC LICENSING, LLC
KCHZ RADIO STATION
OTTAWA, KANSAS
October 2006

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of CMP KC Licensing, LLC, proposed assignee of KCHZ, Channel 239C1, Ottawa, Kansas. CMP KC Licensing, LLC is the licensee of KMJK, Channel 297C, Lexington, Missouri.¹ CMP Houston-KC, LLC (“CMP Houston”), a commonly owned entity,² is the licensee of KCMO, 710 kHz, and KCMO-FM, Channel 235C0, Kansas City, Missouri; KCJK, Channel 286C1, Garden City, Missouri; and KCFX, Channel 266C0, Harrisonville, Missouri. KCHZ is not licensed to a metro county in any Arbitron market, however, the station is considered “home” to the Kansas City, Missouri Arbitron Market (Market #29). KCMO, KCMO-FM, KCJK, KCFX and KMJK are all licensed to metro counties in the Kansas City market. As a result of the location of the city grade contours of these facilities, a hybrid Radio Market Analysis is needed to show compliance in both rated and non-rated markets.

ARBITRON/BIA RATED MARKET ANALYSIS

2. Exhibit #1 is a tabulation of the commercial and non-commercial AM and FM stations in the Kansas City, Missouri/Kansas market. The tabulation shows there are forty-five stations,

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- 1) There is an outstanding construction permit to relocate KMJK to a new site and downgrade the station to Channel 297C1. This CP is considered in this instant review.
- 2) Unless a distinction is otherwise warranted, CMP KC Licensing, LLC and CMP Houston are collectively referred to herein as “CMP”.

including the six subject stations (KCHZ, KCMO, KCMO-FM, KCJK, KCFX and KMJK). The number of stations depicted falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At this level, common ownership or control of up to eight stations, with no more than five in the same service, is permissible. Based on CMP's interests in the above-referenced stations, it has been demonstrated that the proposed acquisition of KCHZ, to the extent it involves stations licensed to metro counties, or considered home to the rated market, is in compliance with the Commission's multiple ownership rules. That is, CMP has permissible attributable interests in five radio stations in the FM service and one radio station in the AM service in the Radio Market.

REVISED CONTOUR OVERLAP ANALYSIS

3 Attached as Exhibit #2 is a map depicting the city grade contours of the CMP facilities. As noted, there is a common location where the city grade contours of all six stations (five FM and one AM) overlap.³ The contours of KCMO-FM, KCJK and KCFX are encompassed by the contours of KCMO, KCHZ and KMJK. Therefore, the city grade contours of KCMO, KCHZ and KMJK define the Radio Market boundary, which will be used to determine the number of stations providing service to the market. It is noted that no other stations in which CMP has interests are considered contributing stations to the market under study, unless they are subject stations in the market. Further, no stations with transmitter sites farther than 92.0 kilometers from the common overlap area are considered.

3) The outstanding KMJK permit overlaps the same area and, therefore, the implementation of the permit will not alter the common overlap area.

4. Exhibit #3A is a depiction of the AM stations serving the Radio Market and Exhibit #3B is a depiction of the FM stations serving the market. A total of forty-six commercial and non-commercial AM and FM stations is shown.⁴ Exhibit #4 is a tabulation of the stations in the Radio Market. The number of stations in the Radio Market falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At this level, common ownership or control of up to eight stations, with no more than five in the same service, is permissible. As such, based on the revised contour overlap rules, the acquisition of KCHZ by CMP is in compliance with the Commission's rules.

5. Based on the above referenced review, CMP's interests in stations in both rated and non-rated markets are in compliance with the Commission's rules. Therefore, the assignment of KCHZ to CMP is in compliance with §73.3555.

6. The foregoing technical statement was prepared on behalf of CMP KC Licensing, LLC, by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities was extracted from the CDBS database. Data regarding the relevant Arbitron market was determined using the BIA MEDIA Access Pro Version 4. We assume no liability for errors or omissions in those databases which may be adverse to the information contained herein.

