

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

By this exhibit and pursuant to the FCC's Public Notice, DA 04-3204, released on October 8, 2004, First Media Radio, LLC ("First Media") addresses the compliance of the instant application with the FCC's local radio ownership rules, which became effective through an order of the United States Court of Appeals of the Third Circuit on September 3, 2004.<sup>1</sup>

The instant application requests consent to the assignment of the license of radio station WINX-FM from CWA Broadcasting, Inc. to First Media Radio. WINX-FM is identified by the BIA Media Access Pro database as "home" to the Salisbury-Ocean City, Maryland Arbitron market, but is not located within the geographic boundaries of that Arbitron market. First Media does not hold attributable interests in any other stations licensed to communities located within the Salisbury-Ocean City, Maryland market or ranked in that market. Accordingly, First Media's proposed ownership of WINX-FM complies with the FCC's local radio ownership rules under the Arbitron metro market methodology. Because WINX-FM is not located within the geographic boundaries of any ranked Arbitron metro market, this exhibit also demonstrates compliance of the instant application under the interim contour-overlap methodology.

As described in the attached Multiple Ownership Contour Showing, First Media holds an attributable interest in two radio stations that have principal community contours that overlap with the proposed principal community contour of WINX-FM -- WEMD(AM) and WCEI-FM, both Easton, Maryland. No other station in which First Media holds an attributable interest has a principal community contour that overlaps the principal community contour of WINX-FM, WEMD(AM), or WCEI-FM.

There are currently at least five additional stations in which First Media holds no attributable interest in the market formed by WINX-FM, WEMD(AM), and WCEI-FM. After consummation of the transaction proposed in this application, the market therefore will include at least eight stations. Under Section 73.3555(a) of the Commission's rules, a person or single entity (or entities under common control) may hold cognizable interests in up to five full-power, commercial radio stations in total and up to three full-power commercial radio stations in the same service (AM or FM) in a radio market with fewer than fifteen full-power commercial and noncommercial radio stations.<sup>2</sup> An entity also may not hold attributable interests in more than fifty percent of the stations in such a market. Consequently, First Media's proposed ownership of two full-power, commercial FM radio stations and one full power, commercial AM radio station in the market complies with the FCC's local radio ownership rules under the interim contour-overlap methodology.

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<sup>1</sup> *Order*, United States Court of Appeals for the Third Circuit, No. 03-3388 (Sept. 3, 2004), *modifying stay granted in Prometheus Radio Project v. FCC*, 373 F.3d 372 (3d Cir. 2004), *affirming in part and remanding in part*, 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, *Cross-Ownership of Broadcast Stations and Newspapers*, Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets, Definition of Radio Markets, Definition of Radio Markets for Areas Not Located in an Arbitron Survey Area, Report and Order and Notice of Proposed Rulemaking, 18 FCC Rcd 13620 (2003).

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