

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of SPANISH INDEPENDENT BROADCAST NETWORK, LLC, licensee of digital Low Power Television Station K38IZ-D, Channel 38 in Phoenix, Arizona, 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, effective radiated power, antenna azimuth pattern or antenna height is proposed herein.

It is proposed to mount an omnidirectional antenna at the 26.2-meter level of the existing 30.5-meter communications tower on which the present K38IZ-D antenna is located. The proposed effective radiated power for the facility is 15.0 kW in horizontal plane, which is the present power level of K38IZ-D. Exhibit B is a map upon which the predicted 51 dBu service contour is plotted. Exhibit C provides antenna elevation pattern data.

Included, as Exhibit D, is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed both a cell size of 1.0 kilometer and an increment spacing of 1.0 kilometer. Further the applicant proposes use of a full-service mask filter. The results indicate that the proposed K38IZ-D 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 K38IZ-D tower is proposed herein, the Federal Aviation Administration has not been notified of this application.

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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.

A handwritten signature in blue ink, appearing to read 'K. T. Fisher', with a stylized flourish at the end.

KEVIN T. FISHER

May 9, 2018

CONTOUR POPULATION
2015 U.S. CENSUS DATA
4,439,211 (1,808,504 HH)

Smith and Fisher, LLC

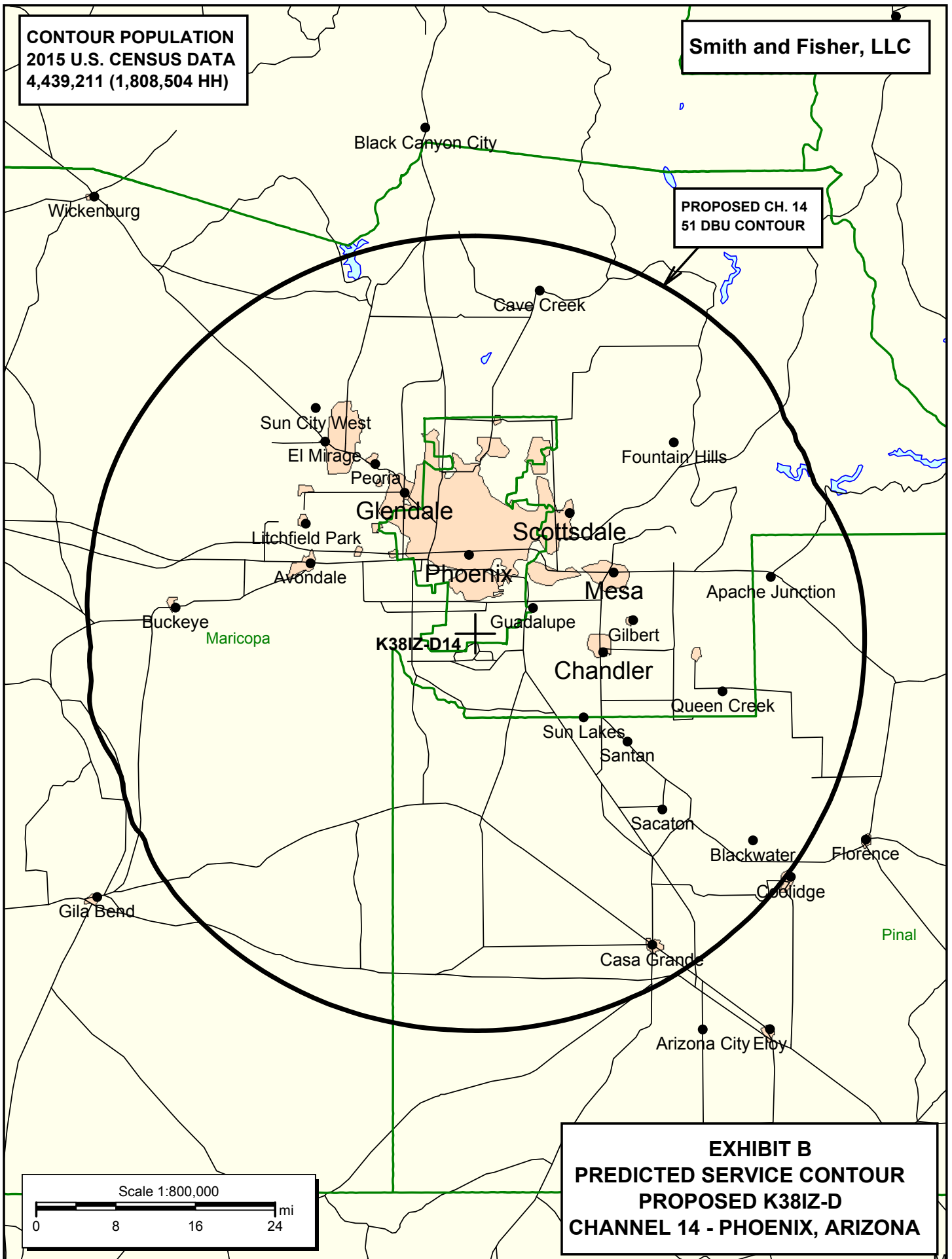
PROPOSED CH. 14
51 DBU CONTOUR

K381Z-D14

EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED K381Z-D
CHANNEL 14 - PHOENIX, ARIZONA

