

EXHIBIT A

ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of LAS AMERICAS SUPERMERCADO, INC., licensee of digital low power television station KXAP-LD, Channel 51 in Tulsa, Oklahoma, in support of this Application for Construction Permit to specify digital operation on Channel 38 from a new site. This proposal is being submitted in response to the Commission's voluntary reclamation of Channel 51 spectrum as a guard band for wireless services, thereby placing this low power television station in a displacement situation.

It is proposed to mount a standard ERI omnidirectional antenna at the 48-meter level of a proposed 51-meter tower to be mounted atop the two-story studio building of KXAP-LD. Exhibit B is a map upon which the predicted service contours are plotted. It is important to note that the newly proposed 51 dBu contour encompasses a significant portion that which obtains from the licensed KXAP-LD facility. Operating parameters for the proposed facility are tabulated in Exhibit C. An interference study is provided in Exhibit D, and a power density calculation follows as Exhibit E.

Due to the diminutive height of the tower and its proximity to the nearest airport runway, FCC antenna structure registration is not required. This has been confirmed using 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.

September 1, 2011


KYLE T. FISHER

CONTOUR POPULATIONS

51 DBU : 698,375

41 DBU : 748,269

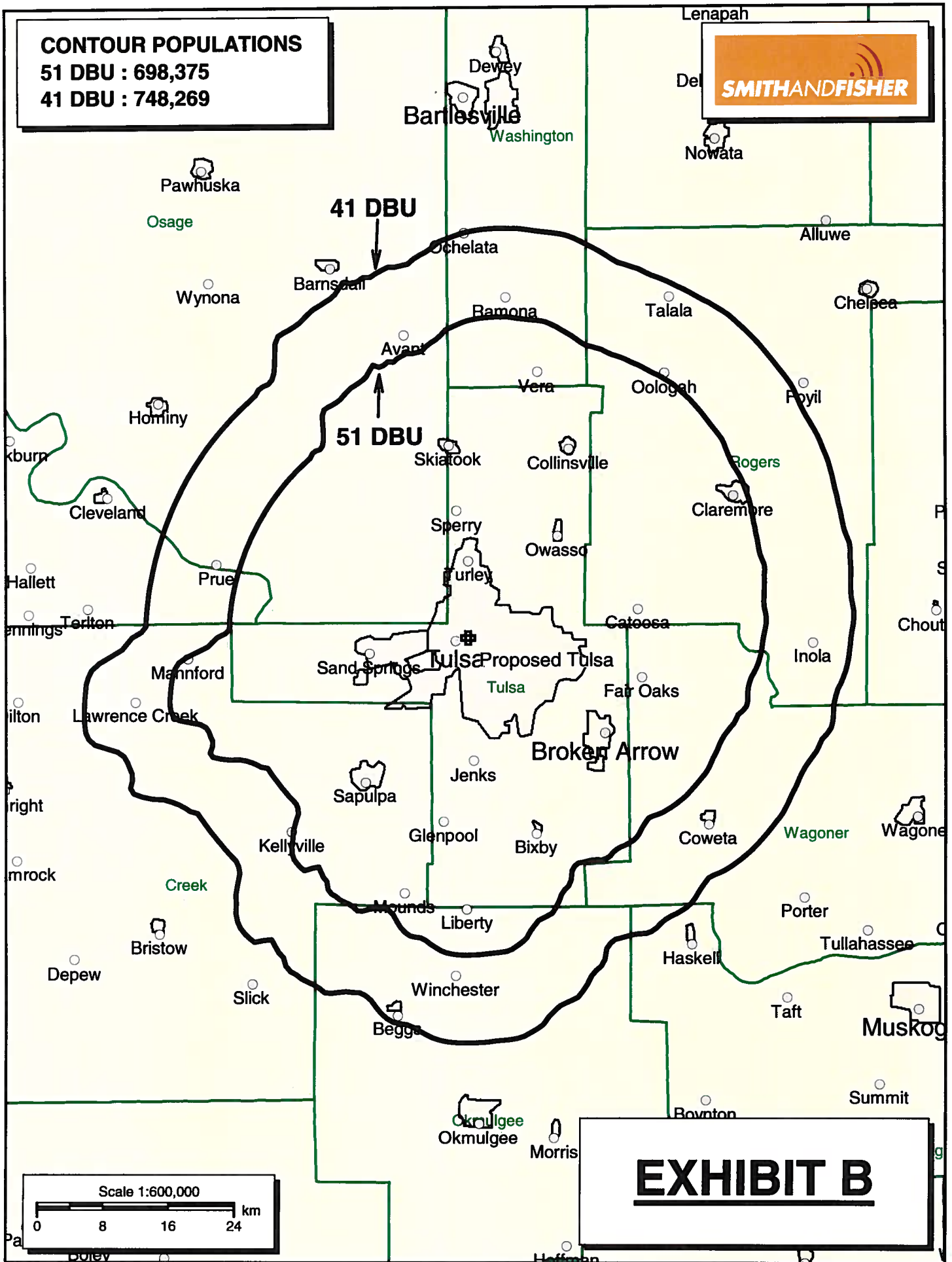


EXHIBIT B

EXHIBIT C

PROPOSED OPERATING PARAMETERS

**PROPOSED KXAP-LD
CHANNEL 38 – TULSA, OKLAHOMA**

Transmitter Power Output:	1.4 kw
Transmission Line Efficiency:	76.3%
Antenna Power Gain – Toward Horizon:	14.06
Antenna Power Gain – Main Lobe:	14.06
Effective Radiated Power – Toward Horizon:	15.0 kw
Effective Radiated Power – Main Lobe:	15.0 kw
Transmitter Make and Model:	Type-accepted
Transmission Line Make and Model:	Andrew LDF7-50A
Size and Type:	1-5/8" foam heliax
Length:	190 feet*
Antenna Make and Model:	ERI AL8
Orientation	Omnidirectional
Beam Tilt	1.75 degrees
Radiation Center Above Ground:	57 meters
Radiation Center Above Mean Sea Level:	262 meters

*estimated

EXHIBIT D-1

**LONGLEY-RICE INTERFERENCE STUDIES
PROPOSED KXAP-LD
