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

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

May 11, 2015

Exemption No. 11546
Regulatory Docket No. FAA–2015–0422

Mr. Ben Van Lare
Raecon Industries Ltd.
1685 H Street #318
Blaine, WA 98230

Dear Mr. Van Lare:

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 16, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Raecon Industries, Ltd. (hereinafter petitioner or operator) for an exemption. The exemption would allow the petitioner to operate an unmanned aircraft system (UAS) to conduct aerial inspections of industrial assets and power structures.

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 Microdrone MD4-1000.

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, Raecon Industries, Ltd. 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, Raecon Industries, Ltd. 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 Microdrone MD4-1000 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 five 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

FAA SECTION 333

Prepared for: Federal Aviation Association
Prepared by: Reacon Industries USA

February 16, 2015

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Section 1

Federal Aviation Association
Section 333 Petition

Prepared for: Federal Aviation Association

Prepared by: Reacon Industries USA

Dear Sir or Madam,

We, Raecon Industries, are writing pursuant to the FAA Modernization and Reform Act of 2012 and the procedures contained with 14 C.F.R. 11, to request, that we, Raecon Industries, a company and operator of a small unmanned aerial system, be exempted from the Federal Avaiations Regulations (FARs) that we have listed below. So that we, Raecon Industries, may operate our small quad-copter unmanned aerial system (UAS) commercially in airspace that is regulated by the Federal Aviation Association (FAA).

We, Raecon Industries Ltd., are a US subsidiary company of Canadian based Raecon Industries located in Vancouver Canada. We specialize in UAS photography and video inspections. We have worked with Transport Canada in filing commercial Special Flight Operation Certificates (SFOC) for the last 13 months, since January 2014. We have been awarded a blanket SFOC with Transport Canada, by showing our practices regarding public safety, manned aircraft safety, and conducting safe commercial flights within Canadian Airspace.

We, Raecon Industries, request the permission to conduct safe aerial inspections of industrial assets and power structures with our quad-copter Microdrone MD4-1000. These operations will be conducted in areas that are typically rural, with low vehicle and human traffic, and below an altitude of 300ft, well within the 400ft permissible ceiling set by the FAA. We have created and implemented safety protocols and controls to avoid public and manned aircraft hazards. We have created preflight site assessments, onsite tailboard meetings, safety and environmental safety plans, and Pilot in Command (PIC) and ground observer training.

Granting our, Raecon Industries request, accords with the Secretary of Transportation's responsibilities and authority to integrate UAS's into the national airspace system (NAS), and to "...establish requirements for the safe operation of such aircraft systems [UAS's] in the national airspace system" under Section 333(c) of the Reform Act specific to the use of UAS's for real estate/Realtor purposes. We, Raecon Industries, will perform our operations in compliance with the protocols described herein or as otherwise established by the FAA.

We, Raecon Industries, respectfully request the permit of an exemption to allow our company, Raecon Industries USA, to operate our Microdrone MD4-1000 to help public utility companies and industries increase safety and affordability for public and private asset inspections.

Contact Information:

Raecon Industries
CC: Ben Van Lare
Raecon Industries Ltd.
1685 H Street #318
Blaine, Washington, USA, 98230
Office: (360)325.5723
Email: ben@raeconindustries.com

The Specific Sections of Title 14 of the Code of Federal Regulations From Which Raecon Industries Requests Exemptions are:

14 CFR 21;
14 C.F.R. 91, et seq.;
14 CFR 407 (a) (1);
14 CFR 409 (a) (2); and, 14 CFR 417 (a) & (b).

The Extent of relief Raecon Industries seek and the Reason we seek such relief:

We, Raecon Industries, submit this application seeking relief from current applicable Federal Aviation Regulations (FARs) that restrict us, Raecon Industries, from utilizing Unmanned Aerial System technology within the national airspace system. The Reform Act in Section 332 provides for such integration of civil unmanned aircraft systems into the national airspace system as it is in the public's interest to do so. Our, Raecon Industries, small UAS meets the definition as defined in Section 331 and therefore the integration of our light weight UAS prior to the time in which the Reform Act requires the FAA to define and promote rules that will govern such unmanned aerial crafts. With our exemption, we will be able to work with the Federal Aviation Association to introduce our UAS safely into the national airspace. We operate our UAS within line of sight and under 400 feet elevation away from populated areas. When working in areas where people or vehicles may be present, we have set guidelines in place that are implemented prior to any performance of operation (see section 2). Along with this we will be operating outside of air traffic controlled (ATC) areas, typically 5-8 miles in diameter from airports. Our UAS is equipped with GPS and is outfitted with auto return to home safety technology.

