S2367 SAT-MOD-20141212-00129 IB2014002407
Yazmi USA, LLC
AfriStar-1

GRANTED
International Bureau

File # SAT-MOD-20141212-00129
Call Sign S2367 Grant Date 03/19/15
(or other identifier)
Term Dates
From 01/06/15 To: 04/15/21
Approved: Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060–0678

Date & Time Filed: Dec 12 2014 6:49:48:436PM
File Number: SAT–MOD–20141212–00129

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	FCC Use Only

APPLICANT INFORMATION
Enter a description of this application to identify it on the main menu:
Extension of License Term for S2367 (AfriStar–1)

1–8. Legal Name of Applicant

Name:	Yazmi USA, LLC	**Phone Number:**	202–803–5740
DBA Name:		**Fax Number:**	
Street:	8515 Georgia Avenue	**E–Mail:**	tlemma@yazmi.com
City:	Silver Spring	**State:**	MD
Country:	USA	**Zipcode:**	20910 –
Attention:	Mr Tedros A Lemma		

9–16. Name of Contact Representative

Name:	Janet Hernandez	**Phone Number:**	703–224–1501
Company:	Telecommunications Management Group, Inc.	**Fax Number:**	703–224–1511
Street:	1600 Wilson Boulevard Suite 710	**E–Mail:**	janet@tmgtelecom.com
City:	Arlington	**State:**	VA
Country:	USA	**Zipcode:**	22209–
Attention:		**Relationship:**	Legal Counsel

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b. ○ a1. Earth Station ◉ a2. Space Station	(N/A) b1. Application for License of New Station (N/A) b2. Application for Registration of New Domestic Receive–Only Station ○ b3. Amendment to a Pending Application ◉ b4. Modification of License or Registration b5. Assignment of License or Registration b6. Transfer of Control of License or Registration ○ b7. Notification of Minor Modification (N/A) b8. Application for License of New Receive–Only Station Using Non–U.S. Licensed Satellite (N/A) b9. Letter of Intent to Use Non–U.S. Licensed Satellite to Provide Service in the United States (N/A) b10. Other (Please specify) (N/A) b11. Application for Earth Station to Access a Non–U.S.satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States (N/A) b12. Application for Database Entry ○ b13. Amendment to a Pending Database Entry Application ○ b14. Modification of Database Entry
17c. Is a fee submitted with this application? ◉ If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114). ○ Governmental Entity ○ Noncommercial educational licensee ○ Other(please explain):	
17d. Fee Classification BFY – Space Station Modification(Geostationary)	

18. If this filing is in reference to an existing station, enter:	19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:
(a) Call sign of station: S2367	(a) Date pending application was filed: (b) File number: SATMOD2008020400036

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- ☐ a. Fixed Satellite
- ☐ b. Mobile Satellite
- ☐ c. Radiodetermination Satellite
- ☐ d. Earth Exploration Satellite
- ☐ e. Direct to Home Fixed Satellite
- ☐ f. Digital Audio Radio Service
- ☒ g. Other (please specify) Broadcasting satellite service (sound)

21. STATUS: Choose the button next to the applicable status. Choose only one.	22. If earth station applicant, check all that apply.
○ Common Carrier ◉ Non–Common Carrier	☐ Using U.S. licensed satellites ☐ Using Non–U.S. licensed satellites

23. If applicant is providng INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

○ Connected to a Public Switched Network ○ Not connected to a Public Switched Network ◉ N/A

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

☐ a. C–Band (4/6 GHz) ☐ b. Ku–Band (12/14 GHz)

☒ c.Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower: 1452 Frequency Upper: 1492 (Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- ○ a. Fixed Earth Station
- ○ b. Temporary–Fixed Earth Station
- ○ c. 12/14 GHz VSAT Network
- ○ d. Mobile Earth Station
- ◉ e. Geostationary Space Station
- ○ f. Non–Geostationary Space Station
- ○ g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

