

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

Exhibit 18
Multiple Ownership Analysis

This exhibit is submitted in conjunction with the proposed transfer of control of stations KFNC(FM), Beaumont, Texas, KHJK(FM), La Porte, Texas, and KRBE(FM), Houston, Texas (collectively, the "Stations"), which are ultimately controlled by Cumulus Media Partners, LLC ("CMP").

Local Radio Ownership Rule Compliance

Attachment A provides information demonstrating CMP's compliance with the Commission's local radio ownership rule as reported in CMP's applications to acquire control of the Stations, FCC File Nos. BALH-20051118ADD, BALH-20051118ADC, and BALH-20051118ACP (the "Transfer of Control Applications"), for the respective Stations. The applicants have reviewed the data and are not aware of any changes.

Radio- Television Cross Ownership Rule Compliance

Attachment B provides information demonstrating compliance with the Commission's radio-television cross ownership rule as reported in the Transfer of Control Applications. The applicants have reviewed the data and are not aware of any changes.

Exhibit 18
Attachment A

The following local radio ownership analysis is copied from Cumulus Media Partnership, LLC's applications to acquire control of KFNC(FM), Beaumont, Texas, KHJK(FM), La Porte, Texas, and KRBE(FM), Houston, Texas, FCC File Nos. BALH-20051118ADD, BALH-20051118ADC, and BALH-20051118ACP, respectively.

RADIO MARKET ANALYSIS
KRBE RADIO STATION
HOUSTON, TEXAS
KIOL RADIO STATION
LA PORTE, TEXAS
KFNC RADIO STATION
BEAUMONT, TEXAS
November 2005

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared in conjunction with an assignment and a transfer of control application (“transfers”) for stations KRBE, Channel 281C, Houston, Texas; KIOL, Channel 279C, La Porte, Texas and KFNC, Channel 248C, Beaumont, Texas. KRBE and KIOL are authorized in communities within metro counties in the Houston-Galveston, Texas Arbitron Market (Market #7). Further, KFNC is licensed to a community within a metro county in the Beaumont-Port Arthur, Texas Arbitron market (Market #133), but is considered “home” to the Houston-Galveston, Texas market. As such, a review of each market will be conducted to show the proposed combination of KRBE, KIOL and KFNC is in compliance with the rules.

HOUSTON-GALVESTON, TEXAS MARKET

2. As shown on Exhibit #1, there are sixty-nine AM and FM (commercial and non-commercial) stations listed in the Houston-Galveston, Texas Arbitron Market. The Transferee would be in control of three FM stations in the market. The number of stations indicated falls in the forty-five or more stations tier of §73.3555(a)(1)(i) of the Commission's rules. At this level,

common ownership or control of up to eight stations, with no more than five in the same service, is permissible. Therefore, the transfer of control of KRBE, KIOL and KFNC, in the Houston-Galveston, Texas market, is believed to be in compliance with the Commission's radio ownership rules.

BEAUMONT-PORT ARTHUR, TEXAS MARKET

3. Only station KFNC is considered a metro station, based on its county of license, in the Beaumont-Port Arthur, Texas market. However, principals of the Transferee have interests in the licensees of KBED, 1510 kHz, Nederland, Texas; KIKR, 1450 kHz, Beaumont, Texas; KQXY, Channel 231C1, Beaumont, Texas; and KTCX, Channel 273C2, Beaumont, Texas. The same licensee is operating station KAYD-FM, Channel 269C3, Silsbee, Texas under a LMA. Each of these additional five stations are licensed to counties within the Beaumont-Port Arthur, Texas market. As shown on Exhibit #2, there are twenty-five AM and FM (commercial and non-commercial) stations listed in the Beaumont-Port Arthur, Texas Arbitron Market. The transferee would be in control of four FM and two AM stations in the market. The number of stations indicated falls in the fifteen to twenty-nine stations tier of §73.3555(a)(1)(iii) of the Commission's rules. At this level, common ownership or control of up to six stations, with no more than four in the same service, is permissible. Therefore, the transfer of control of station KFNC, in the Beaumont-Port Arthur, Texas market, is believed to be in compliance with the Commission's radio ownership rules.

4. Based on the compliance with each combination of stations in the two separate markets, the transfer of control of stations of KRBE, KIOL and KFNC is in compliance with the Commission's rules.

