

## **Exhibit 18 – Multiple Ownership Compliance**

The instant application requests Commission consent to the acquisition of the licenses of radio stations KFXZ-FM, Opelousas, LA; KYMK-FM, Maurice, LA; KFXZ(AM), Lafayette, LA; and KVOL(AM), Lafayette, LA.

Parties holding attributable interests in the proposed assignee also hold interests in television stations KBCA(DT), Alexandria, LA and KLWB(DT), New Iberia, LA, as well as radio stations KSLO-FM, Simmesport, LA; KOGM(FM), Opelousas, LA; KSLO(AM), Opelousas, LA; and KLWB-FM, Opelousas, LA. As a result, this exhibit demonstrates compliance with both the local radio ownership rule and the radio-television cross-ownership rule. Because KBCA(DT) (Alexandria DMA) and KLWB(DT) (Lafayette DMA) are assigned to different Designated Market Areas the television multiple ownership rule is not implicated by the proposed transaction.

### **Local Radio Ownership Rule Compliance:**

All of the radio stations included in this application are listed by BIA as “home” to, and are licensed to communities located within the geographic boundaries of, either the Alexandria, Louisiana or Lafayette, Louisiana Arbitron markets.

*Alexandria Market:* Upon closing of the proposed transactions, the proposed assignee will hold attributable interests in only one station in the Alexandria market - KSLO-FM, Simmesport, Louisiana. Ownership of a single station is allowed in markets of any size and the proposed transaction therefore complies with the local radio ownership rule in the Alexandria market. A copy of the FCC Geographic Market Definition for the Alexandria Arbitron market is nonetheless attached, and shows that the market includes at least 23 full-power stations.

*Lafayette Market:* Upon closing of the proposed transaction, the proposed assignee will hold attributable interests in 7 stations in the Lafayette market, including 4 FM and 3 AM stations, as follows:

KOGM(FM), Opelousas, LA  
KLWB-FM, Opelousas, LA  
KFXZ-FM, Opelousas, LA  
KYMK-FM, Maurice, LA  
KFXZ(AM), Lafayette, LA  
KVOL(AM), Lafayette, LA  
KSLO(AM), Opelousas, LA

Under section 73.3555(a)(1)(ii) of Commission’s multiple ownership rules, an entity may hold interests in up to 7 radio stations, including 4 in the same service, if the radio market includes a total of between 30 and 44 full-power stations. As shown in the attached FCC Geographic Market Definition for Lafayette, LA, the Lafayette market contains 38 full-power stations. As a result, the proposed transaction complies with the local radio ownership rule in the Lafayette Arbitron market.

**Radio-Television Cross-Ownership Rule Compliance:**

Under Section 73.3555(c) of the Commission's rules, the radio-television cross-ownership rule is implicated when the Grade A contour of a television broadcast station encompasses the entire community of license of a existing or proposed commonly owned radio station.<sup>1</sup> Applicant notes that after the digital transition, there is no Grade A contour to evaluate. The analysis in this exhibit has used the digital Noise Limited Service Contour (NLSC).<sup>2</sup>

Once the rule is implicated, compliance is measured based on an analysis of independent media voices remaining in the market after the proposed transaction. Under Section 73.3555(c)(3), independent voices include (1) independently-owned television stations that are in the television DMA and have contour overlap with the subject television station; (2) independently owned radio stations in the Arbitron market; (3) independently owned daily newspapers; and (4) one cable system. This voice count must be performed in each Arbitron market that includes stations whose communities of license are encompassed by the television station contour.<sup>3</sup>

**KBCA(DT), Alexandria, Louisiana**

As shown on the attached contour map, the digital NLSC of KBCA(DT) encompasses the communities of Simmesport and Opelousas. After closing of the proposed transaction, the assignee will hold interests in the following radio stations licensed to those communities:

KSLO-FM, Simmesport, Louisiana  
KOGM(FM), Opelousas, Louisiana  
KFXZ-FM, Opelousas, Louisiana  
KSLO(AM), Opelousas, Louisiana  
KLWB-FM, Opelousas, Louisiana (applicant notes that KLWB-FM holds a construction permit authorizing a change of the station's community of license to Carencro, Louisiana. The community of Carencro is not encompassed by the NLSC of KBCA, but the station is included in this analysis at its former community of license of Opelousas.)

