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

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

April 17, 2015

Exemption No. 11367
Regulatory Docket No. FAA–2015–0106

Mr. Brian Young
Vice President of Claims Department
ADM Crop Risk Services, Inc.
350 North Water Street
Decatur, IL 62523

Dear Mr. Young:

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 letter dated January 14, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of ADM Crop Risk Services, Inc. (hereinafter petitioner or operator) for an exemption. The exemption would allow the petitioner to operate an unmanned aircraft system (UAS) to conduct operations to map crop acres and assess crop damage.

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

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

Airworthiness Certification

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

The petitioner requested relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*. In accordance with the statutory criteria provided in Section 333 of Public Law 112−95 in reference to 49 U.S.C. § 44704, and in consideration of the size, weight, speed, and limited operating area associated with the aircraft and its operation, the Secretary of Transportation has determined that this aircraft meets the conditions of Section 333. Therefore, the FAA finds that the requested relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*, and any associated noise certification and testing requirements of part 36, is not necessary.

The Basis for Our Decision

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

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

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

Our Decision

In consideration of the foregoing, I find that a grant of exemption is in the public interest. Therefore, pursuant to the authority contained in 49 U.S.C. 106(f), 40113, and 44701, delegated to me by the Administrator, ADM Crop Risk 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, ADM Crop Risk 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 DJI Phantom 2 Vision when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

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

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

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

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

6. All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the PIC and VO at all times. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times; electronic messaging or texting is not permitted during flight operations. The PIC must be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC must ensure that the VO can perform the duties required of the VO.

7. This exemption and all documents needed to operate the UAS and conduct its operations in accordance with the conditions and limitations stated in this grant of exemption, are hereinafter referred to as the operating documents. The operating documents must be accessible during UAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in this exemption and the procedures outlined in the operating documents,

the conditions and limitations herein take precedence and must be followed. Otherwise, the operator must follow the procedures as outlined in its operating documents. The operator may update or revise its operating documents. It is the operator's responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. The operator must also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If the operator determines that any update or revision would affect the basis upon which the FAA granted this exemption, then the operator must petition for an amendment to its grant of exemption. The FAA's UAS Integration Office (AFS−80) may be contacted if questions arise regarding updates or revisions to the operating documents.

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

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

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

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

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

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

14. The operator may not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption, including evasive and emergency maneuvers and maintaining appropriate distances from persons, vessels, vehicles and structures. PIC qualification flight hours and currency must be logged in a manner consistent with 14 CFR § 61.51(b). Flights for the purposes of training the operator's PICs and VOs (training, proficiency, and experience-building) and determining the PIC's ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption are permitted under the terms of this exemption. However, training operations may only be conducted during dedicated training sessions. During training, proficiency, and experience-building flights, all persons not essential for flight operations are considered nonparticipants, and the PIC must operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.

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

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

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

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

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

20. The PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough available power for the UA to conduct the intended operation and to operate after that for at least 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 April, 30, 2017, unless sooner superseded or rescinded.

Sincerely,

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

January 14, 2015

United States Department of Transportation

Docket Management System

1200 New Jersey Ave., SE

West Building Ground Floor Room W12-140

Washington, DC 20590

RE: Exemption Request Pursuant To Section 333 of the FAA Reform Act of 2012

Dear Sir or Madam:

We are writing pursuant to the FAA Modernization and Reform Act of 2012 (the "Reform Act") and the procedures contained in 14 C.F.R. 11, to request that ADM Crop Risk Services, Inc. ("ADMCRS"), an owner and operator of small unmanned aircraft, be exempted from the Federal Aviation Regulations ("FARs") listed below so that ADMCRS may operate its small unmanned aircraft / lightweight unmanned aircraft systems ("UAS") commercially in airspace regulated by the Federal Aviation Administration ("FAA"); as long as such operations are conducted within and under the conditions outlined herein or as may be established by the FAA in section 333.

