

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of GILA RIVER TELECOMMUNICATIONS, INC., permittee of digital Low Power Television Station K19JT-D, Channel 19 in Gila River Indian Community, Arizona, in support of its application for modification of Construction Permit BNPDTL-20100713APS to specify a new site. The distance separating the authorized and proposed sites is 10.9 kilometers.

It is proposed to mount a directional slotted cylinder antenna at the 30-meter level of an existing 42.1-meter communications tower. The proposed effective radiated power for the facility is 15.0 kW in the horizontal plane. Exhibit B-1 is a map upon which the predicted 51 dBu service contour of the proposed facility is plotted. In Exhibit B-2, we have plotted the contour authorized to K19JT-D in BNPDTL-20100713APS as well as that of the proposed facility. As shown, there is significant overlap between these two contours. Azimuth and elevation pattern data for the proposed ERI ALP12L2-HSWR antenna is attached as Exhibit C.

Exhibit D is a summary report from a TVStudy interference analysis for the proposed facility. Our study employed a cell size of 1.0 kilometer and increment spacing of 0.1 kilometer. Further the applicant proposes use of a full-service emission mask filter. The results indicate that the proposed K19JT-D facility meets the Commission's interference requirements to all full-power and low-power co-channel and adjacent-channel television facilities, except for two. The station identified as BNPDTL-20100713APS is the authorization for K19JT-D, the station being amended herein. So interference to that facility can be ignored. In addition, KGRF-LD, Channel 19 in Gila River Indian Community, Arizona (LMS-0000001685) is owned by the same entity

EXHIBIT A

that owns K19JT-D, so interference between these two facilities is accepted and can be ignored.

A detailed power density calculation is provided in Exhibit E.

Since no change in the overall height or location of the existing tower is proposed herein, the Federal Aviation Administration has not been notified of this application. In addition, due to the diminutive height of the tower and its proximity with respect to the nearest airport runways, FCC antenna structure registration is not required. This conclusion is supported by the Commission's TOWAIR program.

