



U.S. Department  
of Transportation

**Federal Aviation  
Administration**

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

August 17, 2015

Exemption No. 11672A  
Regulatory Docket No. FAA-2015-0653

Mr. Todd Massey  
Owner  
Aerial Impressions, LLC  
6213 West Dixon Street  
Milwaukee, WI 53214

Dear Mr. Massey:

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 posted to the public docket June 16, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Aerial Impressions, 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 the 3D Robotics X8-M and Align M690-L to your exemption.

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 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. 11672 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.11672 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 DJI Phantom 2, DJI S1000+, Align M690-L, and 3D Robotics X8-M 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

Todd Massey  
Owner Operator  
Aerial Impressions, LLC  
414-899-8512  
aerialimpressionsMKE@gamil.com

Dear Madam or Sir

Aerial Impressions is petitioning the Federal Aviation Administration (FAA) for an exemption to Section 333 of the FAA Modernization and Reform Act of 2012 (FMRA) and 14 CFR Part 11. The exemption would allow operation of the DJI Phantom 2 and DJI S1000 unmanned aircraft systems (UAS) for the purpose of supporting the agriculture industry, aerial photography/video and land surveying. This document will outline requested relief from regulations pertaining to this exemption.

Aerial Impression agrees to operate within the boundaries set forth by this exemption. Along with rules and regulations that the FAA has in place, Aerial Impressions plans to use additional safety precautions where they see fit to ensure safe sUAS operations. Implementation of lightweight small unmanned systems is a tool that can greatly improve the safety standards of our National Airspace (NAS). sUAS can fly operations that would traditionally require manned aircraft which carry pilots, gallons of flammable fuel. Please allow Aerial Impressions to offer sUAS operations to its local market to promote the safe, efficient and responsible use of sUAS.

Thank you for your time,

Todd Massey  
Owner Operator  
Aerial Impressions, LLC  
414-899-8512  
aerialimpressionsMKE@gamil.com

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## Glossary of Abbreviations

AGL	Above Ground Level
ATC	Air Traffic Control
COA	Certificate of Authorization
FAA Administration	Federal Aviation
FAR	Federal Aviation Regulation
MAAP Partnership	Mid Atlantic Aviation
NAS	National Airspace System
PIC	Pilot in Command
sUAS Systems	Small Unmanned Aircraft
VFR	Visual Flight Rules
VMC Conditions	Visual Meteorological
VO	Visual Observer
VLS	Visual Line of Sight

## LIST OF ATTACHMENTS

Futaba 14sg operational manual  
 A2 Flight Control operational manual  
 DJI S1000+ operational Manual  
 DJI Phantom 2 operational manual  
 Naza M flight control operational manual

## Section 1: Introduction and Interest of Petitioner

Aerial Impressions is a small business located in southeastern Wisconsin that intends to use two current DJI model UAV platforms, to gather images for the use of Real estate Precision Framing, Georeference Mapping and Golf courses. Aerial Impressions is committed to offering safe and responsible sUAS flight operations.

It shall be the intent of every sUAS operator to make a responsible effort to not invade a person's reasonable expectation of privacy when operating the UAS while performing safe flight operations. When operating the sUAS, Aerial Impressions operators will abide by all FAA Regulations for flight and receive the proper authorization for flight.

## **Section 2: Unmanned Aerial Systems**

### **General Information Pertaining to All Proposed UAS**

Aerial Impressions will operate less than fifty-five pound sUAS, for the ability to conduct aerial imagery and videography, with payloads capable of supporting these missions.

Prior to each flight the PIC shall inspect the sUAS to ensure it is in a condition for safe flight. If the inspection reveals a condition that affects the safe operation of the sUAS, the aircraft will be prohibited from operating until the necessary maintenance has been performed and the sUAS is found to be in a condition for safe flight. Ground Control Station will be included in preflight inspections as well. Maintenance and Alterations must be properly documented in aircraft records. All discrepancies noted shall be documented as described in the Aerial Impressions Operators Manual pg.2 (Organization)

Any maintenance or alterations made to the sUAS shall be documented in a logbook as well as undergo test flight before it can return to service. Any repairs or alterations must meet the manufacturer's guidelines with particular attention to flight critical components that may not be addressed in the manufacturer's manuals. Only personnel who are authorized shall perform such operations.

