EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of LAS AMERICAS SUPERMERCADO, INC., the licensee of digital Low Power Television Station KXAP-LD, Channel 38 in Tulsa, Oklahoma, in support of its displacement Application for Construction Permit to specify operation on Channel 14. This station is being displaced as a result of the spectrum auction and the relocation of upper UHF channel television stations to the band between Channels 14 and 36. No change in site location, antenna azimuth pattern or antenna height is proposed herein.

It is proposed to mount an omnidirectional antenna at the 55.2-meter level of the existing 57.9-meter communications tower on which the present KXAP-LD antenna is located. The proposed effective radiated power for the facility is 15.0 kW in horizontal plane. Exhibit B is a map upon which the predicted 51 dBu service contour is plotted. Elevation pattern data are presented in Exhibit C.

Exhibit D is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed both a cell size and increment spacing of 1.0 kilometer. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed KXAP-LD facility meets the Commission's interference requirements to all full-power and low-power co-channel and adjacent-channel television facilities.

A detailed power density calculation is provided in Exhibit E.

Since no change in the overall height or location of the existing KXAP-LD tower is proposed herein, the Federal Aviation Administration has not been notified of this application.

EXHIBIT A

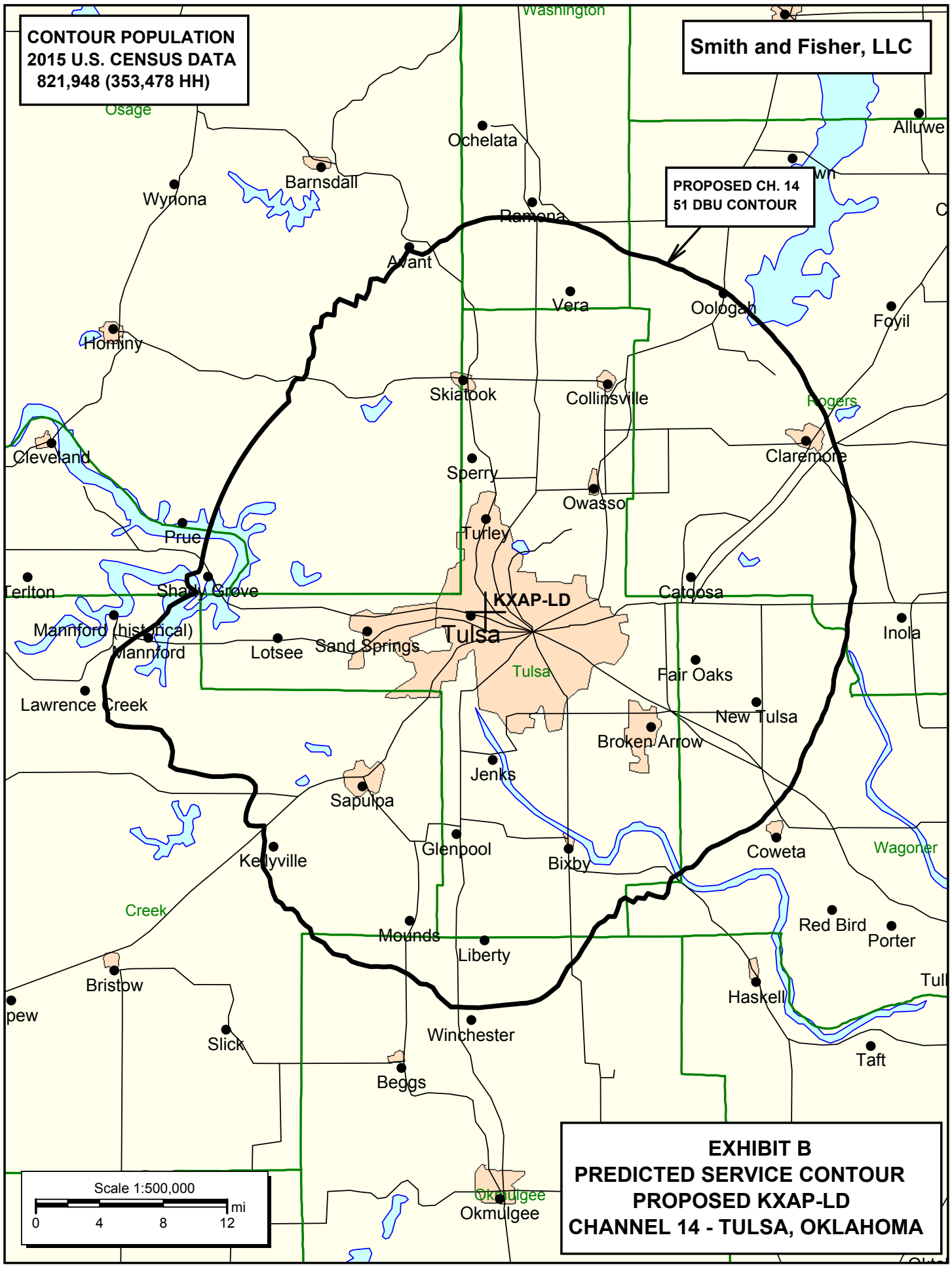
In addition, due to the diminutive height of the tower and its proximity to the nearest airport runway, FCC tower registration is not required for this structure.

