

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

**Multiple Ownership Compliance**

As summarized in Exhibits 5 and 13, to facilitate a multi-station transaction involving the sale of all of the television stations owned by Lincoln Financial Media Company (“LFMC”), Transferor LFMC and Transferee Raycom Holdings, LLC, have joined in filing three mutually-contingent, contemporaneously-filed Form 315 transfer of control applications — one for each of the LFMC television licensee subsidiaries. The instant application seeks FCC consent to transfer of control of LFMC’s subsidiary WWBT, Inc., licensee of WWBT(TV), Richmond, Virginia, to Raycom Holdings, LLC, an indirect subsidiary of Raycom Media, Inc. (“Raycom”). Raycom, through another subsidiary, owns WTVR-TV, Richmond, Virginia, which operates in the same Richmond-Petersburg, VA, Nielsen Designated Market Area (“Richmond DMA”) as WWBT. Because co-ownership of WWBT and WTVR-TV in the Richmond DMA would not satisfy the eight-voice/top four local ownership standard of Section 73.3555(b) of the rules (the “duopoly rule”),<sup>1</sup> Transferee respectfully requests a temporary waiver to allow Raycom a brief period of six months following consummation of the transaction to bring its interests into compliance with the duopoly rule.

---

<sup>1</sup> See Annex A (providing details on the six independent television voices in the market, which will temporarily be reduced to five voices during the six-month waiver period).

**A. Grant Of The Temporary Waiver Accords With FCC Precedent And The Public Interest.**

The facts and circumstances of the instant transaction involving the disposition of all the LFMC television stations demonstrate that grant of the requested six-month waiver would accord with past precedent.<sup>2</sup> The Commission has observed that “the overall benefits of allowing time for an orderly divestiture . . . outweigh any temporary impact on diversity and competition from common ownership,”<sup>3</sup> and it has, accordingly, granted waivers in all-or-nothing transactions like this one, which involve several stations in different markets. Temporary waivers in the context of this type of transaction serve the public interest because, among other benefits, they allow for orderly divestiture of stations and avoid the unnecessary devaluation of stations and restriction of potential buyers that could occur if the stations had to be divested rapidly in a “fire sale.”<sup>4</sup> Temporary waivers also avoid artificial limitations on the range of potential buyers.<sup>5</sup>

In addition to the limited duration of the waiver period requested by Transferee,<sup>6</sup> the existing diversity of voices and competition in the Richmond DMA –

---

<sup>2</sup> See *Telemundo Communications Group, Inc.*, 17 FCC Rcd 6958, 6978 ¶ 51 (2002) (“*NBC/Telemundo*”), citing *UTV of San Francisco*, 16 FCC Rcd 14975 (2001) (“*Fox/Chris-Craft*”), *aff’d*, *Office of Communication of the United Church of Christ v. Fed. Communications Comm’n*, 2002 WL 31596407 (2002). See also *Multimedia, Inc.*, 11 FCC Rcd 4883, 4885, ¶ 5 (1995); *Stockholders of CBS, Inc.*, 11 FCC Rcd 3733, 3755 ¶ 44 (1995) (“*CBS/Westinghouse*”); *Milton S. Maltz*, 13 FCC Rcd 15527, 15533-34 ¶ 20 (1998) (“*Maltz*”); *Guy Gannett*, 14 FCC Rcd 6204, 6216 ¶ 36 (MMB 1999).

<sup>3</sup> *NBC/Telemundo* at 6978 ¶ 51, citing *Fox/Chris-Craft*. See also *CBS/Westinghouse* at 3755; *Providence Journal Co.*, 12 FCC Rcd 2883 (1997).

<sup>4</sup> *Providence Journal Co.*, 12 FCC Rcd 2883 (1997); *Fox/Chris-Craft* at 14984.

<sup>5</sup> *Fox/Chris-Craft* at 14984.