Aerial Impressions will follow all manufacturer's sUAS aircraft/component, maintenance, overhaul, replacement, inspection and life limit requirements, Aerial Impressions shall carry out their maintenance, inspections and record keeping requirements, in accordance with the operator's manual. Maintenance, inspection, and alterations must be noted in the aircraft log book, including total flight hours, description of work

Each sUAS operated under the proposed exemption shall comply with all manufacturer System and Safety Bulletins.

Aerial Impressions technicians will receive and document training referenced in the manufacturer's operations manual.

Before conducting operations, the radio frequency spectrum used for operation and control of the sUAS shall comply with the Federal Communications Commission (FCC) or other appropriate government oversight agency requirements.

## Equipment List

### DJI Phantom 2

Aerial Impressions seeks an exemption to operate DJI Phantom 2 sUAS, for compensation or hire. The DJI Phantom 2 is comprised of a quadrotor unmanned aircraft and a handheld ground control station. The Phantom II has a maximum gross weight of approximately 2.8 pounds, diameter (rotor span) 23.75 inches, width of 12.5 inches, and height of 8.1 inches. The Phantom II is equipped with four rotors driven by four lithium polymer battery powered electric motors.

Design and operational characteristics are provided in DJI Phantom 2 Operating Manual (Page 35). Flight crews shall conduct pre-flight inspections as documented in DJI Phantom 2 Operating Manual (Page 24)

### ATTACHMENTS

DJI Zemuse H3 -3d Gimbal

DJI ISOD mini

DJI 2.4ghz. Data link

14sg Futaba radio transmitter

Gopro Hero 3+

DJI Naza M Flight controller

#### Phantom Specifications

Please refer to (Sec. 8.1) in the provided Phantom Operating Manual.

#### Nazi M Flight Control Specifications

Please refer to (Page 23) in the provided Nazi Flight Control Manual

#### Futaba 14sg specifications

Please refer to (Page 11) of the Futaba 14sg Control Manual

### DJI S1000+

Aerial Impressions seeks an exemption to operate a DJI-S1000 sUAS for compensation or hire. The DJI-S1000+ is comprised of a multi-rotor unmanned aircraft and two handheld ground control stations. The DJI-S1000 has a maximum gross weight of approximately 24 pounds, diagonal wheelbase of 41.4 inches, and height of approximately 18 inches. The DJI- S1000 is equipped with eight rotors driven by eight lithium polymer battery powered electric motors.

Design and operational characteristics are provided in DJI S1000+ Operating Manual (Page 22).

Flight crews shall conduct pre-flight inspections as documented in DJI S1000+ Operating Manual (Page 4).

### ATTACHMENTS

DJI A2 Flight Control

DJI Zemuse Gimbal for either Panasonic GH4 or Canon Mark III

DJI ISOD

DJI Light Bridge

## 2 Futaba 14sg Radio Transmitter

### S1000 Specifications

Please refer to (Page 22) of the S1000+ Operating Manual

### A2 Flight control specifications

Please refer to (Page 49) of the A2 Flight Control Manual

### Futaba 14sg specifications

Please refer to (Page 11) of the Futaba 14sg Control Manual

## Align M690L

Aerial Impressions seeks an exemption to operate a Align M690L sUAS for compensation or hire. The Align M690L is comprised of a multi-rotor unmanned aircraft and two handheld ground control stations. The Align M690L has a maximum takeoff weight of 7,200g, wheelbase of 875mm, and height of approximately 446 mm. The Align M690 is equipped with six rotors driven by six lithium polymer battery powered electric motors.

Design and operational characteristics are provided in Align M690L Operating Manual (Page 59).

