

**Transferees' Exhibit 18**  
**FCC Form 315, Section IV, Item 8(b)**  
**October 2007**

**Exhibit 18**  
**Multiple Ownership Analysis**

This exhibit is prepared in conjunction with the proposed transfer of control of stations WARM-FM, York, Pennsylvania, WSBA(AM), York, Pennsylvania, WGLD(AM), Red Lion, Pennsylvania, and WSOX(FM), Red Lion, Pennsylvania (collectively, the "Stations").

The Commission's local radio multiple ownership rule provides that in markets with between 15 and 29 (inclusive) full-power, commercial and noncommercial radio stations, one party may have a cognizable interest in licenses for not more than six commercial radio stations, no more than four of which are in the same service (AM or FM). 47 C.F.R. § 73.3555(a)(1)(iii). 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).

For purposes of the local radio ownership rule, the Stations are deemed to be included in the York, Pennsylvania Arbitron Metro (the "Metro"). According to BIA Research, Inc.'s *Media Access Pro* database as of October 2, 2007 (*see the attached FCC Geographic Market Definition Report for the York Metro*), there are 15 full-power, commercial and noncommercial radio stations licensed to communities within the Metro or which Arbitron designates as "home" to the Metro. Accordingly, the current local radio ownership rule permits the transferee parties to this application to have a cognizable interest in up to six commercial radio stations (with four in the same service) in the York Metro. As shown on the attached *FCC Geographic Market Definition Report for the York Metro*, the transferee parties to this application have a cognizable interest in four commercial radio stations in the Metro, and will continue to have a cognizable interest in four commercial radio stations (2 AM stations and 2 FM stations) upon a grant of this instant application.

For the reasons set forth herein, a grant of this application is fully consistent with the Commission's local radio ownership rule.



## FCC Geographic Market Definition for York, PA

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
WGLD	AM	1440	C	Clsc Hits	York, PA	07/02/2003	103	Cumulus Media Partners LLC	Red Lion, PA	York
WSOX	FM	96.1	C	Clsc Hits	York, PA	07/02/2003	103	Cumulus Media Partners LLC	Red Lion, PA	York
WGET	AM	1320	C	AC/Nws/Spt	York, PA	07/02/2003	103	Times & News Publishing Company	Gettysburg, PA	Adams
WGTY	FM	107.7	C	Country	York, PA	07/02/2003	103	Times & News Publishing Company	Gettysburg, PA	Adams
WSJW	FM	92.7	C	Smooth	York, PA	07/02/2003	103	Hall Communications Inc	Starview, PA	York
WHVR	AM	1280	C	Country	York, PA	07/02/2003	103	Radio Hanover Inc	Hanover, PA	York
WYYC	AM	1250	C	Chrst/Talk	York, PA	07/02/2003	103	Wilkins Communications Network Inc	York, PA	York
WOYK	AM	1350	C	Sports	York, PA	07/02/2003	103	Starview Media Inc	York, PA	York
WQXA	FM	105.7	C	Rock	Harrisburg-Lebanon-Carlisle, PA	07/02/2003	79	Citadel Communications	York, PA	York
WSBA	AM	910	C	News/Talk	York, PA	07/02/2003	103	Cumulus Media Partners LLC	York, PA	York
WARM	FM	103.3	C	Soft Rock	York, PA	07/02/2003	103	Cumulus Media Partners LLC	York, PA	York
WYCR	FM	98.5	C	Clsc Hits	York, PA	07/02/2003	103	Radio Hanover Inc	York-Hanover, PA	York
WFKJ	AM	890	NC	Religion	York, PA	07/02/2003	103	Jesus is Lord Ministries	Cashtown, PA	Adams
WVYC	FM	99.7	NC	Alternative	York, PA	07/02/2003	103	York College of Pennsylvania	York, PA	York
WZBT	FM	91.1	NC	Alternative	York, PA	07/02/2003	103	Gettysburg College	Gettysburg, PA	Adams

Number of Stations in Geographic Market 15

### Previous Stations in Geographic Market

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

"p" indicates pending sale to owner listed