I declare under penalty of perjury that the foregoing statements and the attached exhibits, which were prepared by me or under my immediate supervision, are true and correct to the best of my knowledge and belief.



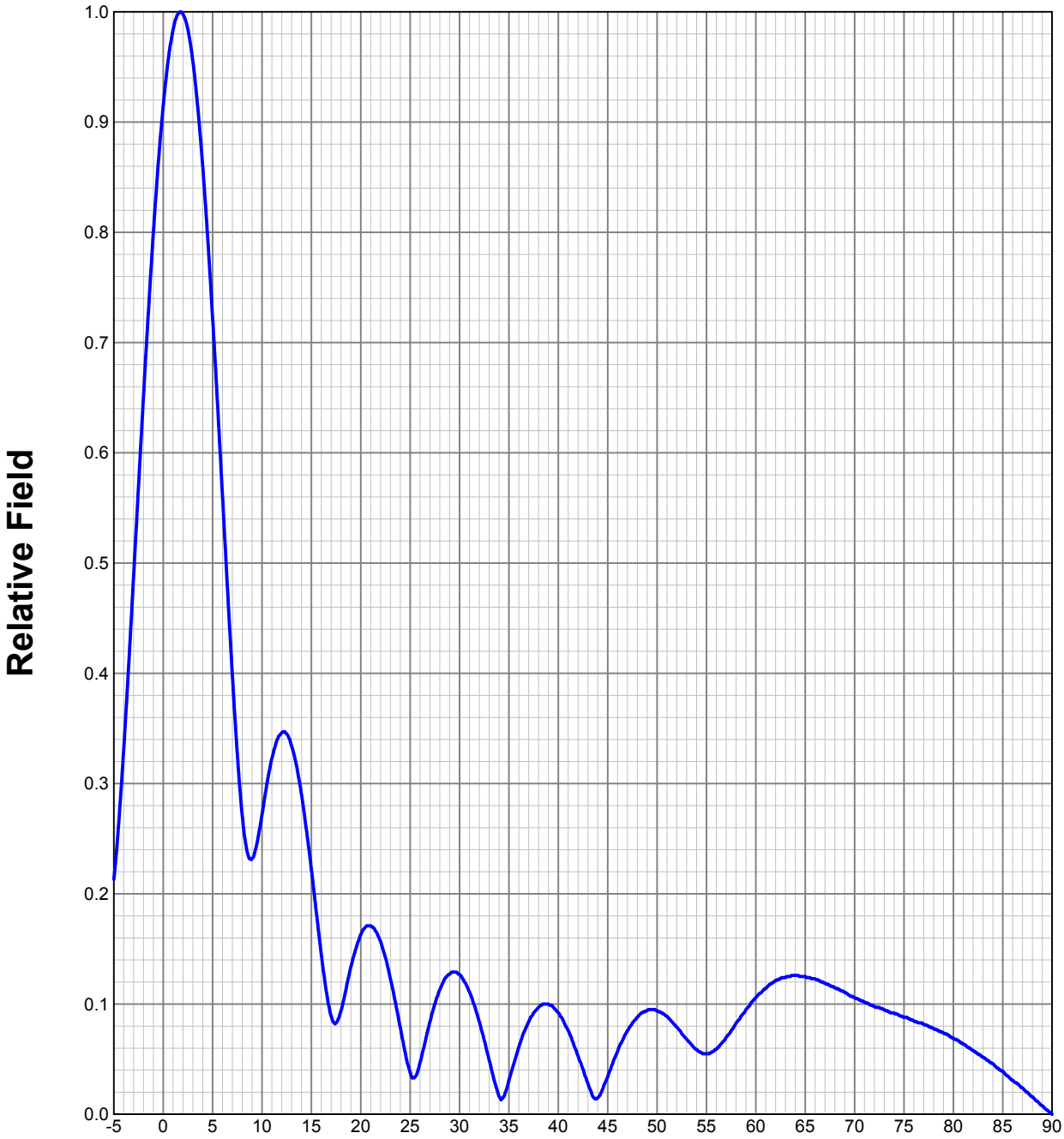
KEVIN T. FISHER

May 2, 2018


CONTOUR POPULATION
2015 U.S. CENSUS DATA
821,948 (353,478 HH)
Smith and Fisher, LLC
PROPOSED CH. 14
51 DBU CONTOUR
KXAP-LD
Tulsa
Osage
Washington
Ochelata
Barnsdall
Wynona
Ramona
Avant
Vera
Oologah
Foyil
Alluwe
Hominy
Skiatook
Collinsville
Rogers
Claremore
Cleveland
Sperry
Owasso
Prue
Turley
Catoosa
Inola
Sand Springs
Lotsee
Mannford
Fair Oaks
New Tulsa
Broken Arrow
Lawrence Creek
Jenks
Sapulpa
Glenpool
Bixby
Coweta
Wagoner
Kellyville
Creek
Mounds
Liberty
Red Bird
Porter
Bristow
Haskell
Winchester
Slick
Beggs
Taft
Okmulgee
Scale 1:500,000
0 4 8 12 mi
EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED KXAP-LD
CHANNEL 14 - TULSA, OKLAHOMA

ELEVATION PATTERN

Type:	LAL8		Channel:	14
Directivity:	Numeric	dBd	Location:	
Main Lobe:	8.68	9.39	Beam Tilt:	1.75
Horizontal:	7.27	8.61	Polarization:	Horizontal



Preliminary, subject to final design and review.

