

KZSD-LP, San Diego, California  
Request for Extension of STA  
October 2016

Scripps Media, Inc. ("Scripps"), licensee of station KZSD-LP, San Diego, California (the "Station"), respectfully requests an extension of the May 6, 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.

The Station is an affiliate of the Azteca Network and airs Spanish-language programming. 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.

The Station's 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 are at home. These results strongly suggest that a sizeable portion of the local Spanish-speaking audience continued to rely on analog television service.

Renewal of the STA is in the public interest. If the station converts to digital at this time, as authorized in its displacement permit, these viewers would lose access to its over-the-air service. Renewal of the STA effectively provides local Spanish-language viewers with additional time to complete their own digital transition.

No viewers would be adversely impacted by a grant. Scripps simulcasts that Station's programming digitally on a multicast channel of KGTU(TV). As a result, no viewer would be denied digital 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.