



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

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

May 14, 2015

Exemption No. 11583
Regulatory Docket No. FAA-2015-0453

Mr. Thomas Joseph Raniere
Flite Video LLC
2267 Montecito Court
Brentwood, CA 94513

Dear Mr. Raniere:

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 posted to the docket on February 24, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Flite Video LLC (hereinafter petitioner or operator) for an exemption. The exemption would allow the petitioner to operate an unmanned aircraft system (UAS) to conduct operations for real estate inspections, sales and advertising.

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 are the DJI Phantom 2 Vision+ and DJI Phantom 3 Professional.

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

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

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, Flite Video 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, Flite Video 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 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 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.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

Enclosures



Flite Video LLC
A Look From Above

United States Department of Transportation
Federal Aviation Administration
800 Independence Ave., SW
Washington, DC 20591

Petition for Exemption

**Parts of certain Title 14 CFRs in regards to Section 333 of the
FAA Modernization & Reform Act of 2012
Concerning Unmanned Aerial Systems (UAS)**

TO whom it may concern:

This letter is a request for exemption from a number of Title 14 CFRs that relate to the commercial operation of “unmanned aerial systems” (UAS). The following will be included in this request: Name & information of Petitioner; Executive Summary of Petitioner summarizing the rules Petitioner seeks exemption from and the reasons the exemptions would serve the public good; Specific Title 14 CFRs to which an exemption is sought; the extent & reasons for the requested exemptions; reasons why safety would not be compromised.

Personal Information:

Name: Thomas Joseph Raniere (hereafter referred to as “Petitioner”)
Company: Flite Video LLC
Address: 2267 Montecito Court
Brentwood, CA 94513
(925) 262-9306
traniere@att.net

The Petitioner was born on February 8, 1947 in Chicago, IL and is a US citizen. He is the owner/member of Flite Video LLC whose primary clients will be Real Estate Companies in need of aerial photography and video in the area of Northern California. The Petitioner is a licensed Air Transport Pilot (1705116) – Airplane Multiengine Land with ratings: B-727; B-737; B-747; B-757; B-767; DC-9; IA-Jet; L-300 – Commercial Privileges: Airplane Single Engine Land (attached). The Petitioner has owned a Phantom 2 Vision + UAS since 2014 and has flown over 100 hours as a hobbyist to get proficient in this type aircraft.

Petitioner is requesting an exemption from the current rules in Section 333 which govern the uses of UASs for commercial purposes. The Petitioner seeks authorization to perform commercial UAS operations for Real Estate Inspections, Sales and Advertising. This would include residential, commercial and rural properties. Prospective customers and clients would include Real Estate Agents and Brokers along with Insurance Companies, Banks and Private Property Owners. There has also been interest shown from the Chief of Police in this area to possibly be on standby if the need arises for my services. This is still being discussed at the executive level of the department.

The Title 14 CFR exemptions that this request includes are: 61.113(a) & (b); 91.7(a); 91.119(a); 91.121; 91.151(a); 91.407(a)(1)&(2); 91.417(a) & (b). Reasons for each request are cited below.

Public Good

Aerial videography for geographical awareness and for real estate marketing and inspections has been around for a long time through manned fixed wing aircraft and helicopters. But for small business owners, its expense has been cost-prohibitive.

Granting this exemption to the Petitioner would allow him to provide this service at a much lower cost. Further, the small UAS being utilized in this application will pose no threat to the public given its small size and lack of combustible fuel when compared to larger manned aircraft. The operation of this UAS will minimize ecological damage and promote economic growth by providing information to businesses & individuals in the Northern California Area..

Description of UAV to be deployed under requested exemptions.

Petitioner currently owns a DJI Phantom 2 Vision + V3 quad copter. The petitioner intends to use the Phantom 2 as the primary UAV in commercial applications described herein. The Phantom 2 is a quad copter that can take off and land vertically. It weighs approximately 3 lbs. and has a maximum airspeed of approximately 25 knots. This UAS uses lithium polymer batteries which have approximately 20-25 minutes of total charge time. This gives this UAS approximately 12-15 minutes of flight time with sufficient remaining battery charge to land safely. The particular model of Phantom 2 being utilized under this request for exemption has First Person View (FPV) which allows the PIC to visually monitor certain telemetry data on a ground station monitor including altitude (AGL), GPS signal strength, battery charge information, etc. This FPV also gives the PIC video feed from the attached Hi-Definition camera showing what images are being captured. This is a significant safety feature as it shows the attitude of the UAS and its forward direction. However, this FPV feature will never be used as a tool to deviate from VLOS operation by the PIC.