TABULATED DATA FOR ELEVATION PATTERN

Type: LAL8
PolarizationHorizontal

ANGLE	FIELD	dB	ANGLE	FIELD	dB	ANGLE	FIELD	dB	ANGLE	FIELD	dB	ANGLE	FIELD	dB
-5.00	0.213	-13.43	6.75	0.437	-7.19	27.00	0.084	-21.51	50.50	0.092	-20.72	74.00	0.092	-20.72
-4.75	0.236	-12.52	7.00	0.398	-8.00	27.50	0.100	-20.00	51.00	0.089	-21.01	74.50	0.090	-20.92
-4.50	0.265	-11.54	7.25	0.361	-8.85	28.00	0.113	-18.94	51.50	0.084	-21.51	75.00	0.088	-21.11
-4.25	0.297	-10.54	7.50	0.327	-9.71	28.50	0.123	-18.20	52.00	0.079	-22.05	75.50	0.087	-21.21
-4.00	0.331	-9.60	7.75	0.296	-10.56	29.00	0.127	-17.92	52.50	0.073	-22.73	76.00	0.085	-21.41
-3.75	0.368	-8.67	8.00	0.271	-11.34	29.50	0.129	-17.79	53.00	0.068	-23.35	76.50	0.083	-21.62
-3.50	0.407	-7.81	8.25	0.251	-12.01	30.00	0.127	-17.92	53.50	0.063	-24.01	77.00	0.082	-21.72
-3.25	0.447	-6.99	8.50	0.238	-12.47	30.50	0.120	-18.42	54.00	0.059	-24.58	77.50	0.080	-21.94
-3.00	0.488	-6.23	8.75	0.232	-12.69	31.00	0.111	-19.09	54.50	0.056	-25.04	78.00	0.078	-22.16
-2.75	0.529	-5.53	9.00	0.232	-12.69	31.50	0.099	-20.09	55.00	0.055	-25.19	78.50	0.076	-22.38
-2.50	0.570	-4.88	9.25	0.237	-12.51	32.00	0.084	-21.51	55.50	0.056	-25.04	79.00	0.074	-22.62
-2.25	0.611	-4.28	9.50	0.246	-12.18	32.50	0.067	-23.48	56.00	0.059	-24.58	79.50	0.072	-22.85
-2.00	0.651	-3.73	9.75	0.259	-11.75	33.00	0.049	-26.20	56.50	0.064	-23.88	80.00	0.069	-23.22
-1.75	0.691	-3.22	10.00	0.272	-11.31	33.50	0.031	-30.17	57.00	0.070	-23.10	80.50	0.067	-23.48
-1.50	0.728	-2.76	10.50	0.300	-10.46	34.00	0.016	-35.92	57.50	0.076	-22.38	81.00	0.064	-23.88
-1.25	0.765	-2.33	11.00	0.323	-9.82	34.50	0.016	-35.92	58.00	0.083	-21.62	81.50	0.061	-24.29
-1.00	0.800	-1.94	11.50	0.339	-9.40	35.00	0.031	-30.17	58.50	0.089	-21.01	82.00	0.058	-24.73
-0.75	0.832	-1.60	12.00	0.346	-9.22	35.50	0.046	-26.74	59.00	0.095	-20.45	82.50	0.055	-25.19
-0.50	0.863	-1.28	12.50	0.345	-9.24	36.00	0.061	-24.29	59.50	0.101	-19.91	83.00	0.052	-25.68
-0.25	0.890	-1.01	13.00	0.334	-9.53	36.50	0.074	-22.62	60.00	0.106	-19.49	83.50	0.049	-26.20
0.00	0.915	-0.77	13.50	0.316	-10.01	37.00	0.084	-21.51	60.50	0.110	-19.17	84.00	0.046	-26.74
0.25	0.937	-0.57	14.00	0.290	-10.75	37.50	0.092	-20.72	61.00	0.114	-18.86	84.50	0.042	-27.54