5. The foregoing technical statement was prepared by Graham Brock, Inc. All information contained herein is true and accurate to the best of our belief and knowledge. All data relating to AM and FM facilities in the relevant BIA/Arbitron market was determined using the BIA Financial Network, Inc. Media Access Pro, Version 4.0. BIA database. We assume no liability for errors or omissions in that database which may be adverse to the information contained herein.



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
KACC	FM	89.7	NC	AOR	Houston-Galveston, TX	07/02/2003	7	Alvin Community College	Alvin, TX	Brazoria
KAJR	FM	88.3	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	7	American Family Association Incorporated	Conroe, TX	Montgomery
KBME	AM	790	C	Sports	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KBRZ	AM	1460	C	Span/CCtmp	Houston-Galveston, TX	07/02/2003	7	Aleluya Christian Broadcasting	Freeport, TX	Brazoria
KBXX	FM	97.9	C	R&BOd/HpH	Houston-Galveston, TX	07/02/2003	7	Radio One Inc	Houston, TX	Harris
KCHN	AM	1050	C	Ethnic	Houston-Galveston, TX	07/02/2003	7	Multicultural Radio Broadcasting Inc	Brookshire, TX	Waller
KCOH	AM	1430	C	Urban	Houston-Galveston, TX	07/02/2003	7	KCOH Inc	Houston, TX	Harris
KEYH	AM	850	C	Span/Mexcn	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Houston, TX	Harris
KEZB	FM	105.3	C	Soft AC	Houston-Galveston, TX	11/07/2003	7	Henderson, Roy E	Hempstead, TX	Waller
KFNC	FM	97.5	C	News/Talk	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KFTG	FM	88.1	NC	Gospel	Houston-Galveston, TX	07/02/2003	7	Aleluya Christian Broadcasting	Pasadena, TX	Harris
KGBC	AM	1540	C	Religion	Houston-Galveston, TX	07/02/2003	7	SIGA Broadcasting Corp	Galveston, TX	Galveston
KGOL	AM	1180	C	Asian	Houston-Galveston, TX	07/02/2003	7	Entravision Holdings LLC	Humble, TX	Harris
KHCB	FM	105.7	NC	Christian	Houston-Galveston, TX	07/02/2003	7	Houston Christian Broadcasters Inc	Houston, TX	Harris
KHCB	AM	1400	NC	Span/Chrst	Houston-Galveston, TX	07/02/2003	7	Houston Christian Broadcasters Inc	Galveston, TX	Galveston
KHJZ	FM	95.7	C	Smooth Jazz	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Houston, TX	Harris
KHMX	FM	96.5	C	Hot AC	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KHPT	FM	106.9	C	80s Hits	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Conroe, TX	Montgomery
KIKK	AM	650	C	Bus News	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Pasadena, TX	Harris
KILE	AM	1560	C	Ethnic	Houston-Galveston, TX	07/02/2003	7	SkyWave Broadcasting Inc	Bellaire, TX	Harris
KILT	AM	610	C	Sports	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Houston, TX	Harris
KILT	FM	100.3	C	Country	Houston-Galveston, TX	07/02/2003	7	Infinity Broadcasting	Houston, TX	Harris
KIOL	FM	103.7	C	Rock	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	La Porte, TX	Harris
KIOX	FM	96.9	C	Span/CHR	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	El Campo, TX	Wharton
KJIC	FM	90.5	NC	Gospel	Houston-Galveston, TX	07/02/2003	7	Community Radio Inc	Santa Fe, TX	Galveston
KJOJ	AM	880	C	Asian	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Conroe, TX	Montgomery
KJOJ	FM	103.3	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Freeport, TX	Brazoria
KKBQ	FM	92.9	C	Country	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Pasadena, TX	Harris
KKHT	FM	100.7	C	Chrst/Talk	Houston-Galveston, TX	07/02/2003	7	Salem Communications Corporation	Winnie, TX	Chambers
KKRW	FM	93.7	C	Clsc Rock	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KLAT	AM	1010	C	Spn/Nws/Tlk	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Houston, TX	Harris
KLDE	FM	107.5	C	Oldies	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Lake Jackson, TX	Brazoria

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

"p" indicates pending sale to owner listed

Printed: 11/09/2005 Data: 11/09/2005

(c) BIA Financial Network, Inc.