Each of these stations is home to either the Alexandria or Lafayette Arbitron markets.

*Alexandria:* KSLO-FM, Simmesport, Louisiana is the only station implicated that is home to the Alexandria market. As a result, after the transaction, there will be only one full power television and one radio station in the market, a combination which will comply with the radio-television cross-ownership rule regardless of the number of remaining voices.

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<sup>1</sup> The radio-television cross-ownership rule is also implicated when the 1 mV/m contour of an FM station or the 2 mV/m groundwave contour of an AM station encompasses the community of license of a commonly owned television station. Analysis of the proposed transaction using radio contours does not result in any additional markets requiring further analysis.

<sup>2</sup> See *Stephen Diaz Gavin, Esq. (Nassau Broadcasting)*, 25 FCC Rcd 1851, 1856-57 (2010).

<sup>3</sup> *Id.* at 1858.

*Lafayette:* After the transaction, assignee will hold interests in one full power television station and four radio stations in the Lafayette market:

KBCA(DT), Alexandria, Louisiana  
KOGM(FM), Opelousas, Louisiana  
KFXZ-FM, Opelousas, Louisiana  
KSLO(AM), Opelousas, Louisiana  
KLWB-FM, Opelousas, Louisiana

Under Section 73.3555(c)(2)(ii) of the Commission's rules, an entity can hold interests in up to two television stations and up to four radio stations if there will be at least 10 independent voices remaining in the market after the transaction. At least 23 independent voices will remain in the Lafayette market following the proposed transaction, as listed below. As a result, the proposed transaction will comply with the radio-television cross-ownership rule in the Lafayette market.

1. Full-power television station KATC, Lafayette, Louisiana
2. Full-power television station KLFY-TV, Lafayette, Louisiana
3. Full-power television station KADN-TV, Lafayette, Louisiana
4. Full-power television station KLPB-TV, Lafayette, Louisiana
5. Daily newspaper *Lafayette Advertiser*
6. Cable television system owned by Cox Communications
7. Radio station owner The Fort Collins/Lafayette Divestiture Trust (KFTE(FM))
8. Radio station owner Townsquare Media LLC (KROF(AM), KPEL(FM), KHXT(FM), KMDL(FM), KPEL(AM), and KTDY(FM))
9. Radio station owner Cumulus Media Holdings Inc. (KSMB(FM), KRRQ(FM), KXKC(FM), KNEK(AM), and KNEK-FM)
10. Radio station owner Broadcast Partners Inc. (KYBG(FM), KSIG(AM), and KLEJ(FM))
11. Radio station owner Mary V. Harris Foundation (WHFG(FM))
12. Radio station owner Family Worship Center Church Inc. (KCKR(FM))
13. Radio station owner Agape Broadcasters Inc. (KAJN(FM))
14. Radio station owner Tri-Parish Broadcasting (KEUN(AM), KEUN-FM)
15. Radio station owner Educational Media Foundation (KITA(FM))
16. Radio station owner R&M Broadcasting Inc (KJCB(AM))
17. Radio station owner University of Louisiana (KRVS(FM))
18. Radio station owner Rose Ann Marx (KBON(FM))
19. Radio station owner Coastal Broadcasting of Lafourche, Inc. (KANE(AM))
20. Radio station owner Radio Maria Inc. (KNIR(AM))
21. Radio station owner The Last Bastion Station Trust LLC (KRDJ(FM))
22. Radio station owner American Family Association Incorporated (KSJY(FM))
23. Radio station owner Southern Consumers Education Foundation (KIEE(FM))

**KLWB(DT), New Iberia, Louisiana**

As shown on the attached contour map, the digital NLSC of KLWB(DT) encompasses the communities of Maurice, Lafayette, Simmesport, Opelousas, and Carencro. After closing of the proposed transaction, the assignee will hold interests in the following radio stations licensed to those communities:

KYMK-FM, Maurice, Louisiana  
KVOL(AM), Lafayette, Louisiana  
KFXZ(AM), Lafayette, Louisiana  
KSLO-FM, Simmesport, Louisiana  
KOGM(FM), Opelousas, Louisiana  
KFXZ-FM, Opelousas, Louisiana  
KSLO(AM), Opelousas, Louisiana  
KLWB-FM, Opelousas, Louisiana (applicant notes that KLWB-FM holds a construction permit authorizing a change of the station's community of license to Carencro, Louisiana. Both Opelousas and Carencro are encompassed by the NLSC of KLWB(DT).)