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

April 17, 2019



SMITHANDFISHER

**FCC 51 DBU
SERVICE CONTOUR**

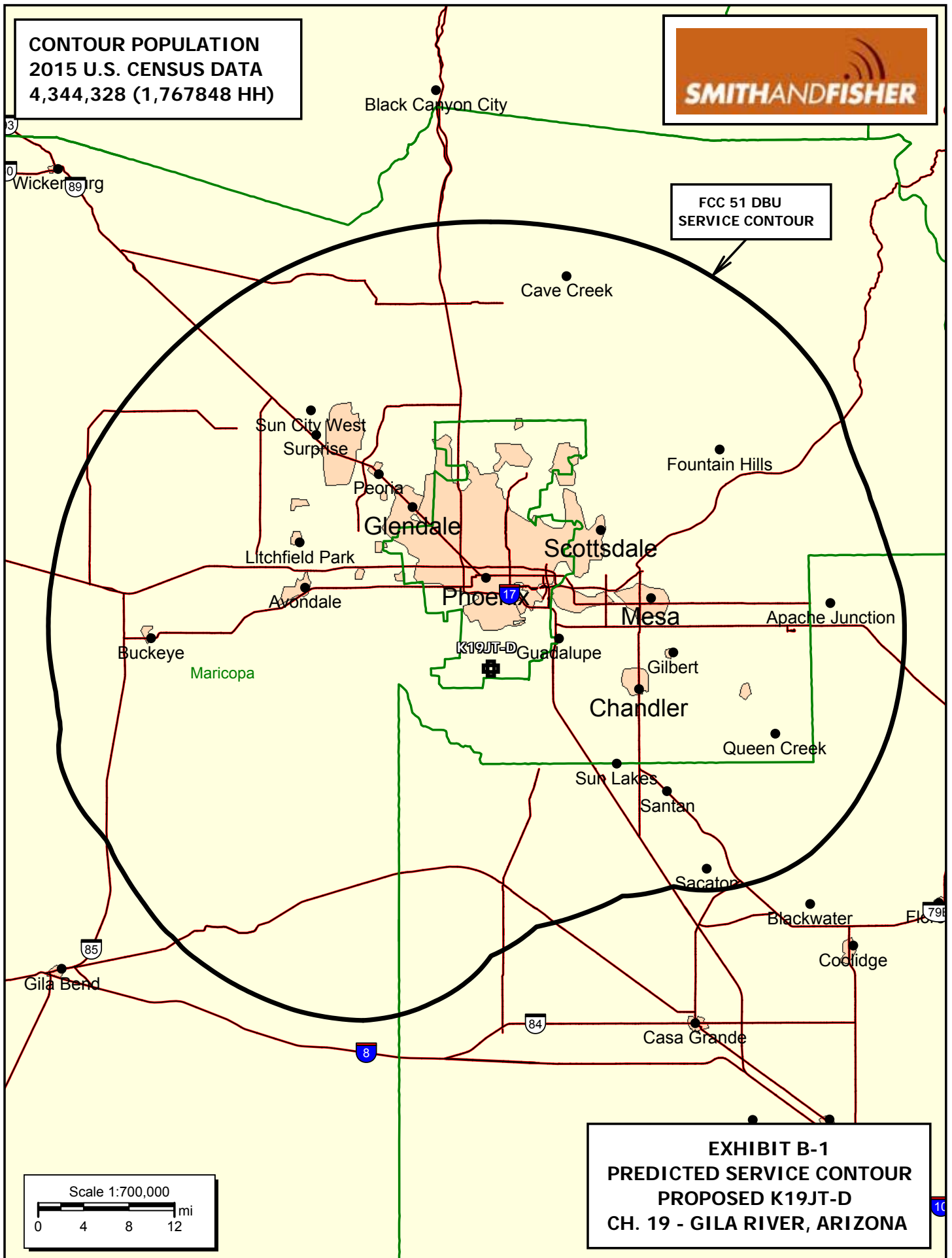
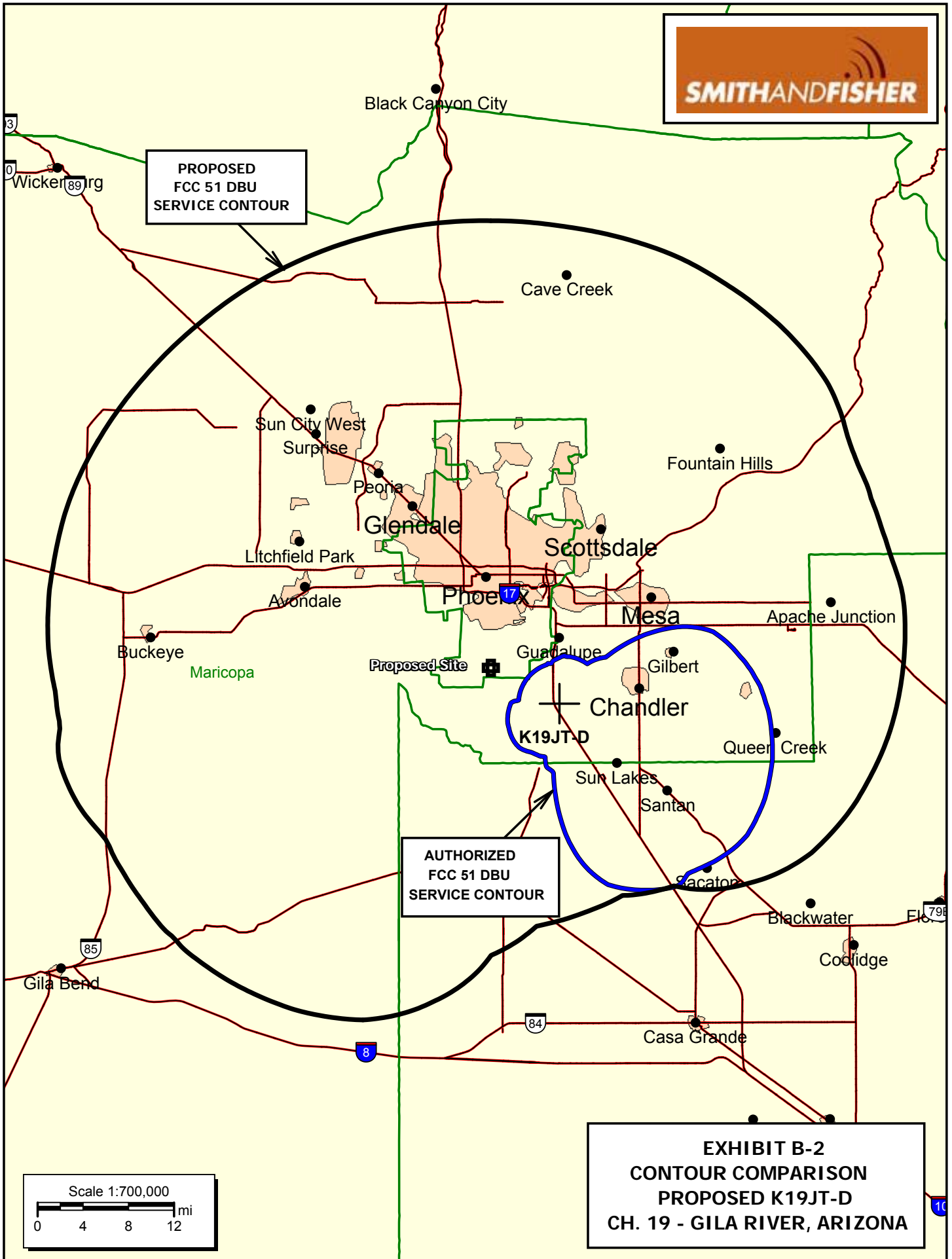