EXHIBIT #1



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designn Date	Home Mkt Rank	Owner	City & State of License	County of License
KLOL	FM	101.1	C	Spanish	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KLTN	FM	102.9	C	Span/Mexcn	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Houston, TX	Harris
KLVL	AM	1480	C	Span/Varty	Houston-Galveston, TX	07/02/2003	7	SIGA Broadcasting Corp	Pasadena, TX	Harris
KMIC	AM	1590	C	Kids/Top40	Houston-Galveston, TX	07/02/2003	7	ABC/Disney	Houston, TX	Harris
KMJQ	FM	102.1	C	Urban	Houston-Galveston, TX	07/02/2003	7	Radio One Inc	Houston, TX	Harris
KNTH	AM	1070	C	Nws/Tlk/Inf	Houston-Galveston, TX	07/02/2003	7	Salem Communications Corporation	Houston, TX	Harris
KODA	FM	99.1	C	Soft AC	Houston-Galveston, TX	08/22/2003	7	Clear Channel Communications	Houston, TX	Harris
KOVE	FM	106.5	C	Span/AdCH	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Galveston, TX	Galveston
KPFT	FM	90.1	NC	Ecltc/Talk	Houston-Galveston, TX	07/02/2003	7	Pacifica Foundation	Houston, TX	Harris
KPRC	AM	950	C	Talk	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KPTI	FM	105.3	C	Hip Hop	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Crystal Beach, TX	Galveston
KPTY	FM	104.9	C	Hip Hop	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Missouri City, TX	Fort Bend
KPVU	FM	91.3	NC	NPR/SJz/Gs	Houston-Galveston, TX	07/02/2003	7	Prairie View A&M University	Prairie View, TX	Waller
KQQK	FM	107.9	C	Span/CHR	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Beaumont, TX	Jefferson
KQUE	AM	1230	C	Ranchera	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Houston, TX	Harris
KRBE	FM	104.1	C	CHR	Houston-Galveston, TX	07/02/2003	7	p Cumulus Media Partners LLC	Houston, TX	Harris
KROI	FM	92.1	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Radio One Inc	Seabrook, TX	Harris
KRTX	AM	980	C	Tejano	Houston-Galveston, TX	07/02/2003	7	Univision Communications Inc	Rosenburg/Richmond, TX	Fort Bend
KSBJ	FM	89.3	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	7	KSBJ Educational Foundation	Humble, TX	Harris
KSEV	AM	700	C	Talk	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Tomball, TX	Harris
KSHN	FM	99.9	C	AC/Old/Cty	Houston-Galveston, TX	07/02/2003	7	Trinity River Valley Broacasting Company	Liberty, TX	Liberty
KSTB	FM	101.5	C	Country	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	Crystal Beach, TX	Galveston
KTBZ	FM	94.5	C	Modern Rock	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KTEK	AM	1110	C	Cst/Tlk/Eth	Houston-Galveston, TX	07/02/2003	7	Salem Communications Corporation	Alvin, TX	Brazoria
KTHT	FM	97.1	C	Country	Houston-Galveston, TX	07/02/2003	7	Cox Radio Inc	Cleveland, TX	Liberty
KTJM	FM	98.5	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Port Arthur, TX	Jefferson
KTRH	AM	740	C	News/Sprts	Houston-Galveston, TX	07/02/2003	7	Clear Channel Communications	Houston, TX	Harris
KTRU	FM	91.7	NC	Variety	Houston-Galveston, TX	07/02/2003	7	Rice University	Houston, TX	Harris
KTSU	FM	90.9	NC	Jaz/Old/BGs	Houston-Galveston, TX	07/02/2003	7	Texas Southern University	Houston, TX	Harris
KUHF	FM	88.7	NC	Classical	Houston-Galveston, TX	07/02/2003	7	University of Houston	Houston, TX	Harris
KVST	FM	99.7	C	Country	Houston-Galveston, TX	07/02/2003	7	New Wavo Communications Group	Willis, TX	Montgomery
KWWJ	AM	1360	C	Gospl/Chrst	Houston-Galveston, TX	07/02/2003	7	Salt of Earth Broadcasting	Baytown, TX	Harris

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Houston-Galveston, TX

Call Letters	AM/ FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KXYZ	AM	1320	C	Span/Intnl	Houston-Galveston, TX	07/02/2003	7	Multicultural Radio Broadcasting Inc	Houston, TX	Harris
KYBJ	FM	91.1	NC	ChrsContem	Houston-Galveston, TX	07/02/2003	7	KSBJ Educational Foundation	Lake Jackson, TX	Brazoria
KYND	AM	1520	C	Ethnic	Houston-Galveston, TX	07/02/2003	7	Provenzano, Matthew	Cypress, TX	Harris
KYOK	AM	1140	C	Gosp/CCtm	Houston-Galveston, TX	07/02/2003	7	Martin Broadcasting	Conroe, TX	Montgomery
KYST	AM	920	C	Spn/Nws/Tlk	Houston-Galveston, TX	07/02/2003	7	Hispanic Broadcasting Inc	Texas City, TX	Galveston

