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November 9, 2017

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., TW-A325  
Washington, D.C. 20554

**Re: Further Supplemental Comments on Draft Ownership Order and Review of  
the Local Radio Ownership Rules Dealing with Embedded Radio Markets  
MB Docket Nos. 09-182 and 14-50**

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Dear Ms. Dortch:

This Ex Parte Statement and Further Supplemental Statement is being filed on behalf of Connoisseur Media LLC following a discussion between Nirali Patel, Legal Advisor to Commissioner Carr, and Bryan Tramont of this office on November 8, 2017.

First, this supplement restates the presumption that Connoisseur seeks in this proceeding. It seeks a presumption that the Commission will evaluate any transaction proposing the acquisition or combination of radio stations located in multiple embedded markets in the same parent market solely by looking to the transaction's compliance with the ownership limits in the embedded markets. No evaluation of the compliance of attributable parties in the parent market would be required, as long as the parties do not own stations home to the core of the parent market.<sup>1</sup>

Second, Connoisseur submits that adoption of this presumption is in the public interest as it will promote localism. The stations that are home to the embedded markets are the ones that

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<sup>1</sup> Connoisseur would expect that there will be few situations in which the presumption would not apply. As set forth below, the embedded market stations simply do not compete in the parent market, and Connoisseur has demonstrated that stations from one embedded market do not compete in other embedded markets. Throughout the proceeding, Connoisseur has noted the one case where the presumption would not apply – to station WKTU, as that station, though licensed to a community on Long Island, has its antenna on the Empire State Building and is considered by BIA to be “home” to the parent market, not to the Nassau/Suffolk embedded market. Thus, as BIA does not consider it to be an embedded market station, it would not be entitled to the presumption requested by Connoisseur.

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cover the local news and events in the embedded market communities, and the ones that provide a local advertising outlet for local business in those markets. However, as Connoisseur has demonstrated, because the stations from the parent markets drain substantial revenue from the embedded markets,<sup>2</sup> allowing an owner to acquire stations in multiple embedded markets may allow that owner to compete for at least some of this lost business. This has been confirmed by an ex parte filing from one of the New York market's largest advertising buyers, who supported Connoisseur's proposal.<sup>3</sup> Regional ownership would also allow for other resource sharing and economies to better allow the embedded market stations to compete.<sup>4</sup>

Finally, this supplement addresses any further concerns about the potential impact if one party owned stations in multiple embedded markets. Connoisseur has submitted extensive data to show that radio stations in one embedded market have little or no listening by residents in other embedded markets.<sup>5</sup> It has shown that there is very little commuting by residents of one market to another market.<sup>6</sup> It has also shown that the embedded market stations are not competitive factors in the parent markets. Even if one owner were to own every one of the over 80 radio stations in the embedded markets in New York (which would not be remotely possible under our rules because the ownership limits in each individual embedded market would preclude owning all of the stations in any embedded market), it would still be at best the third rated owner in the New York parent market with half of the listening audience of the two largest owners in that market.<sup>7</sup> In Washington, D.C., owning all of the embedded market stations would make an owner only the eighth largest owner in the parent market.<sup>8</sup> Connoisseur has demonstrated that embedded market stations are generally unable to compete in the parent

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<sup>2</sup> See *Connoisseur Ex Parte*, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016), substantiating the revenue drain from these markets.

<sup>3</sup> See *Rich Russo of JL Media Ex Parte*, MB Docket Nos. 09-182 and 14-50 (filed July 7, 2017).

<sup>4</sup> See, *Connoisseur Comments*, MB Docket Nos. 09-182 and 14-50, at pp. 9-10 (filed Aug. 6, 2014).

<sup>5</sup> It has demonstrated that there are numerous geographically adjacent markets where the listening to stations from one market in another nearby market far exceeds that which exists in the embedded markets, yet there is no restriction on the ownership of the maximum number of stations allowed by the rules in each of these adjacent markets. *Connoisseur Ex Parte*, MB Docket Nos. 09-182 and 14-50 (filed October 17, 2017)

<sup>6</sup> As might be expected, by contrast, Connoisseur's data shows that there is commuting from the embedded market to the central city, and listening by embedded market residents to stations from the core of the parent market. *Comments of Connoisseur Media, LLC*, MB Docket Nos. 09-182 and 14-50 (filed August 6, 2014) at pp. 5-6.

