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

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

July 14, 2015

Exemption No. 12037
Regulatory Docket No. FAA–2015–1431

Mr. Michael Finnegan
Owner/Operator
Photo Elevations LLC
2508 Eagle Lane, NE.
Bemidji, MN 56601

Dear Mr. Finnegan:

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 17, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Photo Elevations LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography.

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

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

Airworthiness Certification

The UAS proposed by the petitioner are the DJI Phantom 3, DJI Inspire 1, and DJI Spreading Wings S1000+.

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, Photo Elevations 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, Photo Elevations 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 3, DJI Inspire 1, and DJI Spreading Wings S1000+ 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

April 17, 2015

United States Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, DC 20590

Attention: Flight Standards Service Director

Dear Mr. Duncan,

We at Photo Elevations LLC sincerely thank you for your time and consideration for the following review.

Re: Expedited Exemption Petition of Section 333 of the FAA Reform Act of 2012 to Operate Small Unmanned Aircraft Systems (sUAS) For Commercial Purposes Under the New "Blanketed" (COA) Below 200 feet Above Ground Level (AGL) policy for following Pursuant:

Photo Elevations LLC
Michael Finnegan, Owner/Operator
2508 Eagle Lane NE
Bemidji, MN 56601
218-368-1375
photoelevations@yahoo.com

I, Michael Finnegan, sole owner/operator of Photo Elevations LLC, prepared the following document. The use of the terms, "I" "My" "We" "Our" or "The Company" from here forth within this document refer to Photo Elevations LLC.

Photo Elevations LLC respectfully requests exemption from the following Federal Aviation Administration (FAA) regulations:

14 CFR Part 21, Subpart H, 14 CFR Part 27, 14 CFR sections 45.23(b), 61.101(e)(4) and (5), 61.113(a), 61.23(a) and (c), 61.315(a), 91.103, 91.105, 91.109, 91.119, 91.121, 91.151(a), 91.203(a) and (b), 91.405(a), 91.407(a)(1), 91.409(a)(2), 91.417(a) and (b), 91.7(a).

About Photo Elevations LLC and UAS Commercial Applications

Based in Bemidji, MN, Photo Elevations LLC is a small, yet, rapidly growing company that is dedicated towards addressing a wide variety of photographic applications both on and off the ground. Our Aerial Division foresees an abundance of opportunity and discovery. Our initial requests for service have come with a strong demand from the Real Estate and Land Development markets. However, as the technology quickly proves its value, we will be heavily focused on agricultural monitoring of growth, development and deficiencies, as well as, commercial advertising, public safety services, such as, search

and rescue emergencies, lake-ice safety monitoring and first responder for hazardous condition assessments like material spills and fires, both controlled and wild. We also project a wide variety of Environmental Safety and Conservation applications in the near future. This could include botanical and wildlife studies and safety assessments, as well as, forest canopy monitoring and expedited detection of invasive species like the Pine Bark Beetle, Emerald Ash Borer or the Forest Tent Caterpillar into Minnesota territories.

About Michael Finnegan, Owner/Operator, Photo Elevations LLC

I, Michael Finnegan, a long time advocate and hobbyist of many varied UAS's, graduated from Brooks Institute of Photography, Santa Barbara, CA in 1996 with a BA in Illustration and Advertising Photography along with a Minor in Audio/Visual Photography and Videography. My pertinent collegiate resume also includes Meteorology courses at Montana State University. My decades experience and professionalism in difficult situation photography for commercial purposes is very vast. During my career, I have always placed public, crew and overall operational safety on the highest plateau. As an Ambassador of an amazingly new technology, Photo Elevations LLC will always strive to be an exemplary representative of proper UAS's integration into National Air Space (NAS) for commercial applications. Our safety protocols and paramount professionalism will never be compromised.

Pilot In Command (PIC) Training Requirements

Photo Elevations LLC strongly believes the safe integration of UAS's into National Air Space (NAS) is of the utmost importance and is wanting/willing to adhere to any additional regulations imposed by the FAA in order to maintain the NAS safety and security.