0.50	0.956	-0.39	14.50	0.258	-11.77	38.00	0.097	-20.26	61.50	0.118	-18.56	85.00	0.039	-28.18
0.75	0.972	-0.25	15.00	0.222	-13.07	38.50	0.100	-20.00	62.00	0.121	-18.34	85.50	0.035	-29.12
1.00	0.984	-0.14	15.50	0.183	-14.75	39.00	0.100	-20.00	62.50	0.123	-18.20	86.00	0.031	-30.17
1.25	0.993	-0.06	16.00	0.145	-16.77	39.50	0.097	-20.26	63.00	0.124	-18.13	86.50	0.028	-31.06
1.50	0.998	-0.02	16.50	0.112	-19.02	40.00	0.092	-20.72	63.50	0.125	-18.06	87.00	0.024	-32.40
1.75	1.000	0.00	17.00	0.089	-21.01	40.50	0.085	-21.41	64.00	0.126	-17.99	87.50	0.020	-33.98
2.00	0.998	-0.02	17.50	0.083	-21.62	41.00	0.076	-22.38	64.50	0.125	-18.06	88.00	0.016	-35.92
2.25	0.992	-0.07	18.00	0.094	-20.54	41.50	0.065	-23.74	65.00	0.125	-18.06	88.50	0.012	-38.42
2.50	0.984	-0.14	18.50	0.113	-18.94	42.00	0.053	-25.51	65.50	0.124	-18.13	89.00	0.008	-41.94
2.75	0.971	-0.26	19.00	0.134	-17.46	42.50	0.041	-27.74	66.00	0.123	-18.20	89.50	0.004	-47.96
3.00	0.955	-0.40	19.50	0.150	-16.48	43.00	0.028	-31.06	66.50	0.121	-18.34	90.00	0.000	-40.00
3.25	0.935	-0.58	20.00	0.163	-15.76	43.50	0.016	-35.92	67.00	0.119	-18.49			
3.50	0.913	-0.79	20.50	0.170	-15.39	44.00	0.015	-36.48	67.50	0.117	-18.64			
3.75	0.887	-1.04	21.00	0.171	-15.34	44.50	0.023	-32.77	68.00	0.115	-18.79			
4.00	0.860	-1.31	21.50	0.166	-15.60	45.00	0.034	-29.37	68.50	0.113	-18.94			
4.25	0.829	-1.63	22.00	0.157	-16.08	45.50	0.046	-26.74	69.00	0.111	-19.09			
4.50	0.795	-1.99	22.50	0.142	-16.95	46.00	0.057	-24.88	69.50	0.108	-19.33			
4.75	0.760	-2.39	23.00	0.123	-18.20	46.50	0.067	-23.48	70.00	0.106	-19.49			
5.00	0.722	-2.83	23.50	0.102	-19.83	47.00	0.076	-22.38	70.50	0.104	-19.66			
5.25	0.684	-3.30	24.00	0.079	-22.05	47.50	0.083	-21.62	71.00	0.102	-19.83			
5.50	0.644	-3.82	24.50	0.056	-25.04	48.00	0.088	-21.11	71.50	0.100	-20.00			
5.75	0.603	-4.40	25.00	0.038	-28.40	48.50	0.092	-20.72	72.00	0.098	-20.18			
6.00	0.561	-5.02	25.50	0.034	-29.37	49.00	0.094	-20.54	72.50	0.097	-20.26			
6.25	0.519	-5.70	26.00	0.047	-26.56	49.50	0.095	-20.45	73.00	0.095	-20.45			
6.50	0.478	-6.41	26.50	0.065	-23.74	50.00	0.094	-20.54	73.50	0.093	-20.63			

Preliminary, subject to final design and review.