<sup>7</sup> See *Connoisseur Ex Parte*, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016), at Exhibit 1.

<sup>8</sup> *Connoisseur Ex Parte Statement*, MB Docket Nos. 09-182 and 14-50 (filed June 6, 2017) at E-5 (Frederick stations received a 2.3 share and Fredericksburg stations a 2.7 share – the combined 5 share ranking 8<sup>th</sup> in the market).

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market because the embedded market stations have signals that simply do not reach a significant portion of the population of the parent markets.<sup>9</sup> Nevertheless, Connoisseur offers this further supplement to expand on the showing that it has already made.

The attached chart shows the market share for each station that has shown any ratings share in the New York City parent market in the each of the last 13 months. Highlighted in yellow are the embedded market stations with the highest ratings in the parent market, and representing the maximum number of stations that one party could own in each of these markets under the rules applicable solely to those markets.<sup>10</sup>

What this chart shows is that, even if one party were to own the maximum number of stations in each of the embedded markets under Connoisseur's proposed presumption, and all of those stations were to simultaneously achieve the highest rating that they had in any of the last 13 months, one owner of embedded market stations would have only an 11.2 market share – less than half that of each of the top two market players in the parent market and approximately equivalent to the third largest player in the market. That is a worst case scenario, assuming one party owned every one of the highest rated stations in each embedded market and that each station receives the highest rating that it received in the last year. If one reviews the actual monthly ratings for these stations, even if one party owned the highest rated stations in each of

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<sup>9</sup> In New York, one of the embedded market stations covers just over 50% of the people in the embedded market with a 1 mv/m signal, and the vast majority of the other embedded market stations cover less far less than half of the parent market with a 1 mv/m signal. By contrast, all of the FM stations home to the New York parent market cover more than 80% of the market with a 1 mv/m signal. *Connoisseur Ex Parte Statement*, MB Docket Nos. 09-182 and 14-50 (filed June 7, 2016).

<sup>10</sup> According to BIA, the maximum number of stations that can be owned by one party in each of the embedded markets is set out below. Note that in many cases, the embedded market stations do not garner any appreciable ratings in the parent market, and thus are not shown on the attached ratings chart:

Long Island (46 BIA listed stations) – 8 total – 5 FMs and 3 AMs  
Hudson Valley – (35 stations) – 7 total – 4 FMs and 3 AMs  
Monmouth/Ocean (26 BIA stations) – 6 total – 4 FMs and 2 AMs  
Middlesex/Union (8 BIA stations) – 4 total – 3 FMs and 1 AM  
Stamford/Norwalk (7 BIA stations) – 4 total – 3 FMs and 1 AM  
Morristown (7 BIA stations) – 4 total – 3 FMs and 1 AM

Note also, that in the Long Island market, station WKTU is excluded from consideration in the embedded market ratings totals, as that station, though licensed to a community on Long Island, has its tower on the Empire State Building and is considered by BIA to be “home” to the parent market, not to Long Island. As stated in footnote 1, as BIA does not consider it to be an embedded market station, it would not be entitled to the presumption requested by Connoisseur.

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the embedded markets, that owner would consistently be 4<sup>th</sup> and in some cases 5<sup>th</sup>, in the New York parent market.<sup>11</sup>

In short, there is no way that, by buying stations solely in embedded markets, one party could come close to establishing an anticompetitive position in the parent market. This Commission has determined that it will not adopt regulations placing burdens on licensees unless there is substantial evidence that such regulation is needed. Placing any limits on the number of stations that one party can own in embedded markets in the New York City market other than those imposed by the ownership rules for those markets simply has no basis in fact, and no such rule can be adopted. The presumption urged by Connoisseur is in the public interest and should be adopted.

Should there be any questions concerning this matter, please contact the undersigned.

Sincerely,

  
David Oxenford

cc: Nirali Patel, Legal Advisor to Commissioner Carr  
Matthew Berry, Chief of Staff to Chairman Pai  
Alison Nemeth, Legal Advisor to Chairman Pai  
David Grossman, Chief of Staff, Legal Advisor to Commissioner Clyburn  
Kate Black, Legal Advisor to Commissioner Rosenworcel  
Brooke Ericson, Chief of Staff, Legal Advisor to Commissioner O'Rielly  
Michelle Carey, Chief, Media Bureau  
Brendan Holland, Division Chief, Industry Analysis Division

Enclosure

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<sup>11</sup> That assumes that the current owners of the largest stations in each embedded market would all be willing to sell to one owner – itself a dubious proposition.

