

CIG Media LLC
FCC Form 315
WFPX, Fayetteville, NC
Facility ID # 21245
WRPX, Rocky Mount, NC
Facility ID # 20590

Exhibit 18
“Multiple Ownership”

CIG Media LLC seeks Commission consent to the transfer of control of Paxson Communications License Company, LLC, licensee of Station WFPX, Fayetteville, NC, and Paxson Raleigh License, Inc., licensee of Station WRPX, Rocky Mount, NC, from Paxson Management Corporation. Both of these stations are licensed to communities in the Raleigh-Durham (Fayetteville), NC Designated Market Area (DMA).

Section 73.3555(b) of the Commission’s Rules¹ permits common ownership of television stations in the same DMA if (1) the Grade B contours of the stations do not overlap, or (2):

“[a]t the time the application to acquire . . . the station(s) is filed, at least one of the stations is not ranked among the top four stations in the DMA, based on the most recent all-day (9:00 a.m.-midnight) audience share as measured by Nielsen Media Research . . . and [a]t least 8 independently owned and operating full-power commercial and noncommercial stations would remain post-merger in the DMA in which the communities of license of the TV stations in question are located.”

¹ Because the Commission’s 2003 revisions to its local television ownership rules were stayed by the Third Circuit, the pre-2003 version of Section 73.3555(b) remains in effect and all references are to that version. See Public Notice, *Media Bureau to Terminate Temporary Broadcast Station Application Freeze*, 18 FCC Rcd 18631 (2003); *Prometheus Radio Project v. FCC*, 373 F.3d 372 (3d Cir. 2004), *cert. denied*, 125 S. Ct. 2902 (2005).

The Grade B contours of Stations WRPX and WFPX do slightly overlap. Continued common ownership of the two stations is permissible because neither station is ranked among the top four stations in the market and – both currently and following this transaction – there will be eight independently owned and operated full-power television stations in the market.

Attachment 1 is a Declaration of Michelle Barnhill, Operations Manager of WRPX. Ms. Barnhill declares that, according to Nielsen Media Research's February 2007 VIEWERS IN PROFILE REPORT for the Raleigh-Durham (Fayetteville) DMA, which contains the most up-to-date ratings information for the market, WFPX and WRPX were both ranked below the top-four in television household ratings from Monday to Sunday, 9:00 a.m. to midnight. Indeed, neither station had reportable ratings.

Consummation of this transaction will not change the number of independently owned and operating commercial and noncommercial television stations whose Grade B contour overlap with the contours of either WFPX or WRPX. Attachment A to the Barnhill Declaration is a list of the full-power commercial and noncommercial television stations licensed to communities in the Raleigh-Durham (Fayetteville) DMA. There are now eight different owners of full-power television stations in the market, and there will still be eight separate television "voices" in the market after the consummation of this transaction.

Continued common ownership of WFPX and WRPX is, therefore, permitted under the Commission's Rules because they are not among the top-four rated stations in the market and, after consummation, there will remain at least eight independent television "voices" in the Raleigh-Durham (Fayetteville), NC DMA. This transaction, therefore, fully complies with the Commission's ownership rules.

Declaration of Michelle Barnhill
Operations Manager
WRPX(TV), Rocky Mount, North Carolina

I, Michelle Barnhill, do hereby declare under penalty of perjury that the following is correct to the best of my knowledge, information and belief:

1. I am Operations Manager of WRPX(TV), Rocky Mount, North Carolina, licensed to Paxson Raleigh License, Inc. WFPX(TV), Fayetteville, North Carolina, licensed to Paxson Communications License Company, LLC, is under common control with WRPX, and both serve the Raleigh-Durham (Fayetteville), NC Nielsen Designated Market Area (DMA). The Grade B contours of WRPX and WFPX overlap.

2. I am submitting this Declaration with information on the ratings performance of WRPX and WFPX and the ownership of television stations in the DMA. I understand that this statement will be provided to the Federal Communications Commission (FCC) in connection with applications for FCC consent to the transfer of control of ION Media Networks, Inc., the ultimate parent of both licensee companies.

3. Under Section 73.3555(b)(2) of the FCC's Rules presently in effect,¹ two stations in one DMA may be commonly controlled if (a) at least one of the stations is not ranked among the top four stations in the DMA, and (b) at least eight independently owned and operated full-power commercial and non-commercial television stations would remain in the DMA following the proposed transaction.

4. In the current (February 2007) Nielsen Media Research ratings for the Raleigh-Durham (Fayetteville) DMA, neither WRPX nor WFPX were among the top-four rated stations, based on all-day (9:00 a.m.-midnight) ratings for total audience share. Indeed, Nielsen did not report measurable ratings for either station.

5. Attachment A is a list of the full-power commercial and non-commercial television stations licensed to communities in the Raleigh-Durham (Fayetteville) DMA. Following consummation of the proposed transfer of control of ION Media Networks, eight independent owners of full-power television stations will remain in the DMA.

Executed this 9th day of May, 2007.


Michelle Barnhill

¹ Due to the continuing judicial stay of the FCC's 2003 revisions to the local television ownership rule, all references in this statement will be to the Rules established prior to 2003.

Attachment A

Raleigh-Durham (Fayetteville), NC DMA TV Stations

No.	Licensee	Call Sign	Facility ID	Service	Community of License
1	Paxson Communications License Company, LLC	WFPX	21245	TV	Fayetteville, NC
	Paxson Raleigh License, Inc.	WRPX	20590	TV	Rocky Mount, NC
2	WLFL Licensee, LLC	WLFL	73205	TV	Raleigh, NC
	Raleigh (WRDC-TV) Licensee, Inc.	WRDC	54963	TV	Durham, NC
3	Media General Communications Holdings, LLC	WNCN	50782	TV	Goldsboro, NC
4	Capitol Broadcasting Company, Inc.	WRAL-TV	8688	TV	Raleigh, NC
	WRAZ-TV, Inc.	WRAZ	64611	TV	Raleigh, NC
5	MTB Raleigh Licensee LLC	WRAY-TV	10133	TV	Wilson, NC
6	WTVD Television, LLC	WTVD	8617	TV	Durham, NC
7	University of North Carolina	WUNC-TV	69080	ED-TV	Chapel Hill, NC
	University of North Carolina	WUNP-TV	69397	ED-TV	Roanoke Rapids, NC
	University of North Carolina	WUNU	69416	ED-TV	Lumberton, NC
8	WUVC License Partnership, G.P.	WUVC-TV	16517	TV	Fayetteville, NC