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

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

July 8, 2015

Exemption No. 11993
Regulatory Docket No. FAA–2015–1511

Mr. Charles Gilman
BUNGEE LLC
P.O. Box 334
Danville, VT 05828

Dear Mr. Gilman:

This letter is to inform you that we have granted your request for exemption. It transmits our decision, explains its basis, and gives you the conditions and limitations of the exemption, including the date it ends.

By letter dated April 22, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of BUNGEE LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography, videography, and survey services in the utilities, communications, real estate, construction, and agricultural industries.

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+ and DJI Inspire 1.

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[1]. 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, BUNGEE 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.

[1] Aerial data collection includes any remote sensing and measuring by an instrument(s) aboard the UA. Examples include imagery (photography, video, infrared, etc.), electronic measurement (precision surveying, RF analysis, etc.), chemical measurement (particulate measurement, etc.), or any other gathering of data by instruments aboard the UA.

Conditions and Limitations

In this grant of exemption, BUNGEE LLC is hereafter referred to as the operator.

Failure to comply with any of the conditions and limitations of this grant of exemption will be grounds for the immediate suspension or rescission of this exemption.

1. Operations authorized by this grant of exemption are limited to the DJI Phantom 2 Vision+ and DJI Inspire 1 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 July 31, 2017, unless sooner superseded or rescinded.

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

Enclosures

05/22/2015
BUNGEE LLC.
Attn: Charles Gilman
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802-535-4749
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TO: Federal Aviation Administration
US Department of Transportation
Docket Management System
1200 New Jersey Ave. S.E
Washington, DC . 20590

Re:
Exemption Request Section 333 of the FAA Reform Act Pursuant to section 333 of the FAA Modernization and Reform act of 2012 (The Reform Act), and 14 C.F.R. Part 11, BUNGEE LLC , herby seeks and applies for an exemption to the Federal Aviation Regulations (FARs) to allow BUNGEE LLC to operate Small Unmanned Aircraft Systems (UAS) commercially in airspace regulated by the Federal Aviation Administration (FAA) under the conditions and limitations set forth in this petition. The requested exemption would permit BUNGEE LLC to operate small, unmanned aircraft system (UAS) for the purpose of providing an aerial photography and survey service to Municipalities, Utilities & Private consumers. The areas of use will include both photo and video in the Utilities, Communications industry, real estate industry, surveying industry, construction industry, agricultural industry. The UAS will be operated in airspace that is 1) limited 2) predetermined 3) would provide added safety enhancements to the already safe operations in the industry presently using conventional aircraft. system"

Exemption request to section 333 of the FAA Reform Act Plan 11 Specific to UAS operations.

14 CFR 21 subpart H; 14 CFR 45.23(b); 14 CFR 61.113(a) & (b); 14 CFR 91.103;14 CFR 91.105; 14 CFR 91.109: 14 CFR 91.119(c);14 CFR 91.121; 14 CFR 91.151(a); 14 CFR 91.405(a); 14 CFR 91.407(a)(1); 14 CFR 91.401(a)(1) & (2); 14 CFR 91.417(a) 7 (b).

Dear Sir or Madam:

Commercial operation of an UAS, as described herein, which are equipped with camera(s) and sensors, would operate in the following manner:

- Aerial photography and/or video for public and/or private use including real estate, architecture, land surveying, engineering and other related professional activities.
- Aerial video and/or photography of for public and/or private use including television, public events, cinematography and news gatherings.
- Aerial inspection/photography of residential/commercial structures under contract with the owners or local government authority.
- Aerial inspection/photography of residential/commercial utility infrastructure included but not limited to electrical power lines, wind turbines and cell towers.
- Aerial video/photography or providing live video feed to assist with rescue operations in cases of an emergency or natural disaster only when the local authorities or government has requested it by contract and/or donation.
- The ability to offer training to persons or individuals belonging to both private and/or public organizations that have interests in the use and application of UAS for the purpose of the safe operation of a UAS to enhance the safety of national aerospace system (NAS) as well as for protection of the persons and property.

As described fully below, and to be used as FOM (exibit#1), the requested exemptions would permit the operation of a UAS under controlled conditions in the NAS that would be a) limited, b) controlled, c) predetermined, and d) will provide safety enhancements such as limited exposure to flight crew, climbing crews, weight of vehicles, speeds of usage, non use of volatile fuels, ect. Approval of this exemption would thereby enhance safety and fulfill the Secretary of Transportations (the FAA administrators) responsibilities to "….establish requirements for the safe operation of such aircraft systems in the national airspace system.

