

November 23, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: **SAT-ASG-20161025-00101**

Application for Assignment of Authorizations for AfriStar-1 and AfriStar-2 (call signs S2367 and S2666) from Yazmi USA, LLC (“**Yazmi**”) to Silkwave Africa, LLC (“**Silkwave**”).

Dear Ms. Dortch:

At the request of FCC staff, we are submitting this letter in the docket for the above-named application (the “**Application**”) to supplement statements made in the Public Interest Statement of that Application.

The Public Interest Statement explained that the AfriStar-1 satellite will be initially controlled by Intelsat pursuant to an agreement between Intelsat, Silkwave, and an affiliate of Silkwave. The affiliate of Silkwave referred to is New York Broadband LLC, a U.S. limited liability company (“**NYBB**”). NYBB is affiliated with Silkwave because Chi Capital, which owns 100% of Silkwave, also has a minority ownership interest in NYBB. NYBB owns an Australian-licensed satellite, AsiaStar, which is operated by Intelsat pursuant to an agreement between NYBB and Intelsat (the “**NYBB Agreement**”). The AsiaStar satellite was also acquired from Yazmi pursuant to a series of earlier transactions not requiring FCC approval.

The AfriStar-1 satellite is currently being operated by Intelsat pursuant to a separate agreement between Yazmi and Intelsat (the “**Yazmi Agreement**”). The parties intend that, following the transfer of the AfriStar-1 license to Silkwave, Intelsat will continue to operate the AfriStar-1 satellite on Silkwave’s behalf, either through an amended Yazmi Agreement, or more likely through an amended NYBB Agreement that includes the AfriStar-1 satellite and adds Silkwave as a party.

The Public Interest Statement indicated that this agreement will “initially” govern the operation of the AfriStar-1 satellite only to leave open the possibility that a separate agreement will be entered into between Silkwave and Intelsat or another U.S.-based satellite operator. The applicants seek flexibility for changes in the form of the agreement with Intelsat or the identity of the U.S. entity operating the AfriStar-1 satellite.

If Silkwave were in the future to opt to engage a non-U.S. entity to operate the AfriStar-1 satellite, Silkwave would seek FCC approval before doing so.

Please let us know if you need any additional information.

Respectfully submitted,

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cc: Karl Kensinger, Deputy Division Chief, Satellite Division, International Bureau