

SECTION III
EXHIBIT 18

Multiple Ownership

WKPA(AM), Lynchburg, VA, the station subject to the instant application, is located in the Roanoke-Lynchburg, VA, Nielsen Audio Metro (the “Roanoke Metro”). A total of 47 commercial and noncommercial educational full-power radio stations are located within or are reported by BIA as “home” to the Roanoke Metro.¹

Grant of the instant application would result in the Assignee and its attributable parties having cognizable interests in the following three (3) commercial full-power AM stations and five (5) commercial full-power FM stations and in the Roanoke Metro:

Call Sign	Location	Facility ID No.
WFIR(AM)	Roanoke, Virginia	31138
WPLY(AM)	Roanoke, Virginia	41111
<i>WKPA(AM)</i>	<i>Lynchburg, Virginia</i>	<i>59709</i>
WSLQ(FM)	Roanoke, Virginia	41112
WXLK(FM)	Roanoke, Virginia	9692
WVBE-FM	Lynchburg, Virginia	9690
WSLC-FM	Roanoke, Virginia	30156
WLNI(FM)	Lynchburg, Virginia	22663

Other than the above combination of stations, neither the Assignee nor its attributable parties would have any attributable interests in any other broadcast station located in or “home” to the Roanoke Metro.

Pursuant to Section 73.3555 of the Commission’s rules, in a Nielsen Audio market reported by BIA as having 45 or more commercial and noncommercial full-power radio stations, a party may have a cognizable interest in up to eight (8) full-power commercial radio stations, not more than five (5) of which may be in the same service.

¹ See BIA FCC Geographic Market Definition for Roanoke-Lynchburg, VA, February 1, 2019.

Accordingly, the Assignee's proposed combination of three (3) AM stations and five (5) FM stations in the Roanoke Metro complies with the Commission's multiple ownership rules under the Nielsen Audio Metro Methodology.

Assignee is also the licensee of WVBB(FM). WVBB(FM)'s community of license, Elliston-Lafayette, Virginia, is not located within the geographic boundaries of the Roanoke Metro and otherwise is not "home" to the Roanoke Metro. Therefore, WVBB(FM) is not considered under the Nielsen Audio Metro Methodology.

The attached Technical Statement provides an analysis under the Commission's Interim Contour-Overlap Methodology and shows that WVBB(FM) does not overlap with the relevant market. Accordingly, the proposed acquisition of WKPA(AM) also complies with the Commission's Interim Contour-Overlap Methodology.

For the foregoing reasons, the Assignee's proposed acquisition of WKPA(AM) complies with the Commission's multiple ownership rules

* * * * *

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
MEL WHEELER, INC.
LYCHBURG, VIRGINIA

This radio multiple ownership analysis was prepared on behalf of Mel Wheeler, Inc., in support of an application for assignment of WKPA(AM), Lynchburg, Virginia. This analysis considers the attributable radio broadcast stations in the Lynchburg market as it relates to the WKPA facility. This analysis was prepared under the FCC interim contour analysis method.* Considering all attributable radio stations in the area, the following stations were analyzed:

Call Sign	City of License	Facilities
WKPA	Lynchburg, VA	1390 kHz, 4.7 kW-D
WVBE-FM	Lynchburg, VA	Ch. 261C3, 20 kW, 100 m
WLNI	Lynchburg, VA	Ch. 290A, 6 kW, 81 m

The principal community contours of all of these stations are depicted on a map included herein as Figure 1.† The radio multiple ownership analysis considers only those stations with overlapping principal community contours (5 mV/m for AM stations, 3.16 mV/m for FM stations). An ownership study was prepared in accordance with the Federal Communications Commission multiple ownership rules as outlined in Section 73.3555.

* See Report and Order and Notice of Proposed Rulemaking, MB Docket 02-277, FCC 03-127, Released July 2, 2003.