Flight crews shall conduct pre-flight inspections as documented in Align M690L Operating Manual (Page 42).

### ATTACHMENTS

AMP-S Flight Control

Align G3 Gimbal for either Panasonic GH4 or Canon Mark III or Samsung NX1

Align OSD

Align FPV 5.8ghz video transmitter

## 2 Futaba 14sg Radio Transmitter

### Align M690L Specifications

Please refer to (Page 59) of the Align M690L+ Operating Manual

### APSM Flight control specifications

Please refer to (Page 59) of the Align M690L Control Manual

### Futaba 14sg specifications

Please refer to (Page 11) of the Futaba 14sg Control Manual

## X8-M

Aerial Impressions seeks an exemption to operate a X8-M sUAS for compensation or hire. The X8-M is comprised of a multi-rotor unmanned aircraft and one handheld ground control station. The X8-M has payload capacity of 200 g, wheelbase of 20.1 inches, and height of approximately 12 inches. The X8 -M is equipped with eight rotors driven by eight lithium polymer battery powered electric motors.

Flight crews shall conduct pre-flight inspections as documented in X8-M Operating Manual (Page 25).

### ATTACHMENTS

3DR robotics Pixhawk flight control

Spektrum DX7s radio control

Canon S100 with custom 3DR EAI software and fixed mount

Spektrum DX7s radio control

### X8-M Specifications

- Pixhawk autopilot system
- Motors: SunnySky V2216-12 800 kV II (The images above show conical nuts; X8-M ships with hex nuts.)
- Propellers: APC 11X4.7 SFP (4), APC 11X4.7 SF (4)
- Flight battery: 4S 10000 mAh 10C lithium polymer
- Aircraft weight (with battery): 7.7 lbs (3.5 kg)
- Aircraft dimensions: 13.7 in x 20.1 in x 11.8 in (35 cm x 51 cm x 30 cm)
- Case dimensions: 60.7 in x 14.5 in x 15.5 in (154 cm x 37 cm x 39 cm)
- Payload capacity: .4 lbs (200 g)
- Radio range: .6 miles\* (1 km)
- Flight time: 14 min\*
- Maximum operational wind speed: 25 mph (11 m/s)
- Area coverage: 25 acres\* (0.1 km<sup>2</sup>)
- Ground sampling distance: .7 inches per pixel (2 cm per pixel)\*
- Orthomosaic accuracy: 3-16 ft (1-5 m)

### Pixhawk Flight control specifications

Please refer to (Page 12) of the Pixhawk Flight Control Manual

### Spektrum DX7 specifications

Please refer to (Page 103) of the Spektrum Control Manual

## **Section 3: Unmanned Aircraft Pilot in Command (PIC)**

Aerial Impressions Flight Crew, including PIC and Visual Observers (VO), will be qualified as directed by Aerial Impressions Operation Manual pg.3 (operators)

All flight crew members, including PIC and VO, will have an understanding of, and comply with, Title 14 Code of Federal Regulations, and/or Agency directives and regulations, applicable to the airspace where the sUAS will operate. Specifically all flight crew members will receive training on the rules and responsibilities described in 14 CFR Part 91 Sections 91.111, 91.113 and 91.115 regarding cloud clearance, flight visibility and the pilot controller glossary, including standard ATC phraseology and communication.

The PIC must possess at least a current private pilot certificate and third class medical certificate. The PIC must also meet the flight review requirements specified in 14 CFR Section 61.56 in an aircraft in which the PIC is rated on his/her pilot certificate.

