



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

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

May 21, 2015

Exemption No. 11651
Regulatory Docket No. FAA-2015-0664

Mr. Jon Budreski
Co-Founder
AirShark LLC
29 Pleasant Street
Montpelier, VT 05602

Dear Mr. Budreski:

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 March 13, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of AirShark LLC (hereinafter petitioner or operator) for an exemption. The exemption would allow the petitioner to operate an unmanned aircraft system (UAS) to conduct infrastructure inspection such as solar farms, wind turbines, and construction projects.

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 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, AirShark 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, AirShark 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 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.nts.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

AirShark LLC Petition for Exemption – Section 333
Title 14 CFR 111.81 (FAA)

March 13 2015

US Department of Transportation
Docket Management System
1200 New Jersey Ave, SE
Washington, DC 20590

Electronically submitted via regulations.gov from:

AirShark
29 Pleasant Street, Montpelier VT 05602
jon@airshark.io 802 233 9330
www.airshark.io

AirShark is requesting a petition for exemption (Section 333) to fly small UAS for the purpose of infrastructure inspection work such as solar farms, wind turbines and construction projects. AirShark is focusing on supporting energy and infrastructure since it's a critical part of our nation's economic success. Using UAS, we can help contractors and managers inspect aging infrastructure, at reduced risk while providing a new level of information not previously accessible. In addition, noise and air pollution is less than alternatives. We are seeking exemption from several CFR's as noted below that remain burdensome to AirShark doing business and growing. We believe and will provide supporting documentation that AirShark can provide a level of safety greater than or equal to the rules we are seeking exemption from. This request is in the public interest, our interest and our local communities interest here in rural Vermont and New England. We have completed due diligence and have noticed profound potential impacts from safety to economic impacts to information quality.

Aircraft

AirShark is currently in the process of registering (2) DJI Phantom Vision+ UAS.

The Specific sections of Title 14 of the Code of Federal Regulations from which AirShark requests exemption: 14 CFR : Part 21 Subpart H; *61.113(a)&(b); 91.121; 91.151; 91.405(a); 91.407(a) (1); 91.409(a)(1) and (2); 91.417(a)&(b)*

For Each CFR – I have created a response addressing :

- 1) Rule is burdensome to AirShark...

- 2) AirShark can provide a level of safety greater than or equal to the rule we are seeking exemption to. Explain...
- 3) This request is in the public interest (AirShark / Public / Community)

RE: Exemption Request Section 333 of FAA Reform Act of F.A.R.s. and 14 CFR Part 11.

14 CFR 21 H – AirWorthiness Certificates sets forth requirements for procurement of necessary airworthiness certificates in relation to FAR § 91.203(a)(1). The size, weight and operational area of my, UAS permits exemption from Part 21 because my UAS meets (and exceeds) an equivalent level of safety pursuant to Section 333 of the Reform Act. The FAA is authorized to exempt aircraft from the airworthiness certificate requirement under both the Act (49 U.S.C. § 44701 (f)) and Section 333 of the Reform Act. Both pieces of legislation permit the FAA to exempt UAS's from the airworthiness certificate requirement in consideration of the weight, size, speed, maneuverability and proximity to areas such as airports and dense populations.

AirShark UAS meet or exceed each of the elements. Subpart H establishes the procedural requirements for the issuance of airworthiness certificates as required by FAR 91.203 (a) (1). Given the size and limited operating area associated with the aircraft to be utilized by AirShark, an exemption from Part 21 Subpart H meets the requirements of an equivalent level of safety under Part 11 and Section 333 of the Reform Act. The Federal Aviation Act (49 USC 44701 (f)) and Section 333 of the Reform Act both authorize the FAA to exempt aircraft from the requirement for an airworthiness certificate, upon consideration of the size, weight, speed, operational capability, and proximity to airports and populated areas of the particular SUAS. In all cases, an analysis of these criteria demonstrates that the SUAS operated without an airworthiness certificate, in the restricted environment and under the conditions proposed, will be at least as safe, or safer, than a conventional aircraft operating with an airworthiness certificate without the restrictions and conditions proposed.

