



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

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

March 26, 2017

Exemption No. 11239
Regulatory Docket No. FAA-2014-0838

Mr. G. Brent Connor
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Washington, DC 20036-3537

Dear Mr. Connor:

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.

The Basis for Our Decision

By letters dated October 9, 2014 and February 6, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Southern Company Services, Inc. (hereinafter petitioner or operator) for an exemption. The exemption would allow the petitioner to operate an unmanned aircraft system (UAS) to conduct research on the applicability of UAS when assessing damage to power lines due to storm events and performing routine power line inspection.

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

Discussion of Public Comments:

A summary of the petition was published in the Federal Register on November 13, 2014, (79 FR 67532). Four comments were received. The Small UAV Coalition (Coalition) and the Edison Electric Institute (EEI) supported the petition, and the Air Line Pilots Association, International (ALPA) and the National Agricultural Aviation Association (NAAA) opposed it. Also, the petitioner filed comments in response to ALPA's and NAAA's comments.

In support of the petition, the Coalition stated the petitioner has proposed to abide by stronger safety measures than hobby and modeler groups operating similar aircraft. The Coalition stated that it does not believe that heightened safety measures should be required for the petitioner simply because of the commercial nature of its operations. The Coalition urged the FAA to adopt an evaluation framework for UAS operations under section 333 of Public Law 112-95 that weighs the relative safety issues and risks of UAS by class and operational circumstances, rather than adopting artificial distinctions among unmanned aerial vehicles based on commercial and noncommercial operations. The petitioner's UAS poses considerably less safety risk than larger UAS. The Coalition asserted that because UAS operations like the petitioner's pose minimal risk to safety, they should be subject to minimal and appropriate regulations.

The Coalition noted the FAA is to consider the seven factors¹ in section 333 as a minimum. The Coalition stated the petition shows the FAA should consider factors other than those specified in section 333, such as the location and the altitude of its small UAV operations, and the Certificates of Authorization the Sky Ranger has obtained to conduct UAV operations for public universities and law enforcement agencies. The Coalition maintained that the petitioner's proposed operations satisfy the seven factors in section 333 and include several additional mitigating factors to ensure the safety and security of the proposed UAS operations. The Coalition emphasized the FAA must evaluate each factor within the context of the petitioner's proposed UAS operations.

The Coalition also commented that the FAA should grant relief from the requirement to hold an airman's certificate. The Coalition further stated that if an airman certificate is required then, at a minimum, the FAA should provide an exception from the training and testing requirements in part 61 in favor of requirements pertinent to the aircraft and operation proposed. The Coalition also asserted that in section 333 Congress intended for the FAA to consider national security with respect to the operation as opposed to addressing it through pilot certification.

¹ Section 333(b) of P.L. 112-95 states, in part: "In making the determination under subsection (a), the Secretary shall determine, at a minimum-- (1) which types of unmanned aircraft systems, if any, as a result of their size, weight, speed, operational capability, proximity to airports and populated areas, and operation within visual line of sight do not create a hazard to users of the national airspace system or the public or pose a threat to national security; ..."

The FAA notes that, as discussed in the grant of exemption to Trimble Navigation Ltd. (Exemption No. 11110), neither section 333, nor the FAA's exemption authority² allows the FAA to exempt pilots from the statutory requirement to hold an airman certificate as prescribed in 49 USC § 44711.

The Coalition commented that a visual observer (VO) should not be required for all small UAS operations. The Coalition further asserted that the presence of one or more VOs may allow the UAS to be operated beyond visual line of sight (VLOS) of the pilot in command (PIC) and that the petitioner's proposal to operate the UA within VLOS of the PIC *and/or* VO should be permitted.

The FAA notes that one of the determinations for operations under section 333 is operation within VLOS. The PIC must maintain VLOS while operating the UA. The FAA finds that a visual observer complements the PIC's capability to see and avoid other aircraft, including when the PIC may be momentarily attending to other flying tasks (e.g., maneuvering the aircraft close to people and other objects). The VO provides an additional level of operational safety.

The EEI represents all U.S. investor-owned electric companies and provides public policy leadership, strategic business intelligence, and essential conferences and forums. EEI noted small UAS are ideally suited for the petitioner's requested purposes and allow utility workers to conduct inspections without being in close proximity to high-voltage equipment or subject to the hazards of working at height. EEI detailed the benefits of utilizing UAS for tasks such as power line inspections and surveying and monitoring equipment and structures, arguing that it is in the public interest for the FAA to grant the petitioner's request for exemption. EEI noted the requested exemptions satisfy applicable statutory criteria and policies and will provide a level of safety at least equal to existing regulations.

EEI stated that given the characteristics of the UA and the petitioner's proposed operating conditions and environment, the FAA should find that it is not necessary to require commercial pilot certification, and that an equivalent level of safety will be attained by allowing operations with a private pilot certificate.