ADMCRS is an Approved Insurance Provider (AIP) for the Risk Management Agency (RMA) of the United States Department of Agriculture (USDA). ADMCRS is a recognized leader in the crop insurance arena. Our technological and innovative tools have made service to the American farmer quicker, cheaper and safer. The ability to use UASs more extensively will continue that trend of innovation. UAS units will allow ADMCRS to map crop acres more efficiently and assess crop damage faster and safer than ever before.

To that end, ADMCRS respectfully requests the grant of exemption allowing lightweight, remote controlled UASs. The FAA has the authority to issue the exemption to ADM CRS pursuant to the Federal Aviation Act, 85 P.L. 726 (1958), as amended ("the Act").

Name and Address of Applicant is:

ADM Crop Risk Services

Attn: Brian Young, Vice President Claims Department

350 North Water Street

Decatur IL 62523

Main Office 1-888-523-6277

Fax 1-217-451-7829

Email: byoung@admcrs.com

Commercial and Public Benefits

Granting ADMCRS exemption furthers the public interest. As an AIP for the USDA's Risk Management Agency, we partner with the American farmer year after year to ensure their success and the sustainability of the U.S. agricultural system. With our enhanced capabilities through UASs, we will execute faster service of claims, thereby shortening the gap from the insured claim submission to payment of the claim. This facilitates the cash flow of the American farmer and gives them the resources they need to plant and harvest their crops. By servicing the American farmer, we are keeping the supply chain of corn, soybeans and other crops constant to grain elevators across the country. This in turn supplies the flow of grain to companies that make thousands of products for the consumption of the American and even global population. The service we provide to the American farmer provides food security for millions.

ADMCRS Safe UAS Practices

ADMCRS strives to practice the utmost safety for its employees, clients and customers. This endeavor would be no different. As ADMCRS logs more flight time, the experience will help us build better safety practices. Allowing ADMCRS to continue to fly in FAA airspace, we will continue to innovate and implement new safety standards. ADMCRS will continue to abide by these safety standards:

ADMCRS will only fly its UASs in agricultural settings such as rural and country landscapes. By nature our business is rural so we have no need to fly in urban and/or populated areas.

ADMCRS will NOT fly near airports.

ADMCRS only operates its UASs below 400 feet.

ADMCRS UASs weigh less than 15 pounds.

ADMCRS UASs have ability to abort flights if safety is breached or possibility of danger exists.

ADMCRS UAS flights are short, lasting between 5 to 20 minutes.

ADMCRS lands its UAS units when they reach 20% battery power.

ADMCRS UASs utilize the "Come Home" functionality if UAS goes out of range.

ADMCRS remote control pilots operate ADMCRS UASs by visual line of sight (VLOS).

ADMCRS UASs automatically land if battery is below 20%. This is a built in safety feature.

ADMCRS UASs are safe and easy to use. ADMCRS UAS experimentation currently revolves around the DJI Phantom 2. The Phantom 2 gives us assurance of safe flight and will not adversely affect the public (see section above). Some of the general specs of the unit include precision flight, stable hovering technology, auto return-to-home and auto landing. Phantom 2 also includes self-tightening propellers, advanced power management and intelligent orientation control.

ADMCRS UAS Procedures

The pilot in charge (PIC) will be responsible for pre-flight inspections, maintenance and if needed, repair. Pre-flight inspections include checking the propellers for any damage and insuring the motors are not damaged. Pre-flight inspections also include a check of surroundings including trees, power lines, wind speed, etc. If conditions are not safe, flight for that day will be aborted.

Once visual inspection is complete, UAS pilots will start initializing sequences with UAS and remote controller. If everything checks out, a low flight (10-15 feet) is recommended first so PIC can check all functionality including all movements up/down, left/right, rotation right and left. If this low flight does not check out successfully, UAS will be grounded until it functions properly. Low flight check will ensure unit is working normally before it is sent higher into survey height. Any problems or issues will be recorded and communicated via the chain of escalation as outlined in the ADMCRS standard operations manual.

