



Telecommunications Management Group, Inc.

February 5, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

**Re: Inclined-Orbit Operations for AfriStar-1
Call Sign S2367**

Dear Ms. Dortch:

Yazmi USA, LLC ("Yazmi"), by its attorneys, hereby notifies the Commission that its AfriStar-1 satellite, Call Sign S2367, operating in the orbital position at 21° East Longitude ("E.L."), was operated in inclined-orbit mode from June 28, 2012 until July 26, 2014. In this letter, Yazmi provides the information specified in Section 25.280(a) of the Commission's Rules for the period of inclined-orbit operation.

Yazmi acknowledges at that outset that it inadvertently did not provide the notice within 30-days of June 28, 2012 as required by the Commission's Rules. Yazmi first realized its oversight in failing to provide notice of operation in inclined-mode just yesterday, and is acting as swiftly as possible to provide the required information. Yazmi regrets its transgression and has taken steps internally to ensure that there are no recurrences in the future.

The Attachment to this letter provides the information called for in a notification of commencement of operation in inclined-orbit mode by Section 25.280(a) of the Commission's Rules. Yazmi confirms that during the period during which north-south station keeping was suspended on AfriStar-1, it operated in the manner specified in Section 25.280(b) of the Commission's Rules. Specifically, it periodically corrected AfriStar-1's attitude to achieve a stationary spacecraft antenna pattern on the Earth's surface and centered on AfriStar-1's designated service area; it controlled all electrical interference to adjacent satellites to levels not exceeding those which would be caused by operation of AfriStar-1 in a non-inclined orbit (and continues to do so); it did not claim protection in excess of the protection afforded to the AfriStar-1 network operating without an inclined orbit (and continues not to do so); and it continues to maintain AfriStar-1 at the

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authorized orbital location (21° E.L.) with the appropriate east-west station keeping tolerance.

Yazmi intends to re-suspend north-south station keeping on AfriStar-1 at the end of March 2015, in order to extend the useful life of the satellite until April 2021. It has described this intention in its pending modification of license application to extend the license term of AfriStar-1. *See* Application of Yazmi USA, LLC, File No. SAT-MOD-20141212-00129, at Exhibit A. Yazmi will provide notice of this planned station-keeping change in the manner specified in Section 25.280 of the Commission's Rules at the appropriate time.

Please direct any questions you may have on this notification of operation of AfriStar-1 in inclined-orbit mode to me.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'JH', is positioned below the closing text.

Janet Hernandez
Counsel for Yazmi USA, LLC

Attachment

Cc (w/ attachment): Clay DeCell, International Bureau (by email)

ATTACHMENT

Notice of Operation of AfriStar-1 (Call Sign S2367) in Inclined-Orbit Mode

Information Specified in 47 C.F.R. §25.280(a):

1) The operator's name:

Yazmi USA, LLC ("Yazmi"). Yazmi is the licensee of the AfriStar-1 satellite (Call Sign S2367) operating at 21° E.L.

2) The date of commencement of inclined orbit operation:

The AfriStar-1 satellite exited the +/- 0.1 degree north-south station-keeping box on June 28, 2012.

3) The initial inclination:

+/- 0.1 degree.

4) The rate of change in inclination per year:

The average inclination per year is approximately 0.8 degrees. Yazmi resumed north-south station keeping for AfriStar-1 on July 6, 2014. Since that time, AfriStar-1 has been maintained at +/- 1.7 degrees inclination.

5) The expected end-of-life of the satellite accounting for inclined orbit operation, and the maneuvers specified under § 25.283 of the Commission's rules.

Without further inclined-orbit operations, the estimated end-of-life for AfriStar-1 is November 2015 (including maintenance of sufficient reserve fuel to de-orbit the satellite in the manner identified in the modification of license application for Call Sign S2367 (File No. SAT-MOD-20141212-00129, Exhibit A, as supplemented)). As Yazmi has reported in the pending modification of license application proceeding to extend the license term for AfriStar-1, Yazmi intends to resume operation of AfriStar-1 in inclined-orbit mode at the end of March 2015, which will extend the satellite's estimated end-of-life into April 2021.