4) There are numerous other stations, however, they were not considered as there were a sufficient number of stations to allow for common ownership of the stations under study.



FCC Geographic Market Definition for Kansas City, MO-KS

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KCFX	FM	101.1	C	Clsc Rock	Kansas City, MO-KS	07/02/2003	29	Cumulus Media Partners LLC	Harrisonville, MO	Cass
KCZZ	AM	1480	C	Span/Varty	Kansas City, MO-KS	07/02/2003	29	Davidson Media Group LLC	Mission, KS	Johnson
KBEQ	FM	104.3	C	Country	Kansas City, MO-KS	07/02/2003	29	CBS Radio	Kansas City, MO	Jackson
KCWJ	AM	1030	C	Christian	Kansas City, MO-KS	07/02/2003	29	Stayton, D.T.	Blue Springs, MO	Jackson
KMJK	FM	107.3	C	Urban AC	Kansas City, MO-KS	07/02/2003	29	Cumulus Media Partners LLC	Lexington, MO	Lafayette
KCTE	AM	1510	C	Talk	Kansas City, MO-KS	07/02/2003	29	Union Broadcasting Inc	Independence, MO	Jackson
KKLO	AM	1410	C	Chrst/Talk	Kansas City, MO-KS	07/02/2003	29	New Life Evangelistic Center Incorporated	Leavenworth, KS	Leavenworth
WHB	AM	810	C	Sports	Kansas City, MO-KS	07/02/2003	29	Union Broadcasting Inc	Kansas City, MO	Jackson
KCMO	FM	94.9	C	Oldies	Kansas City, MO-KS	07/02/2003	29	Cumulus Media Partners LLC	Kansas City, MO	Jackson
KCNW	AM	1380	C	Chrst/Talk	Kansas City, MO-KS	07/02/2003	29	Wilkins Communications Network Inc	Fairway, KS	Johnson
KCXL	AM	1140	C	Talk/AC	Kansas City, MO-KS	07/02/2003	29	Alpine Broadcasting Corporation	Liberty, MO	Clay
KEXS	AM	1090	C	Gospel	Kansas City, MO-KS	07/02/2003	29	Kansas City Catholic Network Inc	Excelsior Springs, MO	Clay
KDTD	AM	1340	C	Mexican	Kansas City, MO-KS	07/02/2003	29	Davidson Media Group LLC	Kansas City, KS	Wyandotte
KFKF	FM	94.1	C	Country	Kansas City, MO-KS	07/02/2003	29	CBS Radio	Kansas City, KS	Wyandotte
KGSP	FM	90.3	NC	Alternative	Kansas City, MO-KS	07/02/2003	29	Park College Board Trustees	Parkville, MO	Platte
KPHN	AM	1190	C	Children	Kansas City, MO-KS	07/02/2003	29	ABC/Disney	Kansas City, MO	Jackson
WDAF	FM	106.5	C	Country	Kansas City, MO-KS	07/02/2003	29	Entercom	Liberty, MO	Clay
KCHZ	FM	95.7	C	Rhymc/CHR	Kansas City, MO-KS	07/02/2003	29	Kansas City Trust LLC	Ottawa, KS	Franklin
KLEX	AM	1570	C	Relgn/Talk	Kansas City, MO-KS	07/02/2003	29	Bott Radio Network	Lexington, MO	Lafayette
KMXV	FM	93.3	C	CHR	Kansas City, MO-KS	07/02/2003	29	CBS Radio	Kansas City, MO	Jackson
KMAJ	FM	107.7	C	AC	Topeka, KS	07/02/2003	194	Kansas City Trust LLC	Shawnee, KS	Johnson
KYYS	FM	99.7	C	Clsc Rock	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, MO	Jackson
KMBZ	AM	980	C	Nws/Spt/Tlk	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, MO	Jackson
KPRS	FM	103.3	C	Urban	Kansas City, MO-KS	07/02/2003	29	Carter Broadcast Group Inc	Kansas City, MO	Jackson
KPRT	AM	1590	C	Gospel	Kansas City, MO-KS	07/02/2003	29	Carter Broadcast Group Inc	Kansas City, MO	Jackson
KUDL	FM	98.1	C	Lite AC	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, KS	Wyandotte
KXTR	AM	1660	C	Classical	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, KS	Wyandotte
KCKC	FM	102.1	C	AC	Kansas City, MO-KS	07/02/2003	29	CBS Radio	Kansas City, MO	Jackson
KQRC	FM	98.9	C	AOR	Kansas City, MO-KS	07/02/2003	29	Entercom	Leavenworth, KS	Leavenworth
KCSP	AM	610	C	Sports	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, MO	Jackson
KCMO	AM	710	C	Talk	Kansas City, MO-KS	07/02/2003	29	Cumulus Media Partners LLC	Kansas City, MO	Jackson
KRBZ	FM	96.5	C	Rock	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, MO	Jackson
KCCV	AM	760	C	Relgn/Talk	Kansas City, MO-KS	07/02/2003	29	Bott Radio Network	Overland Park, KS	Johnson
KGGN	AM	890	C	Gospel	Kansas City, MO-KS	07/02/2003	29	Mortenson Broadcasting Company Incorporated	Gladstone, MO	Clay
KAYX	FM	92.5	C	Relgn/Talk	Kansas City, MO-KS	07/02/2003	29	Bott Radio Network	Richmond, MO	Ray

