

**Exhibit 15**  
**Multiple Ownership**

This statement and the attached table and map were prepared on behalf of Caledonia Communication Corporation (“*Caledonia*”). By the instant assignment application (“*Application*”), Caledonia proposes to acquire WSTX-FM and WSTX(AM), Christiansted, U.S. Virgin Islands. Mr. Jonathan K. Cohen, who holds an attributable interest in Caledonia, also holds attributable interests in WJKC(FM), WMNG(FM), and WVIQ(FM). The community of license of each of these stations is also Christiansted, U.S. Virgin Islands. As shown in the attached map, the principal community contours of both WSTX-FM and WSTX(AM) intersect with the principal community contours of the other three radio stations in which Mr. Cohen holds an attributable interest. Therefore, this multiple ownership analysis was prepared to demonstrate that a single entity may concurrently hold attributable interests in all of the following radio stations (“*Stations*”) under the Commission’s radio contour overlap rule<sup>1</sup>:

**Table A**

<b>Call Sign</b>	<b>Facility ID</b>	<b>Community of License</b>
WSTX-FM	20601	Christiansted, USVI
WSTX(AM)	20589	Christiansted, USVI
WJKC(FM)	54468	Christiansted, USVI
WVIQ(FM)	74457	Christiansted, USVI
WMNG(FM)	84545	Christiansted, USVI

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<sup>1</sup> 47 C.F.R. § 73.3555(a).

Because the community of license of stations WSTX-FM and WSTX(AM) is not located within the boundaries of an Arbitron radio market, Caledonia must demonstrate compliance with the radio contour overlap rule under the interim contour-overlap methodology (“**Interim Methodology**”). Under the Interim Methodology, a radio market is defined as the area encompassed by the principal community contours (*i.e.*, predicted or measured 5 mV/m groundwave contour for AM; predicted 3.16 mV/m contour for FM) (“**Contour**”) of stations that have overlapping Contours and that are proposed to be commonly attributable post-transaction. As demonstrated in the attached map, the Contours of all of the Stations overlap extensively because they all share the same community of license. Specifically, all of the Stations’ Contours fully encompass the entire Contour of WMNG(FM). Accordingly, for purposes of demonstrating compliance with the Commission’s radio contour overlap rule under the Interim Methodology, the Stations form a radio market that is coextensive with the Contour of WMNG(FM) (“**Radio Market**”).

For purposes of determining the number of radio stations in a radio market using the Interim Methodology, all full-power, operating commercial and noncommercial educational AM and FM radio stations with contours that overlap the appropriate radio market are counted, except: (i) stations with a transmitter located more than 92 kilometers from the perimeter of the area of mutual overlap of the commonly attributable stations that define the radio market, and (ii) stations in which the applicant or any party to the application holds an attributable interest. The attached map demonstrates that the Contours of 24 such stations overlap the Radio Market. These stations are listed in Table B. Under the Commission’s rules, in a radio market consisting

of 15 to 29 commercial radio stations, an entity may hold attributable interests in up to six commercial radio stations of which not more than four may be in the same service.<sup>2</sup> The Application seeks Commission consent for Mr. Cohen to hold an attributable interest in one AM and one FM station in addition to the attributable interests that he already holds in three FM stations in the Radio Market. Accordingly, the Application is consistent with the radio contour overlap rule.