61.113 (a)(b) Private Pilot Privileges and Limits

These regulations limit private pilots to non-commercial operations. Because the SUAS will not carry a pilot or passengers; due to the SUAS's size, weight, speed, and operational capabilities; and since operations will occur in tightly controlled and limited airspace, the proposed operations can achieve the equivalent level of safety of current operations that currently require a commercial pilot's license while still benefiting the public good.

91.121 regarding **altimeter settings** is inapplicable insofar as our UAS utilizes electronic global positioning systems with a barometric sensor. This regulation requires each person operating an aircraft to maintain cruising altitude by reference to an altimeter that is set "...to the elevation of the departure

airport or an appropriate altimeter setting available before departure.” As the SUAS may not have a barometric altimeter, but instead a GPS altitude read out, an exemption may be needed. An equivalent level of safety will be achieved by the operator by confirming the altitude of the launch site shown on the GPS altitude indicator before flight.

91.151(a) prescribes that no person may begin a flight in an airplane under visual flight rules (VFR) conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing and, assuming normal cruising speed—

*(1) During the day, to fly after that **for at least 30 minutes**;*

This regulation prohibits an individual from beginning “a flight in an airplane under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing, and, assuming normal cruising speed – (1) During the day, to fly after that for at least 30 minutes; or (2) At night, to fly after that for at least 45 minutes.” The battery powering the SUAS provides approximately 25 minutes of powered flight. That would make it impossible to meet the 30 minute reserve requirement.

Given the limitations on the SUAS’s flight area and the location of its operations within a predetermined area, a longer time frame for flight in daylight VFR conditions is reasonable. An equivalent level of safety can be achieved by limiting flights to 25 minutes or 25% of battery power (whichever occurs first). This restriction would be more than adequate to return the SUAS to its planned landing zone from anywhere in its limited operating area.

Maintenance Inspections

91.405(a) requires, in pertinent part, that an aircraft operator or owner shall have that aircraft inspected as prescribed in subpart E of the same part and shall, between required inspections, except as provided in paragraph (c) of the same section, have discrepancies repaired as prescribed in part 43 of the chapter.

91.407 (a)(1); prohibits, in pertinent part, any person from operating an aircraft that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless it has been approved for return to service by a person authorized under § 43.7 of the same chapter.

91.409 (a)(1) and (2); prescribes that no person may operate any aircraft unless, within the preceding 12 calendar months, it has had an inspection for the issuance of an airworthiness certificate in accordance with part 21 of this chapter.

91.417 (a)(b)

The above-cited Regulations require, amongst other things, aircraft owners and operators to “have [the] aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph (c) of this section, have discrepancies repaired as prescribed in part 43 of this chapter. . . .” These Regulations only apply to aircraft with an airworthiness certificate. They will not, therefore, apply to out UAS. However, as a safety precaution AirShark shall inspect all UAS before and after each flight. (see attachment for user manual).

These regulations require that an aircraft operator or owner “shall have that aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph (c) of this section, have discrepancies repaired as prescribed in part 43 of this chapter...,” and others shall inspect or maintain the aircraft in compliance with Part 43. Given that these sections and Part 43 apply only to aircraft with an airworthiness certificate, these sections will not apply. Maintenance will be accomplished by the operator pursuant to the Phantom user manual and guide. An equivalent level of safety will be achieved because these small SUASs are very limited in size, will carry a small payload, and operate only in restricted areas for limited periods of time. If mechanical issues arise, the SUAS can land immediately and will be operating from no higher than 400 feet AGL. Further, the operator will ensure that the SUAS is in working order prior to initiating flight and perform maintenance as required. Moreover, the operator is the person most familiar with the aircraft and best suited to maintain the aircraft in an airworthy condition to provide the equivalent level of safety.

UAS Equipment

AirShark plans to utilize a DJI Phantom2 Vision+. AirShark PIC will operate the UAS in a safe manner fully aware of the NAS minimizing risk on both the ground and air. With full VLOS and redundant systems on board as well as GPS the UAS will be carefully guided to inspect infrastructure and energy installations. AirShark shall officially register the UAS with the FAA before any flights commence. See the attached documents for design and operation characteristics. Checklists will be amended as need to create an even higher level of safety. For instance, battery data will be aggregated with each flight log using in house software.