"C" - Commercial Station; "NC" - Non Commercial Station

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Kansas City, MO-KS

Call Letters	AM/ FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KCCV	FM	92.3	C	Relgn/Talk	Kansas City, MO-KS	07/02/2003	29	Bott Radio Network	Olathe, KS	Johnson
KCXM	FM	97.3	C	Rock	Kansas City, MO-KS	07/02/2003	29	p Union Broadcasting Inc	Lee's Summit, MO	Jackson
KCJK	FM	105.1	C	Jack	Kansas City, MO-KS	07/02/2003	29	Cumulus Media Partners LLC	Garden City, MO	Cass
KCUR	FM	89.3	NC	Nws/Tlk/Inf	Kansas City, MO-KS	07/02/2003	29	University of Missouri	Kansas City, MO	Jackson
KKFI	FM	90.1	NC	Variety	Kansas City, MO-KS	07/02/2003	29	Mid-Coast Radio Project Inc	Kansas City, MO	Jackson
KLJC	FM	88.5	NC	Relgn/Insp	Kansas City, MO-KS	07/02/2003	29	Calvary Bible College	Kansas City, MO	Jackson
KWJC	FM	91.9	NC	Variety	Kansas City, MO-KS	07/02/2003	29	William Jewell Coll	Liberty, MO	Clay
KYRV	FM	88.1	NC	Gospel	Kansas City, MO-KS	07/02/2003	29	Full Smile Inc	Concordia, MO	Lafayette
KKHK	AM	1250	C	Spn/Mex/Nw	Kansas City, MO-KS	07/02/2003	29	Entercom	Kansas City, KS	Wyandotte
KCTO	AM	1160	C	Talk/AC	Kansas City, MO-KS	08/25/2006	29	Alpine Broadcasting Corporation	Cleveland, MO	Cass

Number of Stations in Geographic Market 45

Graham Brock, Inc. - Broadcast Technical Consultants

KCHZ
BMLH-20031103ADD
Latitude: 39-00-45 N
Longitude: 095-01-46 W
ERP: 98.00 kW
Channel: 239C1
Frequency: 95.7 MHz

KCFX
BLH-20030424AAS
Latitude: 39-01-20 N
Longitude: 094-30-49 W
ERP: 100.00 kW
Channel: 266C0
Frequency: 101.1 MHz

KCMO
BML-19850906AD
Latitude: 39-19-08 N
Longitude: 094-29-48 W
ERP: 10.00 kW
Frequency: 710.0 kHz

KMJK
BMLH-20010621AAK
Latitude: 39-02-14 N
Longitude: 093-55-49 W
ERP: 100.00 kW
Channel: 297C
Frequency: 107.3 MHz

