

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, 2004.¹

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.² 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.

¹ *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).

² *See* 47 C.F.R. § 73.3555(a).



Multiple Ownership Contour Showing

This exhibit demonstrates that the common ownership of the subject stations discussed herein complies with the Commission's multiple ownership rules as they pertain to station combinations which involve at least one station which is not located in an Arbitron Metro Area. The Applicant currently owns WCEI-FM and WEMD(AM), both licensed to Easton, Maryland. The Applicant proposes to acquire WINX-FM, St. Michaels, Maryland. These stations are referred to herein as the "subject stations".

The city-limits of each station's community of license are located wholly outside Arbitron Metro areas (See Exhibit 1). Because the proposed combination involves stations which are located outside an Arbitron Metro area, a multiple ownership contour study is submitted herein.

The WCEI-FM and WINX-FM principal community contours overlap and the principal community contour of WEMD(AM) overlaps the common area of overlap between the FM stations (See Exhibit 1). Therefore, the contour-defined radio market is the total principal community contour coverage area of the three subject stations.

Pursuant to Section 73.3555(a)(1)(iv) of the FCC Rules, the applicant is permitted to own up to three radio stations (two in the same service) if the radio market is served by at least six operating full service commercial and noncommercial radio stations. As illustrated in Exhibit 2, the radio market contains at least 8 operating commercial or noncommercial radio stations.

For the FM stations considered herein, the principal community contour is the predicted 3.16 mV/m (70 dBu) contour computed in accordance with Section 73.313 of the FCC Rules. For the AM stations considered herein, the principal community contour is the predicted daytime 5.0 mV/m groundwave contour computed in accordance with Section 73.183 of the FCC Rules. All AM and FM facilities represented herein are operating full service commercial or noncommercial radio stations.

The principal community contours of the operating commercial and noncommercial radio stations counted in the radio market are set forth in Exhibit 2. As illustrated there, the principal community contours of all the stations counted as being included in the radio market overlap some portion of the radio market geometry (*i.e.* the combined WCEI-FM, WEMD(AM) and WINX-FM principal community contour coverage area). The transmitter sites of all the stations listed in Exhibit 2 are located less than 92 kilometers from the perimeter of the mutual contour overlap area. Further, a Table is attached which contains each station's call sign, city of license, state, channel of operation, technical facilities.

This statement and the supporting Exhibits and Table were prepared by me or under my direct supervision and are believed to be true and correct.

DATED: January 6, 2009



Herman E. Hurst, Jr.

Principal Community Coverage Contours
 and Arbitron Radio Market Boundaries
 Applicant Owns: WCEI-FM (Fac. ID # 11668) & WEMD (Fac ID # 11667)
 Proposed Acquisition: WINX-FM (Fac. ID# 14774)

