



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

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

July 8, 2015

Exemption No. 11574A  
Regulatory Docket No. FAA-2015-0352

Mr. Bret Lucas  
Agri Tech Systems, LLC  
12871 Geneva Street  
Indianola, IA 50125

Dear Mr. Lucas:

This letter is to inform you that we have granted your petition for an amendment. It explains the basis for our decision, describes its effect, and lists any changes to the original conditions and limitations.

By letter dated May 18, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Agri Tech Systems, LLC (hereinafter petitioner or operator) for an amendment to your current exemption. That exemption from §§ 61.23(a) and (c), 61.101(e)(4) and (5), 61.113(a), 61.315(a), 91.7(a), 91.119(c), 91.121, 91.151(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b) of Title 14, Code of Federal Regulations (14 CFR) allows the petitioner to operate a UAS to perform aerial data collection. You requested an amendment to add Pulse Aerospace Vapor 55.

In your petition, you indicate that there has been no 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 to the exemption would not set a precedent, and any delay in acting on this petition would be detrimental to the petitioner. The unmanned aircraft(s) authorized in the original grant are comparable in type, size, weight, speed and operating capabilities to those in this petition.

### **Airworthiness Certification**

In accordance with the statutory criteria provided in Section 333 of Public Law 112-95 in reference to 49 U.S.C. § 44704, and in consideration of the size, weight, speed, and limited operating area associated with the aircraft and its operation, the Secretary of Transportation

has determined that this aircraft meets the conditions of Section 333. Therefore, the FAA finds that relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*, and any associated noise certification and testing requirements of part 36, is not necessary.

### **Our Decision**

The FAA has determined that the justification for the issuance of Exemption No. 11574 remains valid and is in the public interest. Therefore, under the authority contained in 49 U.S.C. 106(f), 40113, and 44701, delegated to me by the Administrator, the operator is granted an amendment to add new aircraft to its UAS operations.

The operator shall add this amendment to its original exemption.

### **Conditions and Limitations**

All conditions and limitations within Grant of Exemption No. 11574 remain in effect except as follows. Condition No. 1 has been updated to reflect the additional aircraft.

Failure to comply with any of the conditions and limitations of this grant of exemption will be grounds for the immediate suspension or rescission of this exemption.

1. Operations authorized by this grant of exemption are limited to the Pulse Aerospace Vapor 55 and Pulse Aerospace Vapor 01 when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

This exemption terminates on May 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan

Director, Flight Standards Service



18 May 2015

U.S. Department of Transportation  
Docket Management System  
1200 New Jersey Ave., SE  
Washington, DC 20590

Re: Application for Amendment to Exemption 11574, Agri Tech Systems, LLC  
FAA Docket 2015-0352

Dear Sir or Madam,

On May 13, 2015, the FAA issued Exemption 11574 to Agri Tech Systems, LLC ("Agri Tech"), allowing commercial operations of its PA-01 Vapor aircraft under Section 333 of the FAA Modernization and Reform Act of 2012. Agri Tech now respectfully applies for an amendment to the Exemption to allow Agri Tech to operate the Pulse Aerospace Vapor 55 in addition to the PA-01 Vapor described in the exemption request, under the same conditions as approved in Exemption 11574.

The name and address of the applicant is:

Agri Tech Systems, LLC  
Attn: Bret Lucas  
12871 Geneva Street  
Indianola, IA 50125  
Telephone: 515-961-4026  
Email: [bret@agritechsystems.com](mailto:bret@agritechsystems.com)

The Vapor 55 aircraft is essentially the same aircraft described in Exemption 11574 except on a slightly larger scale. The added size simply allows for greater payload capacity and longer flight times due to increased battery size. The flight control system and Ground Control Station are the same as those used on the PA-01 Vapor in Exemption 11574.

The Flight Manual is attached as Agri Tech's Confidential "Appendix A" which details the specifications and operation of the Vapor 55. Agri Tech would request that this document not be made available to the public due to the proprietary information contained therein.

Agri Tech intends operations consistent with those outlined in Exemption 11574 and would only ask that Exemption 11574 be amended to allow operation of the Vapor 55 aircraft. At all times, the total weight of the aircraft will be under 55 pounds.

Because the Vapor 55 is so similar to the PA-01 Vapor aircraft in Exemption 11574, and the conditions under which it will operate remain the same, notice need not be provided in the Federal Register nor public comment solicited.

Please contact us if any additional information is needed.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Bret J. Lucas", written in a cursive style.

Bret J. Lucas  
CEO, Agri Tech Systems

Enclosure