KMJK.C
BMPH-20051021AGG
Latitude: 39-02-14 N
Longitude: 094-05-47 W
ERP: 100.00 kW
Channel: 297C1
Frequency: 107.3 MHz

KCJK
BLH-20010620AAM
Latitude: 39-05-26 N
Longitude: 094-28-18 W
ERP: 69.00 kW
Channel: 286C1
Frequency: 105.1 MHz

KCMO-FM
BLH20021203ACE
Latitude: 39-05-26 N
Longitude: 094-28-18 W
ERP: 100.00 kW
Channel: 235C0
Frequency: 94.9 MHz

KCMO 5.0 mV/m

KCMO-FM 3.16 mV/m

KCJK 3.16 mV/m

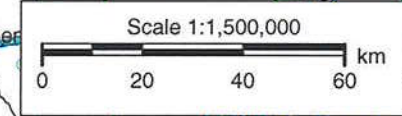
KMJK 3.16 mV/m

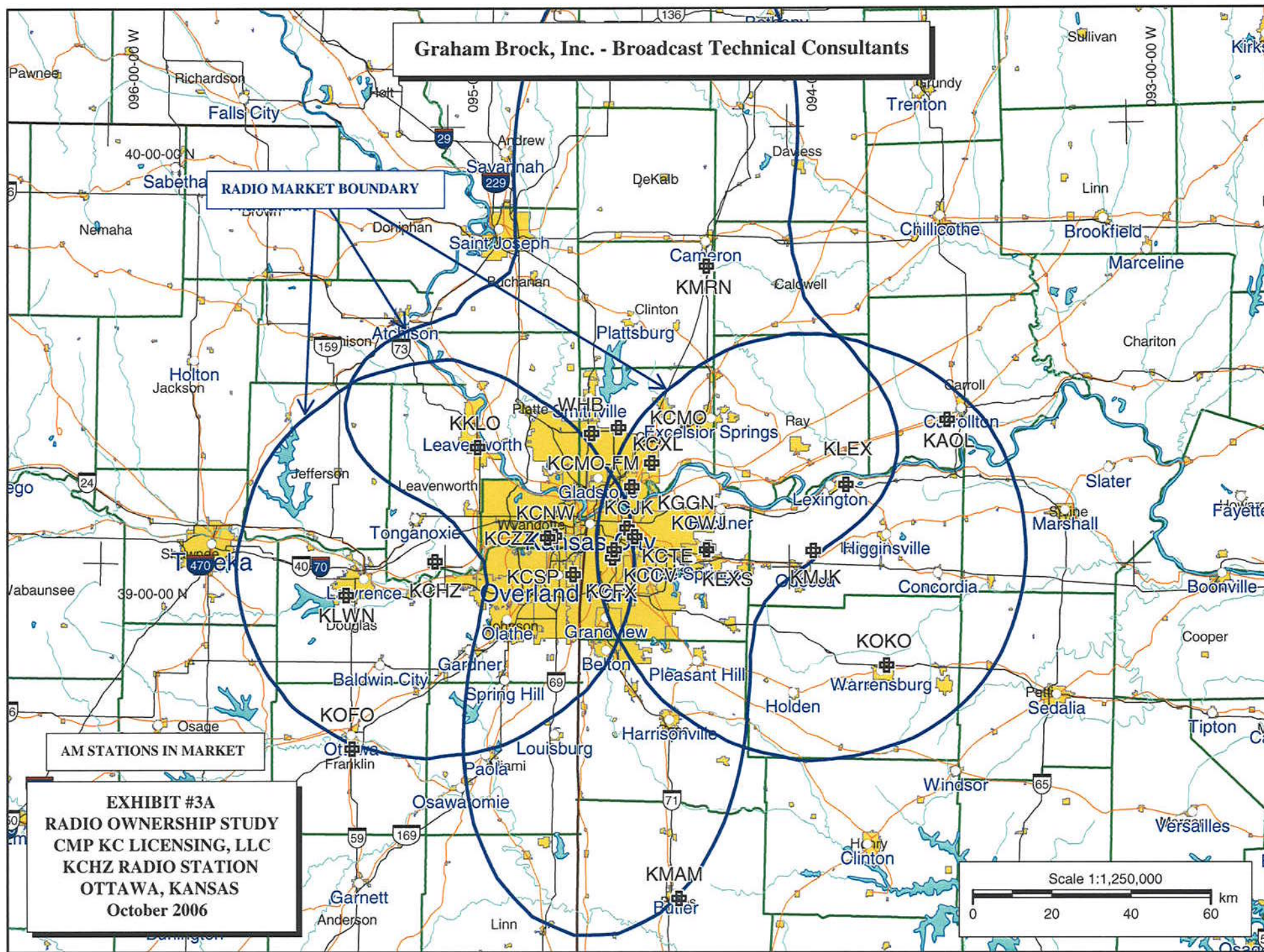
KMJK CP 3.16 mV/m

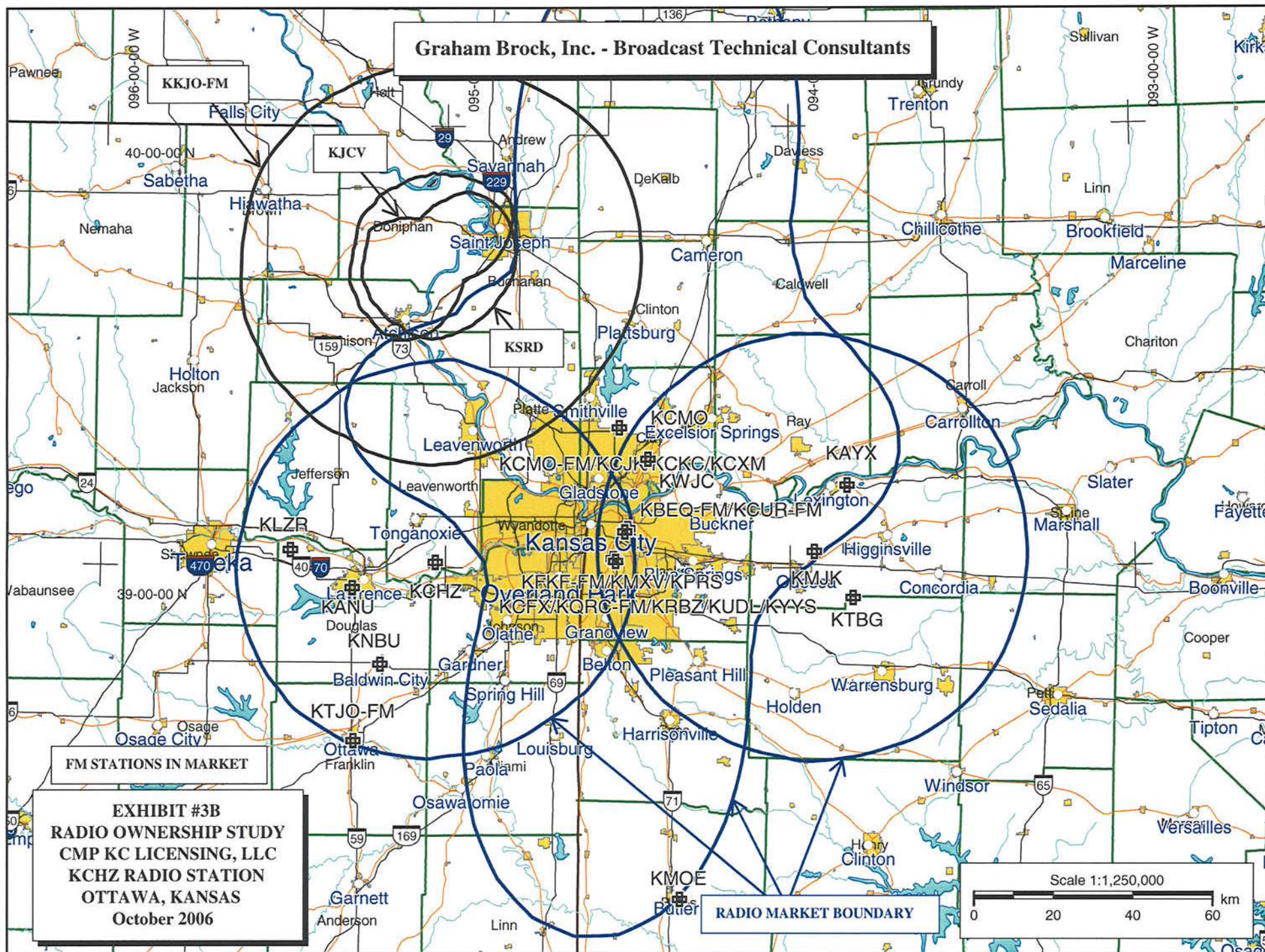
KCHZ 3.16 mV/m

KCFX 3.16 mV/m

EXHIBIT #2
RADIO OWNERSHIP STUDY
CMP KC LICENSING, LLC
KCHZ RADIO STATION
OTTAWA, KANSAS
October 2006







RADIO MARKET ANALYSIS
CMP KC LICENSING, LLC
KCHZ RADIO STATION
OTTAWA, KANSAS
October 2006

EXHIBIT #4A

Tabulation of Stations in Radio Market

AM Stations

KCSP	610 kHz	Kansas City, Missouri
* KCMO	710 kHz	Kansas City, Missouri
