

KZSD-LP, San Diego, California (Facility ID No. 57054)
Request for Special Temporary Authority
October 2010

McGraw-Hill Broadcasting Company, Inc. (“McGraw-Hill”), licensee of KZSD-LP, San Diego, California (the “Station”), hereby requests STA to operate at deviance from its authorized parameters. The Station is an affiliate of the Azteca Network and airs Spanish-language programming. Earlier this year the Commission granted McGraw-Hill’s application for digital displacement relief, authorizing the Station to change site and channel due to new Mexican DTV operations in nearby Tijuana.¹ For reasons explained more fully below, McGraw-Hill is seeking permission in this STA request to operate temporarily in analog from the new displacement site and channel.

The Station currently operates in analog on Channel 41 from a site on Mt. Woodson. The Station’s new displacement permit authorizes digital operation on Channel 39 from San Miguel Mountain. The authorized displacement operations would be co-located with the adjacent-Channel 40 operations of full power station KNSD(TV), San Diego. By this co-location with KNSD(TV)’s adjacent-channel operations, the Station can improve service substantially. This is because the Station’s current analog operations also are adjacent to KNSD(TV)’s channel, but from the other channel. Because the Station’s current analog operations are not co-located with KNSD(TV), the Station’s existing service is comparably inferior.

To achieve this improved service, McGraw-Hill wishes to implement the authorized displacement operations as soon as reasonably possible, but McGraw-Hill’s marketing research is showing that numerous Spanish-language viewers in the area still rely extensively on the Station’s local, over-the-air *analog* programming. This same research is indicating that many of these viewers did not effectively participate in the DTV transition, remain unprepared to make such a transition, and rely on the Station’s analog programming for local news, weather, sports, and entertainment. If the Station was to convert to digital at this time as authorized in its displacement permit, many of these viewers would be materially disenfranchised by the resulting service losses.²

Accordingly, to allow the Station to improve service to – but avoid disenfranchisement of – numerous Spanish-language viewers, McGraw-Hill seeks permission to operate in analog temporarily from the site and on the channel authorized in its digital displacement permit.

Grant of this request is in the public interest as it not only would expand service to numerous Spanish-language viewers, but it effectively would give such viewers additional time to complete their own digital transition. Grant would avoid disenfranchisement of many Spanish-language viewers who rely on the Station’s over-the-air analog programming for local news and weather. No viewer should be adversely impacted. The Station’s programming

¹ See FCC File No. BDISDTL-20080801BAR.

² Low power station KBNT-CA/KTCD-LP, a Univision affiliate, is the only other Spanish-language station in San Diego broadcasting over-the-air analog programming.

currently is aired digitally as a multicast channel on KGTV(TV), so no potential viewer would be denied digital programming from the Station. McGraw-Hill understands that the Commission has proposed that LPTV stations terminate analog operations by June 12, 2012,³ and the Station has every intention to comply with whatever analog termination procedures the Commission ultimately adopts. Upon grant of this STA request, the Station intends to properly advertise the new operations so that no viewer is adversely impacted.

No impermissible interference is predicted to be caused by operating the Station as proposed herein. The proposed operation would not expand service in any direction beyond that already authorized, so Mexican review of this instant request is not required. In the unlikely event that objectionable interference is caused, McGraw-Hill is willing to take all reasonable steps to eliminate such, including modifying operating parameters or ceasing operation, if necessary. McGraw-Hill understands that grant of this request does not provide any permanent authority to operate the Station in the manner proposed.

³ Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, MB Docket No. 03-185, *Further Notice of Proposed Rule Making and Memorandum Opinion and Order*, FCC 10-172, ¶ 10 (rel. Sept. 17, 2010).