Number of Stations in Geographic Market 69

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

"p" indicates pending sale to owner listed



FCC Geographic Market Definition for Beaumont-Port Arthur, TX

Call Letters	AM/FM	Freq	Type Station	Format	Home Market	Market Designtn Date	Home Mkt Rank	Owner	City & State of License	County of License
KAYD	FM	101.7	C	Country	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Silsbee, TX	Hardin
KBED	AM	1510	C	Black Gospl	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Nederland, TX	Jefferson
KCOL	FM	92.5	C	Oldies	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Groves, TX	Jefferson
KDEI	AM	1250	NC	Christian	Beaumont-Port Arthur, TX	07/02/2003	133	Radio Maria Inc	Port Arthur, TX	Jefferson
KFNC	FM	97.5	C	News/Talk	Houston-Galveston, TX	07/02/2003	7	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KIKR	AM	1450	C	Sprts/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KIOC	FM	106.1	C	Rock	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Orange, TX	Orange
KKMY	FM	104.5	C	AC	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Orange, TX	Orange
KLBT	FM	88.1	NC	cp - NOA	Beaumont-Port Arthur, TX	08/26/2005	133	King's Musician Educational Foundation Inc	Beaumont, TX	Jefferson
KLVI	AM	560	C	News/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Beaumont, TX	Jefferson
KOGT	AM	1600	C	Cntry/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	G-CAP Communications	Orange, TX	Orange
KOLE	AM	1340	C	Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Voice in the Wilderness Broadcasting Inc	Port Arthur, TX	Jefferson
KQBU	FM	93.3	C	Span/Mexcn	Beaumont-Port Arthur, TX	10/23/2003	133	Univision Communications Inc	Port Arthur, TX	Jefferson
KQQK	FM	107.9	C	Span/CHR	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Beaumont, TX	Jefferson
KQXY	FM	94.1	C	CHR	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KRCM	AM	1380	C	Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Voice in the Wilderness Broadcasting Inc	Beaumont, TX	Jefferson
KSET	AM	1300	C	Sprts/Talk	Beaumont-Port Arthur, TX	07/02/2003	133	Hill, William G.	Silsbee, TX	Hardin
KTCX	FM	102.5	C	Urban	Beaumont-Port Arthur, TX	07/02/2003	133	Cumulus Broadcasting Inc	Beaumont, TX	Jefferson
KTJM	FM	98.5	C	Mexican	Houston-Galveston, TX	07/02/2003	7	Liberman Broadcasting Inc	Port Arthur, TX	Jefferson
KTXB	FM	89.7	NC	Religion	Beaumont-Port Arthur, TX	07/02/2003	133	Family Stations Inc	Beaumont, TX	Jefferson
KUHD	AM	1150	C	Spn/Cst/Nws	Beaumont-Port Arthur, TX	07/02/2003	133	Vision Latina Broadcasting Inc	Port Neches, TX	Jefferson
KVLU	FM	91.3	NC	Clsc/Varty	Beaumont-Port Arthur, TX	07/02/2003	133	Lamar University	Beaumont, TX	Jefferson
KYKR	FM	95.1	C	Country	Beaumont-Port Arthur, TX	07/02/2003	133	Clear Channel Communications	Beaumont, TX	Jefferson
KZFT	FM	90.5	NC	Christian	Beaumont-Port Arthur, TX	09/14/2004	133	American Family Association Incorporated	Fannett, TX	Jefferson
KZZB	AM	990	C	Gospel	Beaumont-Port Arthur, TX	07/02/2003	133	Martin Broadcasting	Beaumont, TX	Jefferson

Number of Stations in Geographic Market **25**

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

"p" indicates pending sale to owner listed

Printed: 11/09/2005 Data: 11/09/2005

(c) BIA Financial Network, Inc.

