

**GSM Media Corp.**  
**Application for Consent to Transfer of Control**  
**Exhibit 18 - Multiple Ownership Showing**

The proposed transfer of control of GSM Media Corp. (“GSM”) is in compliance with the Commission’s multiple ownership rules as set forth in Section 73.3555 of the Commission’s Rules.

As stated herein, Gunther S. Meisse currently holds 80 percent of the stock of the licensee as an individual. For tax and other business and estate planning purposes, Mr. Meisse is transferring all of his ownership interests in intangibles such as stock to the Gunther S. Meisse Florida Intangible Tax Trust. Therefore, as a part of this overall plan, it is proposed herein that Mr. Meisse’s stock interest in GSM be transferred to the Gunther S. Meisse Florida Intangible Tax Trust, with Mr. Meisse’s wife, Jeanne R. Meisse, as the Trustee. Mr. Meisse also is currently the 51 percent stockholder of Mid State Television, Inc., the licensee of WMFD-TV, Facility ID No. 41893, Mansfield, Ohio, and WOHZ-CA, Facility ID No. 41892, Mansfield, Ohio. Likewise, in an application filed concurrently herewith under separate cover, it also is proposed that Mr. Meisse’s stock in that company be transferred to the Gunther S. Meisse Florida Intangible Tax Trust. Further, Mr. Meisse’s 20 percent stock ownership interest in Johnny Appleseed Broadcasting Co. Inc., licensee of WVNO-FM, Facility ID No. 31855, Mansfield, Ohio, is also being transferred to the Gunther S. Meisse Florida Intangible Tax Trust. Mr. Meisse will remain as an officer and director of all of these companies.

There is overlap between the city grade contours of WRGM(AM) and WVNO-FM, and the relevant contours of both WVNO-FM and WMFD-TV encompass Mansfield, their community of license. This combined ownership is in accordance with the Commission’s Rules, as set forth below.

Moreover, it should be noted that the proposed transfer of control will not create any cognizable change in broadcast station ownership in the Mansfield market but rather merely represents the continuation of an existing combination. As set forth above, Mr. Meisse already has attributable interests in all of the stations involved, and the new interests to be held by the Gunther S. Meisse Florida Intangible Tax Trust merely reflect the long-standing interests controlled by Mr. Meisse as an individual. The stock interests involved currently are held by one party and will continue to be held by one party. The combined ownership of all of the stations was previously approved by the Commission and found to be in the public interest when the Commission granted an application for consent for Mid State Television to acquire the license for WMFD-TV in 1992. See File No. BALCT-19920320KE.

In any event, the proposed combination of stations is in complete accordance with the Commission's Rules. With regard to the combined ownership of the two radio stations, WRGM(AM) and WVNO-FM, Section 73.3555(a)(2) provides that "[o]verlap between two stations in different services is permissible if neither of those two stations overlaps a third station in the same service." Such is the case in this instance, as only one AM and one FM station are involved, and there is no other third radio station in which any party to this application has any attributable interest.

Furthermore, Section 73.3555(c)(2)(ii) provides that, when at least 10 independently owned media voices would remain in the market, an entity may be permitted to own up to two commercial television stations and four commercial radio stations. In the instant case, it is proposed that there would be common ownership of only one television station and two radio stations. Additionally, more than 10 independently owned media voices would remain in the

market. In counting media voices, the Commission considers independently owned, full-power television stations within the DMA of the TV station's community of license; independently owned, operating primary broadcast stations in the radio market; newspapers; and one cable system. WMFD-TV is located in the Cleveland DMA. The following represents a listing of radio stations in the Mansfield radio market (see *Broadcasting and Cable Yearbook 2003-2004* at p. D369), of television stations in the Cleveland DMA (see *Broadcasting and Cable Yearbook 2003-2004* at p. B-152), a daily newspaper in the DMA, and a local cable system. In all, it appears that at least 19 independent voices would remain in the market, as follows:

1) WRGM(AM), Ontario, OH/WVNO-FM, Mansfield, OH/WMFD-TV, Mansfield, OH - these stations are the subject of this application.

2) WMAN(AM)/WYHT(FM), Mansfield, OH and WNCO-FM, Ashland, OH - licensed to Capstar TX Limited Partnership

3) WYKL(FM), Crestline, OH - licensed to Educational Media Foundation

4) WOSV(FM), Mansfield, OH - licensed to The Ohio State University

5) WVMC-FM, Mansfield, OH - licensed to Mansfield Christian School

6) WKYC-TV, Cleveland, OH - licensed to WKYC-TV, Inc. (owned by Gannett Co., Inc.)

7) WEWS-TV, Cleveland, OH - licensed to Scripps Howard Broadcasting Company

8) WOIO(TV), Shaker Heights, OH/WUAB(TV), Lorain, OH - licensed to Raycom National, Inc.

9) WJW(TV), Cleveland, OH - licensed to WJW License, Inc. (common ownership with Fox Television Stations, Inc.)

10) WGGN-TV, Sandusky, OH - licensed to Christian Faith Broadcast, Inc.

11) WQHS-TV, Cleveland, OH - licensed to Univision Cleveland, LLC

- 12) WDLI-TV, Canton, OH - licensed to Trinity Broadcasting Network, Inc.
- 13) WVPX(TV), Akron, OH - licensed to Paxson Akron License, Inc.
- 14) WBNX-TV, Akron, OH - licensed to Winston Broadcasting Network, Inc.
- 15) WOAC(TV), Canton, OH - licensed to WRAY, Inc.
- 16) WEAO(TV), Akron, OH - licensed to Northeastern Educational TV of Ohio, Inc.
- 17) WVIZ(TV), Cleveland, OH - licensed to Ideastream

18) *The Plain Dealer* - Cleveland, OH - part of Advance Publications Group. In addition, although it does not have circulation of five percent of the total DMA households, the community of Mansfield also has its own daily newspaper, the *News Journal*, which is published by the Thomson Newspapers Group. This newspaper thus represents an additional independent media voice within the community of license of WVNO-FM and WMFD-TV.

- 19) Time Warner Communications - cable company in Mansfield

Thus, the number of independent media voices which exist at this time and would continue to remain is almost double the number required for compliance with the Commission's multiple ownership rules, even if a new combination were contemplated. As set forth above, however, there actually is no change proposed in the number of independent voices in the market, as the relevant stations already share common ownership at this time. Accordingly, the proposed transfer of control should be approved.