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

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

May 8, 2015

Exemption No. 11511
Regulatory Docket No. FAA–2015–0444

Mr. Richard Robinson
Robinson Capital, LLC
2106 East 1000 North
Sugar City, ID 83448

Dear Mr. Robinson:

This letter is to inform you that we have granted your request for exemption. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

By letter dated February 18, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Robinson Capital, LLC (hereinafter petitioner or operator) for an exemption. The exemption would allow the petitioner to operate an unmanned aircraft system (UAS) to conduct aerial photography and videography for real estate.

See Appendix A for the petition submitted to the FAA describing the proposed operations and the regulations that the petitioner seeks an exemption.

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

Airworthiness Certification

The UAS proposed by the petitioner is a DJI Phantom 2 Vision+.

The petitioner requested relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*. 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 the requested 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.

The Basis for Our Decision

You have requested to use a UAS for aerial data collection. The FAA has issued grants of exemption in circumstances similar in all material respects to those presented in your petition. In Grants of Exemption Nos. 11062 to Astraeus Aerial (*see* Docket No. FAA−2014−0352), 11109 to Clayco, Inc. (*see* Docket No. FAA−2014−0507), 11112 to VDOS Global, LLC (*see* Docket No. FAA−2014−0382), and 11213 to Aeryon Labs, Inc. (*see* Docket No. FAA−2014−0642), the FAA found that the enhanced safety achieved using an unmanned aircraft (UA) with the specifications described by the petitioner and carrying no passengers or crew, rather than a manned aircraft of significantly greater proportions, carrying crew in addition to flammable fuel, gives the FAA good cause to find that the UAS operation enabled by this exemption is in the public interest.

Having reviewed your reasons for requesting an exemption, I find that—

- They are similar in all material respects to relief previously requested in Grant of Exemption Nos. 11062, 11109, 11112, and 11213;
- The reasons stated by the FAA for granting Exemption Nos. 11062, 11109, 11112, and 11213 also apply to the situation you present; and
- A grant of exemption is in the public interest.

Our Decision

In consideration of the foregoing, I find that a grant of exemption is in the public interest. Therefore, pursuant to the authority contained in 49 U.S.C. 106(f), 40113, and 44701, delegated to me by the Administrator, Robinson Capital, LLC is granted an exemption from 14 CFR §§ 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), to the extent necessary to allow the petitioner to operate a UAS to perform aerial data collection. This exemption is subject to the conditions and limitations listed below.

Conditions and Limitations

In this grant of exemption, Robinson Capital, LLC is hereafter referred to as the operator.

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 Vision+ 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.

2. Operations for the purpose of closed-set motion picture and television filming are not permitted.

3. The UA may not be operated at a speed exceeding 87 knots (100 miles per hour). The exemption holder may use either groundspeed or calibrated airspeed to determine compliance with the 87 knot speed restriction. In no case will the UA be operated at airspeeds greater than the maximum UA operating airspeed recommended by the aircraft manufacturer.

4. The UA must be operated at an altitude of no more than 400 feet above ground level (AGL). Altitude must be reported in feet AGL.

5. The UA must be operated within visual line of sight (VLOS) of the PIC at all times. This requires the PIC to be able to use human vision unaided by any device other than corrective lenses, as specified on the PIC's FAA-issued airman medical certificate or U.S. driver's license.

6. All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the PIC and VO at all times. 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; electronic messaging or texting is not permitted during flight operations. The PIC 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 duties required of the VO.

7. This exemption and all documents needed to operate the UAS and conduct its operations in accordance with the conditions and limitations stated in this grant of exemption, are hereinafter referred to as the operating documents. The operating documents must be accessible during UAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in this exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and must be followed. Otherwise, the operator must follow the procedures as outlined in its operating documents. The operator may update or revise its operating documents. It is the operator's responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. The

operator must also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If the operator determines that any update or revision would affect the basis upon which the FAA granted this exemption, then the operator must petition for an amendment to its grant of exemption. The FAA's UAS Integration Office (AFS−80) may be contacted if questions arise regarding updates or revisions to the operating documents.