† Shown for reference on Figure 1 are Mel Wheeler, Inc. attributable stations WXLK(FM), Roanoke, VA; WSLQ(FM), Roanoke, VA; and WSLC-FM, Roanoke, VA. The predicted principal community contours of these stations are close to that of WKPA, but they do not create a radio market with WKPA that would require analysis. In addition, as noted on Figure 1, attributable stations WVBB(FM), Elliston-Lafayette, VA; WPLY(AM), Roanoke, VA; and WFIR(AM), Roanoke, VA, are too far away to be shown and do not overlap the subject market involving WKPA.

Radio Markets

The “radio market” applicable to common ownership of the subject stations is defined as the area encompassed by the mutually overlapping principal community contours of the stations proposed to be commonly owned. As listed in the table below, there is one defined “radio market” formed by the subject stations:

Defined Radio Market	Stations that Define Radio Market	
	AM Stations	FM Stations
1	WKPA	WVBE, WLNI

Count of Stations in Defined Markets

The number of radio stations in a “radio market” is determined by counting the operating stations that have principal community contours that intersect the principal community contours that define the radio market. Only those stations located within 92 km of the perimeter of the mutual overlap area of the defined market area were employed in the count of stations. Commonly owned stations, other than those that form the market in question were not considered in the count of stations in the defined market. The results of the analysis are tabulated below:

Defined Radio Market	Number of Stations in Radio Market
Market 1	6 AM; 17 FM; 23 Total

Tabulations of the radio stations identified in the defined radio market are included with this statement. Only known licensed, operating stations were employed for the study. Distances to the AM coverage contours were predicted using the antenna patterns as identified in the Commission’s AM database and the appropriate Ground Wave Field Strength versus Distance Graph described in Section 73.184 of the FCC

Rules. Ground conductivity data were obtained from FCC Figure M3. Distances to the FM contours were determined based on the method outlined in Section 73.313 of the FCC Rules. Terrain data were derived from the N.G.D.C. 30-second computer database for each of the FM stations using radials evenly-spaced every 5 degrees of azimuth.