<sup>6</sup> Compare, e.g., *Fox Television Stations, Inc.*, 16 FCC Rcd 14975, 14989 (2001) (24-month waiver of the newspaper/broadcast cross-ownership rule); *Capital Cities/ABC, Inc.*, 11 FCC Rcd 5841, 5862 (18-month waiver of broadcast television multiple

together with Raycom's commitment to maintain separate operations of the two stations during the interim period – would mitigate even the potential for impact on the underlying goals of the duopoly rule during the brief waiver period. First, as set forth in the detail in the next section and in Annexes A-E, the Richmond DMA achieves a level of media diversity and competition similar to or greater than markets in which the FCC previously has granted temporary duopoly waivers.<sup>7</sup>

In this connection, it is noteworthy that the current video marketplace faces dramatically increased competition from multi-channel video programming distributors. Last year, for example, the FCC found that “almost all consumers have the choice between over-the-air broadcast television, a cable service, and at least two DBS providers.”<sup>8</sup> Broadcast television faces unprecedented competition from other video

---

ownership rule); *Telemundo Communications Group, Inc.*, 17 FCC Rcd 6958, 6978 (2002) (12-month waiver of broadcast television multiple ownership rule).

<sup>7</sup> See, e.g., *Applications for Transfer of Control of the Liberty Corporation*, 21 FCC Rcd 244, 245 (2006) (noting markets where two, three, and five independent television voices would exist for the brief waiver period); see also *Applications of AFLAC Broadcasting Group, Inc.*, 12 FCC Rcd 3907 (1997) (“AFLAC Order”) (temporary waiver in Hattiesburg-Laurel DMA, the 168th ranked DMA, where during the divestiture period there would be only one independent television voice in the DMA, and in the Savannah DMA, the 98th ranked DMA, where during the divestiture period there would be six independent television voices); *Maltz*, 13 FCC Rcd at 15527 (temporary waiver in Toledo, Ohio, then the 66th ranked DMA).

<sup>8</sup> Twelfth Annual Report, *Annual Assessment of the Status of Competition in Markets for the Delivery of Video Programming*, 21 FCC Rcd 2503, 2506 (2006) (“Twelfth Annual Report”). Compare Fourth Annual Report, *Annual Assessment of the Status of Competition in Markets for the Delivery of Video Programming*, 13 FCC Rcd 1034, 1039 (1998). In June 1997, 73.6 million households subscribed to cable and direct-to-home satellite television services; as of June 2005, that number was greater than 109.6 million. *Twelfth Annual Report* at 2506. Further, consumers in some areas “may have access to video programming delivered by emerging technologies, such as digital broadcast spectrum, fiber to the home, or video over the Internet.” *Id.* at 2506. New technology means that consumers “are now able to maintain more control over what, when, and how they receive information. Further, MVPDs of all stripes are offering nonvideo services in tandem with their traditional video services.” *Id.*

programming sources, and the Commission has found that “broadcast television stations’ audience shares have continued to fall as cable and DBS penetration, the number of cable channels, and the number of non-broadcast networks continue to grow.”<sup>9</sup> Moreover, MVPDs have begun to supplement the locally-oriented and locally-originated programming already provided by over-the-air broadcasters to their communities.<sup>10</sup>

Second, as a further safeguard to preserve media diversity and competition in the Richmond DMA, Raycom, during the limited waiver period, will not seek to realize any economies of scale in the Richmond market and it will maintain the separate management, programming and sales operations of the stations. Raycom will maintain the services of WWBT’s existing national sales representative firm until divestiture is accomplished and will insulate each station’s staff from all proprietary or confidential information held by the other Richmond station. In addition to this important commitment, Raycom will continue WWBT’s existing efforts to provide programming responsive to the needs and interests of the local Richmond community. The FCC frequently has noted that this type of commitment to continue independent operations provides strong additional basis for granting a temporary waiver.<sup>11</sup>

Third, Raycom firmly commits to achieving prompt compliance with the duopoly rule. Raycom has already begun the process of searching for a qualified buyer for one of the Richmond stations. It has engaged the services of Belmore Corporate Advisors, LLC, an experienced broadcast financial advisory firm. Even at this early

---

<sup>9</sup> *Twelfth Annual Report* at 2550.

<sup>10</sup> *Id.* at 2521.

<sup>11</sup> *See Telemundo Order*, 17 FCC Rcd at 6976. *Accord Guy Gannett Communications*, 14 FCC Rcd at 6215-16; *Maltz*, 13 FCC Rcd ¶¶ 9, 13; *Paxson Communications*, 13 FCC Rcd 15518, ¶ 6.

stage, Raycom has received preliminary expressions of interest from and has entered into confidentiality agreements with four different entities.