## Trender Report Export from TAPSCAN Web

Market: NEW YORK

Survey: Nielsen Radio October 2017, Nielsen Radio September 2017, Nielsen Radio August 2017, Nielsen Radio July 2017, Nielsen Radio June 2017, Nielsen Radio May 2017, Nielsen Radio April 2017, Nielsen Radio March 2017, Nielsen Radio February 2017, Nielsen Radio January 2017, Nielsen Radio Holiday 2016, Nielsen Radio December 2016, Nielsen Radio November 2016, Nielsen Radio October 2016

## Geography Metro

Stations: All Stations

Demo: Persons 12+

Daypart: Monday-Sunday 6a-midnight

Estimate: Average Share

Station	Owner	Home Market	OCT16	NOV16	DEC16	HOL16	JAN17	FEB17	MAR17	APR17	MAY17	JUN17	JUL17	AUG17	SEP17	OCT17	Max Share
39 WEZN-FM	Connoisseur Media Limited Liability Company	Bridgeport, CT	0.6	0.5	0.2	0.2	0.2	0.3	0.2	0.2	0.3	0.3	0.3	0.3	0.2	0.2	0.3
49t WFOX-FM	Connoisseur Media Limited Liability Company	Bridgeport, CT	0.1	0.1	0.1		0.1			0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
1 WLTW-FM	iHeartMedia	Central City ("Core")	6.7	6.4	8.3	13.4	7.2	7.2	6.3	6.1	6.2	6.5	6.7	6	6	6.6	7.1
4 WCBS-FM	CBS Radio	Central City ("Core")	5.5	6	5.8	5.4	5.6	6.3	6	6.2	6.2	6.2	6.5	6.1	5.7	5.6	5.9
10 WBLS-FM	Emmis Communications	Central City ("Core")	5.7	5.7	5.6	5.5	5.5	5.3	5.6	5.7	5.8	5.5	5.5	5.8	5.5	5.7	5.6
12t WINS-AM	CBS Radio	Central City ("Core")	4.5	4.8	4.7	4.5	5.3	5.6	6	5.5	5.2	5	4.9	5.1	5.6	6.1	5.2
5t WAXQ-FM	iHeartMedia	Central City ("Core")	4.9	4.9	5.1	4.5	4.4	5.2	5.3	5	5.1	5.6	5.5	5.5	5.2	4.9	5.1
2 WHTZ-FM	iHeartMedia	Central City ("Core")	5.5	5.4	5.2	4.5	5	5.4	5.9	5.1	4.5	4.6	4.6	4.6	4.2	4.5	4.9
9 WSKQ-FM	Spanish Broadcasting System	Central City ("Core")	4.7	4.5	4.5	5.3	5.8	4.9	4.3	4.3	4.5	4.9	4.6	4.6	4.9	5.2	4.8
8 WWPR-FM	iHeartMedia	Central City ("Core")	3.7	3.5	3.6	3.6	3.5	3.5	3.5	3.6	3.8	4.1	4.1	4.1	4.3	3.9	3.8
14 WFAN-FM	CBS Radio	Central City ("Core")	3.8	3.5	3.4	3.3	3.5	2.7	2.9	3.9	3.9	3.6	4	4.2	4.7	5.3	3.8
5t WQHT-FM	Emmis Communications	Central City ("Core")	2.9	3.1	2.9	2.7	2.8	3.3	3.5	3.5	3.8	3.8	4.1	3.6	3.5	3.2	3.3
17 WCBS-AM	CBS Radio	Central City ("Core")	3.1	3	2.6	2.4	2.7	2.8	2.9	2.5	2.5	2.8	2.8	2.6	2.9	2.7	2.7
7 WNEW-FM	CBS Radio	Central City ("Core")	2.7	2.3	2.5	2.4	2.9	3.1	2.8	2.8	2.8	2.6	2.5	2.9	2.9	2.7	2.7
