

U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
**CERTIFICATE OF WAIVER**

ISSUED TO

**LuluPepper Media LLC**  
**Responsible Person: Randall J Langton**  
**Waiver Number: 107W-2025-05050**

ADDRESS –

**8641 Carriage Hill Ct**  
**Savage, MN 55378**

This certificate is issued for the operations specifically described hereinafter. No person shall conduct any operation pursuant to the authority of this certificate except in accordance with the provisions contained in this certificate.

OPERATIONS AUTHORIZED

Operating Limitations for Small Unmanned Aircraft — Visibility; Operating Limitations for Small Unmanned Aircraft — Cloud Clearance.

LIST OF WAIVED REGULATIONS BY SECTION AND TITLE

**14 CFR §§ 107.51(c)—Operating limitations for small unmanned aircraft - Visibility, and**  
**107.51(d)—Operating limitations for small unmanned aircraft - Cloud Clearance**

**STANDARD PROVISIONS**

1. A copy of the application made for this certificate shall be attached to and become a part hereof.
2. This certificate shall be presented for inspection upon the request of any authorized representative of the Administrator of the Federal Aviation Administration, or of any State or municipal official charged with the duty of enforcing local laws or regulations.
3. The holder of this certificate shall be responsible for the strict observance of the terms and provisions contained herein.
4. This certificate is nontransferable.

NOTE—This certificate constitutes a waiver of those Federal rules or regulations specifically referred to above. It does not constitute a waiver of any State law or local ordinance.

**SPECIAL PROVISIONS**

Special Provisions Nos. 1 to 16, inclusive, are set forth on the attached pages.

This Certificate of Waiver is effective from March 5, 2026, to March 31, 2030, and is subject to cancellation at any time upon notice by the Administrator or an authorized representative.

**BY DIRECTION OF THE ADMINISTRATOR**

**Emerging Technologies Division, AFS-700**

**SPECIAL PROVISIONS ISSUED TO  
LuluPepper Media LLC**

**General.**

The FAA's Flight Standards Service has reviewed your application to ensure compliance with the requirements of 14 CFR § 107.200 and § 107.205. Pursuant to these authorities, the Administrator finds that the proposed small unmanned aircraft (sUA) operation can be conducted safely under the provisions of this Certificate of Waiver (Waiver) as listed below because you have established adequate mitigations for risks involved with operating your sUA in the manner you described. Adherence to the provisions of this Waiver establishes the required level of safety within the national airspace system.

The Administrator may cancel this Waiver at any time. As a general rule, this Waiver may be canceled when it is no longer required, there is an abuse of its provisions, or when unforeseen safety factors develop. Failure to comply with any provision listed below is a violation of the terms of this Waiver and will serve as justification for cancellation.

List of Regulations Waived by Section and Title. The following regulations are waived:

14 CFR § 107.51(c), Operating limitations for small unmanned aircraft - Visibility, is waived to allow operations when the flight visibility as observed from the location of the control station is less than 3 statute miles;

14 CFR § 107.51(d), Operating limitations for small unmanned aircraft - Cloud Clearance, is waived to allow sUA operations not meeting the cloud clearance requirements of § 107.51(d).

No part of this waiver will function as an airspace authorization under 14 CFR § 107.41. The FAA's Air Traffic Organization responds directly to requests for such authorizations. The LAANC system may not be used for Airspace Authorizations for Waivered Operations.

**Common Special Provisions.** The Responsible Person is directly responsible for safety of operations conducted under this Waiver and will ensure the Remote Pilot in Command (remote PIC), manipulator of the controls, and visual observer(s) (VO)<sup>1</sup> comply with all provisions of this Waiver.

1. The Responsible Person listed on the Waiver is responsible to the FAA for the safe conduct of the operations. Prior to conducting operations that are the subject of this Waiver, the Responsible Person:
  - a. Must ensure the remote PIC, manipulators of the controls, and VO(s) are informed of the terms and provisions of this Waiver and strictly observe the terms and provisions herein;
  - b. Must ensure the remote PIC, manipulators of the controls, and VO(s) are informed and familiar with part 107 regulations; and
  - c. Evidence of the above (a and b) must be documented and must be presented for inspection upon request from the Administrator or an authorized representative;
2. This Waiver may not be combined with any other waiver(s), authorization(s), or exemption(s) without specific authorization from the FAA;

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<sup>1</sup> Title 14 CFR § 107.3 defines the term "visual observer." Any VO participating in operations conducted under this Waiver must meet the requirements listed in § 107.33 throughout the duration of flight operations.