EXHIBIT D

TVSTUDY INTERFERENCE ANALYSIS RESULTS
PROPOSED KXAP-LD
CHANNEL 14 – TULSA, OKLAHOMA

Study created: 2018.05.02 13:15:24

Study build station data: LMS TV 2018-04-07

Proposal: KXAP-LD D14 LD LIC TULSA, OK
File number: BLANK0000013521
Facility ID: 43440
Station data: User record
Record ID: 209
Country: U.S.

Build options:
Protect pre-transition records not on baseline channel

Stations potentially affected by proposal:

IX	Call	Chan	Svc	Status	City, State	File Number	Distance
Yes	KPBI-CD	D14	DC	LIC	BENTONVILLE, AR	BLANK0000001534	162.9 km
No	K14OM-D	D14	LD	CP	CLARKSVILLE, AR	BNPDTL20100504AMK	228.4
No	KOCW	D14	DT	LIC	HOISINGTON, KS	BLCDT20090622AFO	374.0
No	K14PX-D	D14	LD	CP	PAXICO, KS	BNPDTL20100514AIA	324.4
No	K14NX-D	D14	LD	CP	PITTSBURG, KS	BNPDTL20100106AGD	174.4
No	K14NY-D	D14	LD	LIC	SAYRE, OK	BLDTT20101008ABX	355.6
No	K14MU-D	D14	LD	LIC	WEATHERFORD, OK	BLDTT20100225ABD	259.1
No	K38KH-D	D14	LD	APP	WOODWARD, ETC., OK	BLANK0000031247	298.9
No	KERA-TV	D14	DT	LIC	DALLAS, TX	BLEDT20140903AFQ	411.7
No	K41EQ-D	D14	LD	APP	TEXARKANA, TX	BLANK0000049650	348.6
No	KHOG-TV	D15	DT	LIC	FAYETTEVILLE, AR	BLCDT20020904AAX	170.8
No	K15IJ-D	D15	LD	CP	PITTSBURG, KS	BNPDTL20100106AGE	174.4
No	KSNW	D15	DT	CP	WICHITA, KS	BLANK0000034801	225.7
No	KTBO-TV	D15	DT	LIC	OKLAHOMA CITY, OK	BLCDT20111028AAX	150.5

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D14
Mask: Full Service

Latitude: 36 9 26.70 N (NAD83)
Longitude: 95 58 35.10 W
Height AMSL: 268.6 m
HAAT: 0.0 m
Peak ERP: 15.0 kW
Antenna: Omnidirectional
Elev Pattrn: Generic
Elec Tilt: 1.75

48.7 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	75.7 m	42.0 km
45.0	15.0	79.2	42.5
90.0	15.0	57.8	39.1
135.0	15.0	43.6	35.6
180.0	15.0	76.6	42.1
225.0	15.0	38.5	34.1
270.0	15.0	39.8	34.5
315.0	15.0	22.7	31.6

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 54 m

Distance to Canadian border: 1280.6 km

Distance to Mexican border: 871.3 km

Conditions at FCC monitoring station: Grand Island NE
Bearing: 338.8 degrees Distance: 570.9 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 301.4 degrees Distance: 919.9 km

No land mobile station failures found

Study cell size: 1.00 km
Profile point spacing: 1.00 km

Maximum new IX to full-service and Class A: 0.50%
Maximum new IX to LPTV: 2.00%

No IX check failures found.

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED KXAP-LD
CHANNEL 14 – TUSLA, OKLAHOMA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Tulsa facility. Employing the methods set forth in *OET Bulletin No. 65* and considering a main-lobe effective radiated power of 15.0 kW, an antenna radiation center 55.2 meters above ground, and the specific elevation pattern for the proposed ERI LAL8OC-14 antenna, maximum power density two meters above ground of 0.0023 mW/cm^2 is calculated to occur 26 meters from the base of the tower. Since this is only 0.7 percent of the 0.31 mW/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 14 (470-476 MHz), a grant of this proposal may be considered a minor environmental action with respect to public exposure to non-ionizing electromagnetic radiation.

Further, the station owner will take whatever precautionary steps are necessary, such as reducing power or leaving the air temporarily, to ensure that workers operating in the vicinity of the antenna are not exposed to excessive non-ionizing radiation.