In summary, the record reflects that the public interest will be served by granting the requested brief six-month temporary waiver. This waiver will facilitate a multi-station, all-or nothing transaction, and the “overall benefits of allowing time for an orderly divestiture will outweigh any temporary impact on diversity and competition from common ownership.”<sup>12</sup>

**B. The Richmond DMA Enjoys Substantial Media Diversity And Competition.**

Temporary common ownership of WWBT and WTVR-TV would not impact the substantial existing diversity of voices and competition in the Richmond market. During the limited waiver period, five independent full-power television voices will continue to serve the Richmond DMA<sup>13</sup> along with two low-power television stations.<sup>14</sup> As noted, Raycom will in addition maintain the separate operations of WWBT and WTVR-TV. The local television stations face significant competition from various other sources, particularly from multi-channel video programming distributors. Over 89.8% of households in the Richmond DMA subscribe to some form of MVPD service,<sup>15</sup> and there is a cable television penetration rate of 62% (314,220 households).<sup>16</sup> Cable

---

<sup>12</sup> *Telemundo Order* at 6978.

<sup>13</sup> *See Annex A.*

<sup>14</sup> *See Annex C.*

<sup>15</sup> *See* Television Bureau of Advertising, “Cable and ADS Penetration by DMA,” [http://www.tvb.org/rcentral/markettrack/Cable\\_and\\_ADS\\_Penetration\\_by\\_DMA.asp](http://www.tvb.org/rcentral/markettrack/Cable_and_ADS_Penetration_by_DMA.asp) (Feb. 2007).

<sup>16</sup> *See Annex B.*

television service is provided by 23 cable systems owned by eight different cable operators, including local cable service provided by Comcast Communications, Inc.<sup>17</sup>

Further, DBS providers EchoStar and DIRECTV serve viewers in the Richmond DMA, and both offer local-into-local delivery of broadcast television stations directly to their Richmond subscribers. Richmond residents also have access to two Satellite Digital Audio Radio Services, Sirius and XM Radio, each offering nearly 200 digital audio channels.

Additional diversity of voices and competition for advertising revenue in the market is supplied by 39 radio stations, including 19 Arbitron independent radio voices.<sup>18</sup> Furthermore, two daily newspapers and seven weekly newspapers are published in the market, including *The Richmond Times-Dispatch*, a local daily newspaper published by Media General, Inc.<sup>19</sup>

Given the presence of substantial competition and the diversity of voices in the Richmond DMA, grant of the limited waiver sought is consistent with Commission precedent and would serve the public interest by facilitating the prompt consummation of the proposed multi-station transaction and an orderly process for achieving compliance with the duopoly rule.

---

<sup>17</sup> *Id.*

<sup>18</sup> *See* Annex D.

<sup>19</sup> *See* Annex E.

## ANNEX A

### Full-Power, Operational and Independently-Owned TV Stations Licensed to Communities in the Richmond-Petersburg, VA DMA

(Sources: Broadcasting & Cable Yearbook 2007, Television and Cable Factbook 2007 and FCC CDBS Database)

	<u>Station (facility ID)</u>	<u>Channel</u>	<u>Community of License</u>	<u>Licensee (Owner)</u>
1.	WRIC-TV (74416)	8/22 (ABC)	Petersburg, VA	Young Broadcasting of Richmond, Inc. (Young Broadcasting, Inc.)
2.	WRLH-TV (412)	35/26 (MNT, Fox)	Richmond, VA	WRLH Licensee, LLC (Sinclair Broadcast Group)
3.	WTVR-TV (57832)	6/25 (CBS)	Richmond, VA	Elcom of Virginia License Subsidiary, LLC (Raycom Media, Inc.)
4.	WUPV (10897)	65/47 (CW)	Ashland, VA	Southeastern Media Holdings, Inc. (Community Newspaper Holdings, Inc.)
5.	WWBT (30833)	12/54 (NBC)	Richmond, VA	WWBT, Inc. (Lincoln Financial Media Company)
6.	WCVE-TV* (9987)	23/42 (ETV)	Richmond, VA	Commonwealth Public Broadcasting
	WCVW* (9989)	57/44 (ETV)	Richmond, VA	Commonwealth Public Broadcasting

\* Denotes Education Television Stations

## **ANNEX B**

### **Cable Systems - Richmond-Petersburg, VA DMA**

#### **General Statistical Market Information**

**TV Market Rating: 61**

**TV Households: 510,770**

**Cable TV Market Rating: 63**

**Cable TV Households: 314,220**

**Cable Penetration: 62%**

**Counties Served: Amelia, Brunkswick, Buckingham, Caroline, Charles City, Chesterfield, Cumberland, Dinwiddie, Essex, Goochland, Greenville, Hanover, Henrico, King and Queen, King William, Louisa, Lunenburg, Middlesex, New Kent, Nottoway, Powhatan, Prince Edward, Prince George, and Sussex**

#### **Cable Providers serving Richmond-Petersburg, VA DMA:**

##### **Comcast Cable (Amelia County)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 480

Channel Capacity: N/A

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Amelia

##### **Charter Communications (Bowling Green)**

Ownership: Charter Communications Inc.