We at Raecon Industries, consider safety as the most important part of any flight operation. Safety for manned aircraft, public safety, and our UAS operations teams are held at the utmost precedent. We have invested in one of the most trusted UAS suppliers worldwide, Microdrone,

because of the safety aspects their units are equipped with. Prior to each flight operation, preflight safety assessments are processed (see section 2). They are signed off by our Pilot-In-Command, Operations Manager, and Ground Observer. We, Raecon Industries operate our UAS safely insuring that we will not “create a hazard to users of the national airspace system or the public.” 112 P.L 95 Section 333 (b). Given that our UAS falls within the weight and size regulations and our safe and successful commercial UAS operations in Canada, we believe our UAS does not pose a threat to the general public, national security, or national airspace.

How Raecon Industries Request Will Benefit the Public As A Whole:

Aerial asset inspections using fixed wing aircraft and helicopters have been used to assess unsafe and difficult to reach areas for many years. The use of UAS technology for these types of inspections bring a new level of increased safety to personnel and industries involved in these inspections. The high cost of using manned aircraft for power line inspections and tower inspections can be significantly reduced by using UAS technology. Manned aircraft have liabilities that pose a threat to the public, pilots, and crew involved in operations. The use of combustible fuel and the size of aircraft cause significant liabilities and if crashed can cause severe environmental and public damage and could result in the loss in life. Our UAS does not pose such a threat since it is battery operated with batteries secured in protective cases within the UAS.

With these increased liabilities and costs of traditional inspections, industries often cannot afford much needed inspections and neglect to inspect viable assets on a regular basis. This neglect can have major consequences on the public. For example, overgrowth or dead vegetation along power lines can lead to power outages and/or fires. This poses a major risk to the public that could be affected in these regions. Utilizing our, Raecon Industries UAS, inspections can be completed in a safer and more cost effective way, thus, leading industries to not neglect much needed asset inspections and have the ability to keep their assets safe and performing optimally.

Reasons Why Raecon Industries Exemption Will Not Adversely Affect Safety or How the Exemption Will Provide A Level of Safety at Least Equal to the Existing Rule:

Raecon Industries exemption will not adversely affect the safety of the public or of manned aircraft. Quite the contrary, we, Raecon Industries are dedicated to ensuring all it's procedures and operations have safety as the highest priority. The most important details before we take off are to ensure public safety, air safety, environmental safety, and the safety of our Operations team. With these procedures in place we can judge what is safe/not safe/or safe with some risks when evaluating sites that are known and random. With our operators trained in manned aircraft

and unmanned aircraft operations, we are insuring that our intention is to reduce risk to airspace users as well as to people and property on the ground. By granting us, Raecon Industries, an exemption, we will be allowed to work with the FAA to monitor and safely deploy unmanned aerial systems into the national airspace and the public. Below are a few key safety procedures that insures our UAS will not adversely affect safety:

- Our UAS will not exceed 300 feet in altitude during operation and stay within 1000 feet of the Pilot and Ground Observer.
- Our UAS operates with redundant batteries, thus insuring that if one battery falters the other one is there to ensure safe return to home.
- Our UAS has the ability to operate for 88 minutes, however we cap all our operations at 25 minutes to ensure battery power is sufficient.
- If GPS communication is lost, our UAS has an automatic return to home function programmed for each flight.
- All flights are operated with a Pilot-In-Command and Ground Observer, ensuring safety of manned aircraft and the public.
- Before each flight operation, we carry out extensive pre-flight inspections of the operations area.