8. Any UAS that has undergone maintenance or alterations that affect the UAS operation or flight characteristics, e.g., replacement of a flight critical component, must undergo a functional test flight prior to conducting further operations under this exemption. Functional test flights may only be conducted by a PIC with a VO and must remain at least 500 feet from other people. The functional test flight must be conducted in such a manner so as to not pose an undue hazard to persons and property.

9. The operator is responsible for maintaining and inspecting the UAS to ensure that it is in a condition for safe operation.

10. Prior to each flight, the PIC must conduct a pre-flight inspection and determine the UAS is in a condition for safe flight. The pre-flight inspection must account for all potential discrepancies, e.g., inoperable components, items, or equipment. If the inspection reveals a condition that affects the safe operation of the UAS, the aircraft is prohibited from operating until the necessary maintenance has been performed and the UAS is found to be in a condition for safe flight.

11. The operator must follow the UAS manufacturer's maintenance, overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.

12. Each UAS operated under this exemption must comply with all manufacturer safety bulletins.

13. Under this grant of exemption, a PIC must hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC must also hold a current FAA airman medical certificate or a valid U.S. driver's license issued by a state, the District of Columbia, Puerto Rico, a territory, a possession, or the Federal Government. The PIC must also meet the flight review requirements specified in 14 CFR § 61.56 in an aircraft in which the PIC is rated on his or her pilot certificate.

14. The operator may not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption, including evasive and emergency maneuvers and maintaining appropriate distances from persons, vessels, vehicles and structures. PIC qualification flight hours and currency must be logged in a manner consistent with 14 CFR § 61.51(b). Flights for the purposes of training the operator's PICs and VOs

(training, proficiency, and experience-building) and determining the PIC's ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption are permitted under the terms of this exemption. However, training operations may only be conducted during dedicated training sessions. During training, proficiency, and experience-building flights, all persons not essential for flight operations are considered nonparticipants, and the PIC must operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.

15. UAS operations may not be conducted during night, as defined in 14 CFR § 1.1. All operations must be conducted under visual meteorological conditions (VMC). Flights under special visual flight rules (SVFR) are not authorized.

16. The UA may not operate within 5 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Directory (AFD) or for airports not denoted with an ARP, the center of the airport symbol as denoted on the current FAA-published aeronautical chart, unless a letter of agreement with that airport's management is obtained or otherwise permitted by a COA issued to the exemption holder. The letter of agreement with the airport management must be made available to the Administrator or any law enforcement official upon request.

17. The UA may not be operated less than 500 feet below or less than 2,000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC.

18. If the UAS loses communications or loses its GPS signal, the UA must return to a pre-determined location within the private or controlled-access property.

19. The PIC must abort the flight in the event of unpredicted obstacles or emergencies.

20. The PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough available power for the UA to conduct the intended operation and to operate after that for at least 5 minutes or with the reserve power recommended by the manufacturer if greater.

21. Air Traffic Organization (ATO) Certificate of Waiver or Authorization (COA). All operations shall be conducted in accordance with an ATO-issued COA. The exemption holder may apply for a new or amended COA if it intends to conduct operations that cannot be conducted under the terms of the attached COA.

22. All aircraft operated in accordance with this exemption must 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 must be as large as practicable.

23. Documents used by the operator to ensure the safe operation and flight of the UAS and any documents required under 14 CFR §§ 91.9 and 91.203 must be available to the PIC at the Ground Control Station of the UAS any time the aircraft is operating. These documents must be made available to the Administrator or any law enforcement official upon request.

24. The UA must remain clear and give way to all manned aviation operations and activities at all times.

25. The UAS may not be operated by the PIC from any moving device or vehicle.

26. All Flight operations must be conducted at least 500 feet from all nonparticipating persons, vessels, vehicles, and structures unless:
    a. Barriers or structures are present that sufficiently protect nonparticipating persons from the UA and/or debris in the event of an accident. The operator must 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 UA, flight operations must cease immediately in a manner ensuring the safety of nonparticipating persons; and
    b. The owner/controller of any vessels, vehicles or structures has granted permission for operating closer to those objects and the PIC has made a safety assessment of the risk of operating closer to those objects and determined that it does not present an undue hazard.