Exhibit 1 December, 2008

WCEI-FM
 70 dBu Principal
 Community Contour

WEMD(AM)
 5 mV/m Daytime Groundwave
 Principal Community Contour

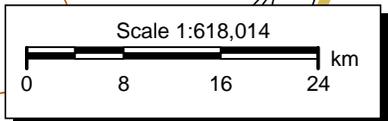
St. Michaels, MD
 City-Limits

Easton, MD
 City-Limits

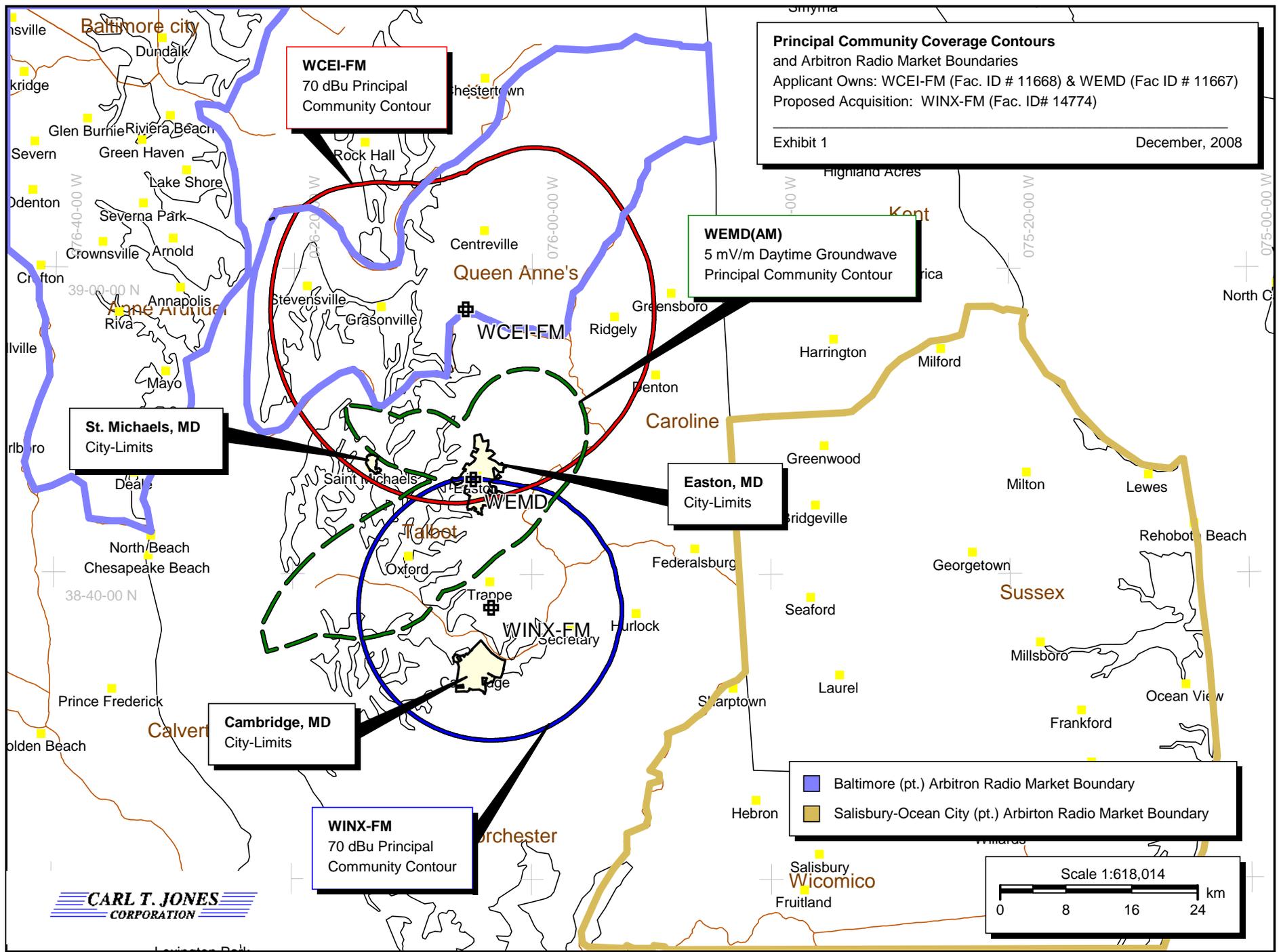
Cambridge, MD
 City-Limits

WINX-FM
 70 dBu Principal
 Community Contour

■ Baltimore (pt.) Arbitron Radio Market Boundary
■ Salisbury-Ocean City (pt.) Arbitron Radio Market Boundary



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Multiple Ownership Contour Study
 and Other Principal Community Coverage Contours
 Applicant Owns: WCEI-FM (Fac. ID # 11668) & WEMD (Fac ID # 11667)
 Proposed Acquisition: WINX-FM (Fac. ID# 14774)

