



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

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

June 9, 2015

Exemption No. 11794
Regulatory Docket No. FAA-2015-0305

Mr. Tony Portelli
ATAC Global LLC
8352 W. Warm Springs Road
Las Vegas, NV 89113

Dear Mr. Portelli:

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

By letter posted to the public docket on February 9, 2015,¹ you petitioned the Federal Aviation Administration (FAA) on behalf of ATAC Global LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography and inspection.

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 S900.

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

¹ On May 20, 2015, the petitioner responded to the FAA's request for information.

consideration of the size, weight, speed, and limited operating area associated with the aircraft and its operation, the Secretary of Transportation has determined that this aircraft meets the conditions of Section 333. Therefore, the FAA finds that the requested relief from 14 CFR part 21 and any associated noise certification and testing requirements of part 36, is not necessary.

The Basis for Our Decision

You have requested to use a UAS for aerial data collection². 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, ATAC Global 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.

² 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, ATAC Global 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 S900 when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.
2. Operations for the purpose of closed-set motion picture and television filming are not permitted.
3. The UA may not be operated at a speed exceeding 87 knots (100 miles per hour). The exemption holder may use either groundspeed or calibrated airspeed to determine compliance with the 87 knot speed restriction. In no case will the UA be operated at airspeeds greater than the maximum UA operating airspeed recommended by the aircraft manufacturer.
4. The UA must be operated at an altitude of no more than 400 feet above ground level (AGL). Altitude must be reported in feet AGL.
5. The UA must be operated within visual line of sight (VLOS) of the PIC at all times. This requires the PIC to be able to use human vision unaided by any device other than corrective lenses, as specified on the PIC's FAA-issued airman medical certificate or U.S. driver's license.
6. All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the PIC and VO at all times. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times; electronic messaging or texting is not permitted during flight operations. The PIC must be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC must ensure that the VO can perform the duties required of the VO.
7. This exemption and all documents needed to operate the UAS and conduct its operations in accordance with the conditions and limitations stated in this grant of exemption, are hereinafter referred to as the operating documents. The operating documents must be accessible during UAS operations and made available to the Administrator upon request. If a discrepancy exists between the conditions and limitations in this exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and must be followed. Otherwise, the operator must follow the procedures as outlined in its operating

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

8. Any UAS that has undergone maintenance or alterations that affect the UAS operation or flight characteristics, e.g., replacement of a flight critical component, must undergo a functional test flight prior to conducting further operations under this exemption. Functional test flights may only be conducted by a PIC with a VO and must remain at least 500 feet from other people. The functional test flight must be conducted in such a manner so as to not pose an undue hazard to persons and property.
9. The operator is responsible for maintaining and inspecting the UAS to ensure that it is in a condition for safe operation.
10. Prior to each flight, the PIC must conduct a pre-flight inspection and determine the UAS is in a condition for safe flight. The pre-flight inspection must account for all potential discrepancies, e.g., inoperable components, items, or equipment. If the inspection reveals a condition that affects the safe operation of the UAS, the aircraft is prohibited from operating until the necessary maintenance has been performed and the UAS is found to be in a condition for safe flight.
11. The operator must follow the UAS manufacturer's maintenance, overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.
12. Each UAS operated under this exemption must comply with all manufacturer safety bulletins.
13. Under this grant of exemption, a PIC must hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC must also hold a current FAA airman medical certificate or a valid U.S. driver's license issued by a state, the District of Columbia, Puerto Rico, a territory, a possession, or the Federal government. The PIC must also meet the flight review requirements specified in 14 CFR § 61.56 in an aircraft in which the PIC is rated on his or her pilot certificate.
14. The operator may not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption, including evasive and emergency maneuvers and

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

15. UAS operations may not be conducted during night, as defined in 14 CFR § 1.1. All operations must be conducted under visual meteorological conditions (VMC). Flights under special visual flight rules (SVFR) are not authorized.
16. The UA may not operate within 5 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Directory (AFD) or for airports not denoted with an ARP, the center of the airport symbol as denoted on the current FAA-published aeronautical chart, unless a letter of agreement with that airport's management is obtained or otherwise permitted by a COA issued to the exemption holder. The letter of agreement with the airport management must be made available to the Administrator or any law enforcement official upon request.
17. The UA may not be operated less than 500 feet below or less than 2,000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC.
18. If the UAS loses communications or loses its GPS signal, the UA must return to a pre-determined location within the private or controlled-access property.
19. The PIC must abort the flight in the event of unpredicted obstacles or emergencies.
20. The PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough available power for the UA to conduct the intended operation and to operate after that for at least five minutes or with the reserve power recommended by the manufacturer if greater.
21. Air Traffic Organization (ATO) Certificate of Waiver or Authorization (COA). All operations shall be conducted in accordance with an ATO-issued COA. The exemption holder may apply for a new or amended COA if it intends to conduct operations that cannot be conducted under the terms of the attached COA.
22. All aircraft operated in accordance with this exemption must be identified by serial number, registered in accordance with 14 CFR part 47, and have identification

(N–Number) markings in accordance with 14 CFR part 45, Subpart C. Markings must be as large as practicable.