ADMCRS UAS Technical Specifications

ADMCRS UAS technical specifications are listed in the ADMCRS standard operations manual (see Appendix A).

ADMCRS UAS Radio Frequency

ADM CRS UASs operate using a transmitter frequency of 5.72GHz – 5.8GHz. The operating frequency of the range extender is 2412-2462MHz. DJI Phantom 2 controllers are FCC compliant.

Extent of Relief ADM CRS Seeks and the Reason It Seeks Such Relief

ADM Crop Risk Services (ADMCRS) seeks exemption pursuant to Section 333 of the FAA Reform Act of 2012 and Part 11 of The Federal Aviation Regulations from 14 CFR part 21 and sections 61 and 91 detailed below.

14 CFR Part 21 – Requirements to Secure Airworthiness Certificate

Certificate exemptions should be given because of size, weight and operation areas of the UAS meet the level of safety necessary for exemption under Section 333 of the Reform Act. FAA has the authority to exempt aircraft from airworthiness certificate requirements under the Act (49 U.S.C. 44701 (f)) and Section 333 of the Reform Act.

14 CFR 61.113 (a) and (b) – Private Pilot Privileges and Limitations; Pilot in Command

Knowledge of flight characteristics and the Federal Aviation Regulations (FARs), along with the ability to physically manipulate the controls of the UAS are the critical aspects of the operation. ADMCRS believes this can be accomplished with a private operator that has specific training on the UAS operated in accordance with the ADMCRS Standard Operations Manual and has successfully completed required training.

Risks associated with the operation of the UASs is diminished from the level of risk that is associated with commercial operations (Part 61). Allowing operations of the UASs by private pilots as PIC exceeds the present level of safety achieved by 14 CFR 61.113 (a) and (b). Furthermore, equivalent or better safety levels can be achieved since there will be no human beings on board the UASs and the UASs will be operated to minimize risk while in the air.

FAA has authority to waive pilot requirements for commercial operations under 49 U.S.C. 44701(f).

14 CFR 91.103 – Preflight Action

ADMCRS PICs will perform preflight inspections in accordance with the manufacturer's recommendations and the ADMCRS Standard Operations Manual. These preflight checks include ground stations, controllers, range extenders and the UAS itself. Preflight inspections will also include weather and wind checks before flight and assessment of potential surrounding hazards such as power lines, trees, bushes, etc.

14 CFR 91.109(a) – Flight Instruction

ADMCRS seeks an exemption from 91.109(a), which provides that "no person may operate a civil aircraft (except a manned balloon) that is being used for flight instruction unless that aircraft has fully functioning dual controls." UASs and remotely piloted aircraft do not have functional dual controls. UAS flight control is accomplished through the use of a device that communicates with the aircraft via radio communication.

14 CFR 91.119(c) – Requirements for Minimum Safe Altitude for Civil Aircraft Operation

ADMCRS UASs will be operated below the 400 feet Above Ground Level (AGL). Given the size, weight (less than 15 pounds) and speed of the UASs, equivalent levels of safety will be achieved.

14 CFR 91.121 Altimeter Settings

ADMCRS UASs may not have a barometric altimeter, but may use GPS altitude read out indication instead, so an exemption may need to be granted. Equivalent safety can be achieved by the operator as the UAS uses AGL height from its initialization or launch point.

14 CFR 91.151 (a) (1) – Fuel Requirements for Flight in VFR Conditions

ADMCRS UASs have a short flight time of 20 minutes maximum per flight and will be operated below the 400 foot AGL ceiling under controlled conditions as defined by ADMCRS Standard Operations Manual. All ADMCRS UASs will be flown up to the maximum of 20 minutes or 20% of battery life, whichever comes first. UAS units have a built in safety that is achieved through battery monitoring. The aircraft system is built to alert the PIC of low battery life and will automatically return the unit to its take off location before battery capacity is depleted. FAA has previously issued exemptions for fuel

requirements in VFR conditions. Previous exemption numbers include 10808, 5745, 2689F, & 10673. Given the small size and operational purposes of the UASs, it does not bear the same risks associated with this section's requirements.