EXHIBIT #2

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

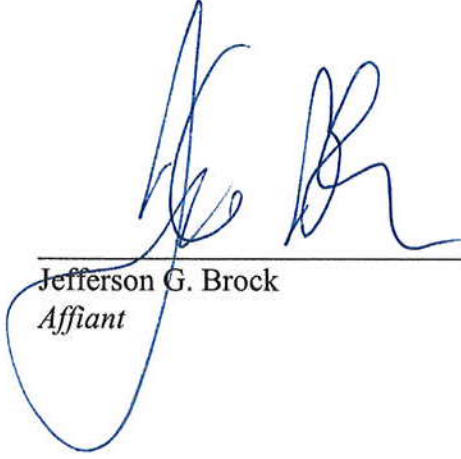
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 10th day of November, 2005.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 10th day of November, 2005*



Notary Public, State of Georgia
My Commission Expires: September 3, 2007

Exhibit 18
Attachment B

The following radio-television cross-ownership analysis is copied from Cumulus Media Partnership, LLC's application to acquire control of KFNC(FM), Beaumont, Texas, KHJK(FM), La Porte, Texas, and KRBE(FM), Houston, Texas, FCC File Nos. BALH-20051118ADD, BALH-20051118ADC, and BALH-20051118ACP, respectively.

TV/RADIO CROSS-OWNERSHIP

The instant application is one of a number of applications that are being filed concurrently for Commission consent to the acquisition by Cumulus Media Partners, LLC (“CMP”) of the radio stations controlled by Susquehanna Radio Corp.

As a result of the proposed transactions, CMP will control the licenses for the following radio stations located in the Houston/Beaumont/Port Arthur, Texas area:

KFNC(FM), Beaumont, TX (Facility ID #52407)
KIOL(FM), La Porte, TX (Facility ID #48676)
KRBE(FM), Houston, TX (Facility ID #35524)

As stated in Transferee’s Exhibit I6, certain of the Blackstone Funds and/or their affiliates, which hold an attributable interest in CMP, also hold an attributable interest in Freedom Communications Holdings, Inc. which, through subsidiaries, owns, *inter alia*, the following full-power television station:

KFDM-TV, Beaumont, TX (Facility ID #22589)

Annexed hereto as Attachment 1 is a map demonstrating that (1) the Grade A contour of KFDM-TV encompasses the community of license of KFNC(FM); and (2) the 1 mV/m contours of KIOL(FM) and KFNC(FM) encompass the community of license of KFDM-TV, thus triggering the TV/radio cross-ownership rule.¹ KFNC(FM) is part of the Beaumont-Port Arthur, TX Arbitron radio metro market, while KIOL(FM) is part of the Houston-Galveston, TX Arbitron radio metro market. Although these radio stations fall within two separate Arbitron radio metro markets, the Commission counts a radio station assigned to one Arbitron radio market toward an entity’s ownership limits in a distant market when the contour of the radio station triggers the rule.² As the 1 mV/m contour of KIOL(FM) triggers the TV/radio cross-

¹ The 1 mV/m contour of KRBE(FM) does not encompass KFDM-TV’s community of license, nor does the Grade A contour of KFDM-TV encompass the community of license of KRBE(FM). Therefore, the TV/radio cross-ownership rule is not triggered by this combination. KRBE(FM)’s contour is included for reference.

² Memorandum Opinion and Second Order on Reconsideration, *Review of the Commission’s Regulations Governing Television Broadcasting*, 16 FCC Rcd 1067, ¶ 41 (2001) (“[F]or purposes of the radio/TV cross-ownership rule, we generally do not count radio stations located in one Arbitron radio market toward the limits on the number of radio stations a party may own in another Arbitron radio market, even when the radio stations in the different markets fall within the Grade A contour of a commonly owned TV station. We do count, however, a radio station assigned to one Arbitron radio market toward an entity’s ownership limits in a distant market when the contour of the radio station triggers the rule, because the rule continues to be triggered by contour encompassment, and such a radio station has a presence for competition and diversity purposes in the distant market.”)

ownership rule independently of the TV station, the resulting combination includes:

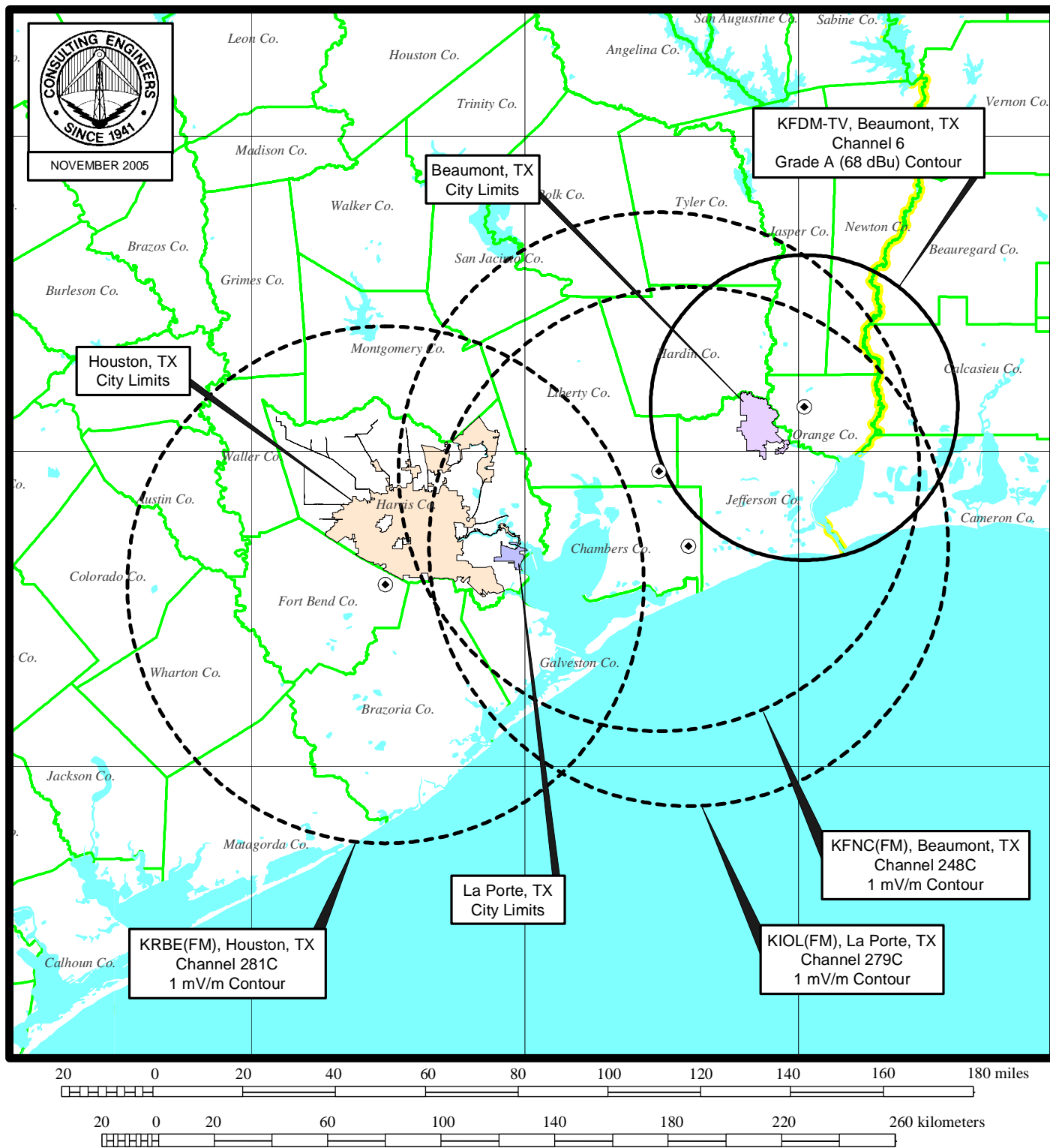
KFNC(FM), Beaumont, TX
KIOL(FM), La Porte, TX
KFDM-TV, Beaumont, TX (Facility ID #22589)

The Commission's rules permit common ownership of two commercial television and four commercial radio stations (to the extent permitted by the television duopoly and local radio ownership limits) if at least 10 independently owned media voices would remain in the market post-merger.³

Annexed hereto as Attachment 2 is a study demonstrating that at least 10 independent media voices will remain in both the Beaumont-Port Arthur, TX and Houston-Galveston, TX Arbitron radio metro markets.⁴ This is a sufficient number of voices to permit common ownership of the 1 TV/2 radio combination.

³ Section 73.3555(c)(2)(ii).

⁴ Section 73.3555(c)(3)(ii)(B) of the Commission's rules states that "[w]hen a proposed combination involves stations in different radio markets, the voice requirement must be met in each market."



