

**EXHIBIT 18
FCC Form 315
Section IV, Question 8**

This application seeks FCC consent to the acquisition of *de jure* control of Midwest Television, Inc. (“Midwest”), licensee of KFMB(AM), KFMB-FM and KFMB-TV, San Diego, California, by Ms. Elisabeth Meyer Kimmel, who currently is a minority (11%) owner. As noted in Exhibit 5, Ms. Kimmel’s family, through its interests in Midwest, has owned the San Diego stations for over four decades.

The stations operate in the San Diego, California Nielsen Designated Market Area (the 26th ranked DMA) and the San Diego Arbitron Metro radio market. Continued ownership of the San Diego AM, FM and TV stations fully complies with the multiple ownership rules. The radio-TV cross ownership rule, Section 73.3555(c)(2), permits co-ownership of a TV station and up to four commercial radio stations in the same market (to the extent permitted by the local radio ownership requirements of subsection (a)¹) if at least 10 independently owned media voices would remain in the market.

The San Diego market would continue to contain far more than the required minimum number of independent media voices. To illustrate:

¹ Neither Midwest nor any party to this application has an attributable interest in another radio station. Thus, co-ownership of KFMB(AM) and KFMB-FM complies with Section 73.3555(a)(2) which permits co-ownership of an AM radio and FM radio station if neither station overlaps a third station in the same service.

- There are at least six independently owned and operating full-power domestic TV stations within the San Diego DMA that have Grade B signal contour overlap with the Grade B contour of KFMB-TV (*see Annex A*).²
- There are at least 12 independently owned primary domestic broadcast radio stations that are in the San Diego Metro radio market (*see Annex B*).³
- There are two English-language newspapers that are published at least four days a week within the San Diego DMA and that have a circulation exceeding 5% of the households in the DMA (*see Annex C*).
- There is at least one cable system which is generally available to households in the DMA (*see Annex C*).

Thus, the instant application fully meets the FCC's multiple ownership requirements.

² Two other entities own and operate three additional full-power TV stations that are licensed to neighboring Tijuana, Mexico, including the owner of the Fox Network affiliate, which stations compete in the San Diego market.

³ A number of other entities own and operate non-domestic radio stations included by BIA in the San Diego radio Metro market.

**Full-Power, Commercial and Noncommercial Domestic
TV Stations in the San Diego, CA DMA (#26)**

(Source: TV & Cable Factbook 2006 and FCC CDBS Database)

Station Count	Call Sign	Channel/DTV (Network)	Community of License	Licensee (Owner)
1	KFMB-TV	8/55 (CBS)	San Diego, CA	Midwest Television, Inc. (Same)
2	KGTV	10/25 (ABC)	San Diego, CA	McGraw-Hill Broadcasting Co. Inc. (Same)
3	KNSD	39/40 (NBC)	San Diego, CA	Station Venture Operations, L.P. (General Electric Company)
4	KSWB-TV	69/19 (WBN)	San Diego, CA	KSWB, Inc. (Tribune Broadcasting Company)
5	KUSI-TV	51/18 (IND)	San Diego, CA	Channel 51 of San Diego, Inc. (McKinnon Broadcasting Co.)
6	KPBS	15/30 (PBS)	San Diego, CA	Board of Trustees, the California State University for San Diego University (Same)