Subscribers: 961

Channel Capacity: N/A

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Caroline

##### **Comcast Cable (Charles City)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 752

Channel Capacity: N/A

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Charles City

**Comcast Cable (Chesterfield)**

Ownership: Comcast Cable Communications Inc.  
Subscribers: 65,893  
Channel Capacity: 81  
Pay-per-view subscribers: 26,394  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: 7,259  
Counties Served: Chesterfield

**Jet Broadband (Crewe)**

Ownership: Jet Broadband  
Subscribers: 1,135  
Channel Capacity: 40  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: Nottaway

**Comcast Cable (Emporia)**

Ownership: Comcast Cable Communications Inc.  
Subscribers: 2,282  
Channel Capacity: 80  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: 53  
Counties Served: Greenville

**Charter Communications (Farmville)**

Ownership: Charter Communications Inc.  
Subscribers: 2, 075  
Channel Capacity: N/A  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: Cumberland & Prince Edward

**Comcast Cable (Henrico County)**

Ownership: Comcast Cable Communications Inc.  
Subscribers: 94,301  
Channel Capacity: 78  
Pay-per-view subscribers: 37,721  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: 10,374  
Counties Served: Goochland, Hanover, & Henrico

**CWA Cable (Jarrat)**

Ownership: Cathy Ashworth  
Subscribers: 260  
Channel Capacity: 50  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: Greenville & Sussex

**MetroCast Communications (King George)**

Ownership: Harron Communications LP  
Subscribers: 260  
Channel Capacity: 54  
Pay-per-view subscribers: 156  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: Caroline,

**Comcast Cable (King William)**

Ownership: Comcast Cable Communications Inc.  
Subscribers: 399  
Channel Capacity: 40  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: King William,

**Charter Communications (Lawrenceville)**

Ownership: Charter Communications Inc.  
Subscribers: 707  
Channel Capacity: N/A  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: Brunswick

**Comcast Cable (Louisa)**

Ownership: Comcast Cable Communications Inc.  
Subscribers: 3,238  
Channel Capacity: N/A  
Pay-per-view subscribers: N/A  
Telephone Service Subscribers: N/A  
Internet Service Subscribers: N/A  
Counties Served: Louisa

**Middlesex Cablevision (Middlesex County)**

Ownership: First Commonwealth Cablevision Ltd.

Subscribers: 2,723

Channel Capacity: 63

Pay-per-view subscribers: 2,000

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Middlesex

**Cox Communications (New Kent)**

Ownership: Cox Communications, Inc.

Subscribers: 3,500

Channel Capacity: 72

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: King & Queen, King William & New Kent

**Comcast Cable (Petersburg)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 16,000

Channel Capacity: 72

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: 80

Counties Served: Prince George

**Comcast Cable (Petersburg, unincorporated areas)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 2,400

Channel Capacity: 59

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Dinwiddie

**Comcast Cable (Powhatan)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 3,200

Channel Capacity: N/A

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: 569

Counties Served: Powhatan

**Comcast Cable (Richmond)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 64,716

Channel Capacity: 78

Pay-per-view subscribers: 25,887

Telephone Service Subscribers: N/A

Internet Service Subscribers: 7,119

Counties Served: Henrico

**Comcast Cable (Ruther Glenn)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 1,779

Channel Capacity: 61

Pay-per-view subscribers: 712

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Caroline

**Nelson Cable (Scottsville)**

Ownership: Nelson County Cablevision Corporation

Subscribers: 94

Channel Capacity: 35

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Buckingham

**Comcast Cable (South Hill)**

Ownership: Comcast Cable Communications Inc.

Subscribers: 2,894

Channel Capacity: N/A

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: 80

Counties Served: Lunenburg

**Charter Communications (Tappahannock)**

Ownership: Charter Communications Inc.

Subscribers: 1, 074 ( add 36 commercial subs?)