CHANNEL 38 – TULSA, OKLAHOMA**

We conducted detailed interference studies using the Longley-Rice methodology contained in the Commission's *OET Bulletin No. 69*, with respect to all facilities of concern. The software utilizes a 1-square kilometer cell size, calculates signal strength at 1.0 kilometer increments along each radial studied, and employs the 2000 U.S. Census to count population within cells. In addition, the program does not attribute interference to the proposed facility in cells within the protected contour of the station under study where interference from another source (other than proposed KXAP-LD) already is predicted to exist (also known as "masking"). The results of these studies are provided in Exhibit D-2. They conclude that the facility proposed herein causes no significant new interference to any of the potentially affected stations.

As a result, it is believed that the proposed KXAP-LD facility complies with the requirements of Sections 74.709, 74.793(e), 74.793(f), 74.793(g), 74.793(h), 74.794(b) and 73.1030 of the Commission's Rules.

INTERFERENCE SUMMARY**PROPOSED KXAP-LP
CHANNEL 38 – TULSA, OKLAHOMA**

<u>Call Sign</u>	<u>Status</u>	<u>City, State</u>	<u>Ch.</u>	<u>Longley-Rice Service Population</u>	<u>Unmasked Interference From Proposed Facility</u>	<u>%</u>	.
K38KG-D BDCCDTT-20061030AHD	CP	Fort Smith, AR	38	234,432	38	<0.1	
K39CW BLTTL-19920507IB	Lic.	Tulsa, OK	39	515,570	937	0.2	

EXHIBIT E

POWER DENSITY CALCULATION

PROPOSED KXAP-LD
CHANNEL 38 – TULSA, 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 kw, an antenna radiation center 51 meters above the roof of the building, and the vertical relative field pattern of the proposed ERI antenna, maximum power density two meters above ground of 0.0019 mw/cm^2 is calculated to occur 44 meters from the base of the tower. Since this is only 0.5 percent of the 0.41 mw/cm^2 reference for uncontrolled environments (areas with public access) surrounding a facility operating on Channel 38 (614-620 MHz), this proposal may be excluded from consideration with respect to public exposure to nonionizing 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 nonionizing radiation.