San Diego, CA

Calls (FM)	FMT	City of License	Freq	PWR	HAAT	Combo	LMA	Rep	St	Owner	Acq	Price
KBZT	ROCK	San Diego	94.9	26.5	686	c		CBS	60	Lincoln Financial Md	0604	g3
KFMB	JACK	San Diego	100.7	30.0	620	d		McGav	59	Midwest TV Inc		
KGB	AOR	San Diego	101.5	50.0	499	b	2	CCRS	56	Clear Channel Comm	9905	g1
KHTS	CHR	El Cajon	93.3	50.0	482	b	2	CCRS	61	Clear Channel Comm	9905	g1
KIFM	JAZZ	San Diego	98.1	26.5	686	c		CBS	60	Lincoln Financial Md	0604	g3
KIOZ	ROCK	San Diego	105.3	23.5	715	b	2	CCRS	54	Clear Channel Comm	9905	d1
KLNV	SPAN	San Diego	106.5	50.0	440	i		KatzH	60	Univision Comm Inc	0310	st
KLOV	SPAN	San Diego	102.9	32.0#	617	i		KatzH	63	Univision Comm Inc	0310	st
KMYI	AC	San Diego	94.1	100.0	617	b	2	CCRS	49	Clear Channel Comm	9905	g1
KPRI	AAA	Encinitas	102.1	32.0#	617			Crstl	62	Compass Radio Group	9603	nc
KSCF	TALK	San Diego	103.7	36.0	581	f		Crstl	65	CBS Radio	0008	g2
KSON	CTRY	San Diego	97.3	50.0	440	c		CBS	64	Lincoln Financial Md	0604	g3
KSOQ	CTRY	Escondido	92.1	0.6	1024	c		CBS	66	Lincoln Financial Md	0604	g3
KSSD	SPAN	Fallbrook	107.1	3.0	299			LER	77	Entravision Comm Co	0304	g
KUSS	CTRY	Carlsbad	95.7	29.0	640	b	2	Katz	65	Clear Channel Comm	9905	g1
KYXY	AC	San Diego	96.5	26.5	686	f		Crstl	60	CBS Radio	0008	g2
YBCE	SPAN	Encinada	105.7	50.0	2825		3	LER	04	Pacific Spanish Ntwk		
XGLX	SPAN	Tijuana	91.7	60.0	994				99	MVS Comunicaciones		
XHFG	SPAN	Tijuana	107.3	15.0	994	j			80	Uniradio Corp		
XHBM	CHR	Tijuana	92.5	100.0	1844		4	CCRS	81	BiNational Bcstg		
YHTY	SPAN	Tijuana	99.7	2.0	200	j			01	Uniradio Corp		
XHTZ	URBN	Tijuana	99.3	93.1	456	g	4	Katz	73	XETRA Communications	0205	na
XFTN	SPAN	Tijuana	104.5	57.3	351		1	KatzH	75	Radio Imagen	0403	na
XMRB	URBN	Tijuana	96.9	50.0	233	k			93	Mere Enterprise Comm		
XOCL	SPAN	Tijuana	99.3	25.0	328	g	2	CCRS	75	XETRA Communications	0205	na
XRST	SPAN	Rosarito Beach	107.7	3.0	328				02	Grupo ACIR		
XTIM	SPAN	Tijuana	97.7	0.7	459		1		03	Sociedad Mexicana		
XTRA	ROCK	Tijuana	91.1	100.0	804	g	4	CCRS	69	XETRA Communications	9905	g1

Calls (AM)	FMT	City of License	Freq	Day	Night	Combo	LMA	Rep	St	Owner	Acq	Price
KCBQ	TALK	San Diego	1170	50.0#	2.90	a		Salem	46	Salem Comm Corp	0009	5,000
KCEO	NEWS	Vista	1000	2.5	0.25	e		Crstl	67	Astor Bcst Group	9706	2,600
KFMB	TALK	San Diego	760	5.0	50.00	d		McGav	41	Midwest TV Inc	6404	
KFSD	CLAS	Escondido	1450	1.0#	1.00	e			58	Astor Bcst Group	8707	c3
KKSM	ROCK	Oceanside	1320	0.5	0.50				56	Palomar Comm College	9603	dn
KLSD	TALK	San Diego	1360	5.0	1.00	b	2	CCRS	22	Clear Channel Comm	9905	g1
KOGO	TALK	San Diego	600	5.0	5.00	b	2	CCRS	26	Clear Channel Comm	9905	g1
KPRZ	REL	San Marcos	1210	20.0	10.00	a		Salem	85	Salem Comm Corp		
KSDO	SPAN	San Diego	1130	10.0	10.00	h			47	Hi-Favor Bcstg LLC	0305	10,000
KSON	CTRY	San Diego	1240	1.0	1.00	c		CBS	46	Lincoln Financial Md	0604	g3
KURS	REL	San Diego	1040	0.4	0.06			LER	93	Pacific Spanish Ntwk	9303	st
XEMO	SPAN	Tijuana	860	5.0	5.00	j			37	Uniradio Corp		
XPRS	SPRE	Rosarito	1090	50.0	50.00		3		47	Bdcst Co of Americas		
XRCN	SPAN	Tijuana	1470	5.0	5.00	j			97	Uniradio Corp		
XSPN	SPPT	Tijuana	800	0.0	0.00	k			03	Mere Enterprise Comm		
XSUR	NOST	Tijuana	540	1.0	1.00			McGav	97	Mt Wilson FM Bcstg		

Daily Newspapers
Media Voices - San Diego, CA Market

The following daily newspapers are published within the San Diego, CA DMA:

<u>Name</u>	<u>City</u>	<u>Owner</u>
<i>North County Times</i>	Escondido, CA	Lee Enterprises, Inc.
<i>San Diego Union-Tribune</i>	San Diego, CA	Union-Tribune Publishing Co.

(Source: *Ulrich's International Periodicals Directory 2004*)

Cable Operator
Media Voices - San Diego, CA DMA Market

General Statistical Market Information

TV Market Rating: 21
 TV Households: 1,026,160
 Cable TV Market Rating: 51
 Cable TV Households: 862,030
 Cable Penetration: 84%
 Counties Served: San Diego

Time Warner (San Diego, CA)

Ownership: Time Warner Cable
 Subscribers: 187,898
 Channel Capacity: 78
 Pay-per-View Subscribers: 54,850
 Telephone Service Subscribers: None
 Internet Service Subscribers: 29,003
 Counties Served: San Diego

(Source: *2005 Television & Cable Factbook; 2006 Broadcasting & Cable Yearbook*)