In order to maintain and advance those necessary safety and security protocols of an emerging industry, Any/All Photo Elevations LLC PIC's must possess and complete the following FAA and Operator requirements before any consideration for commercial flight takes place:

1. All PIC's must complete appropriate Pilot School training and pass the Aeronautics Knowledge Test conducted by the Federal Aviation Administration.
2. All PIC's must be vetted by the Transportation Safety Administration (TSA).
3. All PIC's must complete and log a minimum of 100 hours of advanced flight simulation time using our Real Flight Professional RF 7.5 flight simulation training programs.
4. All PIC's must complete and log a minimum of 40 hours actual hands on flight training at our privately owned, expansive and rural located training facility.
5. All PIC's must possess advanced safety training and knowledge, as well as, advanced training in Pre & Post flight planning, maintenance, checklists, etc..
6. All PIC's must pass Photo Elevations LLC strictly monitored final flight tests.

The Photo Elevations LLC Operator and PIC's would also strictly respect any/all further requirements and regulations set by the FAA including but not limited to the following:

1. The UAS must weigh less than 55 pounds, including payload.
2. Operations for closed-set motion picture and television filming are not permitted.
3. The UAS would never exceed a speed of 87 knots (100 miles per hour).
4. All flights are strictly limited to the current COA height of less than **200 feet** above ground level (AGL). Any higher altitudes would require a new COA approval from the FAA.
5. The UAS must be operated within the unaided visual line of sight (VLOS) of the PIC at all times.
6. The Operator is responsible for maintaining and inspecting the UAS to ensure that it is in a condition for safe flying.
7. Pre and Post Flight safety inspections and documentation.
8. No flight operations will be held at night and conducted under visual meteorological conditions (VMC).
9. The UA will not operate within 5 nautical miles (NM) of any airport with an operational tower; or 3 NM from an airport with a published instrument flight procedure; or 2 NM from an airport without a published instrument flight procedure or operational tower; or 2 NM from a heliport with a published instrument flight procedure.
10. Any UAS's operated by Photo Elevations LLC would be properly identified by serial number, registered in accordance with 14 CFR 47, and have (N-Number) markings as large as practicable.
11. The UA must remain clear and give way to all manned aviation operations and activities at all times.
12. The UAS may not be operated by the PIC from any moving device or vehicle.

Proposed UAS's For Exemption and Their Physical Descriptions

Depending on our photographic, environmental safety and/or atmospheric conditional needs, we have three UAS's prepared for business operations. At this time we formally request exemption for the DJI Phantom 3, DJI Inspire 1 and DJI Spreading Wings S1000+; all of which have had precedent rotorcraft UAS Section 333 exemption approval by the FAA. As performance and safety technologies quickly advance, we too should advance with them. Therefore we respectfully request the approval to update our DJI series systems software and hardware when need be as long as they fit within the FAA's UA size and weight parameters and follow all further imposed regulations.

These are the latest models in their class from DJI, a worldwide leader in technologically advanced small rotorcraft, radio controlled (RC) aircraft. Each of the proposed models are equipped with highly advanced control and navigational features and fit within the prior safety requirements set forth by the FAA.

Included with this petition for exemption are the proposed model flight safety guidelines, battery safety guidelines and maintenance manuals for the DJI Inspire 1, Phantom Series and Spreading Wing S1000+ series. Due to the large size data files of the pilot training

manual and user manuals (exceeding the 10MB file maximum allowed for online submissions) and prior precedent exemption grants by the FAA for each proposed UAS, full user manuals (containing all specifications) are not included with this petition. They are available upon request or at the following website links:

DJI Inspire 1:
http://download.dji-innovations.com/downloads/inspire_1/en/Inspire_1_User_Manual_v1.0_en.pdf

DJI Spreading Wings S1000+
http://download.dji-innovations.com/downloads/s1000_plus/en/S1000_Plus_User_Manual_v1.2_en.pdf

DJI Phantom Series: (Phantom 3 manual not yet available online)
http://download.dji-innovations.com/downloads/phantom_2_vision_plus/en/Phantom_2_Vision_Plus_User_Manual_v1.8_en.pdf

DJI Pilot Training Manual:
http://download.dji-innovations.com/downloads/phantom_2_vision_plus/en/Phantom_2_Vision_Plus_Pilot_Training_Guide_v1.1_en.pdf

UAS Radio Frequencies
All devices used will comply with the FCC usage and emissions regulations and guidelines. The radio frequencies used will also comply with the allotted FCC frequencies for data transmission and vehicle control in unlicensed frequency bands. (More on radio frequencies provided on the specification/user manuals included with this petition.)

About our Location

Bemidji is located in North-Central Minnesota. With a population of nearly 15,000, Bemidji is a central hub of an expansive rural territory made up of agriculture farmlands and dynamic forests both privately and publicly owned. Lakes, bogs and grasslands are also abundant. A majority of our aerial operations would take place in extremely remote, rural locations.

