

EXHIBIT 5—MULTIPLE OWNERSHIP

I. Local Radio Ownership

Station WTLT is located in the Fort Myers-Naples-Marco Island, Florida Arbitron Metro Market. As demonstrated in the BIA Data submitted as Exhibit 5A, there are 37 full power commercial and non-commercial radio stations in the Fort Myers-Naples-Marco Island radio market and, therefore, common ownership of up to seven radio stations, no more than four of which are in the same radio service is permissible. As noted in Exhibit 3, above, the applicant and its owners hold attributable interests in four FM and two AM stations in the Fort Myers-Naples-Marco Island Arbitron Metro Market. This complies with the limitations of Rule 73.3555(a).

II. Radio/Television Cross-Ownership

There are several different permissible levels of radio/TV cross ownership. For our purposes we consider the Fort Myers-Naples, Florida DMA, a television market in which no person may own two television stations (a television market where there would be less than 8 independently-owned full power television stations post acquisition).

In any market, a person can always own one radio station and one television station. If the market has at least 10, but fewer than 20, independently-owned media voices post acquisition, a person can own four radio stations and one television station. If the market has at least 20 independently-owned media voices post acquisition, a person can own up to six radio stations and one television station. Ownership of these radio stations is also limited by the local radio ownership rule. In the Fort Myers-Naples-Marco Island, Florida Arbitron Metro, which has 37 radio stations, a person may own seven commercial radio stations, no more than four in the same radio service.

Presently we can identify the following independent media voices in the Fort Myers-Naples-Marco Island Metro:

A. RADIO VOICES (per attached BIA Data):

1 Manna Christian Mission

- 2 Meridian Broadcasting
- 3 Ave Maria University Inc.
- 4 Renda Broadcasting Corporation
- 5 Glades Media Company
- 6 Fort Myers Broadcasting Company
- 7 Beasley Broadcast Group
- 8 Starboard Media Foundation Inc.
- 9 Dwyer, Robert
- 10 Clear Channel Communications
- 11 Alpert, Norm
- 12 WAY FM Media Group Inc
- 13 Gulf Coast University, Board of Regents
- 14 Airwaves for Jesus Inc
- 15 Moody Bible Institute of Chicago Incorporated
- 16 Shadowlawn Association Inc
- 17 Everglades City Broadcasting Company Inc.

B. Television Voices (per attached Broadcasting & Cable Yearbook data):

- 18 Waterman Broadcasting Corp of Florida
- 19 Emmis (now Journal Broadcast Corporation)
- 20 West Coast Christian Television, Inc.
- 21 Acme Television Licenses of Florida LLC
- 22 Montclair Communications Inc.

C. Other Voices:

- 23 Comcast (Cable Television)
- 24 Fort Myers News Press (Daily Newspaper)
- 25 Naples Daily News (Daily Newspaper)

Joseph Schwartzel's corporation, Sun Broadcasting, Inc., proposes to acquire Station WTVK(TV), Naples, Florida. The proposed transaction would eliminate Acme from the list of independently owned media voices. That still leaves 24 independently owned media voices. So common ownership of one TV and 6 radio (with a maximum of four in one service) is permissible.

Sun Broadcasting, Inc.'s proposal involves attributable ownership by Joseph Schwartzel in stations WTVK(TV), WARO(FM), WRQC(FM),

WTLT(FM) and WNOG(AM), and attributable LMA interests in stations WUSV(FM) and WINK(AM). This is a combination of 1 TV with 6 radio stations (4 FMs and 2 AMs) and is permissible.