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 14 in Tulsa, Oklahoma, in support of its request for Special Temporary Authority to specify operation on Channel 15. This station is causing impermissible interference to a Land Mobile facility in Tulsa and has been ordered off the air by the Commission. No change in site location, antenna azimuth pattern or antenna height from that authorized to KXAP-LD in LMS- 0000064040 is proposed herein.

It is proposed to utilize an omnidirectional slotted cylinder antenna that is mounted 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 the horizontal plane. Exhibit B is a map upon which the predicted 51 dBu service contour is plotted.

Exhibit C 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 D.

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

April 11, 2019

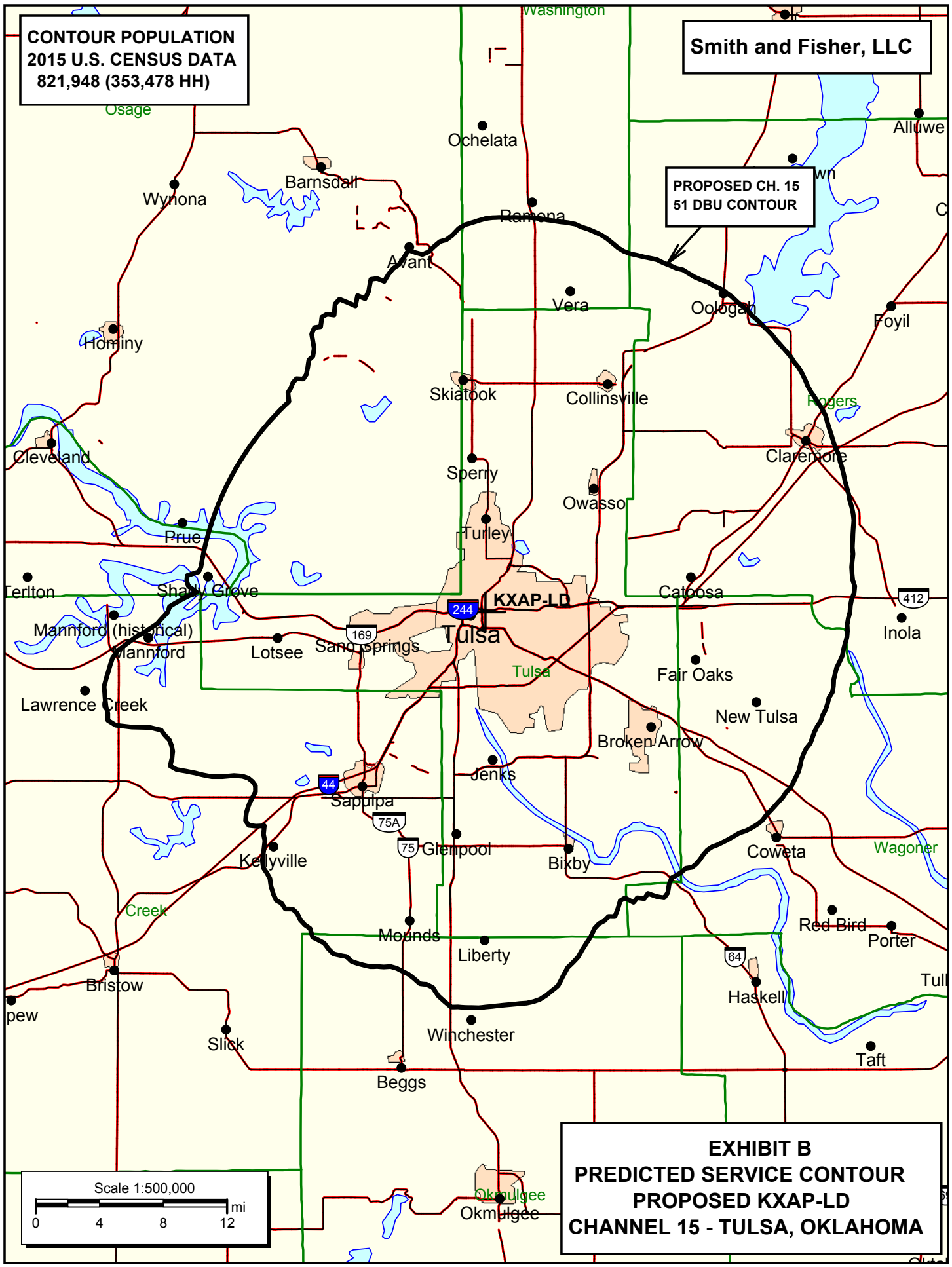
CONTOUR POPULATION
2015 U.S. CENSUS DATA
821,948 (353,478 HH)
Smith and Fisher, LLC
PROPOSED CH. 15
51 DBU CONTOUR
KXAP-LD
Tulsa
Osage
Washington
Ochelata
Barnsdall
Wynona
Ramona
Avant
Vera
Oologah
Foyil
Alluwe
Hominy
Skiatook
Collinsville
Rogers
Claremore
Cleveland
Sperry
Owasso
Prue
Turley
Terlton
Shady Grove
Catoosa
Inola
Mannford (historical)
Mannford
Lotsee
Sand Springs
Fair Oaks
Lawrence Creek
New Tulsa
Broken Arrow
Jenks
Sapulpa
Kellyville
Glenpool
Bixby
Coweta
Wagoner
Creek
Red Bird
Porter
Mounds
Liberty
Bristow
Haskell
Slick
Winchester
Taft
Beggs
Okmulgee
244
169
44
75A
75
64
412
Scale 1:500,000
mi
0
4
8
12
EXHIBIT B
PREDICTED SERVICE CONTOUR
PROPOSED KXAP-LD
CHANNEL 15 - TULSA, OKLAHOMA