15 WXYN-FM	Univision	Central City ("Core")	3.1	3.3	2.7	2.6	2.6	2.9	2.9	2.5	2.8	2.4	2.2	2.3	2.4	2.2	2.6
12t WPLJ-FM	Cumulus Media Holdings Inc	Central City ("Core")	2.6	3	2.9	2.2	2.5	2.4	2.4	2.3	2.3	2.4	2.5	2.6	2.5	2.6	2.5
21 WNYC-FM	New York Public Radio	Central City ("Core")	2.2	2.4	2.7	2.4	2.7	2.6	2.5	2.3	2.1	3	2.5	2.5	2.4	2.5	2.5
16 WPAT-FM	Spanish Broadcasting System	Central City ("Core")	2.7	2.5	2.2	2.3	2.4	2.3	2.5	3.2	2.6	2.4	2.4	2.2	2.3	2	2.4
11 WBMP-FM	CBS Radio	Central City ("Core")	2.7	2.5	2.4	2.4	2.2	2.2	2.2	2.2	2.3	1.9	1.9	1.9	1.9	2	2.2
18 WNSH-FM	Cumulus Media Holdings Inc	Central City ("Core")	1.9	1.8	1.8	1.7	2.7	2.4	2.4	2.3	2.4	1.7	2.2	1.9	2.4	2.3	2.1
20 WOR-AM	iHeartMedia	Central City ("Core")	2.3	1.8	1.7	1.5	1.9	1.9	1.8	2.3	2.5	2.6	2.1	2.2	2	2.3	2.1
23 WQXR-FM	New York Public Radio	Central City ("Core")	1.3	1.4	1.7	1.3	1.6	1.7	1.6	1.6	1.3	1.4	1.4	1.3	1.4	1.5	1.5
19 WEPN-FM	Emmis Communications	Central City ("Core")	1.5	1.8	1.6	1.5	1.6	1.5	1.6	1.3	1.5	1.4	1.2	1.1	1	1.4	1.4
22 WABC-AM	Cumulus Media Holdings Inc	Central City ("Core")	1.4	1.4	1.5	1.2	1.4	1.4	1.5	1.3	1.4	1.4	1.3	1.3	1.2	1.4	1.4
31t WBGO-FM	Newark Public Radio Inc	Central City ("Core")	0.9	0.7	0.8	0.8	0.8	0.7	0.8	0.8	0.8	0.7	0.7	0.6	0.8	1	0.8
40 WADO-AM	Univision	Central City ("Core")	1	1	0.9	0.8	1.1	1.1	0.7	0.6	0.5	0.6	0.5	0.5	0.4	0.6	0.7
41t WNYC-AM	New York Public Radio	Central City ("Core")	0.6	0.7	0.9	0.8	0.7	0.5	0.4	0.3	0.4	0.6	0.5	0.4	0.5	0.5	0.6
34t WFUV-FM	Fordham University	Central City ("Core")	0.9	0.8	0.8	0.4	0.4	0.5	0.5	0.5	0.5	0.4	0.5	0.4	0.6	0.5	0.6
46t WLIB-AM	Emmis Communications	Central City ("Core")	0.4	0.6	0.6	0.6	0.4	0.4	0.4	0.5	0.5	0.6	0.5	0.5	0.4	0.4	0.5
44 WBBR-AM	Bloomberg Communications Inc	Central City ("Core")	0.3	0.3	0.4	0.2	0.3	0.3	0.3	0.2	0.3	0.4	0.3	0.3	0.2	0.2	0.3
54t WMCA-AM	Salem Media Group Inc	Central City ("Core")	0.3		0.2	0.2	0.3		0.3	0.3	0.3	0.3	0.2	0.2	0.2	0.2	0.3
49t WNYM-AM	Salem Media Group Inc	Central City ("Core")	0.3	0.3	0.2	0.2	0.3	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2

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Geography Metro  
Stations: All Stations  
Demo: Persons 12+  
Daypart: Monday-Sunday 6a-midnight  
Estimate: Average Share