    The PIC, VO, operator trainees or essential persons are not considered nonparticipating persons under this exemption.

27. All operations shall be conducted over private or controlled-access property with permission from the property owner/controller or authorized representative. Permission from property owner/controller or authorized representative will be obtained for each flight to be conducted.

28. Any incident, accident, or flight operation that transgresses the lateral or vertical boundaries of the operational area as defined by the applicable COA must be reported to the FAA's UAS Integration Office (AFS−80) within 24 hours. Accidents must be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.ntsb.gov.

If this exemption permits operations for the purpose of closed-set motion picture and television filming and production, the following additional conditions and limitations apply.

29. The operator must have a motion picture and television operations manual (MPTOM) as documented in this grant of exemption.

30. At least 3 days before aerial filming, the operator of the UAS affected by this exemption must submit a written Plan of Activities to the local Flight Standards District Office (FSDO) with jurisdiction over the area of proposed filming. The 3-day notification may be waived with the concurrence of the FSDO. The plan of activities must include at least the following:
    a. Dates and times for all flights;
    b. Name and phone number of the operator for the UAS aerial filming conducted under this grant of exemption;
    c. Name and phone number of the person responsible for the on-scene operation of the UAS;
    d. Make, model, and serial or N−Number of UAS to be used;
    e. Name and certificate number of UAS PICs involved in the aerial filming;
    f. A statement that the operator has obtained permission from property owners and/or local officials to conduct the filming production event; the list of those who gave permission must be made available to the inspector upon request;
    g. Signature of exemption holder or representative; and
    h. A description of the flight activity, including maps or diagrams of any area, city, town, county, and/or state over which filming will be conducted and the altitudes essential to accomplish the operation.

31. Flight operations may be conducted closer than 500 feet from participating persons consenting to be involved and necessary for the filming production, as specified in the exemption holder's MPTOM.

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

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

Sincerely,
/s/
John S. Duncan
Director, Flight Standards Service

Richard Robinson
Robinson Capital, LLC
2106 E 1000 N
Sugar City, ID 83448

February 18th, 2015

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

Re: Exemption Request Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 C.F.R. §21, subpart H; 14 C.F.R 45.23(b);14 C.F.R. §§ 61.113(a) & (b);91.7 (a); 91.9 (b) (2);91.103(b); 91.105; 91.109; 91.119; 91.121; 91.151(a);91.203(a) and (b); 91.405 (a); 91.407 (a) (1); 91.409 (a) (2); 91.409 (a) (2) and 91.417 (a) & (b) to operate commercially for buyer education purposes in Real Estate.

To Whom It May Concern:

My name is Rick Robinson and I am submitting this request for an exemption of section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 C.F.R 45.23(b);14 C.F.R. §§ 61.113(a) & (b);91.7 (a); 91.9 (b) (2);91.103(b); 91.105; 91.109; 91.119; 91.121; 91.151(a);91.203(a) and (b); 91.405 (a); 91.407 (a) (1); 91.409 (a) (2); 91.409 (a) (2) and 91.417 (a) & (b)

Background
I work in the real estate industry and specialize in out-of-state buyers. In fact, 99% of my clients are out of state. When purchasing a piece of property, especially the size of the properties that are purchased in Idaho, it is of significant benefit to use an UAS for aerial photography and videography to help the buyer make an informed decision about the piece of property being purchased. This also includes the purchase of homes. Many out-of-state buyers see the benefit of being able to see aerial photographs and video of high eves, roofs, etc. to note their condition before making an offer on a home.

Regarding the Unmanned Aircraft System
The UAS I will be using is a small rotorcraft weighing less than 55 pounds with any and all payload. These UAS's operate at a speed no greater than 30 knots and can climb to an altitude no higher than 400ft AGL. It operates only in the line of my sight as the sole operator and within a radius of 300ft. It does, however, have the capability of a 1200ft radius of operation, but I have found, in my recreational use, that the line of sight is typically within 300ft of the operator. These flight

restrictions ensure that it is not a hazard to the airspace in which it will be operated. This UAS falls within the safety zone that the FAA will, with an exemption in place, allow commercial operation of a UAS.