EXHIBIT B-1
PREDICTED SERVICE CONTOUR
PROPOSED K19JT-D
CH. 19 - GILA RIVER, ARIZONA



**EXHIBIT B-2
CONTOUR COMPARISON
PROPOSED K19JT-D
CH. 19 - GILA RIVER, ARIZONA**

AZIMUTH PATTERN

Type: ALP-WR

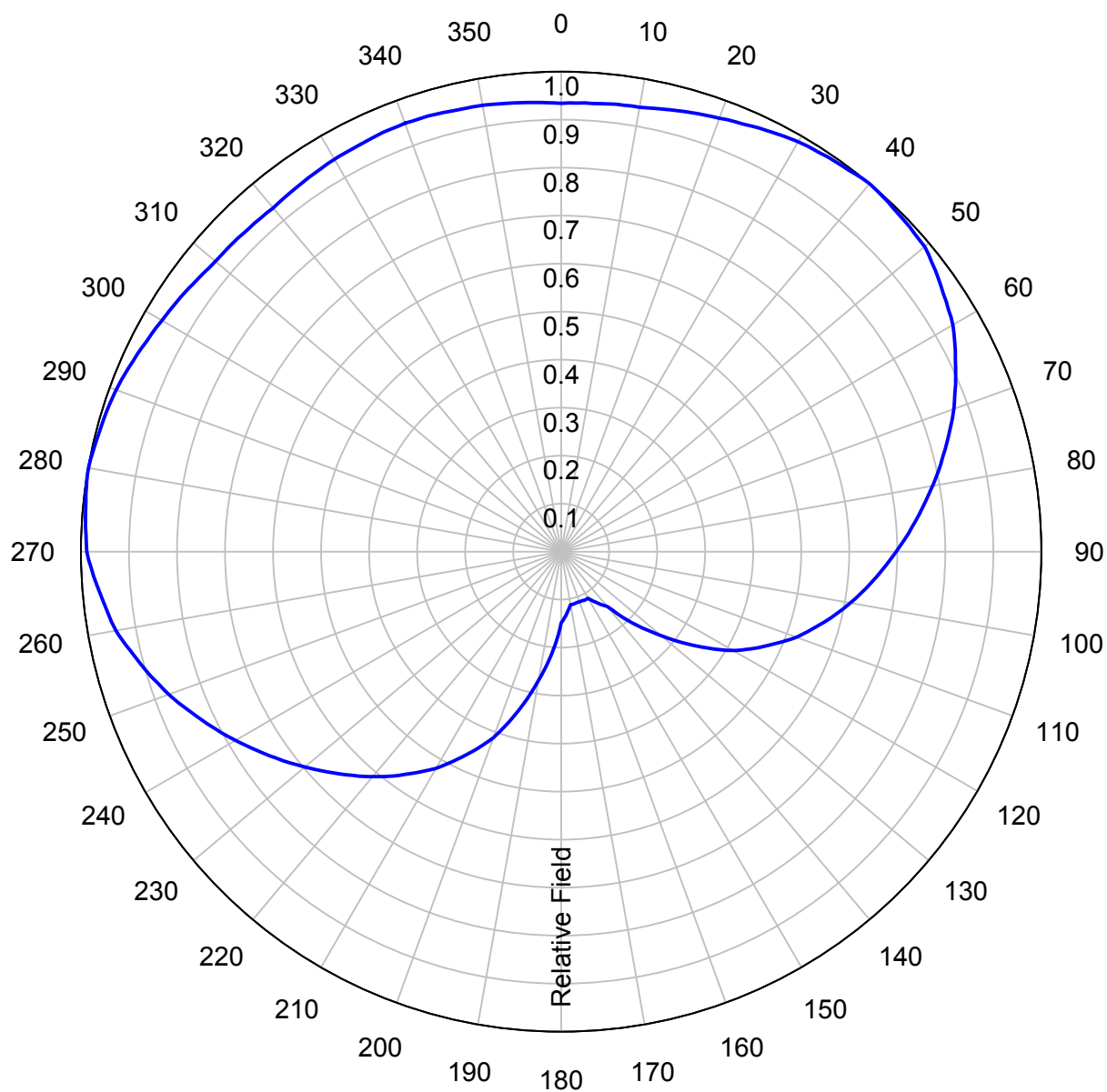
	Numeric	dBd
Directivity:	<u>1.69</u>	<u>2.28</u>
Peak(s) at:		

