

EXHIBIT 18

This Application seeks consent to the assignment of the broadcast authorization for KTVK(TV), Phoenix, Arizona, from Sander Operating Co II LLC to KPHO Broadcasting Corporation (“Meredith Phoenix”), a subsidiary of Meredith Corporation. Nielsen Media Research assigns KTVK(TV) to the Phoenix Designated Market Area. Meredith Phoenix is the licensee of KPHO-TV, Phoenix, Arizona, which is also assigned to the Phoenix DMA.

Multiple Ownership

Section 73.3555(b) of the Commission’s rules permits common ownership of two television stations in the same Nielsen DMA if:

- (1) at least eight independently owned and operating commercial and/or noncommercial television stations, the Grade B contours of which overlap with the Grade B contour of at least one station in the proposed combination, will remain post-merger in the DMA; and
- (2) at least one of the stations to be commonly owned is not among the top four stations in the market, ranked according to audience share by Nielsen or a comparable rating service at the time the application is filed.

The proposed transaction complies with Section 73.3555(b). First, thirteen independently owned commercial and noncommercial television stations with overlapping signals will remain in the Phoenix DMA following consummation of the proposed transaction, as reflected below:

Station	Owner (Licensee)
KAZT-TV, Prescott, AZ	Londen Insurance Group, Inc. (KAZT L.L.C.)
KSAZ-TV, Phoenix, AZ	News Corporation (NW Communications of Phoenix, Inc.)
KUTP(TV), Phoenix, AZ	News Corporation (Fox Television Stations, Inc.)
KPNX(TV), Mesa, AZ	Gannett Co., Inc. (Multimedia Holdings Corporation)
KNAZ-TV, Flagstaff, AZ	Gannett Co., Inc. (Multimedia Holdings Corporation)
KFPH-DT, Flagstaff, AZ	Univision Communications, Inc. (UniMas Partnership of Flagstaff)
KTVW-DT, Phoenix, AZ	Univision Communications, Inc. (KTVW License Partnership, G.P.)
KNXV-TV, Phoenix, AZ	The E.W. Scripps Company (Scripps Media, Inc.)
KPHO-TV, Phoenix, AZ	Meredith Corporation (Meredith Phoenix)
KTVK(TV), Phoenix, AZ	Meredith Corporation (Meredith Phoenix)
KPPX-TV, Tolleson, AZ	ION Media Networks (America 51, L.P.)
KMOH-TV, Kingman, AZ	HERO Broadcasting Holding, Inc. (HERO Licenseco LLC)
KPAZ-TV, Phoenix, AZ	Trinity Broadcasting Network (Trinity Broadcasting of Arizona, Inc.)
KTAZ(TV), Phoenix, AZ	Comcast/NBC (NBC Telemundo License LLC)
KASW(TV), Phoenix, AZ	SagamoreHill of Phoenix, LLC (SagamoreHill of Phoenix Licenses, LLC)
KAET(TV), Phoenix, AZ	Arizona State University (AZ Bd of Regents-AZ St. Univ.)
KDTP(TV), Holbrook, AZ	Community Television Educators, Inc.

Second, the most recent Nielsen ratings publication identifies KPHO-TV as one of the top four rated stations in the DMA based on all-day household audience share. The same publication also identifies KTVK(TV) as the fifth-rated station in the DMA by the same measure. Consequently, this transaction complies with the Commission’s television duopoly rule.