CROSS-OWNERSHIP ANALYSIS MAP

du Treil, Lundin & Rackley, Inc. Sarasota, Florida

ATTACHMENT 2

BEAUMONT-PORT ARTHUR, TX TELEVISION DMA ¹				
CALL	COMMUNITY OF LICENSE	COUNTY	CHANNEL	OWNER
KBMT	Beaumont, TX	Jefferson	12	McKinnon Broadcasting Co.
KBVT	Port Arthur, TX	Jefferson	4	Nexstar Broadcasting Group
KFDM	Beaumont, TX	Jefferson	6	Freedom Communications

BEAUMONT-PORT ARTHUR, TX RADIO METRO ²				
CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KZFT	90.5	Fannett, TX	Jefferson	American Family Association Incorporated
KCOL	92.5	Groves, TX	Jefferson	Clear Channel Communications
KIOC	106.1	Orange, TX	Orange	Clear Channel Communications
KKMY	104.5	Orange, TX	Orange	Clear Channel Communications
KLVI	560	Beaumont, TX	Jefferson	Clear Channel Communications
KYKR	95.1	Beaumont, TX	Jefferson	Clear Channel Communications
KIKR	1450	Beaumont, TX	Jefferson	Cumulus Broadcasting, Inc.
KBED	1510	Nederland, TX	Jefferson	Cumulus Broadcasting, Inc.
KQXY	94.1	Beaumont, TX	Jefferson	Cumulus Broadcasting, Inc.
KAYD	101.7	Silsbee, TX	Hardin	Cumulus Broadcasting, Inc.
KFNC	97.5	Beaumont, TX	Jefferson	Cumulus Broadcasting, Inc.
KTCX	102.5	Beaumont, TX	Jefferson	Cumulus Broadcasting, Inc.
KTXB	89.7	Beaumont, TX	Jefferson	Family Stations, Inc.
KOGT	1600	Orange, TX	Orange	G-CAP Communications
KSET	1300	Silsbee, TX	Hardin	Hill, William G.
KLBT	88.1	Beaumont, TX	Jefferson	King's Musician Educational Foundation, Inc.
KVLU	91.3	Beaumont, TX	Jefferson	Lamar University
KTJM	98.5	Port Arthur, TX	Jefferson	Lieberman Broadcasting, Inc.
KQQK	107.9	Beaumont, TX	Jefferson	Lieberman Broadcasting, Inc.
KZZB	990	Beaumont, TX	Jefferson	Martin Broadcasting
KDEI	1250	Port Arthur, TX	Jefferson	Radio Maria Inc.
KQBU	93.3	Port Arthur, TX	Jefferson	Univision Communications
KUHD	1150	Port Neches, TX	Jefferson	Vision Latina Broadcasting Inc.
KRCM	1380	Beaumont, TX	Jefferson	Voice in the Wilderness Broadcasting Inc.

NEWSPAPER VOICES			
NAME	CIRCULATION	>5% OF DMA	PUBLICATION FREQUENCY
Beaumont Enterprise	55,444	Yes	Mon-Sun

1 CABLE VOICE

¹ The Beaumont-Port Arthur, TX Television DMA consists of the following counties in Texas: Hardin, Jefferson and Orange.

² The Beaumont-Port Arthur, TX Radio Metro consists of the following counties in Texas: Hardin, Jefferson and Orange.

