

**EXHIBIT 18**

**MULTIPLE OWNERSHIP**

The instant application seeks Commission consent to the assignment of the license of WCFT-TV, Tuscaloosa, Alabama (FAC ID 21258) (“WCFT” or “Station”), from TV Alabama, Inc. (“TAI”), a wholly owned subsidiary of Sinclair Television Group, Inc. (“STG”), to HSH Birmingham (WCFT) Licensee, LLC (“HSH Birmingham”). HSH Birmingham also has a pending assignment application to acquire WJSU-TV, Anniston, Alabama (FAC ID 56642) (BALCDT-20141001CIL) from TAI, which is also in the Birmingham DMA.

Should these assignments be granted, HSH Birmingham would have an attributable interest in two stations in the Birmingham DMA, WCFT-TV and WJSU-TV. Pursuant to the Commission's multiple ownership rule, section 47 C.F.R. 73.3555(b)(1), a party may have an attributable interest in up to two television stations within the same market so long as eight or more independently owned and operating, full-power commercial and noncommercial TV stations remain serving the market post-consummation (“Eight Voices”) and at least one of the stations is not ranked among the top four stations in the market (“Top-Four”).

As shown in the attached voices chart (Attachment 1), after consummation of the proposed acquisition of WCFT-TV and WJSU-TV by HSH Birmingham, the market will have 10 independent voices.

Although WCFT-TV and WJSU-TV currently operate as ABC network affiliates, HSH Birmingham will not be acquiring the ABC network programming as part of the proposed transaction and as a result, post-consummation, neither WCFT-TV nor WJSU-TV will likely be rated among the Top-Four ranked stations in the Birmingham DMA.<sup>1</sup> Accordingly, HSH Birmingham believes that its proposed acquisition of WCFT-TV and WJSU-TV complies with the Commission's multiple ownership rule since there will, post-consummation, remain at least Eight Voices in the Birmingham DMA and neither of the stations would be considered as ranked among the Top-Four stations in the DMA.

Further, even if the Commission were to consider the most recent rating information for WCFT-TV and WJSU-TV, these stations have historically been reported as a single ABC network affiliate since they, collectively, operate as an 'enhanced coverage duopoly'. As a result, even

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<sup>1</sup> The ABC network programming is being transferred to WABM(TV), Birmingham, AL, licensed to Birmingham (WABM-TV) Licensee, Inc., a wholly owned subsidiary of STG, to be broadcast on a WABM(TV) multi-cast channel. *See In re Media Bureau Approves Allbritton Communications Co. to Sinclair Television Group, Inc.*, DA 14-1055, (rel. July 24, 2014) (“Sinclair would use the multicasting ability of WABM(TV) to broadcast the programming currently offered on both WABM and WCFT/WJSU.”).

assuming WCFT-TV and WJSU-TV retained the ABC network programming and were rated among the Top-Four stations, the Commission has recognized that in an “enhanced coverage duopoly” situation, the Top-Four ranking component of the Commission's rule should be applied to the collective stations so that both stations are not considered to be in the Top-Four ranked stations in the market. *Review of the Commissions Regulations Governing Television Broadcasting*, 14 FCC Rcd 12903, n.64 (1999). Accordingly, even if HSH Birmingham retained the ABC network programming, HSH Birmingham believes that its proposed acquisition of WCFT-TV and WJSU-TV would comply with the Commission's multiple ownership rule since there would, post-consummation, remain at least Eight Voices in the Birmingham DMA and only one of the stations would be considered as ranked among the Top-Four stations in the DMA.

**Birmingham, TX DMA (Ranked #44) – POST CONSUMMATION  
Television Voices Chart**

	<b>Call Sign</b>	<b>FAC ID</b>	<b>Community of License</b>	<b>Licensee</b>	<b>Ultimate Parent</b>
1.	WUOA	77496	Tuscaloosa, AL	The Board of Trustees of the University of Alabama	University of Alabama
2.	WBIQ(TV)	717	Birmingham, AL	Alabama Educational Television Commission	Alabama Educational Television Commission
3.	WVTM-TV	74173	Birmingham, AL	Media General communications Holdings, LLC	Media General (New)
4.	WTJP-TV	1002	Gadsden, AL	TCCSA, Inc., D/B/A Trinity Broadcasting Network	Trinity Broadcasting Network
5.	WIAT	5360	Birmingham, AL	LIN License Company, LLC	LIN Media LLC
6.	WPXH-TV	73312	Gadsden, AL	ION Media License Company, LLC	ION Media Networks
7.	WBRC	71221	Birmingham, AL	WBRC License Subsidiary, LLC	Raycom Media Inc.
8.	WJSU-TV	56642	Anniston, AL	HSH Birmingham (WCFT) Licensee, LLC	Howard Stirk Holdings, LLC
	WCFT-TV	21258	Tuscaloosa, AL		
9.	WDBB	71325	Bessemer, AL	WDBB-TV, Inc.	Cunningham Broadcast Corporation
10	WABM	16820	Birmingham, AL	Sinclair Television Group, Inc.	Sinclair Television Group, Inc.
	WTTO	74138	Homewood, AL		