Scale 1:800,000

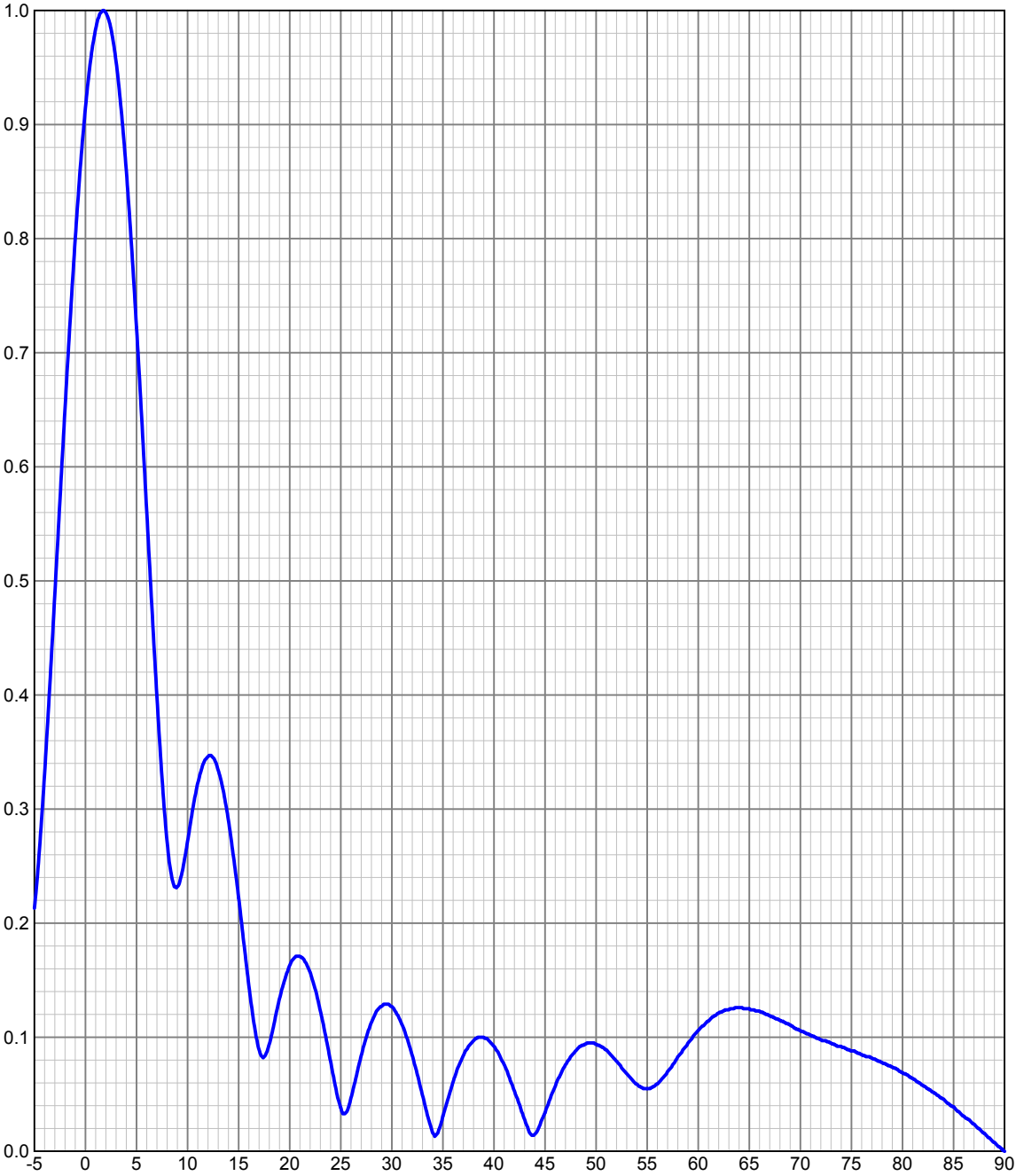
0 8 16 24 mi



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

Relative Field



Preliminary, subject to final design and review.