○ Transmit/Receive ○ Transmit–Only ○ Receive–Only ◉ N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- ☐ a — authorization to add new emission designator and related service
- ☐ b — authorization to change emission designator and related service
- ☐ c — authorization to increase EIRP and EIRP density
- ☐ d — authorization to replace antenna
- ☐ e — authorization to add antenna
- ☐ f — authorization to relocate fixed station
- ☐ g — authorization to change frequency(ies)
- ☐ h — authorization to add frequency
- ☐ i — authorization to add Points of Communication (satellites & countries)
- ☐ j — authorization to change Points of Communication (satellites & countries)
- ☐ k — authorization for facilities for which environmental assessment and radiation hazard reporting is required
- ☐ l — authorization to change orbit location
- ☐ m — authorization to perform fleet management
- ☐ n — authorization to extend milestones
- ☒ o — Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.	○ Yes ◉ No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?	○ Yes ◉ No
30. Is the applicant an alien or the representative of an alien?	○ Yes ◉ No ○ N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	○ Yes ◉ No ○ N/A
32. Is the applicant a corporation of which more than one–fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	○ Yes ◉ No ○ N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one–fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	○ Yes ◉ No ○ N/A
34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.	

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules? If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.	○ Yes ◉ No
36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explination of circumstances.	○ Yes ◉ No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explination of circumstances.	○ Yes	◉ No
38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attemptiing unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition?If Yes, attach as an exhibit, an explanation of circumstances	○ Yes	◉ No
39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhinit, an explanation of the circumstances.	○ Yes	◉ No
40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.	Exhibit B	

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti–Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.	◉ Yes	○ No
42a. Does the applicant intend to use a non–U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.	○ Yes	◉ No
42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?		

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Yazmi seeks to extend the license term of AfriStar-1 from January 6, 2015 to April 15, 2021 (see Exhibit A).

Exhibit A

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

(●) A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

( ) B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

( ) C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- ○ Individual
- ○ Unincorporated Association
- ○ Partnership
- ○ Corporation
- ○ Governmental Entity
- ◉ Other (please specify)

45. Name of Person Signing	46. Title of Person Signing
Tedros Lemma	General Counsel

—>

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD–PERM, Paperwork Reduction Project (3060–0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104–13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

EXHIBIT A

FCC Form 312
Application of Yazmi USA, LLC
for Modification of License
Call Sign S2367
December 2014

NARRATIVE STATEMENT

Yazmi USA, LLC ("Yazmi"), the licensee for the AfriStar satellite (hereinafter referred to as "AfriStar-1"), Call Sign S2367, currently operating at 21º East Longitude ("E.L."), hereby requests that the Commission modify the AfriStar-1 license by extending the license term for AfriStar-1 from January 6, 2015 to and through April 15, 2021. Grant of the requested extension will enable Yazmi to continue to utilize AfriStar-1 to provide service to its customers for the remainder of the satellite's useful life, and thus is in the public interest.

The authorization for AfriStar-1 was granted initially to AfriSpace, Inc. ("AfriSpace") on December 17, 1999 (IBFS File Nos. SAT-LOA-19900723-00002 and SAT-AMD-19990125-00016). On January 6, 2000, AfriSpace certified to the Commission that the authorized satellite was on station and in conformity with the authorized terms and conditions.[1] This certification initiated a ten-year license term that was automatically extended to fifteen years by the Commission's 2003 Space Station Licensing Reform decision in IB Docket No. 02-34. Yazmi acquired the satellite licenses initially held by AfriSpace – including the license for AfriStar-1 – in 2010.[2]

Satellite Health:

Telemetry, tracking, and command ("TT&C") functions for the AfriStar-1 satellite are currently being performed from Intelsat's primary East Coast Operations Center in Tysons Corner, Virginia and the redundant West Coast Center in Long Beach, California. Health Status reports are published monthly and combined into Semi-Annual and Annual Reports. The most recent Semi-Annual Operations Report, covering the period January 1st through November 30th, 2014, indicates that all satellite subsystems are fully functional. The reported solar array power degradation is about 1% from last year, which is consistent with the expected natural degradation of the solar cells' performance.

Inclined Orbit Operation and End-of-Life Considerations:

Yazmi intends to cease north-south station-keeping at the end of March, 2015, thereby extending the satellite's useful life through April 2021. Yazmi will provide the

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[1] *See* Letter dated January 6, 2000, from T. Giunta, Counsel for AfriSpace, to Secretary, FCC, in File No. SAT-19990723-00002.

[2] AfriSpace, Inc. Debtor-in-Possession, Consent to Assignment, Radio Station Authorization, File No.: SAT-ASG-20100604-00123 (granted July 29, 2010).

Commission notice of this change in the manner specified in Section 25.280 of the Commission's Rules at the appropriate time.

Yazmi intends to follow the U.S. Government Standard Practices guidelines regarding post-mission disposal of space structures, and the more recent FCC Order on Orbital Debris.