EEI noted small UAS are more efficient and cost effective than traditional inspection methods, due in large part to their small scale. EEI urged the FAA to ensure the scope of approved exemptions does not inadvertently exclude larger scale UAS capable of lengthier operations.

ALPA expressed concern regarding several aspects of the petition. ALPA noted the petitioner's reference to operations conducted below 400 feet above the surface in Class G airspace stating, "there must be means both to ensure that the sUAS remains within the

² 49 USC § 44701(f)

defined airspace and to ensure that the hazard of other aircraft intruding on the operation is mitigated.”

The FAA believes the limitations under which the petitioner will operate (i.e. VLOS and at or below 400 feet above ground level (AGL)) are sufficient mitigations to this risk so that the operations will not adversely affect safety.

ALPA noted that the petitioner does not state how the pilot and the observer will be able to communicate with each other. ALPA stated that text messaging, either by mobile phone or other means, could have an unknown latency and extend to several minutes. NAAA stated UAS observers must be present and able to communicate with the operator from the most minimal distance possible. The conditions and limitations regarding PIC and VO communications address those concerns.

ALPA asserted the UAS’s lithium polymer batteries have numerous associated fire and explosion hazards as outlined in DOT/FAA/AR-09/55, “Flammability Assessment of Lithium-Ion and Lithium-Ion Polymer Battery Cell Designed for Aircraft Power Usage (January 2010),” and that the safe carriage of the batteries and the mitigations in place for known risks should be addressed. The FAA states the referenced study was primarily conducted to determine how certain battery cells react in a fire situation aboard manned airplanes. Given the size of the battery and the operating conditions of the UAS, the FAA concludes that the use of a lithium polymer battery will not pose an undue safety risk for the proposed operations.

ALPA commented that command and control (C2) link failures are one of the most common failures on a UAS, and that lost link mitigations should require safe modes to prevent fly-aways or other scenarios. The FAA has inserted conditions and limitations in this exemption to mitigate the risk associated with such failures.

ALPA also noted that the petitioner’s proposed operations are for “compensation or hire,” and therefore contends the pilot must hold at least a current FAA commercial pilot certificate with an appropriate category and class rating for the type of aircraft being flown, as well as specific and adequate training on the UAS make and model intended to be used. Similarly, ALPA asserts a current second-class airman medical certificate should be required. NAAA also commented on pilot qualification, stating—

Just as manned aircraft pilots are required to undergo a rigorous training curriculum and show that they are fit to operate a commercial aircraft, so too must UAS operators. Holding a commercial certificate holds UAS operators to similar high standards as commercial aircraft operators and ensures they are aware of their responsibilities as commercial operators within the NAS. Medical requirements ensure they have the necessary visual and mental acuity to operate a commercial aircraft repeatedly over a sustained period of time.

The FAA has reviewed the knowledge and training requirements of sport, recreational, private and commercial certificates and concluded that a UAS PIC holding a minimum of a sport pilot certificate, and operating under this exemption, would not adversely affect operations in the NAS or present a hazard to persons or property on the ground. Additional discussion of the FAA's review is found in the FAA's Analysis section of this exemption.

ALPA opposed an exemption from the pre-flight action requirements of § 91.103. Although the petitioner did not request relief from 14 CFR § 91.103, there will be no approved Airplane or Rotorcraft Flight Manual as specified in paragraph (b)(1). The FAA believes that the petitioner can comply with the other applicable requirements in §91.103(b)(2). Therefore, the FAA finds that exemption from 14 CFR § 91.103 is not necessary.

ALPA noted the petitioner must specify a means to meet the "see and avoid" requirements in § 91.113 given the absence of an onboard pilot. The FAA notes that all flights must be operated within VLOS of the PIC and VO.

ALPA also expressed concern that the petition makes no reference to compliance with, or a request for waiver from, 14 CFR 61.195, *Flight instructor limitations and qualifications*, which defines the requirements for flight instructors. A certificated flight instructor is authorized to provide the instruction required for the certificates or ratings or currency listed in 14 CFR § 61.193. A person instructing on how to operate the UAS under the petitioner's training program would not need to be a certificated flight instructor because the instruction is not being provided for a certificate or rating listed in § 61.193. We note that none of the UAS operations proposed by the petitioner require such flight instruction because § 61.31(l) allows for operation of the UAS by an airman who is current per 14 CFR § 61.56 without a category and class rating. Instruction provided toward obtaining the pilot certificate required by this exemption would need to be provided by a certificated flight instructor.