UAS are less than 50lbs and fly less than 30 MPH and under 400ft. Flights will be ceased and UAS will return to home at 25% battery power. A Return to Home feature is available and can be used should connectivity or power issues arise.

Procedures

Preflight checklists will be followed (see attached user guide). Maintenance and repairs will be logged and batteries will be logged as well. (attached user manual).

Radio Frequencies

2.4 and 5.8 Radio Spectrum Frequencies will be used to communicate and provide video feeds from the UAS to a ground station. All frequencies and usage will comply with existing FCC bands. In addition, ground spotters (Visual Observers) will be equipped with a 462 MHz radios complying with part 15 FCC and be in communication at all times with PIC.

Pilot in Command (PIC) and Visual Observer Rules/Goals

AirShark's (PIC) shall hold a valid FAA issued Private Pilot's license (SEL) and valid class II or III medical at the time of flights. Jon Budreski currently holds approximately 140 hours of flight time S.E.L. and has 25 hrs. of UAS time. PIC will have had at least 3 takeoffs and 3 landings in the preceding 90 days.

- Pilot will be "re-certified" via flight review before May 2015 (S.E.L.) with (3rd Class Medical)
 - o Total Hrs. 140
 - o Total UAS Hrs. 25
 - o License / Certificate #_FF-1687500

A Visual Observer will understand basic UAS operational characteristics, safety protocols and have site understanding to help in successful missions. The visual observer will primarily be for keeping an extra set of eyes on the sky while noting proximity to ground hazards including people and property. Prompt notification via radio will be key for quick communication.

Operation of UAS / Privacy / Public Safety

AirShark is aiming to work with customers in the construction, energy and infrastructure space in primarily Northern New England to start. AirShark will inspect solar panels, wind turbines, construction sites and bridges (for example). Our nation's infrastructure requires tremendous amounts of maintenance and check-ups and is aging. We feel that using UAS will complement existing technologies and equipment that is being used today but also provide a greater level of safety than alternatives.

AirShark shall conduct operations in VFR VMC weather during daylight hours outside of Class B airspace and outside of 5 mile area of Class D/C airport unless approved in the COA. In addition, flight altitudes will be no higher than 400FT AGL. All operations will be conducted line of sight (LOS). We are aware a clearance in the form of a COA will be needed to conduct any operations outside of Class G airspace from the local controlling authority (Tower or FSDO). In addition any needed NOTAMs will be completed 48 hrs before flights.

Potential hazards will be outlined in initial safety briefings and clearly avoided. Hazards could include power lines, tall structures and mechanized moving equipment. "See and Avoid" rules using VLOS will be followed to minimize NAS

impacts. Further, permissions must be granted or approved over private or public lands where UAS is operating.

COA will be secured before flights as required by latest FAA guidance. TFRs, NOTAMS, weather etc will all be recognized / utilized as applicable.

Further:

- All operations will avoid congested or populated areas.
- Notifications will be made in advance to nearby or legal entities such as local police, fire.
- The operator will file a NOTAM for each flight as required by FAA / FSDO Office.
- A pre-job brief will be developed and conducted and must verify control of the flight area, including the absence of members of the public in the flight area.

Checklists will guide operators during pre-flight, flight, and post flight operations and reduce risk. Safety risk assessment checklists will be developed and updated yearly.

Since the areas being photographed or filmed will be on primarily private property, accessed only after given written and/or oral consent by the property owner(s), and clear of all people, except for the PIC and the PIC's helper(s), approval of this application presents no risk to the public privacy.

Reference to similar Petitions:

Astreus Aerial, petition – Petition No. 0352, Grant No. 11062.

Alan Purwin, petition -p#0786

Singer's Creations, petition - p#0915

Supporting Documents Etc.

- Phantom User Manual
- Phantom Users Manual (1-3)
- Phantom Guide
- Phantom Training Guide
- AMA Safety Code

We are prepared to modify or amend any part of this request to satisfy the need for an equivalent level of safety. We look forward to working with your office. Please contact me at any time if you require additional information or clarification.

Respectfully,
Jon Budreski, Co Founder – AirShark LLC
29 Pleasant St
Montpelier VT 05602

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a 'B'.