KCCV	760 kHz	Overland Park, Kansas
WHB	810 kHz	Kansas City, Missouri
KGGN	890 kHz	Gladstone, Missouri
KCWJ	1030 kHz	Blue Springs, Missouri
KEXS	1090 kHz	Excelsior Springs, Missouri
KCXL	1140 kHz	Liberty, Missouri
KOFO	1220 kHz	Ottawa, Kansas
KLWN	1320 kHz	Lawrence, Kansas
KMRN	1360 kHz	Cameron, Missouri
KCNW	1380 kHz	Fairway, Kansas
KKLO	1410 kHz	Leavenworth, Kansas
KAOL	1430 kHz	Carrollton, Missouri
KOKO	1450 kHz	Warrensburg, Missouri
KCZZ	1480 kHz	Mission, Kansas
KCTE	1510 kHz	Independence, Missouri
KMAM	1530 kHz	Butler, Missouri
KLEX	1570 kHz	Lexington, Missouri

Total AM Stations - 19

RADIO MARKET ANALYSIS
CMP KC LICENSING, LLC
KCHZ RADIO STATION
OTTAWA, KANSAS
October 2006

EXHIBIT #4B (continued)

Tabulation of Stations in Radio Market

FM Stations

	KTJO-FM	Ch 205A	Ottawa, Kansas
	KCUR-FM	Ch 207C1	Kansas City, Missouri
	KNBU	Ch 209A	Baldwin City, Kansas
+	KJCV	Ch 209C3	Country Club, Missouri
	KTBG	Ch 215C1	Warrensburg, Missouri