Channel: 19

Location: _____

Polarization: Horizontal

Note: Pattern shape and directivity may vary with channel and mouting configuration.



Preliminary, subject to final design and review.

TABULATED DATA FOR AZIMUTH PATTERN FCC FILING FORMAT

Type: ALP-WR

PolarizationHorizontal

ANGLE	FIELD	ERP (kW)	ERP (dBk)
0	0.934	12.745	11.053
10	0.940	12.909	11.109
20	0.961	13.492	11.301
30	0.986	14.203	11.524
40	1.000	14.609	11.646
50	0.988	14.261	11.541
60	0.942	12.964	11.127
70	0.870	11.058	10.437
80	0.785	9.003	9.544
90	0.697	7.097	8.511
100	0.612	5.472	7.381
110	0.521	3.966	5.983
120	0.412	2.480	3.944
130	0.272	1.081	0.338
140	0.148	0.320	-4.948
150	0.112	0.183	-7.369
160	0.111	0.180	-7.447
170	0.112	0.183	-7.369
180	0.148	0.320	-4.948
190	0.272	1.081	0.338
200	0.412	2.480	3.944
210	0.521	3.966	5.983
220	0.612	5.472	7.381
230	0.697	7.097	8.511
240	0.785	9.003	9.544
250	0.870	11.058	10.437
260	0.942	12.964	11.127
270	0.988	14.261	11.541
280	1.000	14.609	11.646
290	0.986	14.203	11.524
300	0.961	13.492	11.301
310	0.940	12.909	11.109
320	0.934	12.745	11.053
330	0.944	13.019	11.146
340	0.950	13.185	11.201
350	0.944	13.019	11.146

Preliminary, subject to final design and review.

