

**REQUEST FOR WAIVER FOR DISPLACEMENT APPLICATION**  
**KZCS-LP**  
**COLORADO SPRINGS, CO**

Scripps is proposing that KZCS-LP displace to the pre-auction channel for KRMA (Ch. 18). The proposed KZCS digital facility on Ch. 18 is predicted to cause interference to the KRMA (Ch. 18, BLEDT-20100312ABH) and KTVD (Ch. 19, BLCDT-20090218ABY) pre-auction facilities. Both KRMA and KTVD are scheduled to transition to their post-auction channels (Ch. 33 and Ch. 31 respectively) in Phase 2 (construction deadline of April 12, 2019). Scripps respectfully requests a waiver of the contingent application rule (Part 73.3517). Displacing KZCS-LP to Ch. 18 is necessary as no other available channel could be identified for KZCS-LP which satisfies the FCC interference requirements to full-service, Class A and non-displaced LPTV/translator stations. Scripps agrees to the condition that it will not begin operating KZCS-LP on Ch. 18 prior to KRMA and KTVD discontinuing their operations on Ch. 18 and Ch. 19 respectively.