Our, Raecon Industries, safety policies and procedures provide a level of safety equal to or exceeding existing rules and regulations. Today most visual inspection of power poles and hard to reach assets are done using manned helicopters or by having technicians climb dangerous areas for the inspection. Both these options can be highly dangerous and environmentally taxing. It can also lead to a lack of thorough inspections because cost is relatively high, thus, leading to unknowingly defective assets or vegetation overgrowth that can lead to environmental damage, such as forest fires. Our UAS operations can mitigate these potential high-risk situations.

- Our UAV is certified in Germany to work around 500KV power line structures, thus ensuring that there is no electro-magnetic frequency that will affect performance of the UAS while in the air or cause it to go rouge.
- There is no combustible fuel on board the UAS, thus the potential for fire or explosion is greatly reduced.
- There is a far less environmental impact then conventional inspection techniques, insuring that safety of public and industrial infrastructure is maintained more efficiently and cost effectively.

VI. Summary The FAA Can Publish in the Federal Register:

We, Raecon Industries, seek the exemption of the following:

14 C.F.R. 21 and 14 C.F.R. 91: Airworthiness Certificates and Manuals.

14 C.F.R. 21, Subpart H, entitled Airworthiness Certificates, sets forth requirements for procurement of necessary airworthiness certificates in relation to FAR § 91.203(a)(1). The size, weight and enclosed operational area of our UAS allows exemption from Part 21 because our UAS meets the 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.

14 C.F.R. 91.7(a) prohibits the operation of an aircraft without an airworthiness certificate. As no such certificate will be applicable in the form contemplated by the FARs, this Regulation is not relevant.

14 C.F.R. § 91.9 (b) (2) requires an aircraft flight manual in the aircraft. Since there are no on board pilots or passengers in regard to UAS's, this Regulation is also not relevant. A similar level of safety will be achieved by maintaining a safety/flight manual that will be on hand for operations crew during all operations. The FAA has previously issued exemptions to this regulation in Exemption Nos. 8607, 8737, 8738, 9299, 9299A, 9565, 9565B, 10167, 10167A, 10602, 10700 and 32827.

14 C.F.R. § 91.121 in regards to altimeter settings, this is inapplicable insofar as our UAS utilizes global positioning systems that monitor flight conditions for all flight operations

14 C.F.R. § 91.203 (a) and (b) provides for the carrying of civil aircraft certifications and registrations. They are inapplicable for the same reasons described above.

14 C.F.R. 91.119: Minimum Safe Altitudes.

Ensure safe altitudes for the operation of civil aircraft. It allows helicopters to operate at lower altitudes in certain conditions. Reacon Industries UAS will never operate at an altitude greater than 400 AGL; while most operations take place under 100-200 feet AGL. We will operate our UAS only in areas deemed safe and away from people and vehicle traffic, providing a level of safety at least equivalent to or below those in relation to minimum safe altitudes.

14 C.F.R. 91.405 (a); 407 (a) (1); 409 (a) (2); 417 (a) & (b): Maintenance Inspections.

This regulation requires that aircraft owners and operators “have the aircraft inspected and 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..” Before each operation we run a full inspection of the UAS checking all critical surface areas

Summary:

We, Raecon Industries, seek an exemption from the aforementioned Regulations to operate our unmanned aerial system commercially and lawfully, while at the same time working with the FAA to develop safe protocols and procedures for UAS usage. We seek relief of FAA restrictions for commercial UAS use to have the ability to offer asset inspections for the power and industrial industry. By granting our request, we Raecon Industries, will be able to provide a safer more environmentally friendly approach for asset management compared to standard practices, thus, alleviating conventional dangerous inspections of hard to reach and highly energized assets. Our UAS pilots are trained in manned aircraft and unmanned aircraft operations having completed manned aircraft ground school and/or pilot licensing. Our UAV is certified to work around 500KV power structures while maintaining limits of approach set by the power line trade. We have successfully and safely flown power line and energy assets for the last 13 months in Canada working along side Transport Canada. We, Raecon Industries, respectfully request that the FAA grant our exemption request and we are willing to work with and share all information to benefit the FAA to keep the national airspace, manned aircraft and public at large safe and informed.

Kind Regards,

Ben Van Lare

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