The particular UAS that will be operated is a DJI Phantom 2 Vistion+. The specific specifications are found on the following pages:

Aircraft	**Supported Battery** DJI 5200mAh LiPo Battery **Weight (Battery & Propellers Included)** 1242g **Hover Accuracy (Ready To Fly)** Vertical: 0.8m; Horizontal: 2.5m **Max Yaw Angular Velocity** 200°/s **Max Tiltable Angle** 35° **Max Ascent / Descent Speed** Ascent: 6m/s; Descent: 2m/s **Max Flight Speed** 15m/s (Not Recommended) **Diagonal Motor-Motor Distance** 350mm
Gimbal	**Working Current** Static : 750mA; Dynamic : 900mA **Control Accuracy** ±0.03° **Controllable Range** Pitch : -90° – 0° **Maximum Angular Speed** Pitch : 90°/s
Camera	**Operating Environment Temperature** 0°C-40°C **Sensor Size** 1/2.3" **Effective Pixels** 14 Megapixels **Resolution** 4384×3288 **HD Recording** 1080p30 & 720p **Recording FOV** 110° / 85°
Remote Control	**Operating Frequency** 5.728 GHz – 5.85 GHz **Communication Distance (Open Area)** CE Compliance: 400m; FCC Compliance: 800m **Receiver Sensitivity (1%PER)** -93dBm **Transmitter Power** CE Compliance: 25mW; FCC Compliance: 100mW **Working Voltage** 120 mA@3.7V

	Built-In LiPo Battery Working Current/Capacity 3.7V, 2000mAh
Range Extender	**Operating Frequency** 2412-2462MHz **Communication Distance (Open Area)** 500-700m **Transmitter Power** 20dBm **Power Consumption** 2W

Procedures for Flight

As an avid aviation enthusiast, I understand the necessity for safety when flying an airplane or an UAS. The procedures for flight are as follows (in no particular order):

1. With an observer, make a walk around the area that is going to be filmed or photographed by the UAS. We will observe the location of trees, power lines, or any other obstacle that may interfere with the safe flight of an UAS.
2. Ensure that nothing will prevent a line-of-sight operation during the flight.
3. Test batteries in UAS, remote controls, and range extenders. The only acceptable battery level will be above 75% before takeoff. The UAS will be grounded before the battery level (which is monitored remotely) reaches 25%.
4. Conduct a pre-flight checklist (see appendix A)
5. Review the plan for the flight with the observer. Review altitudes, distances, and movements of the UAS.
6. Ensure the PIC has license and medical on hand.
7. Establish a security perimeter for observers. Care will also be taken to obtain the consent of all persons involved in the area and ensure a perimeter of 100ft is kept of the flight operation to maintain a sterile area.
8. The operator will file FAA Form 7711-1 or equivalent, with the appropriate Flight Standards District Office.
9. 3 days prior to the operation of an UAS, the PIC will submit a written plan of activities to the FSDO if required.
10. PIC and observer will maintain communication throughout the entire flight.
11. Permission from homeowner, landowner, or other property owner will be obtained prior to flight.
12. Permission from the local authorities will be obtains prior to flight.
13. In the event the UAS loses signal, the built in programming will force the UAS to return to is location of take off, and will safely land and power down.
14. Flights have the capability of being aborted due to unpredicted obstacles or emergencies.

Radio Frequency
This particular UAS operates at a frequency of 5.728GHz- 5.85 GHz. It is compliant with the FCC to 800m. The power of the radio falls within the FCC compliance of 100mW.