14 CFR 91.405(a) – Maintenance Required

This section and Part 43 apply only to aircraft with an airworthiness certificate, therefore these sections will not apply to ADMCRS UASs. Maintenance, preventative maintenance, rebuilding and alteration will be accomplished pursuant to the manufacturer's recommendations and the ADMCRS UAS Standard Operations Manual. UASs shall be free of mechanical issues and discrepancies prior to flight. If mechanical issues arise, flight will be terminated immediately. This standard exceeds that of a manned aircraft which allows possible flight despite minor discrepancies that do not impair safety.

ADMCRS, along with guidance from the manufacturer, shall be the most familiar with the aircraft and best suited to maintain the aircraft in an airworthy condition to provide the equivalent level of safety. ADMCRS standard operation practices outline how to log maintenance issues and flight information. An equivalent level of safety will be achieved because ADMCRS operates its UASs below 400 feet AGL.

14 CFR 407 (a) (1) – Maintenance, Preventive Maintenance, Rebuilding, or Alteration

This section and Part 43 apply only to aircraft with an airworthiness certificate, therefore these sections will not apply. In the absence of regulatory provisions dealing with UASs operations, maintenance, preventive maintenance, rebuilding and alteration, ADMCRS has developed operational standards to address this topic. Maintenance will be accomplished by ADMCRS pursuant to the manufacturer's recommendations and ADMCRS operational standards. ADMCRS UASs will be discrepancy free prior to initiating flight and will be grounded if mechanical issues are discovered while in flight. ADMCRS will consult manufacturer regarding any discrepancies or damages to the UAS.

ADMCRS shall be the most familiar with the aircraft and best suited to maintain the aircraft in an airworthy condition to provide the equivalent level of safety. Furthermore, ADMCRS UASs will flow below the 400 feet AGL, which will add an equivalent level of safety. Maintenance schedules and logs will be documented by ADMCRS standard operations.

14 CFR 409 (a) (1) and (2) – Inspections

This section and Part 43 apply only to aircraft with an airworthiness certificate, therefore these sections will not apply. In the absence of regulatory recommendations, ADMCRS has developed operation standards to address this topic. Pre-flight and post-flight inspections will be accomplished by ADMCRS pursuant to the manufacturer's recommendations and ADMCRS operational standards. ADMCRS UASs will be flown free of discrepancies and if mechanical issues arise during flight, the UAS will be grounded immediately. Flights will be executed under 400 feet AGL and logged according to the ADMCRS Standard Operations Manual.

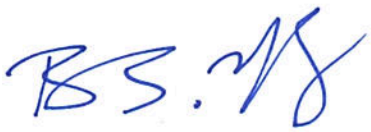
14 CFR 417(a) and (b) – Maintenance Records

This section and Part 43 apply only to aircraft with an airworthiness certificate, therefore these sections will not apply. In the absence of regulatory recommendations, ADMCRS has developed operation standards to address this topic. Maintenance will be accomplished by ADMCRS pursuant to the manufacturer's recommendations and ADMCRS operational standards. Maintenance, preventive maintenance, rebuilding and alteration will be successfully accomplished by trained personnel.

ADMCRS UASs will be free of discrepancies prior to initiating flight. If mechanical issues arise during flight of the UAS, the PIC will land the unit safely. ADMCRS shall be the most familiar with the aircraft and best suited to maintain the aircraft in an airworthy condition to provide the equivalent level of safety. ADMCRS operational standards will detail how to log scheduled maintenance or flights that are performed.

ADMCRS respectfully requests that the FAA grant its exemption request without delay. The FAA has the authority to issue the exemption sought by ADMCRS pursuant to the Federal Aviation Act, 85 P.L. 726 (1958), as amended (the "Act").

Sincerely,



Brian Young, Vice President of Claims

ADM Crop Risk Services