TABULATED DATA FOR ELEVATION PATTERN

Type: LAL8

Polarization Horizontal

ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB	ANGLEFIELD	dB
-5.00	0.213	-13.43	6.75	0.437	-7.19	27.00	0.084	-21.51	50.50
-4.75	0.236	-12.52	7.00	0.398	-8.00	27.50	0.100	-20.00	51.00
-4.50	0.265	-11.54	7.25	0.361	-8.85	28.00	0.113	-18.94	51.50
-4.25	0.297	-10.54	7.50	0.327	-9.71	28.50	0.123	-18.20	52.00
-4.00	0.331	-9.60	7.75	0.296	-10.56	29.00	0.127	-17.92	52.50
-3.75	0.368	-8.67	8.00	0.271	-11.34	29.50	0.129	-17.79	53.00
-3.50	0.407	-7.81	8.25	0.251	-12.01	30.00	0.127	-17.92	53.50
-3.25	0.447	-6.99	8.50	0.238	-12.47	30.50	0.120	-18.42	54.00
-3.00	0.488	-6.23	8.75	0.232	-12.69	31.00	0.111	-19.09	54.50
-2.75	0.529	-5.53	9.00	0.232	-12.69	31.50	0.099	-20.09	55.00
-2.50	0.570	-4.88	9.25	0.237	-12.51	32.00	0.084	-21.51	55.50
-2.25	0.611	-4.28	9.50	0.246	-12.18	32.50	0.067	-23.48	56.00
-2.00	0.651	-3.73	9.75	0.259	-11.75	33.00	0.049	-26.20	56.50
-1.75	0.691	-3.22	10.00	0.272	-11.31	33.50	0.031	-30.17	57.00
-1.50	0.728	-2.76	10.50	0.300	-10.46	34.00	0.016	-35.92	57.50
-1.25	0.765	-2.33	11.00	0.323	-9.82	34.50	0.016	-35.92	58.00
-1.00	0.800	-1.94	11.50	0.339	-9.40	35.00	0.031	-30.17	58.50
-0.75	0.832	-1.60	12.00	0.346	-9.22	35.50	0.046	-26.74	59.00
-0.50	0.863	-1.28	12.50	0.345	-9.24	36.00	0.061	-24.29	59.50
-0.25	0.890	-1.01	13.00	0.334	-9.53	36.50	0.074	-22.62	60.00
0.00	0.915	-0.77	13.50	0.316	-10.01	37.00	0.084	-21.51	60.50
0.25	0.937	-0.57	14.00	0.290	-10.75	37.50	0.092	-20.72	61.00
0.50	0.956	-0.39	14.50	0.258	-11.77	38.00	0.097	-20.26	61.50
0.75	0.972	-0.25	15.00	0.222	-13.07	38.50	0.100	-20.00	62.00
1.00	0.984	-0.14	15.50	0.183	-14.75	39.00	0.100	-20.00	62.50
1.25	0.993	-0.06	16.00	0.145	-16.77	39.50	0.097	-20.26	63.00
1.50	0.998	-0.02	16.50	0.112	-19.02	40.00	0.092	-20.72	63.50
1.75	1.000	0.00	17.00	0.089	-21.01	40.50	0.085	-21.41	64.00
2.00	0.998	-0.02	17.50	0.083	-21.62	41.00	0.076	-22.38	64.50
2.25	0.992	-0.07	18.00	0.094	-20.54	41.50	0.065	-23.74	65.00
2.50	0.984	-0.14	18.50	0.113	-18.94	42.00	0.053	-25.51	65.50
2.75	0.971	-0.26	19.00	0.134	-17.46	42.50	0.041	-27.74	66.00
3.00	0.955	-0.40	19.50	0.150	-16.48	43.00	0.028	-31.06	66.50
3.25	0.935	-0.58	20.00	0.163	-15.76	43.50	0.016	-35.92	67.00
3.50	0.913	-0.79	20.50	0.170	-15.39	44.00	0.015	-36.48	67.50
3.75	0.887	-1.04	21.00	0.171	-15.34	44.50	0.023	-32.77	68.00
4.00	0.860	-1.31	21.50	0.166	-15.60	45.00	0.034	-29.37	68.50
4.25	0.829	-1.63	22.00	0.157	-16.08	45.50	0.046	-26.74	69.00
4.50	0.795	-1.99	22.50	0.142	-16.95	46.00	0.057	-24.88	69.50
4.75	0.760	-2.39	23.00	0.123	-18.20	46.50	0.067	-23.48	70.00
5.00	0.722	-2.83	23.50	0.102	-19.83	47.00	0.076	-22.38	70.50
5.25	0.684	-3.30	24.00	0.079	-22.05	47.50	0.083	-21.62	71.00
5.50	0.644	-3.82	24.50	0.056	-25.04	48.00	0.088	-21.11	71.50
5.75	0.603	-4.40	25.00	0.038	-28.40	48.50	0.092	-20.72	72.00
6.00	0.561	-5.02	25.50	0.034	-29.37	49.00	0.094	-20.54	72.50
6.25	0.519	-5.70	26.00	0.047	-26.56	49.50	0.095	-20.45	73.00
6.50	0.478	-6.41	26.50	0.065	-23.74	50.00	0.094	-20.54	73.50

Preliminary, subject to final design and review.