	KANU	Ch 218C1	Lawrence, Kansas
	KWJC	Ch 220A	Liberty, Missouri
+	KSRD	Ch 220C3	St. Joseph, Missouri
	KMOE	Ch 221A	Butler, Missouri
	KAYX	Ch 223A	Richmond, Missouri
	KMXV	Ch 227C0	Kansas City, Missouri
	KFKF-FM	Ch 231C0	Kansas City, Kansas
*	KCMO-FM	Ch 235C0	Kansas City, Missouri
*	KCHZ	Ch 239C1	Ottawa, Kansas
	KRBZ	Ch 243C0	Kansas City, Missouri
	KCXM	Ch 247C1	Lee's Summit, Missouri
	KUDL	Ch 251C0	Kansas City, Kansas
	KQRC-FM	Ch 255C0	Leavenworth, Kansas
	KYYS	Ch 259C0	Kansas City, Missouri
*	KCFX	Ch 266C0	Harrisonville, Missouri
	KCKC	Ch 271C0	Kansas City, Missouri
	KPRS	Ch 277C	Kansas City, Missouri
	KBEQ-FM	Ch 282C0	Kansas City, Missouri
*	KCJK	Ch 286C1	Garden City, Missouri
+	KKJO-FM	Ch 288C1	St. Joseph, Missouri
	KLZR	Ch 290C1	Lawrence, Kansas
*	KMJK	Ch 297C	Lexington, Missouri

Total FM Stations - 27

TOTAL NUMBER OF STATIONS IN STUDY - 46

- * Subject stations.
- + Provides city grade service to market.

