

**EXHIBIT 18**

**COMPLIANCE WITH OWNERSHIP RULES**

This application seeks FCC approval for the assignment of full-power television station WWSI, Atlantic City, New Jersey (FIN 23142) (“WWSI”) from ZGS Philadelphia, Inc. to NBC Telemundo License LLC (“Applicant”). The Applicant is the licensee of full-power television WCAU, Philadelphia, Pennsylvania (FIN 63153) (“WCAU”). Upon consummation of the proposed transaction, the Applicant will be the licensee of WWSI and WCAU, both of which are assigned to the Philadelphia, PA Designated Market Area (“DMA”).

Under Section 73.3555(b) of the Commission’s rules, common ownership of two full-power television stations in the same DMA is permitted if eight independently owned and operating full-power commercial and noncommercial television stations will remain in the DMA post-transaction, and at least one of the two stations to be commonly owned is not ranked among the top four television stations in the DMA based on the most recent all-day (9:00 a.m.-midnight) audience share as measured by The Nielsen Company (“Nielsen”).<sup>1</sup>

WWSI is not ranked as a top four station in the Philadelphia DMA.<sup>2</sup> In addition, as demonstrated below, more than eight independently owned and operating full-power commercial and noncommercial television stations will remain in the Philadelphia, PA DMA post-transaction, as required by the television duopoly rule.

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<sup>1</sup> See 2006 Quadrennial Regulatory Review -- Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Report and Order and Order on Reconsideration, 23 FCC Rcd 2010 (2008); see also 47 C.F.R. §73.3555(b) (2008); Review of the Commission's Regulations Governing Television Broadcasting, 14 FCC Rcd 12903, 12935-40 (1999), recon. granted in part, 16 FCC Rcd 1067 (2001).

<sup>2</sup> The Nielsen Company, Nielsen Station Index audience share data for Feb. 28, 2013 - Mar. 11, 2013.

## Post-Transaction Independent TV Voices Philadelphia, PA (DMA Rank 4)<sup>3</sup>

1 = Counted as Independent Voice  
0 = Not counted as Independent Voice

Voices	Owner	Licensee	Affiliation	Call Sign
1	Access.1 Communications Corp.	Access.1 New Jersey License Company	NBC	WMGM-TV, Wildwood, NJ
1	CBS Corporation	CBS Broadcasting Inc.	CBS	KYW-TV, Philadelphia, PA
0	CBS Corporation	Philadelphia Television Station WPSG, Inc.	CW	WPSG, Philadelphia, PA
1	Disney Enterprises Inc.	ABC, Inc.	ABC	WPVI-TV, Philadelphia, PA
1	H. Chase Lenfest	Lenfest Broadcasting LLC	IND	WMCN-TV, Atlantic City, NJ
1	Independence Public Media of Philadelphia, Inc.	Independence Public Media of Philadelphia, Inc.	ETV	WYBE, Philadelphia, PA
1	ION Media Networks, Inc.	ION Media Philadelphia License, Inc.	ION	WPPX-TV, Wilmington, DE
1	Lehigh Valley Public Telecommunications Corp.	Lehigh Valley Public Telecommunications Corp.	ETV	WLVT-TV, Allentown, PA
1	Maranatha Broadcasting Company, Inc.	Maranatha Broadcasting Company, Inc.	IND	WFMZ-TV, Allentown, PA
1	NBCUniversal LLC	NBC Telemundo License LLC	NBC	WCAU, Philadelphia, PA
0	NBCUniversal LLC	NBC Telemundo License LLC	Telemundo	WWSI, Atlantic City, NJ
1	New Jersey Public Broadcasting Authority	New Jersey Public Broadcasting Authority	ETV	WNJS, Camden, NJ
0	New Jersey Public Broadcasting Authority	New Jersey Public Broadcasting Authority	ETV	WNJT, Trenton, NJ
1	News Corporation	Fox Television Stations, Inc.	FOX	WTFX-TV, Philadelphia, PA
1	Sonshine Family Television, Inc.	Sonshine Family Television, Inc.	IND	WBPH-TV, Bethlehem, PA
1	Tribune Broadcasting Company	WPHL, LLC	MyNetworkTV	WPHL-TV, Philadelphia, PA
1	Trinity Broadcasting Network, Inc.	TCCSA, Inc. d/b/a Trinity Broadcasting Network	IND	WGTW-TV, Burlington, NJ
1	Univision Communications Inc.	Univision Philadelphia LLC	Univision	WUVP-DT, Vineland, NJ
1	WRNN-TV Associates LP	NRJ TV Philly License Co., LLC	IND	WTVE, Reading, PA

**Total 16**

<sup>3</sup> *Television and Cable Factbook*, 2012.