TVSTUDY INTERFERENCE ANALYSIS RESULTS
 PROPOSED K38IZ-D
 CHANNEL 14 – PHOENIX, ARIZONA

Study created: 2018.05.09 08:42:25

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

Proposal: K38IZ-D D14 LD LIC PHOENIX, AZ
 File number: BLDTL20140627ACE
 Facility ID: 52892
 Station data: User record
 Record ID: 236
 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
No	K14PE-D	D14	LD	CP	BOWIE, AZ	BNPDTL20100504AMN	263.8 km
Yes	K14KK-D	D14	LD	LIC	FLAGSTAFF, AZ	BLANK0000024870	216.3
Yes	K14NA-D	D14	LD	LIC	GLOBE & MIAMI, AZ	BLDTT20100527ADW	110.8
No	K14HG-D	D14	LD	LIC	KINGMAN, AZ	BLDTT20130625AAR	257.6
No	NEW	D14	LD	APP	LAKE HAVASU, AZ	BNPDTL20100510ADH	245.3
Yes	K14HC-D	D14	LD	LIC	PRESCOTT, AZ	BLDTT20141222ABB	135.7
No	NEW	D14	LD	APP	ROLL, AZ	BNPDTL20100510AAO	150.5
Yes	KUDF-LP	D14	LD	LIC	TUCSON, AZ	BLDTL20131101AIX	162.0
No	NEW	D14	LD	APP	DESERT CENTER, CA	BNPDTL20100514ACI	365.3
No	K14PI-D	D14	LD	CP	DESERT CENTER, CA	BNPDTL20100514ADB	232.5
No	K14JT	N14	TX	LIC	JOSHUA TREE, ETC., CA	BLTVL19980330JH	369.2
No	KNBX-CD	D14	DC	LIC	LAS VEGAS, NV	BLDTA20111006ACF	398.2
No	KNXV-TV	D15	DT	APP	PHOENIX, AZ	BLANK0000035696	0.0
No	KNXV-TV	D15	DT	LIC	PHOENIX, AZ	BLCDT20090619ABX	0.0
No	K21GE	N21-	TX	LIC	CAMP VERDE, AZ	BLTT20040830AAI	127.6
No	K22JD-D	N22-	TX	LIC	MADERA PEAK, AZ	BLTT20091029ABD	110.8

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: 33 20 0.10 N (NAD83)
Longitude: 112 3 47.50 W
Height AMSL: 837.0 m
HAAT: 0.0 m
Peak ERP: 15.0 kW
Antenna: Omnidirectional
Elev Pattn: Generic

48.7 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	497.5 m	67.6 km
45.0	15.0	459.6	66.4
90.0	15.0	453.9	66.2
135.0	15.0	479.9	67.0
180.0	15.0	492.8	67.4
225.0	15.0	497.7	67.6
270.0	15.0	441.9	65.7
315.0	15.0	510.7	68.0

Database HAAT does not agree with computed HAAT
Database HAAT: 0 m Computed HAAT: 479 m

Distance to Canadian border: 1741.2 km

**Proposal is within coordination distance of Mexican border
Distance to Mexican border: 176.0 km

Conditions at FCC monitoring station: Douglas AZ
Bearing: 131.4 degrees Distance: 304.3 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:
Bearing: 36.8 degrees Distance: 967.2 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%

---- Below is IX received by proposal BLDTL20140627ACE ----

**MX with BLANK0000035696 APP scenario 1, 3.66% interference received

Proposal receives 3.55% interference from scenario 2

POWER DENSITY CALCULATION

PROPOSED K38IZ-D
CHANNEL 14 – PHOENIX, ARIZONA

Since the FCC considers the possible biological effects of RF transmissions in its environmental determinations, we have studied the matter with respect to this Phoenix 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 26.2 meters above ground, and the specific elevation pattern for the ERI 8-bay antenna, maximum power density two meters above ground of 0.012 mW/cm^2 is calculated to occur 12 meters from the base of the tower. Since this is only 3.8 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.