3. The FAA has the authority to cancel or delay any or all flight operations if the safety of persons or property on the ground or in the air are in jeopardy or there is a violation of the terms of this Waiver;
4. A copy of this Waiver must be accessible and available to the remote PIC at the ground control station during sUA operations that are the subject of this Waiver;
5. The Responsible Person listed on this Waiver must maintain a current list of pilots by name and remote pilot certificate number used in operations under this Waiver. This list must be presented for inspection upon request from the Administrator or an authorized representative;
6. The Responsible Person listed on this Waiver must maintain a current list of sUA by registration number(s) used in operations under this Waiver. This list must be presented for inspection upon request from the Administrator or an authorized representative;
7. For the purposes of this Waiver, direct participants are the remote PICs, persons manipulating the controls, VOs, and any persons whose involvement is necessary for safety of the sUA operation. All other persons are considered non-participants;
8. If a discrepancy exists between the provisions in this Waiver and the waiver application, the Waiver takes precedence and must be followed;

**Operating limitations for small unmanned aircraft - Weather: Visibility Minimums Special Provisions**

sUAS operations may be conducted in weather conditions with reduced visibility and cloud clearance minimums, provided

9. Visual Observers: All operations conducted under this Waiver must use one or more VO as described in the waiver application:
  - a. All VOs must receive documented training for their duties and responsibilities to include;
    - 1) Scanning of the Operational Volume for Air and Ground based intruders;
    - 2) Communications procedures and phraseology;
    - 3) Overall operations conducted under this Waiver;
  - b. Sufficient VO(s), defined as the minimum number of VO(s) required to continuously observe at least a 2 statute mile radius of airspace surrounding the sUA in flight, are;
    - 1) Used to identify any non-participating aircraft prior to their entry into the planned operational area;
    - 2) Physically located such that the remote PIC receives sufficient notice to ensure the UA remains well clear of all other aircraft;
    - 3) Physically located to notify the remote PIC of any moving vehicle or human presence that may pose a hazard to the operation;
  - c. Communication between the remote PIC and VO must occur to facilitate, when necessary, for the remote PIC taking action to maneuver the sUA with sufficient time to:
    - 1) Give way to all other aircraft in accordance with § 107.37;
    - 2) React to any unforeseen operational or mechanical failure without creating a hazard to other people, other aircraft, or property in the event of a loss of control of the sUA; and
    - 3) Maintain compliance with this Waiver and un-waived provisions of part 107;
  - d. If communication between the VO and the remote PIC will occur by electronic device:
    - 1) The device must be continuous full-duplex;
    - 2) The remote PIC must be able to use the device hands-free; and
    - 3) There must be a reliable back-up communication method;

10. Reduced Minimum Visibility and Cloud Clearance Requirements:
  - a. During operations conducted under this Waiver the remote PIC will not fly the sUA unless the minimum flight visibility, as observed from the location of the control station or where sUA is positioned for flight, is no less than **2 statute miles**;
  - b. Operations into clouds is prohibited. The sUA must remain clear of clouds at all times;
  - c. Notwithstanding provisos a. or b. above the UA must remain within visual line of sight of the remote PIC and visual observer;
  - d. The maximum downrange distance must not exceed 2500 feet;
  - e. The maximum altitude must not exceed 200 feet AGL; or
  - f. 50 feet above any obstruction within a 200 foot radius of the UA, not to exceed 400 feet AGL;
11. Unmanned Aircraft System: Operations conducted under this Waiver may only occur with the make and model sUAS described in the waiver application. Proposed operations of any other manufacturer, make or model of sUAS will require a new waiver application or a request to amend this Waiver;
12. ADS-B out (1090/978 MHz) may not be transmitted from the sUAS when operating pursuant to this Waiver. An ADS-B in Receiver (other than a cell phone or third party internet services) must be operational and monitored during all operations pursuant to this Waiver;
13. Anti-Collision Lighting: The sUA must be equipped with anti-collision lighting compliant with §107.29 to appropriately increase the conspicuity of the sUA. The anti-collision lighting system must be operational at all times;
14. Ground Control Station, Control and Communications (C2) System:
  - a. Telemetry: The sUAS ground control station must display in real-time the sUA altitude, position, direction of flight, ground speed, C2 signal strength, GPS or navigation system signal condition, battery condition, and sUA distance from the control station as described in the Waiver application;
  - b. Alerting: The remote PIC must ensure the GCS is configured to audibly and/or visually alert the remote PIC of degraded system performance, geofence loss of containment, loss of Control link with the sUA, and intrusion alerts as described in the Waiver application;
  - c. Emergency Profiles: The remote PIC must ensure the GCS is configured for automated emergency actions (e.g. RTL/RTH, altitude descend, position hold etc.) as described in the Waiver application; and
  - d. Sensors: the remote PIC must ensure any installed collision/obstacle avoidance sensors are operational;
15. All emitters used in sUAS must be compliant with all applicable FCC regulations provisions of the FCC authorization granted for the emitter. A FCC Experimental authorization may not be used for sUAS operations under this Waiver; and
16. Operations conducted under this Waiver are limited to the locations meeting the site selection performance procedures as stated in the Waiver application.