Channel Capacity: N/A

Pay-per-view subscribers: N/A

Telephone Service Subscribers: N/A

Internet Service Subscribers: N/A

Counties Served: Essex

## ANNEX C

### **Low Power TV Stations - Richmond-Petersburg, VA DMA**

<u>Call Sign</u>	<u>Ch. (Location)</u>	<u>Licensee</u>	<u>Ownership</u>
WRID-LP	48	Word of Fellowship, Inc.	Word of Fellowship, Inc.
WXOB-LP	17	KM Broadcasting	KM Broadcasting, Inc.

# ANNEX D

## Radio Stations in the Richmond-Petersburg DMA



### FCC Geographic Market Definition for Richmond, VA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WLEE	AM	990	C	News	Richmond, VA	07/02/2003	56	Davidson Media Group LLC	Richmond, VA	Richmond (City)
WBBC	FM	93.5	C	Country	Richmond, VA	05/11/2005	56	Denbar Communications Inc	Blackstone, VA	Nottoway
WWLB	FM	98.9	C	Adult Hits	Richmond, VA	09/15/2004	56	Main Line Broadcasting LLC	Midlothian, VA	Chesterfield
WDYL	FM	101.1	C	Modern	Richmond, VA	07/02/2003	56	Cox Radio Inc	Chester, VA	Chesterfield
WMXB	FM	103.7	C	Soft AC	Richmond, VA	07/02/2003	56	Cox Radio Inc	Richmond, VA	Richmond (City)
WGGM	AM	820	C	Gospel/Urban	Richmond, VA	07/02/2003	56	Hoffman, Hubert N., Jr. Family Trust	Chester, VA	Chesterfield
WHAP	AM	1340	C	R&B Oldies	Richmond, VA	07/02/2003	56	Brown, Preston	Hopewell, VA	Hopewell (City)
WHK	FM	95.3	C	Country	Richmond, VA	07/02/2003	56	Cox Radio Inc	Colonial Heights, VA	Colonial Heights (City)
WREJ	AM	1540	C	Urban/Insp	Richmond, VA	07/02/2003	56	Davidson Media Group LLC	Richmond, VA	Richmond (City)
WLES	AM	580	C	Religion	Richmond, VA	12/20/2005	56	p Truth Broadcasting Corporation	Bon Air, VA	Chesterfield
WCLM	AM	1450	C	Variety	Richmond, VA	07/02/2003	56	Brown, Preston	Highland Springs, VA	Henrico
WARV	FM	100.3	C	Oldies	Richmond, VA	07/02/2003	56	Main Line Broadcasting LLC	Petersburg, VA	Petersburg (City)
WDZY	AM	1290	C	Family Hits	Richmond, VA	07/02/2003	56	ABC/Disney	Colonial Heights, VA	Colonial Heights (City)
WKLR	FM	96.5	C	Cisc Rock	Richmond, VA	07/02/2003	56	Cox Radio Inc	Fort Lee, VA	Prince George
WBTJ	FM	106.5	C	Urban	Richmond, VA	07/02/2003	56	p Clear Channel	Richmond, VA	Richmond (City)
WWNZ	AM	1320	C	Spanish AC	Richmond, VA	07/02/2003	56	Davidson Media Group LLC	Richmond, VA	Richmond (City)
WRNL	AM	910	C	Sprts/Talk	Richmond, VA	07/02/2003	56	p Clear Channel	Richmond, VA	Richmond (City)
WRVA	AM	1140	C	News/Talk	Richmond, VA	07/02/2003	56	p Clear Channel	Richmond, VA	Richmond (City)
WRVQ	FM	94.5	C	CHR	Richmond, VA	07/02/2003	56	p Clear Channel	Richmond, VA	Richmond (City)
WRXL	FM	102.1	C	Alternative	Richmond, VA	07/02/2003	56	p Clear Channel	Richmond, VA	Richmond (City)
WROU	AM	1240	C	Nws/Tlk/Old	Richmond, VA	07/02/2003	56	Radio One Inc	Petersburg, VA	Petersburg (City)
WKJS	FM	105.7	C	Urban AC	Richmond, VA	07/02/2003	56	Radio One Inc	Richmond, VA	Richmond (City)
WBTK	AM	1380	C	Chrst/Talk	Richmond, VA	07/02/2003	56	Mountain Broadcasting Corp (NJ)	Richmond, VA	Richmond (City)
WTVR	FM	98.1	C	AC	Richmond, VA	07/02/2003	56	p Clear Channel	Richmond, VA	Richmond (City)
WXGI	AM	950	C	Sports	Richmond, VA	07/02/2003	56	Red Zebra Broadcasting	Richmond, VA	Richmond (City)
WYFJ	FM	100.1	NC	Christian	Richmond, VA	07/02/2003	56	Bible Broadcasting Network	Ashland, VA	Hanover
WCDK	FM	92.1	C	Urban	Richmond, VA	07/02/2003	56	Radio One Inc	Mechanicsville, VA	Hanover
WFTH	AM	1590	C	Gospel	Richmond, VA	07/02/2003	56	Johnson, James Jr.	Richmond, VA	Richmond (City)
WKJM	FM	99.3	C	Urban AC	Richmond, VA	07/02/2003	56	Radio One Inc	Petersburg, VA	Petersburg (City)
WPZZ	FM	104.7	C	Gospel	Richmond, VA	07/02/2003	56	Radio One Inc	Crewe, VA	Nottoway
WBBT	FM	107.3	C	Oldies	Richmond, VA	07/02/2003	56	Main Line Broadcasting LLC	Powhatan, VA	Powhatan
WLFV	FM	93.1	C	Country	Richmond, VA	07/02/2003	56	Main Line Broadcasting LLC	Ettrick, VA	Chesterfield
WAUQ	FM	89.7	NC	Christian	Richmond, VA	07/02/2003	56	American Family Association Incorporated	Charles City, VA	Charles City
WCVE	FM	88.9	NC	CiscNews	Richmond, VA	07/02/2003	56	Commonwealth Public Broadcasting Corporation	Richmond, VA	Richmond (City)