AIRCRAFT AND EQUIVALENT LEVEL OF SAFETY

The primary vehicle to be used will be the DJI Phantom 2 Vision+ and or DJI Inspire1. While vehicles may be upgraded as new technological and safety advanced occur the bar for operation and safety will be set by DJI Phantom 2 Vision + and any new vehicles or versions will exceed the current safety and operational standards. No vehicle operated by BUNGEE LLC will be modified from the manufacturers design unless specifically directed by the same manufacturer.

The operation limitations proposed for an equivalent or higher level of safety because operations will further enhance the safety of the persons and/or property using conventional aircraft. These limitations and conditions to which the applicant agrees to adhere to when conducting commercial operations under the FAA issued exemption as set forth in the flight operations manual include:

Exhibit #1

- The UAS will weigh less than 55 lbs
- The UAS will have a maximum operating speed of no more than 100 mph
- Flights will be operated within line of sight of the pilot in command and/or visual observer
- Maximum flight time for each operational flight will be 30 minutes. Flights will be terminated at 25% battery power reserve or 30 minutes of flight time whichever occurs first
- Flights will be operated at altitude of no more than 200feet above ground level and no more than 200 feet above an equivalent platform from which filming is planned.
- UAS will NOT operate.
- 5 nautical miles (NM) from an airport having an operational control tower; or
- 3 NM from an airport with a published instrument flight procedure, but not an operational tower; or
- 2 NM from an airport without a published instrument flight procedure or an operational tower; or
- 2 NM from a heliport with a published instrument flight procedure
- Minimum crew for each operation will consist of the UAS pilot(PIC), the visual observer (VO) and may include but not limited to a camera operator
- The UAS pilot will be designated pilot in command and hold a private pilot's license along with a Current State Drivers License. If the PIC feels another operator to be qualified with the necessary skills to be pilot in command and possesses a private pilot's license along with, Current credentials, that person may be designated PIC provided they have a minimum of 20 hours of flight time with the UAS.
- A briefing will be performed regarding the planned UAS operations prior to each day's flight consisting of all days production activities
- All flights will occur under visual flight rules meteorological conditions (VFR only).
- The operator will obtain verbal/written consent of all persons involved with the planned operations and ensure only consenting persons will be allowed within 100 feet of the flight operation, and the radius may be reduced to 30 feet based upon an equivalent level of safety determination, as required under the FOM. With the advance permission of the FFDO, operations at closer range may be approved.
- The PIC and VO will have been trained in operation of UAS and receive up-to-date information for the particular UAS to be operated.
- The PIC and VO will be able to communicate by voice, radio, and/or text at all times.
- Written and/or verbal permission and permits will be obtained from territorial, state, county or city jurisdictions, including law enforcement, fire or other appropriate governmental agencies.
- If the UAS loses communications with the remote controller or losses GPS signal, the UAS will have the capability to return to a pre-determined location within a designated location and land autonomously.
- The UAS will have the capability to abort a flight and return to designated landing area in case of unpredicted obstacles, weather, or emergencies.
- VO or PIC instructed to switch UAS to automatically return home in event either are incapacitated.

https://www.faa.gov/uas/legislative_programs/section_333/how_to_file_a_petition/media/section333_public_guidance.pdf

As of March 23, 2015, the FAA will automatically grant a "blanket" COA for flights at or below 200 feet to any UAS operator with a Section 333 exemption, provided the aircraft weighs less than 55 pounds, operations are conducted during daytime Visual Flight Rules (VFR) conditions and within visual line of sight (VLOS) of the pilots, and stay certain distances away from airports or heliports.

In seeking authorization, petitioners will require exemptions from regulations with which they cannot fully comply. The table below provides guidance regarding regulations from which a petitioner may require exemption. However, some proposed operations may require exemption from regulations not listed here, while others may not require exemption from all regulations listed here.

