

## EXHIBIT 17 MULTIPLE OWNERSHIP COMPLIANCE

By this application, Lincoln Financial Media Company of Florida (“LFM”) proposes to acquire WMSF(FM), West Palm Beach, Florida (Facility ID No. 29567) (“WMSF” or the “Station”). The proposed transaction is consistent with the Commission’s local radio multiple ownership rule, both at the Station’s current location in the West Palm Beach-Boca Raton, FL Arbitron Metro (the “WPB Metro”) as well as after giving effect to the pending proposal to move the station to Miramar, Florida, which is located in the Miami-Ft. Lauderdale-Hollywood, FL, Florida Arbitron Metro (the “Miami Metro”).<sup>1</sup>

### WPB Metro

Presently, WMSF is both physically located within, and “home” to, the WPB Metro. As shown in *Attachment 17-1*, there are 32 full-power commercial and non-commercial stations in the WPB Metro.

The Commission’s local radio ownership rule provides that in a radio market with 30 to 44 (inclusive) full-power, commercial and noncommercial radio stations, a single entity may not have a cognizable interest in more than 7 commercial radio stations in total and not more than 4 commercial stations in the same service (AM or FM).<sup>2</sup>

LFM does not own or operate other full-power commercial radio stations within the WPB Metro. Accordingly, grant of this application will result in LFM acquiring a cognizable interest in its first commercial radio station in the WPB Metro, which is consistent with the Commission’s local radio multiple ownership rules.

### Miami Metro

To facilitate the Commission’s review of the proposed transaction, as well as the effect of the proposed transaction on the pending Minor Change Application, LFM notes that its proposed acquisition of the Station will comport with the Commission’s local radio multiple ownership rule after giving effect to the change in the Station’s community of license proposed in the Minor Change Application.

As demonstrated in *Attachment 17-2*, there are 58 full-power commercial and non-commercial radio stations in the Miami Metro. The Commission’s local radio multiple

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<sup>1</sup> See FCC File No. BPH-20120529AKO (requesting authority to change the Station’s community of license to Miramar, Florida and to operate on Channel 282C1 from a new transmitter site) (the “Minor Change Application”). For purposes of assessing compliance with the local multiple ownership rules, the Commission defines the relevant market to be the “Arbitron Metro,” in those markets so designated by Arbitron. See 2002 *Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, 18 FCC Rcd 13620, 13712-13 (2003).

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

ownership rule provides that in a radio market with 45 or more full-power commercial and non-commercial radio stations, a single entity may not have a cognizable interest in more than 8 full-power radio stations in total and not more than 5 within the same service (AM or FM).<sup>3</sup>

Following (a) consummation of the proposed transaction, and (b) the Station's relocation to the Miami Metro, LFM will be the licensee of 3 FM stations (WMSF, WLYF(FM), Miami, FL; and WMXJ(FM), Pompano Beach, FL) and 1 AM station (WAXY, South Miami, FL). Such a combination of 3 FM and 1 AM station within the Miami Metro is consistent with the Commission's local radio multiple ownership rule.<sup>4</sup>

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<sup>3</sup> 47 C.F.R. § 73.3555(a)(1)(i).

<sup>4</sup> *Id.*