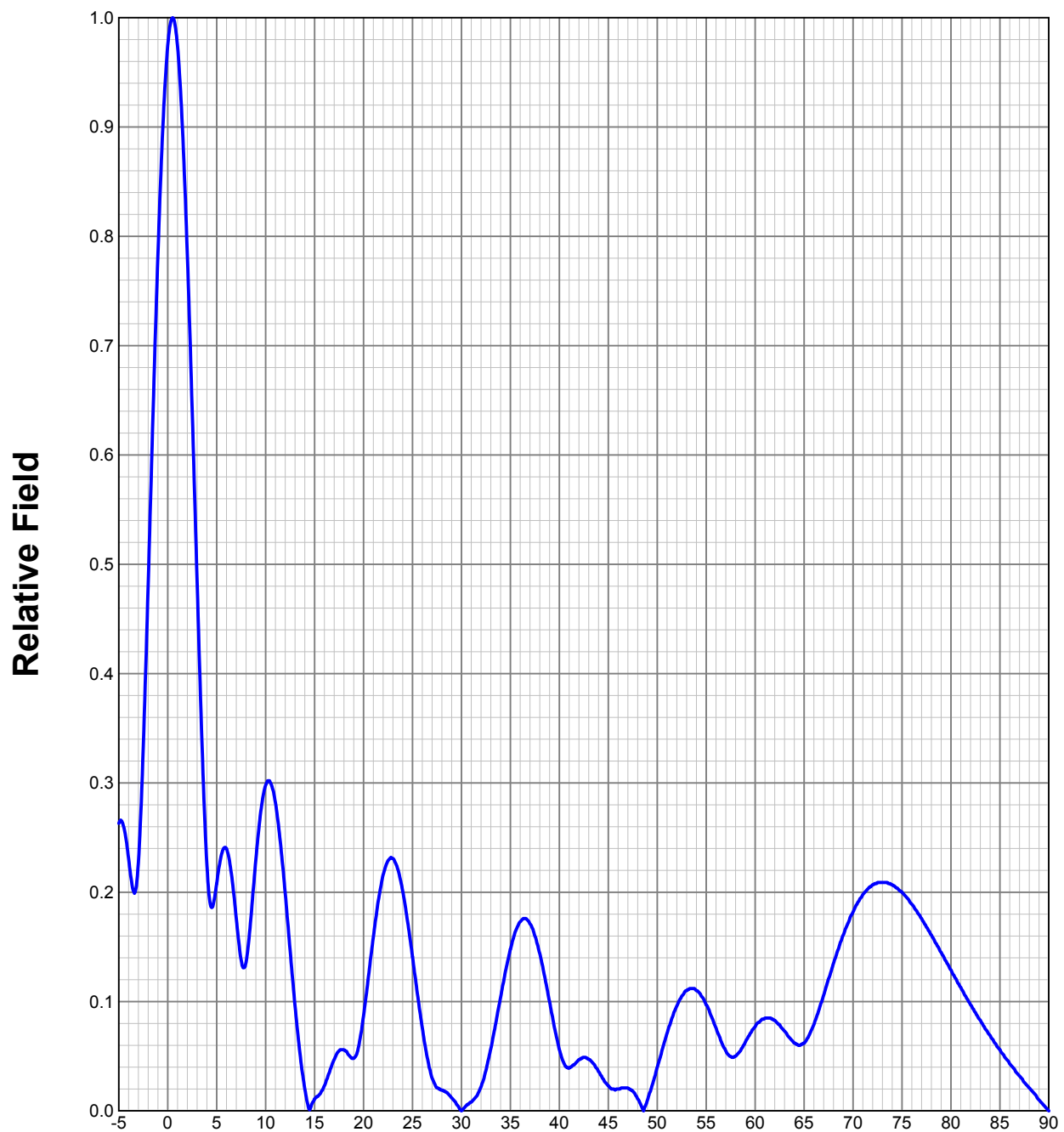
ELEVATION PATTERN**Type:****ALP12L2****Channel:****19****Directivity:****Numeric****dBd****Location:****Main Lobe:****12.64****11.02****Beam Tilt:****0.50****Horizontal:****12.02****10.80****Polarization:****Horizontal***Preliminary, subject to final design and review.*