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

"p" indicates pending sale to owner listed

Printed: 10/30/2007 Data: 10/30/2007

Copyright © 2007 BIA Financial Network, Inc. Unauthorized distribution prohibited. (703) 818-2425 www.bia.com

Page 1



FCC Geographic Market Definition for Richmond, VA

Call Letters	AM/FM	Freq	Type	Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WDCE	FM	90.1	NC	Variety		Richmond, VA	07/02/2003	56	University of Richmond	Richmond, VA	Henrico
WHCE	FM	91.1	NC	CHR		Richmond, VA	07/02/2003	56	Henrico County Schools	Highland Springs, VA	Henrico
WVST	FM	91.3	NC	Jazz		Richmond, VA	07/02/2003	56	Virginia State University	Petersburg, VA	Petersburg (City)
WZEZ	FM	100.5	C	Adlt Strnd		Richmond, VA	07/02/2003	56	Hoffman, Hubert N., Jr. Family Trust	Goochland, VA	Goochland
WTOX	AM	1480	C	Mexican		Richmond, VA	09/27/2004	56	Davidson Media Group LLC	Glen Allen, VA	Henrico

Number of Stations in Geographic Market 39

Previous Stations in Geographic Market

WHAN	AM	1430	C	BusNw/Talk			06/12/2007	0	Fifth Estate Communications LLC	Ashland, VA	Hanover
WBQK	FM	107.9	C	Classical		Norfolk-Virginia Beach-Newport News,	01/24/2007	41	Davis Media LLC	West Point, VA	King William

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

"p" indicates pending sale to owner listed

Printed: 10/30/2007 Data: 10/30/2007

Copyright © 2007 BIA Financial Network, Inc. Unauthorized distribution prohibited. (703) 818-2425 www.bia.com

Page 2

## ANNEX E

### **Newspaper - Richmond-Petersburg, VA DMA**

The following daily newspapers are published with in the Richmond-Petersburg DMA:

<b><u>Title</u></b>	<b><u>City</u></b>	<b><u>Owner</u></b>
Richmond Times-Dispatch	Richmond, VA	Media General, Inc.
The Progress Index	Petersburg, VA	Times-Shamrock Group

The following weekly and bi-weekly newspapers are published within the Richmond-Petersburg DMA

<b><u>Title</u></b>	<b><u>City</u></b>	<b><u>Owner</u></b>
Richmond Free Press	Richmond, VA	Raymond H. Boone
The Amelia Bulletin Monitor	Amelia, VA	AMB Enterprises
The Central Virginian	Louisa, VA	CV Corporation of Virginia
The Orange County Review	Orange, VA	Central Virginia Weekly Group
The Richland News Press	Orange, VA	Central Virginia Weekly Group
The Harold-Progress	Ashland, VA	The CV Corp. of Virginia
The Collegian	Richmond, VA	University of Richmond

(Source: Gayle Directory of Publications and Broadcast Media 2007)