**Table B**

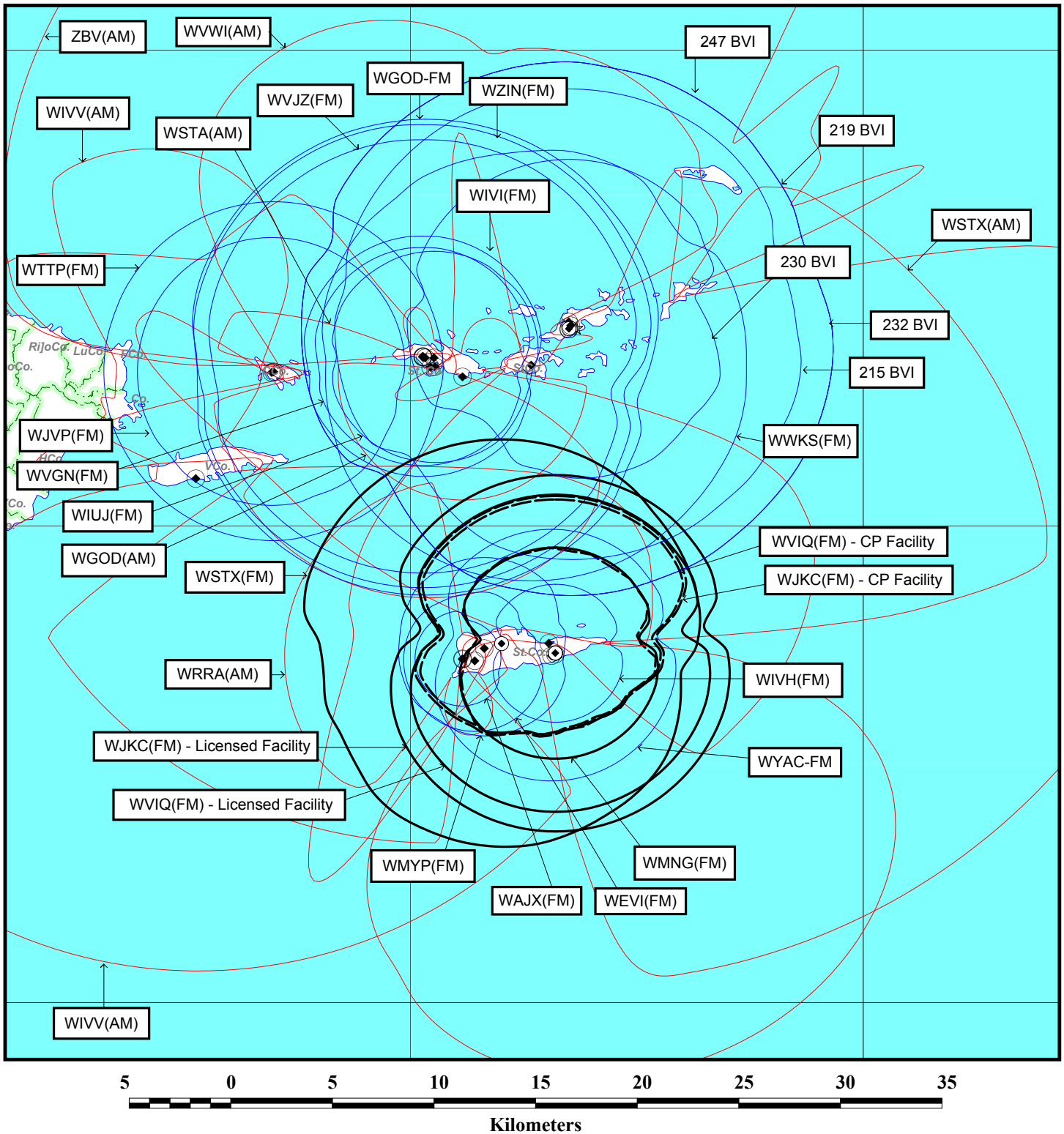
	<b>Call Sign</b>	<b>Community of License</b>	<b>Distance from Transmitter to Perimeter of Mutual Overlap Area</b>
1	WYAC-FM	Christiansted, USVI,	Within Radio Market
2	WMYP-FM	Frederickstead, USVI	Within Radio Market
3	WIVH-FM	Christiansted, USVI	Within Radio Market
4	WEVI-FM	Frederickstead, USVI	Within Radio Market
5	WWKS-FM	Cruz Bay, USVI	44.2 kM
6	ZBV-AM	Tortola, BVI	76.1 kM
7	219 BVI	British Virgin Islands	53 kM
8	WZIN-FM	Charlotte Amalie, USVI	51.2 kM
9	WVJZ-FM	Charlotte Amalie, USVI	51.2 kM
10	WVGN-FM	Charlotte Amalie, USVI	51.2 kM
11	WIVI-FM	Charlotte Amalie, USVI	51.2 kM
12	WGOD-FM	Charlotte Amalie, USVI	51.2 kM

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<sup>2</sup> 47 C.F.R. § 73.3555(a)(1)(iii).

	<b>Call Sign</b>	<b>Community of License</b>	<b>Distance from Transmitter to Perimeter of Mutual Overlap Area</b>
13	WIUJ-FM	Charlotte Amalie, USVI	51.3 kM
14	230 BVI	British Virgin Islands	53 kM
15	247 BVI	British Virgin Islands	53 kM
16	WJVP-FM	Culebra Island, PR	70 kM
17	WSAN-FM	Vieques Island, PR	69 kM
18	232 BVI	British Virgin Islands	53 kM
19	WVWI-AM	Charlotte Amalie, USVI	48.8 kM
20	WRR-AM	Frederiksted, USVI	Within Radio Market
21	WIVV-AM	Island of Vieques, PR	70 kM
22	WGOD-AM	Charlotte Amalie, USVI	37.7 kM
23	WSTA-AM	Charlotte Amalie, USVI	49.1 kM
24	WDHP-AM	Frederiksted, USVI	Within Radio Market

Figure 1



## PRINCIPAL COMMUNITY CONTOURS OF STATIONS

CALEDONIA COMMUNICATION CORPORATION

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du Treil, Lundin & Rackley, Inc. Sarasota, Florida