EXHIBIT D

TVSTUDY INTERFERENCE ANALYSIS RESULTS
 PROPOSED K19JT-D
 CHANNEL 19 – GILA RIVER INDIAN COMMUNITY, ARIZONA

Study created: 2019.04.15 11:44:33

Study build station data: LMS TV 2019-04-01

Proposal: K19JT-D D19
 File number: BLANK0000055317
 Facility ID: 37578
 Station data: User record
 Record ID: 539
 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	K18DD-D	D18	LD	LIC	CAMP VERDE, AZ	BLDTL20150202AAM	150.6 km
Yes	K18JL-D	D18	LD	LIC	PHOENIX, AZ	BLDTL20141203AAT	0.1
Yes	K18JL-D	D18	LD	CP	PHOENIX, AZ	BLANK0000063101	0.0
No	K18LD-D	D18	LD	CP	ROLL, AZ	BNPDTL20100510AAP	150.2
No	NEW	D18	LD	APP	SALOME, AZ	BNPDTL20100514AEP	133.4
No	KFTU-CD	D18	DC	LIC	TUCSON, AZ	BLDTA20120110ADO	162.1
Yes	K19FD	D19	LD	CP	CAMP VERDE, AZ	BDFCDTL20120604AAB	127.1
No	K19FD	N19+	TX	LIC	CAMP VERDE, AZ	BLTTL20050506ACT	127.1
No	K19IP-D	D19	LD	LIC	FLAGSTAFF, AZ	BLDTL20140528AHZ	216.3
Yes	KGRF-LD	D19	LD	LIC	GILA RIVER INDIAN CO, AZ	BLANK0000001685	15.6
Yes	K19JT-D	D19	LD	CP	GILA RIVER INDIAN CO, AZ	BNPDTL20100713APS	10.9
Yes	KMOH-TV	D19	DT	LIC	KINGMAN, AZ	BLCDT20060707ABK	283.6
Yes	K19KV-D	D19	LD	LIC	PRESCOTT, AZ	BLANK0000063234	135.7
Yes	KTTU	D19	DT	LIC	TUCSON, AZ	BLCDT20030926ANZ	162.2
No	K19CX	N19	TX	LIC	YUMA, AZ	BLTT19941212JC	224.0
No	NEW	D19	LD	APP	DESERT CENTER, CA	BNPDTL20100514ADD	232.2
No	NEW	D19	LD	APP	HOLTVILLE, CA	BNPDTL20100510AAD	305.8
No	KPBS	D19	DT	CP	SAN DIEGO, CA	BLANK0000027963	459.2
No	KSWB-TV	D19	DT	LIC	SAN DIEGO, CA	BLCDT20040722AAO	459.3
No	KPBS	D19	DT	BL	SAN DIEGO, CA	DTVBL6124	459.2
No	KHDF-CD	D19	DC	LIC	LAS VEGAS, NV	BLDTA20140912AAV	400.9
No	KPAZ-TV	D20	DT	LIC	PHOENIX, AZ	BLCDT20131121AHS	0.4

No K20IA N20- TX LIC PRESCOTT, AZ BLTTL20110711AAR 159.3
No K22JD-D N22- TX LIC MADERA PEAK, AZ BLTT20091029ABD 111.1

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D19
Mask: Full Service
Latitude: 33 19 57.10 N (NAD83)
Longitude: 112 3 59.50 W
Height AMSL: 837.7 m
HAAT: 0.0 m
Peak ERP: 15.0 kW
Antenna: HSWR 0.0 deg
Elev Pattn: Generic

49.3 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	13.1 kW	498.1 m	66.0 km
45.0	14.8	461.6	65.6
90.0	7.29	451.9	60.9
135.0	0.662	478.3	47.1
180.0	0.329	493.1	43.4
225.0	6.43	499.5	61.6
270.0	14.6	445.2	64.9
315.0	13.2	511.9	66.4

Database HAAT does not agree with computed HAAT

Database HAAT: 0 m Computed HAAT: 480 m

Distance to Canadian border: 1741.3 km

**Proposal is within coordination distance of Mexican border

Distance to Mexican border: 175.8 km

Conditions at FCC monitoring station: Douglas AZ

Bearing: 131.3 degrees Distance: 304.5 km

Proposal is not within the West Virginia quiet zone area

Conditions at Table Mountain receiving zone:

Bearing: 36.8 degrees Distance: 967.4 km

No land mobile station failures found

Study cell size: 1.00 km

Profile point spacing: 0.10 km

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

Maximum new IX to LPTV: 2.00%

**IX check failure to BLANK0000001685 LIC scenario 1, 89.04% interference caused

**IX check failure to BLANK0000001685 LIC scenario 2, 89.04% interference caused

**IX check failure to BNPDTL20100713APS CP scenario 1, 96.77% interference caused

---- Below is IX received by proposal BLANK0000055317 ----

Proposal receives 47.09% interference from scenario 1

Proposal receives 47.07% interference from scenario 2

POWER DENSITY CALCULATION

PROPOSED K19JT-D
CHANNEL 19 – GILA RIVER INDIAN COMMUNITY, 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 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 30 meters above ground, and the specific elevation pattern for the proposed ERI ALP12L2-HSWR antenna, maximum power density two meters above ground of 0.026 mW/cm² is calculated to occur 9 meters north-northwest of the base of the tower. Since this is only 7.8 percent of the 0.33 mW/cm² reference for uncontrolled environments (areas with access to the public) surrounding a facility operating on Channel 19 (500-506 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.