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

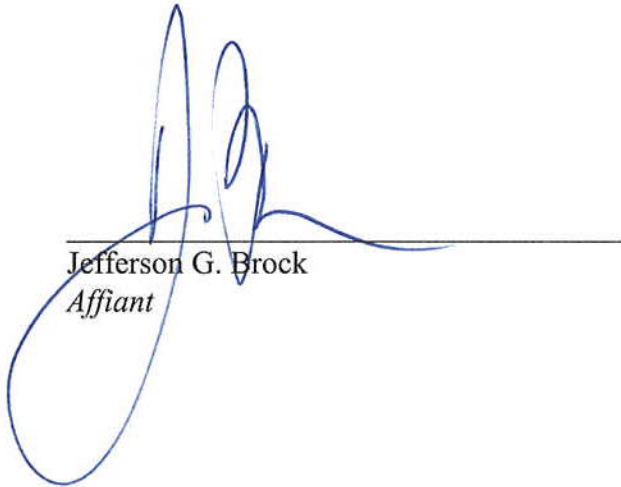
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by CMP KC Licensing, LLC, to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 5th day of October 2006.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 5th day of October 2006*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007

Exhibit 18
Attachment B

The following radio-television cross ownership analysis is copied from Cumulus Media Partnership, LLC's application to acquire KCHZ(FM), Ottawa, Kansas, FCC File No. BALH-20061010ALQ.

TV/RADIO CROSS-OWNERSHIP

The instant application seeks Commission consent to the acquisition by CMP KC Licensing, LLC of radio station KCHZ(FM), Ottawa, Kansas.