Prior to operations conducted for the purpose of aerial imagery and videography (or similar operations), the PIC must have accumulated and logged, in a manner consistent with 14 CFR Section 61.51(b), a minimum of 25 hours of total time as a sUAS pilot and at least ten hours logged as a sUAS pilot with similar sUAS type (fixed wing or rotary). Prior documented flight experience that was obtained in compliance with applicable



regulations may satisfy this requirement. Training, proficiency, and experience building flights are requested to be conducted under this grant of exemption to accomplish the required flight cycles and flight time. During training, proficiency, and experience building flights, all persons not essential for flight operations will be considered non-participants and the PIC will operate the sUAS with appropriate distance from non-participants in accordance with 14 CFR Section 91.119. operations), the PIC must have accumulated and logged in a manner consistent with 14 CFR Section 61.51(b), a minimum of five hours as a sUAS PIC operating the make and model of the sUAS to be utilized for operations under this requested exemption, and three take-offs and landings in the preceding 90 days. Training, proficiency, experience- building, and take-off and landing currency flights are requested to be conducted under this grant of exemption to accomplish the required flight time and 90 day currency. During training, proficiency, experience building, and take-off and landing currency flights all personnel not essential for flight operations are considered non participants, and the PIC must operate the sUAS with appropriate distance from nonparticipants in accordance with 14 CFR Section 91.119.

All operations must utilize a VO. The VO may be used to satisfy the Visual Line of Sight (VLOS) requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times. This condition and limitation is consistent with all FAA approved Exemptions

## **Section 4: Operations of sUAS**

At all times the sUAS must remain close enough to ☐the operator for the operator to be capable of seeing the aircraft with ☐vision unaided by any device other than corrective lenses.

Small unmanned aircraft may not operate over any persons not directly ☐involved in the operation.

Daylight-only operations (official sunrise to official sunset, local time).

Must yield right-of-way to other aircraft, manned or unmanned.

First-person view camera cannot satisfy “see-and-avoid” requirement ☐but can be used as long as requirement is satisfied in other ways.

Maximum airspeed of 30 mph

Maximum altitude of 400 feet above ground level.

Minimum weather visibility of 3 miles from control station.

No operations are allowed in Class A (18,000 feet & above) airspace.

Operations in Class B, C, D and E airspace are allowed with the ☐required ATC permission.

Operations in Class G airspace are allowed without ATC permission

No person may act as an operator or VO for more than one unmanned ☐ aircraft operation at one time.

No careless or reckless operations.

Requires preflight inspection by the operator.

The sUAS shall remain clear and yield the right of way to all other manned aviation operations and activities at all times.

The sUAS shall be operated at an altitude of no more than 400 feet above ground level (AGL). All altitudes reported to ATC will be in feet.

The multi-rotor sUAS shall not be flown at a ground speed exceeding 30 mph.

sUAS Operations will be conducted under visual meteorological conditions (VMC). The sUAS will not be operated less than 500 feet below or less than 2000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC.

If the sUAS loses communications or loses its GPS signal, it must return to a predetermined location within the planned operating area and land or be recovered.

The sUAS PIC must abort the flight in the event of unpredicted obstacles or emergencies in accordance with operating documents.

The sUAS PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough power to fly at normal cruising speed to the intended landing point and land the sUAS with 25% battery power remaining.

The sUAS operated in accordance with this proposed exemption shall be identified by serial numbers, registered in accordance with 14 CFR part 47, and have identification (Number) markings in accordance with 14 CFR part 45, Subpart C. Markings will be as large as practicable.

The sUAS documents required under 14 CFR 91.9 and 91.203 shall be available to the PIC at the Ground Control Station of the sUAS anytime the aircraft is operating. Those documents shall be available to the Administrator or any law enforcement official upon request.

Any sUAS incidents, accidents or flight operations that transgress the lateral or vertical boundaries of the operational area as defined by the applicable COA shall be reported to the FAA's UAS Integration Office (AFS-80) within 24 hours. Accidents shall be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: [www.nts.gov](http://www.nts.gov).

Unless otherwise specified in this petition, the sUAS PIC, and the sUAS operations shall comply with all applicable parts of 14 CFR including, but not limited to, parts 45, 47, 61 and 91.

## Intended Area of Operations

The sUAS shall not be operated over congested or densely populated areas. These areas include but are not limited to the yellow areas depicted on World Aeronautical Charts (WAC), Sectional Aeronautical Charts (Sectionals), or Terminal Area Charts (TAC). Each work site will also be evaluated based on local conditions.