Preflight

The petitioner will always follow procedures outlined in the UAS operator's manual as to proper preflight inspection of all hardware, software, environment and any other factors needed to ensure a safe flight.

FCC Information

The UAS being deployed here is a DJI Phantom 2 Vision + V 3.0. The Remote Control operates on a frequency of 5.728 GHz – 5.85 GHz. Published FCC Range is 800 m (2624 ft.) with a sensitivity of -93dbm.

PIC Qualifications

As stated above, the petitioner holds a FAA Air Transport Pilot's License with ratings in multiple commercial/military jet aircraft. Along with the extensive flight experience, the petitioner was also a FAA Flight Inspection Pilot at NAFEC in New Jersey and an Air Traffic Controller at both Oakland and Kansas City Centers. The Petitioner was also an Air Carrier Inspector at the Kansas City ACDO.

Petitioner has owned the UAS described above since 2014 and has over 100 hours in this type of UAS as a hobbyist. The petitioner envisions being the PIC in all operations that will be performed under the requested rule exemptions and the subsequent COA request. However, if another PIC is used for these operations, petitioner agrees that any PIC of the UAS in the envisioned operations will hold at least a FAA Private pilots' certificate have no less than 25

hours of PIC time in the UAS being deployed before beginning any type of commercial for hire operations and conform to all safety protocols.

Description of Intended Commercial Operations

Petitioner intends to solicit work for aerial real estate inspections from real estate agents & brokers, insurance companies & related vendors, banks and private property owners to provide photography and videography of residential, commercial and rural real estate. This work will always be conducted with the permission of the property owner or their respective agent. Flight operations will be restricted to flights directly over the property that has granted permission. Safety will always be the primary concern regarding any flight at any time.

Petitioner agrees to place a sign during any flight operation that says: CAUTION UNMANNED AERIAL VEHICLE IN OPERATION. STAY BACK 100 FEET FROM AIRCRAFT.

UAS Operating Parameters

The UAS being deployed in these exemption request can fly at a speed of approximately 25 knots. However, given the intended use describe here, this speed will never be necessary. Much slower speeds are preferred to collect the photographic material needed.

Petitioner agrees never to fly UAS outside of VLOS and also agrees to only fly UAS during the day in VMC conditions at altitudes below 400 feet AGL, clear of clouds.

The UAS will not be operated within 5 nautical miles of an airport reference point as denoted on a current FAA published aeronautical chart.

The UAS being deployed with these exemption requests has the capability of using GPS signals to return to its initial point of takeoff if connection with the radio control link is lost.

The Petitioner agrees to yield right of way to all manned aviation activities at all times.

Exemption Requests

The following are a list of Title 14 CFRs which the petitioner seeks exemption. Please note that the Petitioner has used Exemption No. 11138 to Douglas Trudeau (Regulatory Docket No. FAA-2014-0481) as a reference. Given that the petitioner and Mr. Trudeau intend to use the exemptions in similar manners and both use similar equipment, it seemed prudent not to burden the reviewer in this matter with exemption requests that have been previously deemed that relief was not necessary. These rules are Part 21, 45.23(b), 91.9(b)(2), 91.103(b), 91.109 and 91.203(a) & (b). If the reviewer believes that these rules need to be addressed in this request, the petitioner will make a supplemental request including these additional rule exemptions.

Rule 61.113 - Private Pilot Privileges and Limitations

The Petitioner hold an ATP with aircraft rating (a copy included in supplemental material). The Petitioner does not have the need to keep the qualifications of this license current with a 1st. or 2nd. Class medical, but would be willing to keep a 3rd. Class medical certificate current. This would reduce the limitation of the ATP to be equal to that of a Private Pilot with appropriate limitations. As to the Private Pilot Limitations concerning operations for hire or compensation, it seems that Exemption No. 11062 to Astraecus has allowed this exemption previously and was noted in the Trudeau Exemption No. 11138.

As to airmanship skills, the Petitioner has been operating his UAS since 2014 and has over 100 hours of flight time. Petitioner currently fly's this UAS several hours a month as a hobby and is very proficient and has the skills to maintain altitude, maintain VLOS, navigate, avoid obstacles, avoid air traffic and respond to loss of control link. Petitioner understands that he must make at least 3 takeoffs and landings within a 90 day period for currency purposes.

Rule 91.7(a) Civil Aircraft Airworthiness

There is no current FAA regulatory standard for determining airworthiness of UAS and there is no certificate currently available for UAS airworthiness. Petitioner seeks an exemption from this rule by ensuring that the UAS is in an airworthy condition based on compliance with the operating documents prior to every flight. Flight manuals and other important documents will be kept in a location readily accessible to the PIC at all times.

