

Scripps Broadcasting Holdings LLC (“Scripps”), licensee of station KZSD-LP, San Diego, California (the “Station”), respectfully requests an extension of the October 17, 2016, extension of the grant of Special Temporary Authority (“STA”) to the Station to operate at deviance from its authorized parameters by transmitting in analog format from its displacement site and channel (Channel 39) (see File No. BDISDTL-20080801BAR).

The Station was a longtime affiliate of the Azteca Network and aired Spanish-language programming until March, 2017. In 2010, the Commission granted former licensee McGraw-Hill Broadcasting Company, Inc.’s application for digital displacement relief, authorizing the Station to change site and channel due to Mexican DTV operations in nearby Tijuana.

This request for STA was intended to allow the Station to improve service to but avoid disenfranchisement of numerous Spanish-language viewers, and all indications are that the Station’s operations under the STA achieved that goal. Marketing research showed that numerous Spanish-language viewers in the area relied extensively on the Station’s local over-the-air analog programming. This same research indicated that many of these viewers did not effectively participate in the DTV transition, remained unprepared to make such a transition, and relied on the Station’s analog programming for local news, weather, sports, and entertainment.

After the Station began broadcasting in analog format pursuant to the STA, the Station experienced a significant increase in viewership, especially during the evening hours when more people were at home.

Now that the Station is no longer an Azteca affiliate, it is temporarily rebroadcasting the ABC-network program feed of its parent, Station KGTV(TV). Scripps seeks the STA extension while it addresses the fact that the Station’s existing STA frequency (as well as the frequency upon which it remains licensed, Channel 41) will no longer be available in the reduced post-auction broadcast spectrum and it explores what channel reassignment might be available to the Station, if any, in the post-auction spectrum environment.

No viewers would be adversely impacted by a grant. Since the offered programming is available in digital over-the-air via Station KGTV, no viewer would be denied programming from the Station as the Station continues to operate in analog. In addition, no impermissible interference has resulted from the Station’s operations under the STA. In the unlikely event that objectionable interference occurs, Scripps is willing to take all reasonable steps to eliminate it, including modifying operating parameters or ceasing operation, if necessary.