



New York Broadband LLC

August 16, 2020

Mr. Jose Albuquerque
International Satellite Division Chief
Federal Communications Commission 445
12th street, S.W.
Washington, DC 20554
Jose.Albuquerque@fcc.gov

CC: Jay.Whaley@fcc.gov,
Karl.Kensinger@fcc.gov

Subject: Request to Drift Asiastar to 21E to Bring-Back-Into-Use (BBIU) AFRIBSS

Dear Mr. Albuquerque:

Silkwave Africa LLC ("Silkwave") seeks authority in this application to drift the Asiastar satellite from 105E to 21E orbit slot for the purpose of Bring-Back-Into-Use the spectrum frequency of the AFRIBSS IFIC 2438 space station registered in the Master Index of Frequency Registration with the International Telecommunications Union.

Silkwave Holdings Limited, the parent company, owns the Asiastar spacecraft and the spectrum license at 105E with the space station call sign ASIABSS IFIC 2470. The ASIABSS is managed by the Australian Communications Media Authority (ACMA) on the behalf of the Australian administration.

As the corporate organizational chart indicates, Silkwave through New York Satellite Holdings owns the Asiastar satellite and the ASIABSS license through Asiaspace Pty Ltd. The license deed agreement between Asiaspace and ACMA was granted in 1999 and remains active to date. Silkwave has notified Mr. Mark Arkell (Mark.Arkell@acma.gov.au), Manager, Space Systems, Spectrum Planning & Engineering Branch, Communications Infrastructure Division ACMA, on the planning to relocate the Asiastar spacecraft from its current position at 105E to 21E for the purpose of BBIU Silkwave AFRIBSS filing.

ACMA requested a direct correspondence between FCC International Bureau and ACMA to further coordinate the drift process through the contact below and Mr. Mark Arkell.

Australian Communications and Media Authority
Red Building, Benjamin Offices
Chan Street
BELCONNEN, ACT, 2617
Australia
Fax: +61 2 621 95447
Email: satellite.coordination@acma.gov.au

The Asiastar and Afristar-1 spacecraft were manufactured as identical satellite designed for Worldspace with the same communications and telemetry and command frequencies. Once at 21E, the Asiastar will provide service coverage to Africa, Middle East, and Southern Europe.

While Asiastar is a vintage spacecraft, it continues to operate in good health providing BSS services in Asia. The satellite is currently capable to support all transponders as designed, adequate systems redundancy, and reaming fuel to provide Operating Maneuver Life (OML) until March 2026. A copy of the Asiastar July 2020 Health Report, as provided monthly from Intelsat, the satellite contracting operator, is attached for the FCC review.

Based on the latest drift maneuver analysis, a summary of the drift rate versus fuel consumption is shown below for reference. With the FCC support to petition the ITU for a short extension to the October 31, 2020 BBIU deadline, Silkwave is hoping to relocate the Asiastar spacecraft at a low drift rate to minimize the fuel expended and prolong the remaining fuel life once at 21E.

Drift Rate (deg/day)	Drift Duration (days) to 21E	OML Expended (Years)
2.5	51	2.6
2.0	57	2.1
1.5	69	1.6
1.0	94	1.0
0.5	176	0.5

If the assumption that the October 31, 2020 deadline is firm, the Asiastar drift would need to commence in early September and the maneuver would use about 2.1 years of fuel life. However, a low drift rate at 0.5 degree per day would only consume about 6 months of fuel. As such, Silkwave is requesting the FCC support in requesting a 6-month extension to the October 31, 2020 BBIU deadline.

As previously communicated, Silkwave is looking to preserve the AFRIBSS L-Band BSS priority at 21E to support the company commercial mobile vehicle infotainment services into Africa,

Middle East, and Southern Europe. In working with the ITU Space Services Department, several filings from credible operators that are next in line for the L-Band BSS spectrum priority queue. Support from the FCC to mitigate the regulatory risks will go a long way to protect Silkwave business interests in the region.

Please do not hesitate to contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael Do". The signature is stylized with a cursive-like font.

Michael Do
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Appendix 1

Silkwave Holdings Limited Corporate Structure

Silkwave Corporate Structure