Each of these stations is home to either the Alexandria or Lafayette Arbitron markets.

*Alexandria:* KSLO-FM, Simmesport, Louisiana is the only station implicated that is home to the Alexandria market. As a result, after the transaction, there will be only one full power television and one radio station in the market, a combination which will comply with the radio-television cross-ownership rule regardless of the number of remaining voices.

*Lafayette:* After the transaction, assignee will hold interests in one full power television station and seven radio stations in the Lafayette market:

KBCA(DT), Alexandria, Louisiana  
KOGM(FM), Opelousas, Louisiana  
KFXZ-FM, Opelousas, Louisiana  
KSLO(AM), Opelousas, Louisiana  
KLWB-FM, Opelousas, Louisiana (or Carencro, Louisiana)  
KYMK-FM, Maurice, Louisiana  
KVOL(AM), Lafayette, Louisiana  
KFXZ(AM), Lafayette, Louisiana

Under Section 73.3555(c)(2)(i) of the Commission's rules, an entity can hold interests in one television station and up to seven radio stations if there will be at least 20 independent voices remaining in the market after the transaction. As shown above, at least 23 independent voices will remain in the Lafayette market following the proposed transaction. As a result, the proposed transaction will comply with the radio-television cross-ownership rule in the Lafayette market.

# FCC Geographic Market Definition for Alexandria, LA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAPM	FM	91.7	NC	Chrst/Inspr	Alexandria, LA	07/02/2003	220	American Family Association Incorporated	Alexandria, LA	Rapides
KDBS	AM	1410	C	Sports	Alexandria, LA	07/02/2003	220	Cenla Broadcasting Company Inc	Alexandria, LA	Rapides
KEDG	FM	106.9	C	Hot AC	Alexandria, LA	07/02/2003	220	Flinn Broadcasting Corporation	Alexandria, LA	Rapides
KJMJ	AM	580	NC	Christian	Alexandria, LA	07/02/2003	220	Radio Maria Inc	Alexandria, LA	Rapides
KLSA	FM	90.7	NC	Nws/Cls/Var	Alexandria, LA	07/02/2003	220	Louisiana State University	Alexandria, LA	Rapides
KLXA	FM	89.9	NC	ChrsContem	Alexandria, LA	07/02/2003	220	Educational Media Foundation	Alexandria, LA	Rapides
KMXH	FM	93.9	C	Urban	Alexandria, LA	07/02/2003	220	JWBP Broadcasting LLC	Alexandria, LA	Rapides
KQID	FM	93.1	C	Top 40	Alexandria, LA	07/02/2003	220	Cenla Broadcasting Company Inc	Alexandria, LA	Rapides
KRRV	FM	100.3	C	Country	Alexandria, LA	07/02/2003	220	Cenla Broadcasting Company Inc	Alexandria, LA	Rapides
KSYL	AM	970	C	Nws/Tlk/Spt	Alexandria, LA	07/02/2003	220	Cenla Broadcasting Company Inc	Alexandria, LA	Rapides
KZMZ	FM	96.9	C	Clsc Rock	Alexandria, LA	07/02/2003	220	Cenla Broadcasting Company Inc	Alexandria, LA	Rapides
KBKK	FM	105.5	C	Country	Alexandria, LA	07/02/2003	220	Opus Media Partners LLC	Ball, LA	Rapides
KWDF	AM	840	C	Chrst/Talk	Alexandria, LA	07/02/2003	220	Wilkins Communications Network Inc	Ball, LA	Rapides
KBCE	FM	102.3	C	Hip Hop	Alexandria, LA	07/02/2003	220	JWBP Broadcasting LLC	Boyce, LA	Rapides
KEZP	FM	104.3	C	Nws/Tlk/Spt	Alexandria, LA	07/02/2003	220	Opus Media Partners LLC	Bunkie, LA	Avoyelles
KVDP	FM	89.1	NC	Religion	Alexandria, LA	07/02/2003	220	Dry Prong Educational Broadcasting Foundation	Dry Prong, LA	Grant
KZLG	FM	95.9	C	AC	Alexandria, LA	07/02/2003	220	Cajun Broadcasting Inc	Mansura, LA	Avoyelles
KAPB	FM	97.7	C	Country	Alexandria, LA	07/02/2003	220	Gay, Tom D	Marksville, LA	Avoyelles
KLIL	FM	92.1	C	Oldies	Alexandria, LA	07/02/2003	220	Cajun Broadcasting Inc	Moreauville, LA	Avoyelles
KKST	FM	98.7	C	Urban	Alexandria, LA	07/02/2003	220	Cenla Broadcasting Company Inc	Oakdale, LA	Allen
KTTP	AM	1110	C	BkGsp/CCt	Alexandria, LA	07/02/2003	220	Benjamin-Dane LLC	Pineville, LA	Rapides
KSLO	FM	105.3	C	Spanish AC	Alexandria, LA	02/28/2008	220	Delta Media Corporation	Simmesport, LA	Avoyelles
KLAA	FM	103.5	C	Country	Alexandria, LA	07/02/2003	220	Opus Media Partners LLC	Tioga, LA	Rapides