HOUSTON-GALVESTON, TX RADIO METRO³

CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KMIC	1590	Houston, TX	Harris	ABC/Disney
KBRZ	1460	Freeport, TX	Brazoria	Aleluya Christian Broadcasting
KFTG	88.1	Pasadena, TX	Harris	Aleluya Christian Broadcasting
KACC	89.7	Alvin, TX	Brazoria	Alvin Community College
KAFR	88.3	Conroe, TX	Montgomery	American Family Association Incorporated
KTBZ	94.5	Houston, TX	Harris	Clear Channel Communications
KBME	790	Houston, TX	Harris	Clear Channel Communications
KLOL	101.1	Houston, TX	Harris	Clear Channel Communications
KKRW	93.7	Houston, TX	Harris	Clear Channel Communications
KODA	99.1	Houston, TX	Harris	Clear Channel Communications
KPRC	950	Houston, TX	Harris	Clear Channel Communications
KHMX	96/5	Houston, TX	Harris	Clear Channel Communications
KTRH	740	Houston, TX	Harris	Clear Channel Communications
KJIC	90.5	Santa Fe, TX	Galveston	Community Radio Inc.
KKBQ	92.9	Pasadena, TX	Harris	Cox Radio Inc.
KLDE	107.5	Lake Jackson, TX	Brazoria	Cox Radio Inc.
KHPT	106.9	Conroe, TX	Montgomery	Cox Radio Inc.
KTHT	97.1	Cleveland, TX	Liberty	Cox Radio Inc.
KRBE	104.1	Houston, TX	Harris	Cumulus Media Partners
KFNC	97.5	Beaumont, TX	Jefferson	Cumulus Broadcasting, Inc.
KSTB	101.5	Crystal Beach, TX	Galveston	Cumulus Broadcasting, Inc.
KGOL	1180	Humble, TX	Harris	Entravision Holdings LLC
KEZB	105.3	Hempstead, TX	Waller	Henderson, Roy E.
KYST	920	Texas City, TX	Galveston	Hispanic Broadcasting Inc.
KHCB	105.7	Houston, TX	Harris	Houston Christian Broadcasters
KHCB	1400	Galveston, TX	Galveston	Houston Christian Broadcasters
KIKK	650	Pasadena, TX	Harris	Infinity Broadcasting
KHJZ	95.7	Houston, TX	Harris	Infinity Broadcasting
KILT	610	Houston, TX	Harris	Infinity Broadcasting
KILT	100.3	Houston, TX	Harris	Infinity Broadcasting
KCOH	1430	Houston, TX	Harris	KCOH Inc.
KYBJ	91.1	Lake Jackson, TX	Brazoria	KSBj Educational Foundation
KSBj	89.3	Humble, TX	Harris	KSBj Educational Foundation
KEYH	850	Houston, TX	Harris	Liberman Broadcasting Inc.
KTJM	98.5	Port Arthur, TX	Jefferson	Liberman Broadcasting Inc.
KJOH	880	Conroe, TX	Montgomery	Liberman Broadcasting Inc.
KJOJ	103.3	Freeport, TX	Brazoria	Liberman Broadcasting Inc.
KQUE	1230	Houston, TX	Harris	Liberman Broadcasting Inc.
KIOX	96.9	El Campo, TX	Wharton	Liberman Broadcasting Inc.
KQQK	107.9	Beaumont, TX	Jefferson	Liberman Broadcasting Inc.
KSEV	700	Tomball, TX	Harris	Liberman Broadcasting Inc.
KYOK	1140	Conroe, TX	Montgomery	Martin Broadcasting
KCHN	1050	Brookshire, TX	Waller	Multicultural Radio Broadcasting Inc.
KXYZ	1320	Houston, TX	Harris	Multicultural Radio Broadcasting Inc.

³ The Houston-Galveston, TX Radio Metro consists of the following counties in Texas: Brazoria, Chambers, Fort Bend, Galveston, Harris, Liberty, Montgomery, Waller. Stations licensed outside of these counties are home to or have a reportable share in the Houston-Galveston Radio Metro according to BIA.

CALL SIGN	FREQUENCY	COMMUNITY OF LICENSE	COUNTY	OWNER
KVST	99.7	Willis, TX	Montgomery	New Wavo Community College
KPFT	90.1	Houston, TX	Harris	Pacifica Foundation
KPVU	91.3	Prairie View, TX	Waller	Prairie View A&M University
KYND	1520	Cypress, TX	Harris	Provenzano, Matthew
KBXX	97.9	Houston, TX	Harris	Radio One Inc
KMIQ	102.1	Houston, TX	Harris	Radio One Inc
KROI	92.1	Seabrook, TX	Harris	Radio One Inc
KTRU	91.7	Houston, TX	Harris	Rice University
KKHT	100.7	Winnie, TX	Chambers	Salem Communications Corporation
KTEK	1110	Alvin, TX	Brazoria	Salem Communications Corporation
KNTH	1070	Houston, TX	Harris	Salem Communications Corporation
KWWJ	1360	Baytown, TX	Harris	Salt of Earth Broadcasting
KGBC	1540	Galveston, TX	Galveston	SIGA Broadcasting Corp
KLVL	1480	Pasadena, TX	Harris	SIGA Broadcasting Corp
KILE	1560	Bellaire, TX	Harris	SkyWave Broadcasting Inc.
KTSU	90.9	Houston, TX	Harris	Texas Southern University
KSHN	99.9	Beaumont, TX	Jefferson	Trinity River Valley Broadcasting
KRTX	980	Rosenburg/Richmond, TX	Fort Bend	Univision Communications Inc.
KPTY	104.9	Missouri City, TX	Fort Bend	Univision Communications Inc.
KLAT	1010	Houston, TX	Harris	Univision Communications Inc.
KLTN	102.9	Houston, TX	Harris	Univision Communications Inc.
KOVE	106.5	Galveston, TX	Galveston	Univision Communications Inc.
KPTI	105.3	Crystal Beach, TX	Galveston	Univision Communications Inc.
KUHF	88.7	Houston, TX	Galveston	University of Houston