Station	Owner	Home Market	OCT16	NOV16	DEC16	HOL16	JAN17	FEB17	MAR17	APR17	MAY17	JUN17	JUL17	AUG17	SEP17	OCT17	Max Share
62t WABC-AM Stream	Cumulus Media Holdings Inc	Central City ("Core")			0.3		0.2	0.2	0.2								0.2
60t WSKQ-FM Stream	Spanish Broadcasting System	Central City ("Core")														0.2	0.2
54t WSNR-AM	Davidzon Radio, Inc.	Central City ("Core")		0.2	0.2	0.2	0.3	0.2	0.2	0.2					0.1	0.1	0.2
54t WFAN-FM Stream	CBS Radio	Central City ("Core")	0.2	0.2	0.2	0.2							0.2		0.1	0.2	0.2
54t WEPN-AM	ABC/Disney	Central City ("Core")	0.1	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
49t WBAI-FM	Pacifica Foundation, Inc.	Central City ("Core")								0.1			0.1		0.1	0.1	0.1
62t WCBS-FM Stream	CBS Radio	Central City ("Core")									0.1			0.1			0.1
62t WNYE-FM	New York City Public Schools	Central City ("Core")			0.1												0.1
62t WRKI-FM	Townsquare Media Incorporated	Danbury, CT	0.1	0.1	0.1	0.1	0.1		0.1	0.1	0.1	0.1	0.1	0.1	0.1		0.1
28 WKLV-FM	Educational Media Foundation	Hudson Valley, NY	0.8	0.6	0.7	0.7	0.5	0.7	0.9	0.8	0.9	0.9	0.8	0.9	0.8	0.9	0.9
29t WHUD-FM	Pamal Broadcasting Ltd	Hudson Valley, NY	0.5	0.6	0.4	0.4	0.5	0.5	0.5	0.5	0.6	0.6	0.5	0.7	0.7	0.6	0.7
34t WNBW-FM	Cumulus Media Holdings Inc	Hudson Valley, NY	0.5	0.5	0.4	0.4	0.5	0.5	0.6	0.7	0.6	0.5	0.5	0.4	0.4	0.5	0.7
45 WXPB-FM	Pamal Broadcasting Ltd	Hudson Valley, NY	0.3	0.2	0.3	0.3	0.3	0.2	0.3	0.3	0.3	0.2	0.1	0.1	0.2	0.2	0.3
62t WVIP-FM	Hudson Westchester	Hudson Valley, NY			0.2			0.2	0.3	0.2	0.2	0.2	0.2	0.3			0.2
54t WSPB-FM	Pamal Broadcasting Ltd	Hudson Valley, NY	0.1	0.1	0.1	0.1		0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0	0.1
37 WAWZ-FM	Pillar of Fire	Middlesex-Somerset-Union, NJ	0.5	0.5	0.4	0.6	0.6	0.5	0.6	0.6	0.5	0.5	0.6	0.5	0.5	0.5	0.6
34t WMGQ-FM	Greater Media Inc	Middlesex-Somerset-Union, NJ	0.4	0.4	0.4	0.4	0.3	0.3	0.3	0.4	0.4	0.4	0.4	0.5	0.4	0.3	0.5
41t WWZY-FM	Press Communications LLC	Monmouth-Ocean, NJ	0.1	0.1	0.1	0	0.1	0.1	0.2	0.2	0.1	0.2	0.2	0.3	0.4	0.5	0.5
62t WRAT-FM	Beasley Media Group	Monmouth-Ocean, NJ	0.1											0.2	0.2		0.2
48 WKMK-FM	Press Communications LLC	Monmouth-Ocean, NJ	0.1	0.1	0.1	0.1	0.1	0.2			0.1	0.2	0.2	0.2	0.2	0.2	0.2
46t WJLK-FM	Townsquare Media Incorporated	Monmouth-Ocean, NJ	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.1	0.1	0.1	0.1	0.2
33 WDHA-FM	Greater Media Inc	Morristown, NJ	0.3	0.4	0.4	0.4	0.5	0.4	0.5	0.4	0.4	0.5	0.5	0.4	0.4	0.5	0.5
62t WMTR-AM	Greater Media Inc	Morristown, NJ										0.4					0.4
3 WKTU-FM	iHeartMedia	Central City ("Core")	3.8	4.1	3.9	3.5	4	3.8	4	4	4	3.9	3.8	4	3.4	3.4	3.8
25t WALK-FM	Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	0.9	0.8	0.9	1.6	1.2	1	0.8	0.9	0.9	1	1	1.1	1.1	0.9	1.6
27 WBLI-FM	Cox Media Group	Nassau-Suffolk, NY	0.7	0.7	0.6	0.6	0.7	0.7	0.8	0.8	0.9	0.9	1.1	0.9	0.9	0.8	1.1
24 WBAB-FM	Cox Media Group	Nassau-Suffolk, NY	0.7	0.7	0.6	0.6	0.7	0.7	0.8	0.8	0.8	0.8	0.8	0.8	1	0.9	1.0
31t WBZO-FM	Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	0.7	0.7	0.7	0.7	0.7	0.7	0.8	0.8	0.8	0.7	0.7	0.7	0.6	0.5	0.8
25t WKJY-FM	Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	0.7	0.7	0.6	0.7	0.7	0.6	0.6	0.8	0.8	0.6	0.5	0.5	0.6	0.6	0.6
49t WQBU-FM	Univision	Nassau-Suffolk, NY	0.3	0.5	0.6	0.4	0.4	0.3	0.2	0.3	0.3	0.2	0.2	0.2	0.2	0.2	0.3
43 WWSK-FM	Connoisseur Media Limited Liability Company	Nassau-Suffolk, NY	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.3	0.2	0.2	0.2
62t WPTY-FM	JVC Media LLC	Nassau-Suffolk, NY		0.1									0.2	0.1			0.1