Specifically, Yazmi plans to dispose of the AfriStar-1 spacecraft at the end of its mission life by maneuvering it into a storage orbit above geosynchronous Earth orbit, and has computed the recommended minimum increase in the spacecraft perigee altitude according to the formula developed by the IADC, namely:

235 km + (1000 C_r * A/m), where:

C_r is the solar radiation pressure coefficient, and
A/m is the aspect area (m^2) to dry mass ratio.

For AfriStar-1, the product (C_r * A), defined by the Spacecraft manufacturer as the "mean effective area as seen from the sun," is 68.5 m^2, and the predicted mass at end-of-life is 1279 kg. Accordingly, the estimated minimum increase in perigee altitude is 288.6 km.

Yazmi calculates that AfriStar-1 has sufficient fuel to provide reliable service during the proposed license term extension and to execute end-of-life maneuvers that will place the satellite in a disposal altitude described above, barring a catastrophic failure of satellite components. Yazmi estimates that about 6 kg of propellant will be required for the orbit raising operation, and will keep that amount in reserve.

* * *

In sum, extending the AfriStar-1 license term to and through April 15, 2021 will facilitate continuity of service Yazmi provides over the satellite, and is consistent with the fuel budget and health of the satellite. Accordingly, grant of this license extension application is in the public interest.

EXHBIT B

FCC Form 312
Application of Yazmi USA, LLC
for Modification of License
Call Sign S2367
December 2014

OWNERSHIP INFORMATION

Yazmi USA, LLC ("Yazmi"), the licensee for the AfriStar-1 satellite, Call Sign S2367, currently operating at 21º East Longitude ("E.L."), hereby provides the following ownership information in response to Question 40:

Officers' and directors' names, mailing addresses, and citizenship	Noah Samara Chairman & Chief Executive Officer 8515 Georgia Avenue Silver Spring, MD 20910 Citizenship: USA Tedros Lemma General Counsel 8515 Georgia Avenue Silver Spring, MD 20910 Citizenship: USA Tarek Abdel-Nabi Senior Vice President, Engineering & Operations 8515 Georgia Avenue Silver Spring, MD 20910 Citizenship: USA
Identify all 10%+ equity holders, including names, addresses, and citizenship.	Noah Samara 8515 Georgia Avenue Silver Spring, MD 20910 Citizenship: USA

EXHIBIT C

FCC Form 312
Application of Yazmi USA, LLC
for Modification of License
Call Sign S2367

December 2014

FREQUENCY BAND INFORMATION

Yazmi USA, LLC ("Yazmi"), the licensee for the AfriStar satellite (hereinafter referred to as "AfriStar-1"), Call Sign S2367, currently operating at 21º East Longitude ("E.L."), hereby provides the following frequency band information in response to Question 24 on Form 312:

In addition to operating service links in the 1452-1492 MHz band, AfriStar-1 uses the frequency band 7025-7075 MHz for Earth-to-space links.

Telecommunications Management Group, Inc.

February 5, 2015

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

Re: Application of Yazmi USA, LLC
For Modification of License for Call Sign S2367
File No. SAT-MOD-20141212-00129

Dear Ms. Dortch:

Yazmi USA, LLC ("Yazmi"), by its attorneys, hereby provides information supplemental to the above-referenced modification of license application for Call Sign S2367 in response to a request received telephonically from the Commission's International Bureau.

The Bureau requested information in eight areas from Yazmi. Yazmi's responses are provided below:

1. Estimated Fuel Life of AfriStar-1:

   Afristar-1 was launched in October 1998, with an estimated fuel life of 15 years. Yazmi estimates that the current end-of-fuel life for AfriStar-1 is approximately nine months (assuming no additional inclined-orbit operation), with sufficient reserve fuel to de-orbit the spacecraft in the manner identified in the modification of license application for Call Sign S2367.

2. Estimated Service Life, if Different:

   In Exhibit A to its above-reference modification of license application for Call Sign S2367, Yazmi stated that the useful life of AfriStar-1 will end in April 2021. The service life of AfriStar-1 is thus estimated to continue until April 2021. The difference between the estimated fuel life and estimated service/useful life of AfriStar-1 is attributable to Yazmi's expectation that it will discontinue current north-south station keeping on AfriStar-1 in March 2015. In making this service-life estimate, Yazmi will maintain sufficient reserve fuel to de-orbit the satellite in the manner identified in the modification of license application for Call Sign S2367.