Public Safety, Privacy and Environmental Impact

Photo Elevations LLC is very excited to have our foot in on the ground floor of such an extraordinary and electrifying new industry. As mentioned before, flight safety is of the highest importance and we vow to maintain all regulations and guidelines to the highest standards. These standards would also adhere towards all privacy rights and environmental impact issues.

This new sUAS technology virtually releases both the environmental and economic restraints on a level never fathomed before in the aerial photography industry. Traditional methods of piloted aircraft for our proposed purposes are extremely

expensive, produces high levels of toxic emissions into the atmosphere, carry large payloads of flammable fuel and greatly increase the risk of human endangerment. For those reasons, Photo Elevations LLC believes its proposed services are in the best Public Interest.

Our small, lightweight, micro UAS's run on rechargeable LiPo batteries and produce zero toxic emissions during flight. They're highly controllable with advanced safety features for stabilization, GPS navigations, electronic speed controllers, autopilot safety modes and real-time data transmissions and recording. Overall, the proposed UAS's greatly increase public safety and benefits as compared to conventional methods of aerial photography.

Pre and Post Flight Checklist/Inspections

To include, but not be limited to the following:

1. Inspect all parts and system components for proper working condition. Including, but not limited to:
    a. Actuators/Servos
    b. All Motors
    c. Wiring and Connectors
    d. Propellers, cleaned, inspected for damage, mounted correctly
    e. Electronic Speed Controllers
    f. Batteries Levels and Condition of all power supplies.
    g. Remote Control Functions and Settings
    h. Ground Station equipment and connections

2. Conduct preflight safety discussions and assessments regarding areas of concern and taking steps to minimize all safety risks prior to flight.
3. Proper clearance of NAS, if need be, and proper permission for land use.
4. Spectator, Crew and Public Safety management.
5. Must have on hand all necessary flight documents, handbooks, exemptions, etc.
6. All preflight inspections and operational testing recommended in the UAS user and operational manuals.

Conditions

Photo Elevations LLC will only conduct operational flights under ideal visual meteorological conditions (VMC). No flights will take place in obstructed view locations or during unpredictable weather conditions. No flights will be conducted 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. No flight operations will be conducted at night. All flights will be aborted in the event of unpredicted obstacles or emergencies.

Licensing and Supporters of Photo Elevations LLC

Photo Elevations LLC has obtained proper State and Local licensing, extensive liability insurance coverage, and proper Federal and State Tax Identification Numbers, as well as, approval support from local Law Enforcement, Bemidji Fire Dept., City Council Members, Local Business Owners and the Chamber of Commerce. Acceptance of this emerging technology is growing fast through the use of the tremendous visual benefits. Seeing is believing and Photo Elevations LLC wants to help show our Community a new vision and the amazing reimbursements that flow with.

Petition Summery

Petition Pursuant:

Photo Elevations LLC
Michael Finnegan, Owner/Operator
2508 Eagle Lane NE
Bemidji, MN 56601
218-368-1375
photoelevations@yahoo.com

Re: Expedited Exemption Petition of Section 333 of the FAA Reform Act of 2012

Photo Elevations LLC respectfully requests exemption from the following Federal Aviation Administration (FAA) regulations:

14 CFR Part 21, Subpart H, 14 CFR Part 27, 14 CFR sections 45.23(b), 61.101(e)(4) and (5), 61.113(a), 61.23(a) and (c), 61.315(a), 91.103, 91.105, 91.109, 91.119, 91.121, 91.151(a), 91.203(a) and (b), 91.405(a), 91.407(a)(1), 91.409(a)(2), 91.417(a) and (b), 91.7(a).

Proposed UAS's: DJI Phantom 3, DJI Inspire 1, DJI Spreading Wings S1000+
Proposed Uses:

Real Estate and Land Development
Agricultural
Commercial Photography
Public Safety Services
Aerial Surveying
Botanical and Wildlife Studies/Assessments
Invasive Species Detection

Conclusion

Photo Elevations LLC would like to thank you again for your time and consideration. The FAA has granted prior exemptions in circumstances similar in all material respects to those presented in this petition. We strongly believe our services will greatly benefit the surrounding community and serve in the public's overall best interest as a whole. For the preceding reasons listed throughout this petition, Photo Elevations LLC formally asks for these exemptions. Thank you.

Sincerely,
Michael Finnegan