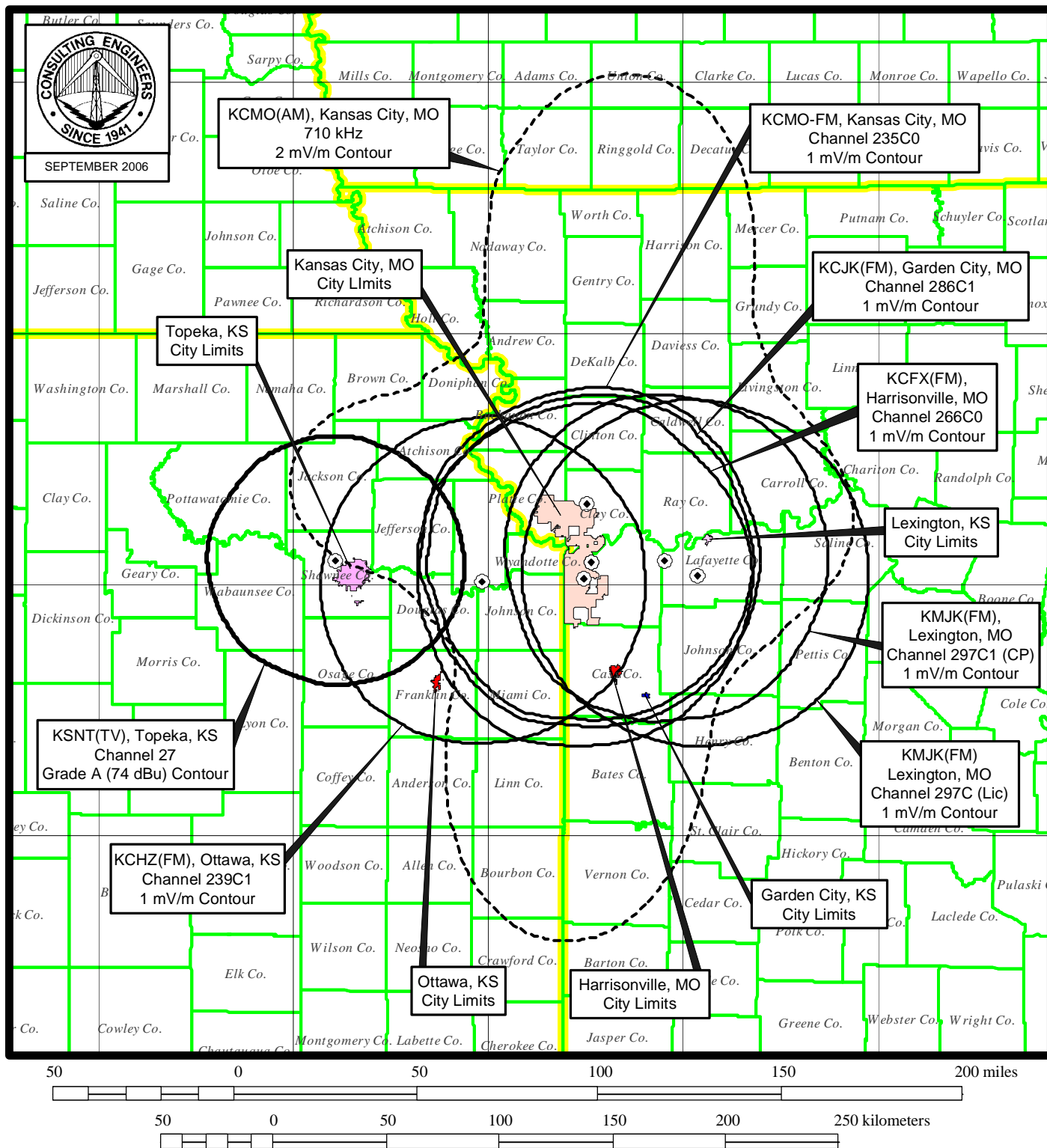
As a result of the proposed transaction, CMP KC Licensing, LLC and/or CMP Houston-KC, LLC, a common-owned entity (collectively, "CMP"), will control the licenses for the following radio stations located in the Kansas City, MO-KS radio market:

KCHZ(FM), Ottawa, KS (Facility ID #33332)
KMJK(FM), Lexington, MO (Facility ID #33713)
KCFX(FM), Harrisonville, MO (Facility ID # 27021)
KCJK(FM), Garden City, MO (Facility ID #87565)
KCMO-FM, Kansas City, MO (Facility ID #6385)
KCMO(AM), Kansas City, MO (Facility ID #33391)

Certain of the Blackstone Funds and/or their affiliates, which hold an attributable interest in CMP, also hold attributable interests in the parent of Montecito Television License Corporation of Topeka, the licensee of the following full-power television station:

KSNT(TV), Topeka, Kansas (Facility ID #67335)

Included as Attachment 1 is a map demonstrating that (1) the 1 mV/m contour of KCHZ(FM) encompasses Topeka, Kansas, the community of license of KSNT(TV) and (2) the Grade A contour of KSNT(TV) does not encompass the communities of license of any of the other above-listed radio stations controlled by CMP, and, similarly, neither the 1 mV/M contours of the above-listed FM stations controlled by CMP, other than KCHZ(FM), nor the 2 mV/m contour of the above-listed AM station controlled by CMP, encompass the community of license for KSNT(TV). Accordingly, for purposes of the TV/radio cross-ownership rule, the instant transaction creates a TV/radio combination of radio station KCHZ(FM) and television station KSNT(TV). Because the TV/radio cross-ownership rule permits common ownership of one television and one radio station in any market regardless of the number of media "voices" (see 47 C.F.R. § 73.3555(c)(2)), the proposed transaction complies with the rule.



CROSS-OWNERSHIP ANALYSIS MAP

du Treil, Lundin & Rackley, Inc. Sarasota, Florida