Operations of sUAS may be conducted at distances less than 500 feet from participating persons, vessels, vehicles or structures that perform an essential function in connection with these special purpose operations. Operations closer than 500 feet from the PIC, VO, operator trainees and essential persons are permitted when operationally necessary; but never so close to present an undue hazard. This is consistent with Exemption No. 11138.

Operations of sUAS may be conducted at distances less than 500 feet from unoccupied vessels, vehicles or structures owned by the land owner/controller when the land owner/controller grants such permission, and the PIC makes a safety assessment of the risk from operations and determines that it does not present an undue hazard to persons or property. This is consistent with Exemption No. 11138.

Flight operations will be conducted at least 500 feet from all nonparticipating persons unless barriers or structures are present that sufficiently protect nonparticipating persons from the sUAS and/or debris in the event of an accident. HAZON shall ensure that nonparticipating persons remain under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the sUAS, flight operations will cease immediately. This is consistent with Exemption No. 11138.

All operations of sUAS shall be conducted with the permission from the land owner/controller or authorized representative. Permission from the land owner/controller or authorized representative will be obtained for each flight to be conducted.

## Airport Proximity

The sUAS will not operate within 5 nautical miles of an airport reference point as denoted on a current FAA-published aeronautical chart unless a letter of agreement with that airport's management is obtained, and the operation is conducted in accordance with a NOTAM as required by the operator's COA. The letter of agreement with the airport management will be made available to the Administrator upon request. This is consistent with Exemption No 11159.

## Visual Line of Site

The sUAS must be operated within VLOS of the PIC and VO at all times. This requires the PIC to be able to use human vision to see the sUAS unaided by any device other than corrective lenses, as specified on the PIC's FAA issued medical certificate.

All sUAS operations must utilize a VO. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times. The PIC and VO must be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC must ensure that the VO can perform the functions.

The sUAS will not be operated by the PIC from any moving device or vehicle. Operations will not be conducted during night as defined in 14 CFR 1.1.

## PreFlight Safety (14 CFR § 91.7(b))

Aerial Impressions will conduct preflight safety risk assessments to determine that the sUAS is in a condition for safe flight (14 CFR Section 91.7(b)) and that the planned operation can be completed safely. Specific procedures are addressed in Aerial Impressions Operators manual pg.6

## Flight Standards District Offices (FSDOs)

Aerial Impressions operations do not require a notification to Flight Standards District Offices (FSDOs). They will not be engaging in the type of sUAS that would warrant contact.

## *Certificate of Waiver or Authorization*

Aerial Impressions shall obtain an Air Traffic Organization (ATO) issued Certificate of Waiver or Authorization (COA) prior to conducting any operations under this requested grant of exemption. Additionally, Aerial Impressions will request a Notice to Airmen (NOTAM) not more than 72 hours, but not less than 48 hours prior to the operation.

## Weather

sUAS Operations will be conducted under visual meteorological conditions (VMC). The sUAS will not be operated less than 500 feet below or less than 2000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC. In additions fellow sUAS manufacturer's guidelines for weather operation limitations and standards.

## Section 5: Requested Exemptions from Regulations

Considered Regulation	Title	Recommended Action
14 C.F.R Part 21.185	Airworthiness Certificate	Aerial Impressions recommends that in consideration of the size, weight, speed and limited operating area associated with these aircraft and their operation, the Secretary of Transportation determines that these aircraft meet the conditions of Section 333. <b>Relief is not necessary.</b>
14 C.F.R. Part 45.23(b)	Display of marks	Aerial Impressions sUAV shall be identified by serial number, registered in accordance with 14 CFR part 47, and have identification (N-Number) markings in accordance with 14 CFR part 45, Subpart C. Markings will be as large as practicable.