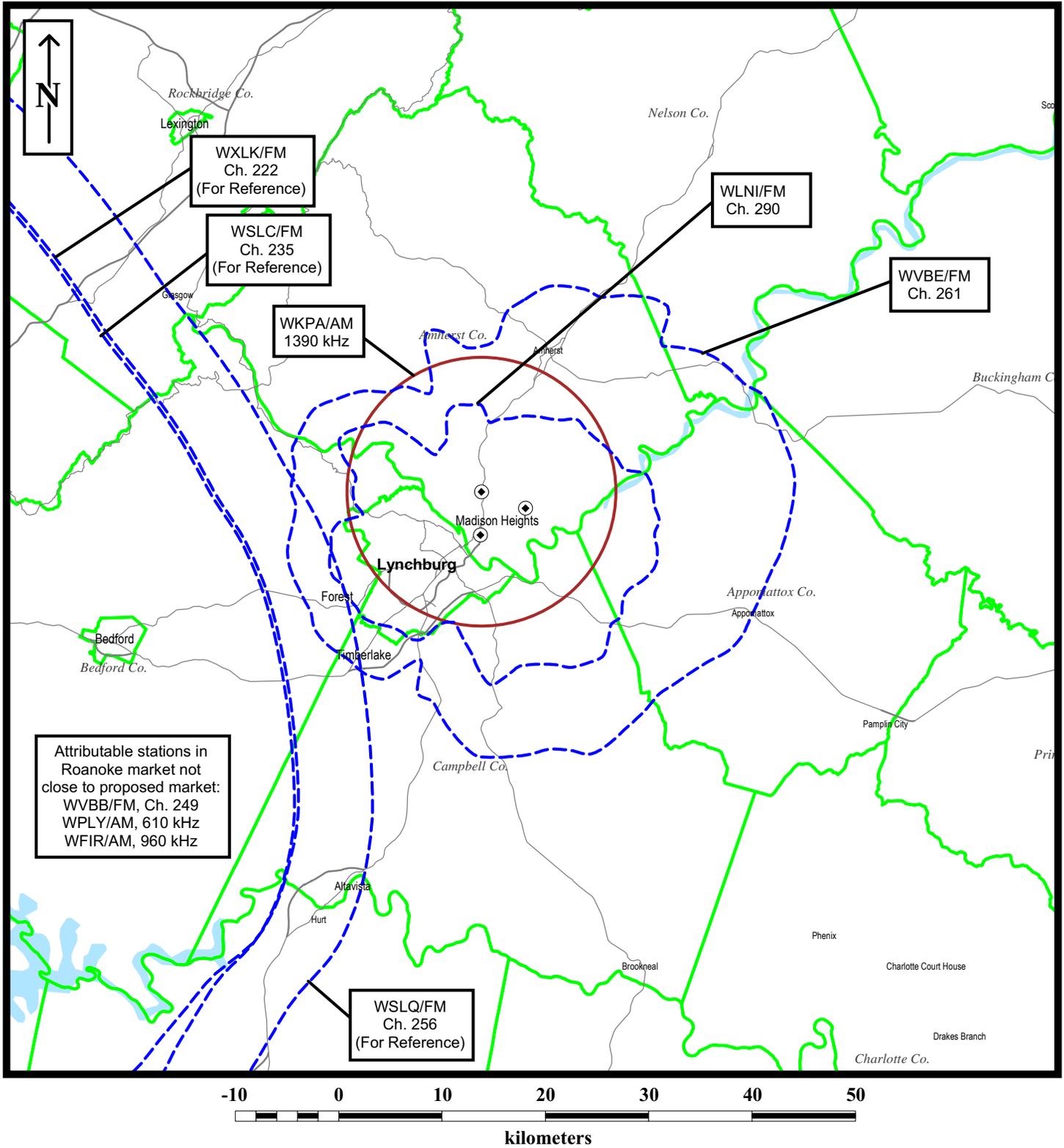
Based on the above, it is concluded that the proposed combination of the stations to be owned complies with Section 73.3555(a) of the FCC Rules.



Louis R. du Treil, Jr.

du Treil, Lundin & Rackley, Inc.
3135 Southgate Circle
Sarasota, Florida 34239

February 11, 2019



PREDICTED PRINCIPAL COMMUNITY CONTOURS OF SUBJECT STATIONS

duTreil, Lundin & Rackley, Inc. Sarasota, Florida

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
MEL WHEELER, INC.
LYNCHBURG, VIRGINIA

Call Sign	City	State	Frequency		Call Sign	City	State	Frequency
WLVA	LYNCHBURG	VA	580					
WLLL	LYNCHBURG	VA	930					
WBRG	LYNCHBURG	VA	1050					
WVGM	LYNCHBURG	VA	1320					
WKPA	LYNCHBURG	VA	1390					
WAMV	AMHERST	VA	1420					

TECHNICAL STATEMENT
RADIO MULTIPLE OWNERSHIP ANALYSIS
MEL WHEELER, INC.
LYNCHBURG, VIRGINIA

Call Sign	City	State	Channel		Call Sign	City	State	Channel
WRVL	LYNCHBURG	VA	202					
WNRS-FM	SWEET BRIAR	VA	210					
WRXT	ROANOKE	VA	212					
WQLU	LYNCHBURG	VA	215					
WEQP	RUSTBURG	VA	219					
WKHF	LYNCHBURG	VA	229					
WWZW	BUENA VISTA	VA	244					
WZZU	LYNCHBURG	VA	250					
WVBE-FM	LYNCHBURG	VA	261					
WIQO-FM	FOREST	VA	265					
WSNZ	LYNCHBURG	VA	269					
WJJX	APPOMATTOX	VA	274					
WHTU	BIG ISLAND	VA	280					
WKDE-FM	ALTAVISTA	VA	288					
WLNI	LYNCHBURG	VA	290					
WTTX-FM	APPOMATTOX	VA	296					
WYYD	AMHERST	VA	300					