Exhibit 2 December, 2008

Eight Operating Stations
 Counted In Radio Market

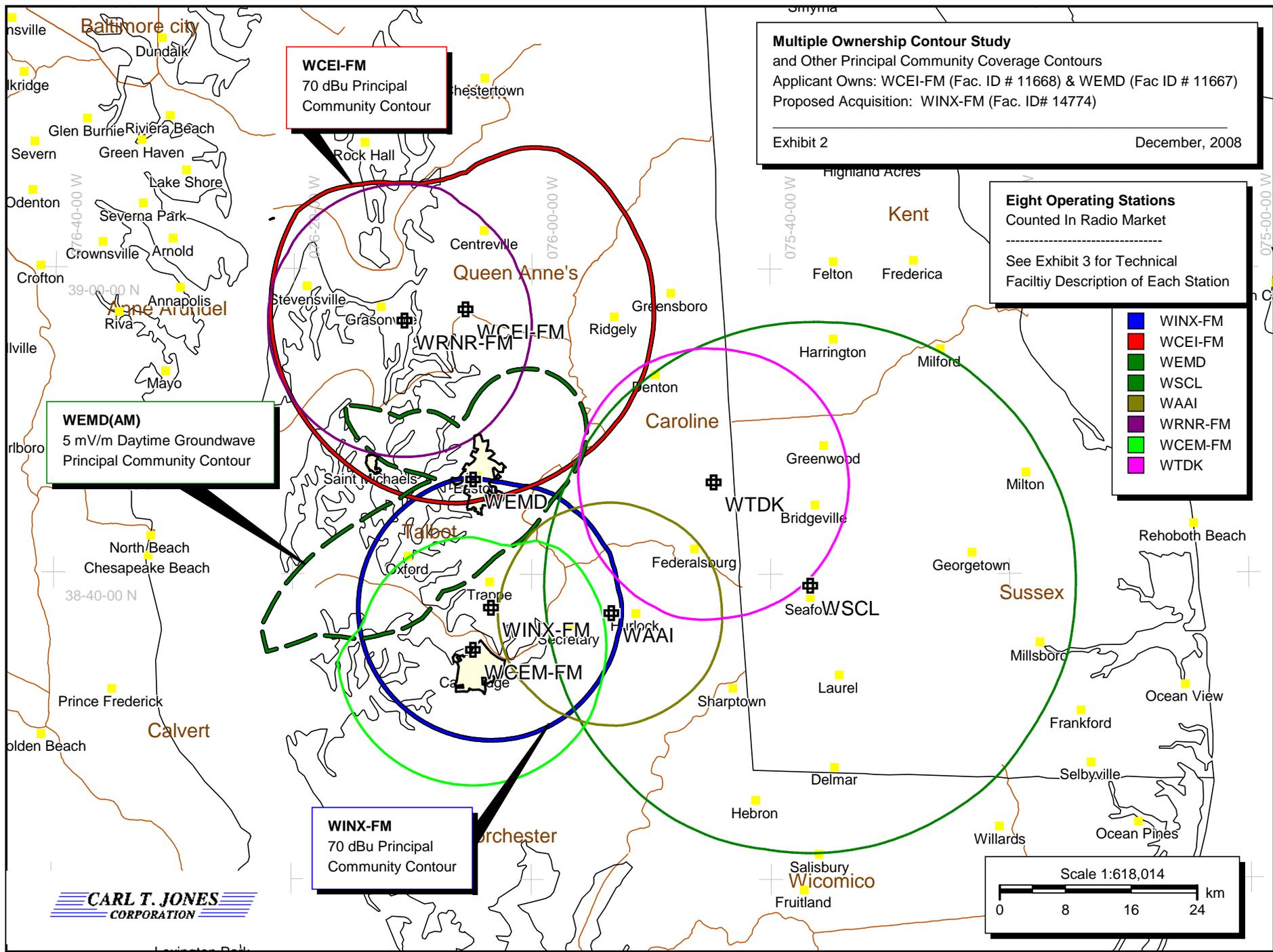
 See Exhibit 3 for Technical
 Facility Description of Each Station

- WINX-FM
- WCEI-FM
- WEMD
- WSCL
- WAAI
- WRNR-FM
- WCEM-FM
- WTDK

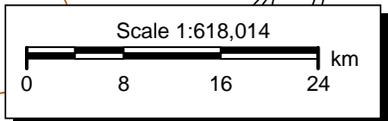
WCEI-FM
 70 dBu Principal
 Community Contour

WEMD(AM)
 5 mV/m Daytime Groundwave
 Principal Community Contour

WINX-FM
 70 dBu Principal
 Community Contour



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**Technical Description of Stations
Counted in Proposed Radio Market**

December, 2008

<u>Station Count</u>	<u>Call Sign</u>	<u>Status</u>	<u>Chan/Freq.</u>	<u>Svc</u>	<u>Cls</u>	<u>City</u>	<u>ST</u>	<u>DA</u>	<u>Power (kW)</u>
1	WINX-FM**	LIC	232	FM	A	St. Michaels	MD	No	4.6
2	WCEI-FM*	LIC	244	FM	B1	Easton	MD	Yes	12.5
3	WEMD*	LIC	1460	AM	B	Easton	MD	No	1
4	WSCL	LIC	208	FM	B	Salisbury	MD	No	33
5	WAAI	LIC	265	FM	A	Hurlock	MD	No	1.3
6	WRNR-FM	LIC	276	FM	A	Grasonville	MD	No	6
7	WCEM-FM	LIC	292	FM	A	Cambridge	MD	Yes	6
8	WTDK	LIC	296	FM	A	Federalsburg	MD	No	3.9

* Applicant Owns

** Proposed Acquisition