		<b>Relief is not necessary.</b>
14 C.F.R. Part 61.113(a)	Private pilot privileges and limitations	The FAA has found in previous grants of exemption that a PIC with a private pilot certificate operating a sUAS would not adversely affect operations in the NAS or present a hazard to persons or property on the ground. <b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 61.133(b)	Commercial pilot privileges and limitations	The FAA has found in previous grants of exemption that a PIC with a private pilot certificate operating a sUAS would not adversely affect operations in the NAS or present a hazard to persons or property on the ground. <b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 91.7(a)	Civil Aircraft Airworthiness	Aerial Impressions recommends that in consideration of the size, weight, speed and limited operating area associated with this aircraft and its operation, the Secretary of Transportation determines that these aircraft meet the conditions of Section 333. <b>Relief is not necessary.</b>
14 C.F.R. Part 91.9(b)(2) &(c)	Civil Aircraft Flight Manual, Marking, and Placard Requirements	The FAA has previously determined that relief from these sections is not necessary. Relevant materials may be kept in a location accessible to the PIC in compliance with the regulations. <b>Relief is not necessary.</b>
14 C.F.R. Part 91.103	Preflight Action	Aerial Impressions will perform. <b>Relief is not necessary.</b>
14 C.F.R. Part 91.109(a)	Flight Instruction	Aerial Impressions will conduct all flight training through procedures specified in Training Instruction during dedicated training sessions. Based on previous decisions made by the FAA for sUAS petitions regarding this regulation, <b>relief is not necessary.</b>
14 C.F.R. Part 91.119(c)	Minimum Safe Altitude	Aircraft will be operated below 400 AGL, but not over congested areas. <b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 121	Altimeter Settings	The proposed aircraft have a barometric altimeter and GPS derived altitude capabilities. Aerial Impressions recommends that the altimeter be set to zero feet AGL rather than local barometric pressure or field altitude before flight. Considering the limited altitude of the proposed operations. <b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part	Fuel	Prior relief has been granted for manned and unmanned

91.151(a)	Requirements in VFR	aircraft to operate at less than prescribed minimums. <b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 91.203(a) and (b)	Certifications Required	Original intent of these regulations was to display an aircraft's airworthiness, certification and registration documents so they would be easily available to inspectors and passengers. Based on the FAA Memorandum subject, "Interpretation regarding whether certain required documents may be kept at an unmanned aircraft's control station," dated August 8, 2014, <b>relief is not necessary.</b>
14 C.F.R. Part 91.405(a)	Maintenance Required	<b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 91.407(a)(1)	Operation after Maintenance	<b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 91.409(a)(1) and (2)	Inspections	<b>Request relief with limitations and conditions specified in this petition.</b>
14 C.F.R. Part 91.417(a) and (b)	Maintenance Records	<b>Request relief with limitations and conditions specified in this petition.</b>

## Protection of Rights and Privacy

UAS Pilot in Command, Gimbal Operators and Spotter or any other person involved in flight mission is to observer and privacy rights or expectations of the public. Any person involved in any unlawful flights that may jeopardize someone's privacy right or expectations will be held accountable for their actions.

## Public Interest

Aerial Impressions is a small local business supporting and promoting the safe and responsible implementation of sUAS into our national airspace (NAS). Aerial Impressions will offer local market an accredited sUAS option to aid in aerial imagery gathering. Aerial Impressions use small unmanned units that have the capacity to perform work that would require a full scale fixed winged aircraft and pilot, reducing risk to people and property.

## Conclusion

In conclusion if granted relief for :14 CFR § 61.113(a) & (b) 14 CFR § 91.7(a) 14 CFR § 91.119(c) 14 CFR § 91.151(a) 14 CFR § 91.405(a). Aerial Impression believes they can perform safe, efficient and responsible flight operations. Promoting legal flight operations solutions to ensure greater public safety and discouraging unlaw use. While lessen risk to pilots, property and civilians due to the implementation of lightweight small unmanned systems.

Sincerely,

Todd Massey  
Owner Operator  
Aerial Impressions, LLC  
414-899-8512  
aerialimpressionsMKE@gamil.com