

**ENGINEERING STATEMENT**

The engineering data contained herein have been prepared on behalf of KTBS, LLC, licensee of full-power digital television station KPXJ-DT, Channel 21 in Minden, Louisiana, in support of its application for modification of Construction Permit 0000028329, which authorizes operation of KPXJ-DT on its post-repack channel, Channel 32. The purpose of this amendment is to address the fact that the upgrade proposed in FCC application LMS-0000035670 exceeds the FCC's power/height limits for UHF television stations located in Zone 2 of the United States.

Although the above-referenced proposal exceeds the power/height limits set forth in Section 73.622(f)(8)(i) of the Commission's Rules, we note herein that the coverage of the proposed KPXJ-DT facility does not exceed that of KTBS-DT, Channel 28 in Shreveport, Louisiana, as authorized in LMS-0000053971, which is the largest stations in the Shreveport/Minden DMA. Attached is a map on which the noise-limited service contours of proposed KPXJ-DT and licensed KTBS-DT are plotted. As shown, the proposed coverage area of KPXJ-DT (43,899 square kilometers) is less than that of KTBS-DT (45,421 square kilometers), meaning that the KPXJ-DT proposal in LMS-0000035670 meets the requirements of Section 73.622(f)(5) of the FCC's Rules.

I declare under penalty of perjury that the foregoing statements and the attached exhibit are true and correct to the best of my knowledge and belief.

A handwritten signature in blue ink, appearing to read 'K. T. Fisher', is written over a horizontal line.

KEVIN T. FISHER

September 7, 2018

**AREA WITHIN SERVICE CONTOUR  
PROPOSED KPXJ-DT : 43,899 SQ. KM  
LICENSED KTBS-DT : 45,421 SQ. KM**

**Smith and Fisher, LLC**

**KTBS-DT FCC N/L  
SERVICE CONTOUR**

**PROPOSED KPXJ-DT FCC N/L  
SERVICE CONTOUR**

**KPXJ-DT  
KTBS-DT**

**Shreveport**

Scale 1:1,400,000

0 10 20 30 mi

**CONTOUR COMPARISON  
LICENSED KTBS-DT (CH. 28 - SHREVEPORT, LA)  
PROPOSED KPXJ-DT (CH. 32 - MINDEN, LA)**