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Market: NEW YORK  
Survey: Nielsen Radio October 2017, Nielsen Radio September 2017, Nielsen Radio August 2017, Nielsen Radio July 2017, Nielsen Radio June 2017, Nielsen Radio May 2017, Nielsen Radio April 2017, Nielsen Radio March 2017, Nielsen Radio February 2017, Nielsen Radio January 2017, Nielsen Radio Holiday 2016, Nielsen Radio December 2016, Nielsen Radio November 2016, Nielsen Radio October 2016

Geography Metro  
Stations: All Stations  
Demo: Persons 12+  
Daypart: Monday-Sunday 6a-midnight  
Estimate: Average Share

Station	Owner	Home Market	OCT16	NOV16	DEC16	HOL16	JAN17	FEB17	MAR17	APR17	MAY17	JUN17	JUL17	AUG17	SEP17	OCT17	Max Share
62t WJVC-FM	JVC Media LLC	Nassau-Suffolk, NY	0.1							0.1							0.1
49t WPLR-FM	Connoisseur Media Limited Liability Company	New Haven, CT		0.1	0.1	0.1	0.1		0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.1	0.1
54t WKCI-FM	iHeartMedia	New Haven, CT	0.1	0.1	0.1					0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
38 WEBE-FM	Cumulus Media Holdings Inc	Stamford-Norwalk, CT	0.2	0.2	0.2	0.2	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
62t WSHU-FM	Sacred Heart University Incorporated	Stamford-Norwalk, CT	0.2	0.2	0.1		0.1	0.1	0.1								0.2
29t WKXW-FM	Townsquare Media Incorporated	Trenton, NJ	1.3	1.2	1.1	1	1.2	1.2	1.1	1	1.2	1.2	1.1	1.2	1.1	1.1	1.1
60t WPST-FM	Connoisseur Media Limited Liability Company	Trenton, NJ	0.1	0.1	0		0.1			0.1			0.1			0	0.1
AQH Share of max # of stations in the 6 embedded markets			7.9	7.6	7.0	7.8	7.7	7.5	8.1	8.3	8.4	8.8	8.2	8.5	8.7	8.2	11.2
iHeartMedia			27.0	26.2	27.9	31.0	26.0	27.0	26.8	26.2	26.2	27.4	26.9	26.5	25.2	25.7	
CBS Radio			22.5	22.3	21.6	20.6	22.2	22.7	22.8	23.1	23.0	22.1	22.8	22.9	23.8	24.6	
Emmis Communications			10.5	11.2	10.7	10.3	10.3	10.5	11.1	11.0	11.6	11.3	11.3	11.0	10.4	10.7	
Spanish Broadcasting System			7.4	7.0	6.7	7.6	8.2	7.2	6.8	7.5	7.1	7.3	7.0	6.8	7.2	7.4	
Cumulus Media Holdings Inc			6.6	6.9	7.1	5.7	7.4	7.1	7.3	6.8	6.9	6.2	6.7	6.4	6.7	7.0	
New York Public Radio			4.1	4.5	5.3	4.5	5.0	4.8	4.5	4.2	3.8	5.0	4.4	4.2	4.3	4.5	
Univision			4.4	4.8	4.2	3.8	4.1	4.3	3.8	3.4	3.6	3.2	2.9	3.0	3.0	3.0	
