

## **Exhibit 18**

### **Multiple Ownership**

As identified in Exhibit 16, certain attributable parties of the Assignee are also attributable parties of the licensee of television station KRDO-TV, licensed to the Assignee, and radio station KRDO(AM), licensed to Pikes Peak Radio, LLC, both of which are located in the Colorado Springs-Pueblo Designated Market Area (DMA) and/or Arbitron radio market.

The FCC's radio/television cross-ownership rule currently in effect provides that the rule is triggered when (in pertinent part):

The predicted or measured 1 mV contour of an existing or proposed FM station (computed in accordance with § 73.313) encompasses the entire community of license of an existing or proposed commonly owned TV broadcast station(s), or the Grade A contour(s) of the TV broadcast station(s) (computed in accordance with § 73.684) encompasses the entire community of license of the FM station . . . .<sup>1</sup>

When the rule is triggered, an “[a]n entity may directly or indirectly own, operate, or control up to two commercial TV stations (if permitted by paragraph (b) of this section, the local television multiple ownership rule) and 1 commercial radio station situated as described in paragraph (c)(1) of this section [quoted above].”<sup>2</sup> The rule then goes on to describe the circumstances under which this cap can be exceeded.

One of the circumstances in which the cap described above may be exceeded is if at least 10 independently owned media voices would remain in the market post-combination. In such a case, an entity is permitted to directly or indirectly own, operate or control up to two commercial TV stations and four commercial radio stations to the extent permissible under the local radio ownership rule.<sup>3</sup>

The local radio ownership rule, in turn, provides that in a market with between 30 and 44 full-power commercial and noncommercial radio stations, a single entity can control no more than seven commercial stations in total and not more than four in the same service (AM or FM).<sup>4</sup> Overlap between two stations in different services is permitted if neither of those two stations overlaps a third station in the same service.<sup>5</sup>

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<sup>1</sup> 47 C.F.R. § 73.3555(c)(1).

<sup>2</sup> 47 C.F.R. § 73.3555(c)(2).

<sup>3</sup> See 47 C.F.R. § 73.3555(c)(2)(ii).

<sup>4</sup> See 47 C.F.R. § 73.3555(a)(1)(ii).

<sup>5</sup> See 47 C.F.R. § 73.3555(a)(2).

In the proposed assignment, the radio/television cross-ownership rule is triggered because the contour of KRDO-FM encompasses Colorado Springs, the community of license of KRDO-TV; likewise, the contour of KRDO-TV encompasses the community of license of KRDO-FM.<sup>6</sup> Accordingly, the media voices in the market must be counted. The table below shows the current number of media voices, radio and television, in the Colorado Springs-Pueblo market.<sup>7</sup>

<b>Voice</b>	<b>Owner</b>	<b>Call Sign(s)</b>	<b>Community of License</b>
1	Alleycat Communications	KRKV-FM	Los Animas, CO
2	Bahakel Communications	KILO-FM KRXP-FM	Colorado Springs, CO Pueblo West, CO
3	Calvary Chapel Aurora	KXCL-FM	Rock Creek Park, CO
4	Catholic Radio Network, Inc.	KFEL-AM	Pueblo, CO
5	Cherry Creek Radio, LLC	KTHN-FM KBLJ-AM	La Junta, CO La Junta, CO
6	Cheyenne Mountain Public Broadcasting House, Inc.	KCME-FM	Manitou Springs, CO
7	Colorado College	KRCC-FM KECC-FM KCCS-FM	Colorado Springs, CO La Junta, CO Starkville, CO
8	Colorado Public Radio	KCFP-FM KKPC-AM	Pueblo, CO Pueblo, CO
9	Colorado State University-Pueblo	KTSC-FM	Pueblo, CO
10	Cumulus Media, Inc.	KKFM-FM KKMG-FM KATC-FM KKPK-FM KVOR-AM KCSF-AM	Colorado Springs, CO Pueblo, CO Colorado Springs, CO Colorado Springs, CO Colorado Springs, CO Colorado Springs, CO
11	Educational Communications of Colorado Springs Inc.	KTLE-FM KTLC-FM KTPL-FM KTAW-FM KTDL-FM KLCX-FM	Colorado Springs, CO Canon City, CO Pueblo, CO Walsenburg, CO Trinidad, CO Pueblo, CO
12	Edward Mangus	KFEZ-FM	Walsenburg, CO
13	Family Stations, Inc.	KFRY-FM	Pueblo, CO
14	Grace Public Radio	KILE-FM	Woodland Park, CO
15	Greeley Broadcasting Corp.	KFVR-FM	Beulah, CO

