



U.S. Department
of Transportation

**Federal Aviation
Administration**

800 Independence Ave., S.W.
Washington, D.C. 20591

February 25, 2015

Exemption No. 11112A
Regulatory Docket No. FAA-2014-0382

Mr. Brian Whiteside
President
VDOS Global, LLC
230 SW 6th Street
Corvallis, OR 97333

Dear Mr. Whiteside:

This letter is to inform you that we have granted your petition to amend Exemption No. 11112. It explains the basis for our decision, describes its effect, and lists any changes to the original conditions and limitations.

The Basis for Our Decision

By letter posted to the docket on February 3, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of VDOS Global, LLC (VDOS) for an amendment to Exemption No. 11112. That exemption from §§ 91.119(c), 91.151, 91.405(a) and (b), 91.407(a)(1), 91.409(a)(1) and 91.417(a) of Title 14, Code of Federal Regulations (14 CFR) allows VDOS to operate unmanned aircraft systems (UAS) for the purpose of flare stack inspections on 14 Shell Oil Gulf of Mexico platforms that are beyond 12 nautical miles (nm) beyond the coast of the United States.

The amendment requested would change four provisions because of the need to perform operations other than in the Gulf of Mexico beyond the 12 nm limit:

- 1) Allow the scheduling of UAS operations in between manned operations, as needed.
- 2) Eliminate the need to coordinate with platform safety officers and air traffic officers on a platform when operating on land;
- 3) Eliminate the reference to 14 Shell Oil Gulf of Mexico production platforms allowing operations on land and for other companies other than Shell Oil; and

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- 4) Delete the condition and limitation number 27 which limits operations to the Gulf of Mexico.

In your petition, you indicate that there has been no other change in the conditions and reasons relative to public interest and safety that were the basis for granting the original exemption.

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested amendment of the exemption would not set a precedent, and any delay in acting on this petition would be detrimental to VDOS.

Our Decision

The FAA has determined that the justification for the issuance of Exemption No. 11112 remains valid with respect to this exemption and is in the public interest. Therefore, under the authority provided by 49 U.S.C. 106(f), 40113 and 44701, which the FAA Administrator has delegated to me, VDOS Global, LLC is granted an amendment to its exemption, subject to the following conditions and limitations listed below.

The operator shall add this amendment to the original Exemption No. 11112.

The FAA's analysis is amended as follows:

Operating parameters of the UAS

The following bullets are deleted when operations are not in the Gulf of Mexico:

- Scheduling operations in between any scheduled departures or arrivals of helicopter traffic to or from the platform;
- Securing approvals prior to launch and recovery from the platform safety officer, air traffic officer, visual observer (VO) and PIC.

When operations are on land or do not involve a platform, the PIC must coordinate launch and recovery of the UA in between any other air traffic.

The FAA's Decision is amended to allow VDOS to operate unmanned aircraft systems for the purpose of flare stack inspections on platform structures.

Conditions and Limitations

All conditions and limitations within Grant of Exemption No. 11112 remain in effect except as follows. Number 27 below replaces number 27 in the original grant and number 20 replaces number 20 in the original grant.

27. All operations shall be conducted in compliance with the Air Traffic Organizations (ATO) issued certificate of Waiver or Authorization (COA) prior to conducting any operations under this grant of exemption. All operations conducted outside the U.S. 12 nm limit, must be conducted within airspace managed by the U.S. and within the U.S. Flight Information Region (FIR) boundary.

20. The operator must obtain an Air Traffic Organization (ATO) issued Certificate of Waiver or Authorization (COA) prior to conducting any operations under this grant of exemption. This COA will also require the operator to request a Notice to Airman (NOTAM) not more than 72 hours in advance, but not less than 48 hours prior to the operation. All operations shall be conducted in accordance with airspace requirements in the ATO issued COA including class of airspace, altitude level and potential transponder requirements.

This exemption terminates on December 31, 2016, unless sooner superseded or rescinded.

Sincerely,

/s/

John Barbagallo

Acting Deputy Director, Flight Standards Service