Connoisseur Media Limited Liability Company			3.3	3.2	2.8	3.5	3.3	2.8	2.7	3.2	3.3	3.1	3.1	3.2	3.0	2.6	
Cox Media Group			1.4	1.4	1.2	1.2	1.4	1.4	1.6	1.6	1.7	1.7	1.9	1.7	1.9	1.7	
Townsquare Media Incorporated			1.6	1.5	1.3	1.2	1.4	1.3	1.3	1.2	1.4	1.5	1.3	1.4	1.3	1.2	
Newark Public Radio Inc			0.9	0.7	0.8	0.8	0.8	0.7	0.8	0.8	0.8	0.7	0.7	0.6	0.8	1.0	
Educational Media Foundation			0.8	0.6	0.7	0.7	0.5	0.7	0.9	0.8	0.9	0.9	0.8	0.9	0.8	0.9	
Pamal Broadcasting Ltd			0.9	0.9	0.8	0.8	0.8	0.8	0.9	0.9	1.0	0.9	0.7	0.9	1.0	0.8	
Greater Media Inc			0.7	0.8	0.8	0.8	0.8	0.7	0.8	0.8	0.8	1.3	0.9	0.9	0.8	0.8	
Press Communications LLC			0.2	0.2	0.2	0.1	0.2	0.3	0.2	0.2	0.2	0.4	0.4	0.5	0.6	0.7	
Fordham University			0.9	0.8	0.8	0.4	0.4	0.5	0.5	0.5	0.5	0.4	0.5	0.4	0.6	0.5	
Pillar of Fire			0.5	0.5	0.4	0.6	0.6	0.5	0.6	0.6	0.5	0.5	0.6	0.5	0.5	0.5	
Salem Media Group Inc			0.6	0.3	0.4	0.4	0.6	0.3	0.5	0.5	0.5	0.5	0.4	0.4	0.4	0.4	
Bloomberg Communications Inc			0.3	0.3	0.4	0.2	0.3	0.3	0.3	0.2	0.3	0.4	0.3	0.3	0.2	0.2	
Davidzon Radio, Inc.			-	0.2	0.2	0.2	0.3	0.2	0.2	0.2	-	-	-	-	0.1	0.1	

Trender Report Export from TAPSCAN Web

Market: NEW YORK  
Survey: Nielsen Radio October 2017, Nielsen Radio September 2017, Nielsen Radio August 2017, Nielsen Radio July 2017, Nielsen Radio June 2017, Nielsen Radio May 2017, Nielsen Radio April 2017, Nielsen Radio March 2017, Nielsen Radio February 2017, Nielsen Radio January 2017, Nielsen Radio Holiday 2016, Nielsen Radio December 2016, Nielsen Radio November 2016, Nielsen Radio October 2016

Geography Metro  
Stations: All Stations  
Demo: Persons 12+  
Daypart: Monday-Sunday 6a-midnight  
Estimate: Average Share

Station	Owner	Home Market	OCT16	NOV16	DEC16	HOL16	JAN17	FEB17	MAR17	APR17	MAY17	JUN17	JUL17	AUG17	SEP17	OCT17	Max Share
	ABC/Disney		0.1	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	
	Pacifica Foundation, Inc.		-	-	-	-	-	-	-	0.1	-	-	0.1	-	0.1	0.1	
	New York City Public Schools		-	-	0.1	-	-	-	-	-	-	-	-	-	-	-	
	Hudson Westchester		-	-	0.2	-	-	0.2	0.3	0.2	0.2	0.2	0.2	0.3	-	-	
	Beasley Media Group		0.1	-	-	-	-	-	-	-	-	-	-	0.2	0.2	-	
	JVC Media LLC		0.1	0.1	-	-	-	-	-	0.1	-	-	0.2	0.1	-	-	
	Sacred Heart University Incorporated		0.2	0.2	0.1	-	0.1	0.1	0.1	-	-	-	-	-	-	-	