Qualifications of UAS PIC
At all times, the PIC of the UAS will be an FAA certified Private Pilot with a current 3rd class medical. Because the UAS will not carry passengers and will fly within a restricted area, it will exceed the safety standards set forth in 14 C.F.R 61.113 a & b. The PIC will also undergo training that the FAA will require to operate such UAS. The PIC will have over 100 hours of flight time. The PIC will also carry at all times a portable 2-way radio for air traffic monitoring and announcement of the location of the UAS if required by the FAA. At all times there will be an observer who will also monitor the UAS, surrounding buildings or obstacles, observers, and will be the second set of eyes to warn of any dangers that may affect the safe flight of the UAS.

Operations of the Unmanned Aircraft
As stated earlier, the UAS will be a tool mostly for out of state real estate clients to be able to view properties, view entire structures, and educate them more fully before entering into a real estate transaction.

The flights of the UAS will not pose a safety threat with the proper procedures in place as mentioned in the section "Procedures for Flight." As described earlier, there will, at all times, be an observer, a safety perimeter of 100 feet, battery levels above 75% before flight, a full pre-flight checklist and run-up, review of the flight plan, permission of property owners, written plan submitted to the FSDO if required, proper communication between PIC and observer, and permission from local authorities. Flights will only be conducted during daylight hours.

The UAS does not have the capability to fly over 29.1577 knots and speeds will generally be around 3-10 knots. The UAS will not be operated if clouds are at a level below 700ft AGL. This will ensure a safe distance from clouds and any low-flying aircraft.

The indented area of operation will be in rural settings, as well as neighborhoods where homes are on lots over one-half acre and have a distance of 75-100 feet between homes. It will not be used in high-density residential settings as that could pose too many safety concerns. Potential hazards in the intended area of operation are trees, power lines, structures, street lights, and fences. Because of the slow flight of the UAS when in operation for videography and photography for the intended purpose, the PIC and observer will be able to safely maneuver the UAS around the obstacles. The UAS also has capabilities of hovering in place which allows it to be flown at very low speeds.

The intended cities and counties of use have small non-towered municipal airports. The UAS will never be flown near the airports so as to pose any sort of safety

concern to pilots in the area. The altitude of the UAS will barely be above structures which should no pose any concern to piloted aircraft in the area. But for added safety, a 2-way radio to communicate to air traffic will always be on hand. This UAS will NEVER be flown within a 5-mile radius of any large international airport. The UAS has built in restrictions that prevent flight within those distances from an airport. The built in flight restrictions prevent takeoff in a 5-mile radius of a large International airport such as LAX, SLC, etc. The UAS will also be prevented from taking off within .6 miles of a smaller regional airport such as IDA. If the UAS is in flight and tries to fly into a no-fly zone, the UAS will stop and return back.

If required be the FAA, I will notify the FSDO of my flight operations prior to flight.

14 C.F.R. Part 21, Subpart H, 91.203(a) & (b) Airworthiness Certificate
Because the UAS is under 55lbs, fully loaded, and does not carry a pilot, passenger, any explosive materials or flammable fuel, operates in a fully restricted and controlled environment, I request exemption from 91.203 part A & B.

14 C.F.R. 45.23 B Marking the Aircraft
The UAS will not have an airworthiness certificate and because there is no entrance to the cabin, cockpit, or pilot station, there is no place inside the aircraft to place the word "Experimental." If required by the FAA, I will place the word "Experimental" on the exterior of the UAS. However, due to the size, 2 inch lettering will not be possible.

14 C.F.R. 61.113 A & B Private Pilot Privileges and Limitations: Pilot in Command
Unlike civil aircraft, the UAS does not carry living things on board; rather, it is controlled remotely via a safe and restricted location. The risks during operation are so minuscule that the PIC will exceed the present level of safety required for a commercial pilot to operate a rotorcraft with a commercial license.

14 C.F.R. 91.9 B(2): Civil Aircraft Flight Manual in the Aircraft
Because of the size and configuration of the UAS, no such manual can be carried. The flight manual will be carried at the ground station where the PIC and observer are operating the UAS.

14 C.F.R. 91.103 B(2): Preflight Action
A thorough pre-flight inspection and run-up of the aircraft will be performed prior to any flight of the UAS. Please see the appendix for the pre-flight checklist.