ALPA commented the aircraft will not have a barometric altimeter as required by § 91.121. ALPA stated that processes or mitigations must be in place to ensure the UA can accurately maintain altitude including engineering processes, software development and control, electronic hardware development and control, configuration management, and design assurance to ensure the aircraft and its control system(s) operate to the same level of safety as other aircraft operated commercially in the National Airspace System (NAS).

Regarding § 91.151, *Fuel requirements for flight in VFR conditions*, ALPA argued that using batteries as the only source of an aircraft's power is a substantial shift from traditional methods of propulsion, and requires further research to determine best safety practices. The FAA refers to Exemption Nos. 8811, 10808, and 10673 for an explanation of its determination to grant relief to § 91.151.

Regarding §§ 91.405(a), 91.407(a)(1), 91.409(a)(2), and 91.417(a) and (b), ALPA opposed the petitioner's attempt to avoid compliance with established aircraft maintenance and recordkeeping requirements. ALPA also expressed concern regarding the petitioner's request for exemption from § 91.213, noting a need for further understanding of the conditions, instruments and equipment that would be exempted. ALPA stated the UAS should comply with the same level of safety as other aircraft operated commercially in the NAS.

The FAA has previously granted relief to §§ 91.405(a), 91.407(a)(1), 91.409(a)(2), and 91.417(a) and (b). See Exemption No. 11185 (Commonwealth). Relief from § 91.213, *Inoperative instruments and equipment*, is discussed in the FAA's analysis below.

NAAA noted that its members operate in low-level airspace, and therefore clear low-level airspace is vital to the safety of these operators. NAAA stated that seeing and avoiding other aircraft and hazardous obstructions is the backbone for agricultural safety, and that agricultural pilots depend on pilots of other aircraft to perform their see-and-avoid functions to prevent collisions. NAAA believes UAS operations at low altitudes will increase the potential for collision with agricultural aircraft.

The FAA recognizes these concerns and has incorporated associated conditions and limitations into this exemption, including: (a) a Notice to Airmen (NOTAM) issued for all operations; (b) operations conducted within VLOS of the pilot in command (PIC) and the VO; and (c) the UAS PIC must always yield right-of-way to manned aircraft.

NAAA stated that FAA airworthiness certification should be a requirement for all unmanned aircraft to operate within the NAS. NAAA recommended UAS be equipped with ADS-B or similar identification and positioning systems, strobe lights, high-visibility markings and registration numbers. NAAA also recommended UAS be operated strictly within the line-of-sight of the ground controller, with the assistance of a VO and clear of any low-flying manned aircraft.

The petitioner filed a response and addressed the issues raised by ALPA and NAAA comments. The petitioner stated that its petition includes all necessary measures to ensure that the proposed operation will be at least as safe as other operations in the NAS. It further noted that neither ALPA nor the NAAA appear to be concerned with the specific Aeryon SkyRanger operations that the petition proposes inasmuch as small UAS operations as a whole. The petitioner also outlined various safety features of the SkyRanger, including flight boundary programming capability, a flight termination feature, and see-and-avoid capabilities.

FAA Analysis

The petitioner requested relief from 14 CFR § 61.31, *Type rating requirements, additional training, and authorization requirements*. This part applies to persons who act as PIC of large aircraft, turbojet-powered airplanes, and other aircraft specified by the Administrator through aircraft type certificate procedures, not the Aeryon SkyRanger that weighs about 5 pounds. Accordingly, relief from 14 CFR § 61.31 is not necessary.

The petitioner requested relief from 14 CFR § 61.3(d), *Requirement for certificates, ratings, and authorizations, (d) Flight instructor certificate*. As noted in the petitioner's operating documents, the training proposed by the petitioner does not require a person who holds a flight instructor certificate. Therefore, the FAA finds that relief from § 61.3(d) is not necessary.

The petitioner requested relief from 14 CFR § 91.213, *Inoperative instruments and equipment*. The FAA has added conditions and limitations numbers 7, 9 and 10 below to mitigate risk associated with inoperative equipment.

Airworthiness Certification

The UAS proposed by the petitioner is a SkyRanger.

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, 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 Astraesus Aerial (Docket No. FAA–2014–0352), 11109 to Clayco, Inc. (Docket No. FAA–2014–0507), 11112 to VDOS Global, LLC (Docket No. FAA–2014–0382), 11176 to Chevron UAS, Inc. (Docket No. FAA–2014–0802), 11185 to Commonwealth Edison, Co. (Docket No. FAA–2014–0855), and 11213 to Aeryon Lab, Inc. (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, 11176, 11185 and 11213;
- The reasons stated by the FAA for granting Exemption Nos. 11062, 11109, 11112, 11176, 11185, 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, Southern Company Services, Inc. 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, Southern Company Services, Inc. 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 SkyRanger 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 Colombia, 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 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 March 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John Barbagallo

Acting Deputy Director, Flight Standards Service