Rule 91.119© Minimum Safe Altitudes

91.119 prescribes safe altitudes for the operation of civil aircraft, but it allows helicopters to be operated at lower altitudes in certain conditions. Petitioner seeks an exemption from this rule as Petitioner will only operate the UAS in a range from ground level up to but not exceeding 400 feet (AGL) and will only operate in safe areas away from the public thus providing a level of safety not available to manned aircraft. The petitioner asserts that given the size, weight, maneuverability and speed of the UAS, an equivalent or higher level of safety will be achieved that from conventional manned helicopters.

Petitioner will avoid actively populated areas. These areas will be interpreted to include areas on a FVR chart depicted in yellow and will be supplemented with information from a F1ights Standard District Office (FSDO). Petitioner intends to operate the UAS over real estate for inspection purposes.

Per the exemption granted in No. 11138 concerning 91.119(c), Petitioner agrees to act in strict accordance to that exemption. However, Petitioner seeks an exemption from the rule stipulating that a UAS cannot be operated within 500 feet of a structure without permission of the owner. Given the intended use Petitioner will use these exemptions for, which is for photography and videography of real estate for marketing & inspection purposes, agreement from the engaging property owner or their agent is an absolute necessity. The UAS will only be flown over properties with this permission. However,

given the housing density in the Northern California area, maintaining a 500 foot distance from other structures even while strictly flying over a permission granting owner's property is impossible in many instances. The Petitioner seeks an exemption to this rule which would allow a 50' stand-off from other structures as long as the UAS is operated completely over and within the property boundary lines of a permission granting property owner. Petitioner agrees to always keep privacy rights of other property owners in mind.

Rule 91.121 Altimeter Settings

Petitioners' UAS has GPS derived altitude capabilities with a barometric sensor. The petitioner believes this rule is not applicable to the UAS operations intended.

Rule 91.151(a) Fuel Requirements For Flight in VFR Conditions.

Petitioner seeks relief from this rule due to the UAS being deployed is battery operated and the requirements under this rule are not applicable. The UAV in question has First Person Vision (FPV) capabilities which transmits certain telemetry to a monitor where the PIC can monitor certain aspects of the flight including battery level. A typical battery for a Phantom 2 Vision + UAS will last approximately 20-25 minutes before total exhaustion. Certain battery level warnings are set where the PIC will know when the battery state is at 30% and 15% remaining charge levels. This will normally allow a flight of 12 - 15 minutes with sufficient battery charge to make a safe landing. Petitioner will never begin a flight unless a fully charged battery is used.

Rule 91.405(a) Maintenance Required, 91.407(a) Operation After Maintenance, Preventative Maintenance, Rebuilding or Alteration; 91.409(a)(2) Inspections; 91.417(a)(b) Maintenance Records

Petitioner seeks relief from these rules due to it being an alternate inspection requirement of 91.409(a)(2). The Petitioner will inspect and ensure UAS is in a condition for safe flight and adhere to all operating documents.

Supplemental Information

The Petitioner has provided the following information to support these requests for rule exemptions and personal identification:

- 1) Copy of Petitioner's FAA ATP License, 2) Phantom 2 Vision + Manual V1.4, 3) Petitioner's California Driver's License

Closing

The Petitioner believes that exemption from the above listed Title 14 CFRs is warranted given Petitioner's background as an Air Transport Pilot, Air Traffic Controller, Air Carrier Inspector, the nature of the type of UAS flights that will be undertaken, the size & weight of the UAS being deployed, the safety precautions to the general public and the NAS the Petitioner intends to adhere to, the positive environmental impact the flight operations

would have compared to manned fuel consuming missions and the economic benefit the Petitioner's business would have in this new area of aviation.

As it appears that this class of flying is and will be getting more popular as the cost of these units comes down even further, I would like to also put my name, qualifications and experience in the running for a FAA UAS Designee to assist in the certification of new UAS operators. I feel that this certification could be accomplished with short NAS written exam and short operational hands on flight check with direction from the Certification Division. I have discussed this with an Inspector at the Oakland FSDO and said that I would follow up when/if I am given the Exemption to operate this as a commercial venture.

Thank you for your review of this matter. Please feel free to contact me at any time with With requests for additional information regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thomas J. Ranieri', with a stylized flourish at the end.

Thomas J. Ranieri
Flite Video, LLC
Brentwood, CA
(925) 917-0641