Number of Stations in Geographic Market 23

## Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed

# FCC Geographic Market Definition for Lafayette, LA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KFTE	FM	105.1	C	Alternative	Lafayette, LA	07/02/2003	107	Ft Collins/Lafayette Divestiture Trust	Abbeville, LA	Vermilion
KROF	AM	960	C	Talk	Lafayette, LA	07/02/2003	107	Townsquare Media LLC	Abbeville, LA	Vermilion
KSMB	FM	94.5	C	CHR	Lafayette, LA	07/02/2003	107	Cumulus Media Holdings Inc	Lafayette, LA	Lafayette
KYBG	FM	102.1	C	Clsc Hits	Lafayette, LA	07/02/2003	107	Broadcast Partners Inc	Basile, LA	Evangeline
KPEL	FM	96.5	C	News/Talk	Lafayette, LA	07/02/2003	107	Townsquare Media LLC	Breaux Bridge, LA	St Martin
WHFG	FM	91.3	NC	Chrst/Talk	Lafayette, LA	09/23/2008	107	Mary V Harris Foundation	Broussard, LA	Lafayette
KLWB	FM	103.7	C	Sports	Lafayette, LA	06/08/2010	107	Delta Media Corporation	Opelousas, LA	St Landry
KCKR	FM	91.9	NC	Religion	Lafayette, LA	07/02/2003	107	Family Worship Center Church Inc	Church Point, LA	Acadia
KAJN	FM	102.9	C	ChrsContem	Lafayette, LA	07/02/2003	107	Agape Broadcasters Inc	Crowley, LA	Acadia
KSIG	AM	1450	C	Oldies	Lafayette, LA	07/02/2003	107	Broadcast Partners Inc	Crowley, LA	Acadia
KHXT	FM	107.9	C	CHR/Rhymc	Lafayette, LA	07/02/2003	107	Townsquare Media LLC	Erath, LA	Vermilion
KEUN	AM	1490	C	News/Talk	Lafayette, LA	07/02/2003	107	p Roger Cavaness Testamentary Sub-Trust FBO	Eunice, LA	St Landry
KEUN	FM	105.5	C	Country	Lafayette, LA	07/02/2003	107	p Roger Cavaness Testamentary Sub-Trust FBO	Eunice, LA	St Landry
KITA	FM	89.5	NC	Chrst/Altve	Lafayette, LA		107	Educational Media Foundation	Iota, LA	Acadia
KLFT	FM	90.5	NC	Religion	Lafayette, LA	11/16/2012	107	Talents Ministry Inc	Kaplan, LA	Vermilion
KMDL	FM	97.3	C	Country	Lafayette, LA	07/02/2003	107	Townsquare Media LLC	Kaplan, LA	Vermilion
KFXZ	AM	1520	C	SGspl/Oldes	Lafayette, LA	07/02/2003	107	Pittman Broadcasting Services LLC	Lafayette, LA	Lafayette
KIKL	FM	90.9	NC	ChrsContem	Lafayette, LA	07/02/2003	107	Educational Media Foundation	Lafayette, LA	Lafayette
KJCB	AM	770	C	Urban	Lafayette, LA	07/02/2003	107	R&M Broadcasting Inc	Lafayette, LA	Lafayette
KPEL	AM	1420	C	Sports	Lafayette, LA	07/02/2003	107	Townsquare Media LLC	Lafayette, LA	Lafayette
KRRQ	FM	95.5	C	Urban/HpHo	Lafayette, LA	07/02/2003	107	Cumulus Media Holdings Inc	Lafayette, LA	Lafayette
