

**Fisher Broadcasting Company
KWOG(TV), Bellevue, WA (4624)**

**EXHIBIT 18
FCC Form 315
Section IV, Paragraph 8**

Multiple Ownership Compliance

Transferee Fisher Broadcasting Company (“Fisher”), is the sole member of Fisher Broadcasting - Seattle TV, LLC, licensee of station KOMO-TV, Ch. 4 (ABC), Seattle, Washington, which is located in the Seattle-Tacoma, Washington, Nielsen Designated Market Area (the 13th ranked DMA) (“Seattle DMA”). The station subject to the instant application, KWOG, Ch. 51 (I) (4624), Bellevue, Washington, is licensed to a community in the Seattle DMA. Fisher also is the sole member of Fisher Broadcasting - Seattle Radio, LLC (“FBSR”). FBSR is the licensee of radio stations KOMO(AM), KVI(AM) and KPLZ-FM, each licensed to Seattle, and it has an attributable interest in KING-FM, Seattle, by virtue of a joint sales agreement.¹ Co-ownership of the two same-market TV stations by Transferee would fully comply with the FCC's multiple ownership rules. *See* Section 73.3555(b)-(c).

The television duopoly rule permits co-ownership of two stations within the same DMA where at least eight independently-owned and operating full-power commercial and noncommercial TV stations will remain in the DMA in which the communities of license of the TV stations in question are located² and at least one of the two co-owned stations is not among

¹ The radio-TV cross ownership rule is triggered because the Grade A contours of KOMO-TV and KWOG encompass the entire community of license of radio stations KOMO(AM), KVI(AM), KPLZ-FM and KING-FM. The four radio stations are in the Seattle-Tacoma Arbitron Radio Metro Market (“Seattle Metro Market”).

² The FCC counts only those stations whose Grade B contours overlap the Grade B contour of at least one of the stations in the proposed combination.

the top-four ranked TV stations in the DMA based on audience share. Under the eight-voices standard, rankings are based on the most recent all-day (9 a.m.-midnight) audience share, as measured by a professional rating service such as Nielsen Media Research, at the time the application is filed.

Transferee's proposed co-ownership of KOMO-TV and KWOG complies with both components of the eight-voices duopoly standard. First, as shown in the attached Declaration of Mr. Richard J. Warnsinske, Senior Vice President of the licensee of KOMO-TV and the station's General Manager and Annex A thereto, at least eight independently-owned and operating full-power commercial and noncommercial TV stations will remain in the Seattle DMA following the proposed acquisition of KWOG.

Second, as shown in paragraph 2 of the attached Declaration, KWOG is not a top four ranked TV station in the Seattle DMA, based on Nielsen's most recent all-day (9 a.m.-midnight) audience share rankings. According to the most recent Nielsen rankings available at the time of filing this application, KWOG is unranked (did not meet minimum reporting standards) among stations in the Seattle DMA. Thus, the proposed acquisition of television station KWOG meets both components of the eight-voices television duopoly standard of Section 73.3555(b).

The proposed acquisition of KWOG complies with the radio-TV cross ownership rule as well. As noted above, following the closing, Fisher would have attributable interests in two TV stations and four radio stations (two AM and two FM) in the Seattle area. Under Section 73.3555(c), a single entity may own two TV stations (if permitted under the TV duopoly rule) and four radio stations (if permitted under the local radio ownership rule) provided that at least

ten (10) independently owned media voices would remain in the market following consummation of the proposed transaction. As shown in Annex A, excluding KOMO-TV and KWOG, there are more than 10 other independently owned and operating full-power TV stations in the Seattle DMA. Annex B to Mr. Warnsinske's Declaration further reflects, moreover, that, excluding Fisher owned stations, there are over 10 other independently owned radio stations in the Seattle Metro Market; there are several English-language daily newspapers published within the Seattle DMA that have a circulation exceeding 5% of the households in the DMA; and there is at least one cable system (Comcast Cable Communications, Inc.) which is generally available to households in the Seattle DMA. Thus, the proposed co-ownership of two TV stations and four radio stations in the market fully complies with the FCC's radio-TV ownership rule.