EXHIBIT C

TVSTUDY INTERFERENCE ANALYSIS RESULTS
PROPOSED KXAP-LD
CHANNEL 15 – TULSA, OKLAHOMA

Study created: 2019.04.11 17:22:47

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

Proposal: KXAP-LD D15 LD LIC TULSA, OK
File number: BLANK0000064040
Facility ID: 43440
Station data: User record
Record ID: 533
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	K14NX-D	D14	LD	CP	PITTSBURG, KS	BNPDTL20100106AGD	174.4 km
No	KOCY-LP	D14z	LD	CP	OKLAHOMA CITY, OK	BLANK0000053741	152.4
Yes	KHOG-TV	D15	DT	LIC	FAYETTEVILLE, AR	BLCDT20020904AAX	170.8
No	K27JP-D	D15	LD	CP	LITTLE ROCK, AR	BLANK0000051762	366.5
No	K15IJ-D	D15	LD	CP	PITTSBURG, KS	BNPDTL20100106AGE	174.4
No	K15CN	N15z	TX	LIC	SALINA, KS	BLTTL19880714IH	330.5
No	K15CN	D15	LD	CP	SALINA, KS	BMPDTL20121022AAF	327.7
Yes	KSNW	D15	DT	CP	WICHITA, KS	BLANK0000034801	225.7
No	K15DD-D	D15	LD	LIC	WICHITA, KS	BLDTL20110331AHX	208.7
No	K45IO-D	D15	LD	CP	KANSAS CITY, MO	BLANK0000054324	343.5
No	KNPN-LD	D15	LD	LIC	SAINT JOSEPH, MO	BLANK0000064322	411.6
No	KMOS-TV	D15	DT	LIC	SEDALIA, MO	BLEDT20030108ABK	388.1
No	KSPR-LD	D15	LD	LIC	SPRINGFIELD, MO	BLDTL20150120AHZ	264.1
No	K15HL-D	D15	LD	LIC	CHEROKEE & ALVA, OK	BLDTT20101007ABG	241.2
No	K15AA-D	D15	LD	LIC	HUGO, OK	BLDTT20100226AFI	244.0
Yes	K16KR-D	D15	LD	CP	MCALESTER, OK	BLANK0000054069	132.4
Yes	K16KR-D	D15	LD	LIC	MCALESTER, OK	BLANK0000068703	132.4
Yes	KTBO-TV	D15	DT	LIC	OKLAHOMA CITY, OK	BLCDT20111028AAX	150.5
No	K15HQ-D	D15	LD	LIC	SAYRE, OK	BLDTT20100802BAC	355.6
No	KTAL-TV	D15	DT	LIC	TEXARKANA, TX	BLCDT20070404ABW	404.2
No	KJTL	D15	DT	LIC	WICHITA FALLS, TX	BLCDT20090303ACS	331.4
No	KAJL-LD	D16	LD	LIC	FAYETTEVILLE, AR	BLANK0000004346	160.6

No	KAJL-LD	D16	LD CP	FAYETTEVILLE, AR	BLANK0000058725	160.6
No	K16IS-D	D16	LD CP	PITTSBURG, KS	BNPDTL20100106AGF	174.4
No	K16KR-D	D16	LD LIC	MCALESTER, OK	BLDTT20121009ACT	132.4
No	KOCM	D16	DT CP	NORMAN, OK	BLANK0000034483	151.3
No	KWHB	D16	DT LIC	TULSA, OK	BLANK0000067852	12.9

No non-directional AM stations found within 0.8 km

No directional AM stations found within 3.2 km

Record parameters as studied:

Channel: D15
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

48.8 dBu contour:

Azimuth	ERP	HAAT	Distance
0.0 deg	15.0 kW	75.7 m	41.9 km
45.0	15.0	79.2	42.4
90.0	15.0	57.8	39.0
135.0	15.0	43.6	35.5
180.0	15.0	76.6	42.0
225.0	15.0	38.5	34.0
270.0	15.0	39.8	34.4
315.0	15.0	22.7	31.5

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

Proposal is not within the Offshore Radio Service protected area

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 BLANK0000064040 ----

Proposal receives 8.23% interference from scenario 1
No IX check failures found.

EXHIBIT D

POWER DENSITY CALCULATION

PROPOSED KXAP-LD
CHANNEL 15 – 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 assuming a vertical relative field value of 20 percent at the steeper elevation angles for the proposed antenna, maximum power density two meters above ground of 0.0071 mW/cm^2 is calculated to occur near the base of the tower. Since this value is only 2.2 percent of the 0.32 mW/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 15 (476-482 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.