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3. Is Movement to Another Satellite Orbit Expected?:

   Yazmi has no current plans or proposals to relocate AfriStar-1 from its current orbital position at 21° East Longitude ("E.L."). As Yazmi reported in Exhibit A to its above-reference modification of license application for Call Sign S2367, Yazmi intends to permanently discontinue north-south station keeping for AfriStar-1 at the end of March, 2015, thereby extending the satellite's useful life through April 2021. The satellite is currently maintained at 1.7 degrees of inclination following a prior suspension of north-south station keeping from June 2012 to July 2014. *See* Response No. 6, below. Yazmi will provide the Commission notice of the planned new station-keeping change in the manner specified in Section 25.280 of the Commission's Rules at the appropriate time.

4. Has there been any failure on the satellite during its term of operation?:

   AfriStar-1 was launched with a manufacturing defect in its solar panels, resulting in the panels collecting less power than intended.

   Aside from the solar array degradation, which is accounted for in the service-life estimate above, the satellite has experienced the following two equipment failures:

   1. One of the satellite thrusters has developed seepage and is no longer in use. The satellite is being operated under the redundant thruster configuration.

   2. An infrared earth sensor has failed, and the redundant unit is in use.

   As both equipment failures have been mitigated, the satellite subsystems remain fully functional.

   There has been no failure of the satellite during its term of operation.

5. What is the cumulative solar array power performance?

   From the first summer solstice after launch, i.e., June 1999, until June 2014, the available solar array power has decreased from an estimated 5,200W to approximately 4,200W.

   From June 2013 to June 2014, the available solar array power has reduced from 4,235W to 4,207W, i.e., 0.66% ~ 1%.

6. What is the different in calculation in the current application from the 2008 modification? Have there been any changes in the propellant or in the orbital degree?

   In reviewing the 2008 and 2014 modification of applications (File Nos. SAT-MOD-20080204-00036 and SAT-MOD-20141212-00129, respectively), Yazmi noticed a common error in both calculations. Specifically, although Yazmi used the same formula in each calculation, the "mass" parameter in the formula was incorrect in both instances.

   In the 2008 modification of license application, the mass parameter was stated as being 1250 kg, and in the above-referenced 2014 modification of license application it is stated as being 1279 kg. The correct mass parameter to apply in both cases was the dry mass of the satellite as given by the satellite manufacturer, namely 1209.93 kg.

   When the correct "mass" parameter is inserted into the formula, the minimum increase in de-orbiting altitude becomes 291.6 km, and the final disposal altitude as per Section 25.283 of the Commission's Rules shall be 36,021 km + 291.6 km = 36,312.6 km. Yazmi estimates the amount of propellant kept in reserve (~6 kg) would allow the de-orbiting altitude to exceed the computed minimum.

   As of this date, AfriStar-1 is stationkept to the parameters (both east-west and north-south) in its authorization. From June 2012 until July 2014, Yazmi suspended north-south station keeping on AfriStar-1, which resulted in a current spacecraft inclination of 1.7 degrees. Station keeping in the north-south direction was resumed on July 6, 2014. As noted above, Yazmi intends to again cease north-south station keeping for AfriStar-1 at the end of March, 2015, and will provide the Commission notice of this change in the manner specified in Section 25.280 of the Commission's Rules at the appropriate time.

7. The application states that Yazmi is using Intelsat for its TTC. Are they transmitting from US earth stations? If so, to include the call signs for those.

   In Exhibit A to its above-reference modification of license application for Call Sign S2367, Yazmi stated that TT&C transmissions to AfriStar-1 originate from Intelsat's East Coast Operations Center in Tysons Corner, Virginia, and from the redundant Intelsat West Coast Operations Center in Long Beach, California. The actual earth stations used to make the TT&C transmissions are located in Mauritius and Bangalore, India, respectively. The earth stations are operated remotely by Intelsat from its U.S. operations centers.

8. Is Noah Samara the sole owner of the Afristar satellite?

No. Mr. Samara owns 99% of Yazmi. The remaining 1% is owned equally by Eyob Samara and Rahel Samara, both of whom are U.S. citizens.

Please direct any questions you may have on the answers provided above to me.

Respectfully submitted,

Janet Hernandez
Counsel for Yazmi USA, LLC

cc: Clay DeCell, International Bureau (by email)