<sup>6</sup> See 47 C.F.R. § 73.3555(c)(1).

<sup>7</sup> These data are derived from reports of radio and television stations located in the Colorado Springs-Pueblo market provided by PrecisionTrak (<http://www.precisiontrak.com/>) and the Commission's Consolidated Database System.

16	iHeart Media, Inc.	KIBT-FM KCCY-FM KCSJ-AM KDZA-FM KCCY-AM KKLI-FM KVUU-FM KPHT-FM	Fountain, CO Pueblo, CO Pueblo, CO Pueblo, CO Pueblo, CO Widefield, CO Pueblo, CO Rocky Ford, CO
17	Kevin J. Youngers	KPCR-FM	Fowler, CO
18	Latino Communications, LLC	KAVA-AM KXRE-AM	Pueblo, CO Manitou Springs, CO
19	Mainstreet Broadcasting Co.	KSPK-FM	Walsenburg, CO
20	Michael Radio Group	KKHI-AM	Colorado Springs, CO
21	News-Press & Gazette Co.	KRDO-AM KRDO-TV	Colorado Springs, CO Colorado Springs, CO
22	Optima Communications, Inc.	KRDO-FM	Security, CO
23	Phillips Broadcasting Inc.	KCRT-AM KCRT-FM	Trinidad, CO Trinidad, CO
24	Pikes Peak Community College	KEPC-AM	Colorado Springs, CO
25	Pilgrim Communications	KHIG-AM	Colorado Springs, CO
26	Pueblo Broadcasting Group, LLC	KJQY-FM	Colorado City, CO
27	Royal George Broadcasting, LLC	KRLN-AM KSTY-FM	Canon City, CO Canon City, CO
28	Salem Media Group	KGFT-FM KBIQ-FM KZNT-AM	Pueblo, CO Manitou Springs, CO Colorado Springs, CO
29	Timothy C. Cutforth	KJME-AM KCEG-AM	Fountain, CO Fountain, CO
30	United States CP, LLC	KCBR-AM KWRP-AM KRYE-FM KKCS-FM	Monument, CO Pueblo, CO Olney Springs, CO Calhan, CO
31	WAY Media, Inc.	KXWA-FM KRWA-FM KJWA-FM	Centennial, CO Rye, CO Trinidad, CO
32	Whiplash Community Radio, Inc.	KTTE-FM	Springfield, CO
33	Cordillera Communications, Inc.	KOAA-TV	Pueblo, CO
34	Entravision Communications	KVSN-TV	Pueblo, CO
35	Gray Television, Inc.	KKTV-TV	Colorado Springs, CO
36	Media General	KXRM-TV	Colorado Springs, CO
37	Rocky Mountain Public Television	KTSC-TV	Pueblo, CO

After common attribution of KRDO-TV, KRDO(AM), and KRDO-FM, there will be 36 independent media voices in the market—more than the required ten needed to meet the requirements of the radio/television cross-ownership rule.<sup>8</sup>

Because there will be 36 independent media voices in the Colorado Springs-Pueblo market following the proposed assignment, the proposed assignment complies with the Commission's multiple ownership rules.

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<sup>8</sup> See 47 C.F.R. § 73.3555(c)(2)(ii).