14 CFR PART	
21, Subpart H	Certification procedures for products and parts, Airworthiness Certificates
91.103(b)(2)	Preflight action
91.105	Flight crewmembers at stations
91.109	Flight instruction
91.119	Minimum safe altitudes
91.121	Altimeter settings
91.151	Fuel requirements for flights in VFR conditions
91.405	Maintenance required
91.407	Operation after maintenance
91.409	Inspections
91.417	Maintenance

14 C.F.R. Part 21, Subpart H: Airworthiness Certificates 14 C.F.R. Sec 91.203(a)(1)

The UAS will operate @ 55lbs or less (Gross), carries neither a pilot or passenger*, carries no explosive materials or flammable liquid fuels*, and operates in within a secured and pre-determined designated area, at altitudes not to exceed 200 ft ALT or speeds in access of 100 MPH.

14 C.F.R. Sec 91.105 Flight crew members at station

Exemption may be required, the PIC may not leave his station nor shall VO leave station . In event that PIC or VO become incapacitated, UAS is to automatically return to designated landing area, as outlined in FOM

14 CFR Sec 91.109 Flight Instruction (Dual Controls)

Requiring that no person shall operate a civil aircraft for flight instruction unless the aircraft has fully functioning dual controls.UAS and Remote controlled aircraft by design do not have dual controls, to do so on a radio controlled aircraft would lower the ability to safely operate the UAS. This section cannot reasonably apply

14 C.F.R. Sec 45.23(b). Marking of the Aircraft

Although exemption from said section cannot benefit nor exceed current stipulations, physical limitations of UAV are reality, such as cabins, letter size, ect. The UAV will operate under my control with registration lettering sized to fit fuselage in compliance of said section 45.23(b) under conditions and or limitations deemed mandatory by FAA . I and my colleges must be held responsible for compliancy, on behalf of Public's safety and shared air space, as well as its need to indentify and Enforce the accountability and of this growing industry.

14 C.F.R. Sec 61.113(a) and (b): Private Pilot Privileges and Limitations: Pilot in Command

By current regulations because the applicants UAS does not carry passengers, or property. The use of UAS is far less dangerous (weight, speed, Fuel) than the inherent usage of commercial activities outlined in 14 CFR.16. The pilot in command shall have a current Private pilots license as well as a Current state drivers licsence which will equal if not exceed safety regulations outlined in 14 CFR 16.113.(a) & (b).

14 C.F.R. Sec. 91.103: Preflight Action:

Exemption is requested due to fact that FAA rotor flight manuals are not available for UAV. The PIC will take all actions as stated in FOM, under normal procedures included but not limited to review of weather, examination of batteries for flight time analysis, landing and takeoff distances as well as flight and aircraft performance in flight.

14 C.F.R. Sec 91.119; Minimum Safe Altitudes

Mandates safe altitude for operation of civil aircraft and allow helicopter to operates less then minimums prescribed, providing the person operating helicopter complies with any route with and or altitudes prescribed for Helicopter's by FAA. Being that UAV is of Helicopters standards and operation a request for exemption to operate at altitude's not to exceed 200 AGL or not more than 200 ft above any elevated platform from which take off is necessary to achieved filming. In the event of such particular flight plan, property owners, filming crews and other personnel would all be briefed as to safety and conduct procedures during flight. FOB or ATC having jurisdiction in such area would have notification and briefing as mandated.

14 C.F.R. Sec 91.121 Altimeter Settings

The requirement of PIC is to use altimeter as means to navigate aircraft to cruise altitudes to and from corresponding airports as predetermined in flight plan, unless ordered otherwise. As the UAS has no barometric altimeter, but instead uses GPS altitude read out, an exemption would need be applied. Per a pre flight check list and live flight data monitoring, the altitude of launch site will be predetermined and therefore calculated into the UAS- GPS indicator before flight.

14 C.F.R. Sec 91.151(a): Fuel Requirements for Flight in VFR Co

Fuel requirements for flight. The maximum flight time under ideal conditions is 30 minutes with the current manufacturers battery pack. The proposed rule under this exemption would require the UAS to return to its point of launch if its battery reaches less than 25% provides a higher standard of safety when applied to UAS.

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

Referring to maintenance, preventive maintenance, and alterations to the UAS. The operator will provide minor maintenance and inspection to the UAS, documented as outlined in the operational and safety guidelines. Given the size and simplicity of the UAS combined with the operational and safety guidelines outlined in this petition the operator can maintain or exceed the required level of safety.

Sincerely

Charles Gilman

BUNGEE, LLC