14 C.F.R. 91.105: Flight Crewmembers at Station
Because there are no souls on board a UAS, regulation 91.105 should be exempt from my purposes of using a UAS. However, crewmembers will be on the ground and in direct communication, namely the PIC and Observer.

14 C.F.R. 91.109: Flight Instruction

The UAS does not have dual controls. The PIC communicates to the UAS via a radio control box. The FAA has approved exemptions for flight training without fully functional dual controls for a number of aircraft.

14 C.F.R. 91.119: Minimum Safe Altitudes
The UAS will never operate at an altitude greater than 400ft AGL. It will be operated within a restricted area and with the consent of any and all persons or property involved.

14 C.F.R. 91.121 Altimeter Settings
The UAS that will be used does not have an altimeter. Rather, it uses GPS to determine the altitude. Since the normal protocol is to set your altimeter to the barometric pressure reading at the time of flight, an exemption will be needed. A safety check will be performed before each flight ensuring that the GPS altitude is reading correctly.

14 C.F.R. 91.151: Fuel Requirements for Flight in VFR Conditions
The battery in the DJI Phantom 2 Vision+ is capable of 25 minutes of powered flight. Given that the UAS will never be further than 300ft away and 400ft AGL, the longest possible time it could take the UAS to return to the ground safely is approximately 1.5 minutes. I categorize battery life under 10 minutes as the danger zone. The UAS will automatically return to its point of origin and safely land when the battery life reaches 2 minutes. Battery life as well as flight-time remaining is displayed on the screen visible to the PIC and observer. For safe flight, I will never fly the UAS with under 10 minutes of battery life.

14 C.F.R. 91.203 A & B: Carrying Civil Aircraft Certification and Registration
The UAS weighs under 55 pounds and does not have an on-board pilot operating it. The UAS is not capable of carrying such documents should they be required. These documents, if required by the FAA, will be carried by the PIC and will be accessible upon request immediately.

14 C.F.R. 91.405 A; 407 A(1); 409 A (2); 417 A & B: Maintenance Inspections
This regulation applies to aircraft that have an airworthiness certificate and should not apply to the operation of my intended use for the UAS. However, regular maintenance, checks, and cleaning of the UAS will be performed before each flight and if required by the FAA, can be logged into a log book and surrendered upon request. Regular maintenance will include cleaning of the 4 motors on the UAS Rotorcraft, motor testing, flight control testing, checking lights, and a cleaning of the entire UAS.

Should a mechanical issue arise during a flight, the UAS will land immediately and should not pose a safety concern because of its lightweight, restricted flying area, and low and slow maneuvering.

General Summary

I feel that my operation of the UAS will meet and exceed all current safety standards set forth by the FAA. I am seeking exemption from the following rules:

14 C.F.R. §21, subpart H; 14 C.F.R 45.23(b);14 C.F.R. §§ 61.113(a) & (b);91.7 (a); 91.9 (b) (2);91.103(b); 91.105; 91.109; 91.119; 91.121; 91.151(a);91.203(a) and (b); 91.405 (a); 91.407 (a) (1); 91.409 (a) (2); 91.409 (a) (2) and 91.417 (a) & (b) to operate commercially for buyer education purposes in Real Estate.

Approval of this exemption will ensure safe flight operations for my UAS following the strict guidelines set forth in the request.

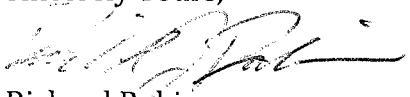
Should you have any questions or need to contact me, my information is:

Richard Robinson
Robinson Capital, LLC
2106 E 1000 N
Sugar City, ID 83448
208-360-4688
rick@theidahorealtor.com
rickrobnson@gmail.com

I feel that the criteria for exemption in Section 333 of the Reform Act of 2012 (namely size, weight, speed, operating capabilities, proximity to airports and populated areas and operation within visual line of sight and national security) have been satisfied and adequate justification has been provided for this exemption.

I appreciate your time and consideration in this matter.

Sincerely Yours,



Richard Robinson
Robinson Capital, LLC