KRVS	FM	88.7	NC	Variety	Lafayette, LA	07/02/2003	107	University of Louisiana	Lafayette, LA	Lafayette
KTDY	FM	99.9	C	AC	Lafayette, LA	07/02/2003	107	Townsquare Media LLC	Lafayette, LA	Lafayette
KVOL	AM	1330	C	News/Talk	Lafayette, LA	07/02/2003	107	Pittman Broadcasting Services LLC	Lafayette, LA	Lafayette
KBON	FM	101.1	C	Variety	Lafayette, LA	07/02/2003	107	Marx, Rose Ann	Mamou, LA	Evangeline
KYMK	FM	106.3	C	Urban AC	Lafayette, LA	07/02/2003	107	Pittman Broadcasting Services LLC	Maurice, LA	Vermilion
KANE	AM	1240	C	Variety	Lafayette, LA	07/02/2003	107	Coastal Broadcasting of Larose, Inc.	New Iberia, LA	Iberia
KNIR	AM	1360	NC	Christian	Lafayette, LA	07/02/2003	107	Radio Maria Inc	New Iberia, LA	Iberia
KRDJ	FM	93.7	C	Rock	Lafayette, LA	01/11/2007	107	The Last Bastion Station Trust LLC	New Iberia, LA	Iberia
KXKC	FM	99.1	C	Country	Lafayette, LA	07/02/2003	107	Cumulus Media Holdings Inc	New Iberia, LA	Iberia
KFXZ	FM	105.9	C	Urban AC	Lafayette, LA	07/02/2003	107	Pittman Broadcasting Services LLC	Opelousas, LA	St Landry
KOGM	FM	107.1	C	Hot AC	Lafayette, LA	07/02/2003	107	Delta Media Corporation	Opelousas, LA	St Landry
KSLO	AM	1230	C	Spanish AC	Lafayette, LA	07/02/2003	107	Delta Media Corporation	Opelousas, LA	St Landry
KLEJ	FM	106.7	C	Country	Lafayette, LA	07/02/2003	107	Broadcast Partners Inc	Rayne, LA	Acadia

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

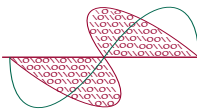
"p" indicates pending sale to owner listed

## FCC Geographic Market Definition for Lafayette, LA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KSJY	FM	89.9	NC	Talk	Lafayette, LA	04/25/2005	107	American Family Association Incorporated	St Martinville, LA	St Martin
KIEE	FM	88.3	NC	Variety	Lafayette, LA	08/23/2011	107	Southern Consumers Education Foundation	St. Martinville, LA	St Martin
KNEK	AM	1190	C	Urban AC	Lafayette, LA	07/02/2003	107	Cumulus Media Holdings Inc	Washington, LA	St Landry
KNEK	FM	104.7	C	Urban AC	Lafayette, LA	07/02/2003	107	Cumulus Media Holdings Inc	Washington, LA	St Landry

Number of Stations in Geographic Market 38

### Previous Stations in Geographic Market



**Chesapeake RF Consultants, LLC**  
Radiofrequency Consulting Engineers  
Digital Television and Radio

## Radio - Television Crossownership

prepared for  
**Delta Media Corporation**

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