23. Documents used by the operator to ensure the safe operation and flight of the UAS and any documents required under 14 CFR §§ 91.9 and 91.203 must be available to the PIC at the Ground Control Station of the UAS any time the aircraft is operating. These documents must be made available to the Administrator or any law enforcement official upon request.
24. The UA must remain clear and give way to all manned aviation operations and activities at all times.
25. The UAS may not be operated by the PIC from any moving device or vehicle.
26. All Flight operations must be conducted at least 500 feet from all nonparticipating persons, vessels, vehicles, and structures unless:
 - a. Barriers or structures are present that sufficiently protect nonparticipating persons from the UA and/or debris in the event of an accident. The operator must ensure that nonparticipating persons remain under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations must cease immediately in a manner ensuring the safety of nonparticipating persons; and
 - b. The owner/controller of any vessels, vehicles or structures has granted permission for operating closer to those objects and the PIC has made a safety assessment of the risk of operating closer to those objects and determined that it does not present an undue hazard.

The PIC, VO, operator trainees or essential persons are not considered nonparticipating persons under this exemption.

27. All operations shall be conducted over private or controlled-access property with permission from the property owner/controller or authorized representative. Permission from property owner/controller or authorized representative will be obtained for each flight to be conducted.
28. Any incident, accident, or flight operation that transgresses the lateral or vertical boundaries of the operational area as defined by the applicable COA must be reported to the FAA's UAS Integration Office (AFS–80) within 24 hours. Accidents must be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.nts.gov.

If this exemption permits operations for the purpose of closed-set motion picture and television filming and production, the following additional conditions and limitations apply.

29. The operator must have a motion picture and television operations manual (MPTOM) as documented in this grant of exemption.
30. At least 3 days before aerial filming, the operator of the UAS affected by this exemption must submit a written Plan of Activities to the local Flight Standards District Office (FSDO) with jurisdiction over the area of proposed filming. The 3-day notification may be waived with the concurrence of the FSDO. The plan of activities must include at least the following:
- a. Dates and times for all flights;
 - b. Name and phone number of the operator for the UAS aerial filming conducted under this grant of exemption;
 - c. Name and phone number of the person responsible for the on-scene operation of the UAS;
 - d. Make, model, and serial or N-Number of UAS to be used;
 - e. Name and certificate number of UAS PICs involved in the aerial filming;
 - f. A statement that the operator has obtained permission from property owners and/or local officials to conduct the filming production event; the list of those who gave permission must be made available to the inspector upon request;
 - g. Signature of exemption holder or representative; and
 - h. A description of the flight activity, including maps or diagrams of any area, city, town, county, and/or state over which filming will be conducted and the altitudes essential to accomplish the operation.
31. Flight operations may be conducted closer than 500 feet from participating persons consenting to be involved and necessary for the filming production, as specified in the exemption holder's MPTOM.

Unless otherwise specified in this grant of exemption, the UAS, the UAS PIC, and the UAS operations must comply with all applicable parts of 14 CFR including, but not limited to, parts 45, 47, 61, and 91.

This exemption terminates on June 30, 2017, unless sooner superseded or rescinded.

Sincerely,

John S. Duncan
Director, Flight Standards Service

Enclosures

ATAC Global, LLC FAA Exemption Request

Letter dated February 4, 2015, ATAC Global LLC(POC Tony Portelli) 8352 W. Warm Springs Rd, Las Vegas, Nevada, 89113, petitioned the Federal Aviation Administration (FAA) for an exemption from part 21 and §§ 45.23(b), 61.113(a) and (b), 91.7(a), 91.9(b)(2), 91.103, 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), and 91.417(a) and (b) of Title 14, Code of the Federal Regulations (14 CFR). The proposed exemption would allow ATAC Global to operate its unmanned aerial system (UAS) for aerial photography and inspection, including but not limited to operations: (1) over land, waterways, and oceans; (2) operation over and/or in nonrestricted National Parks, National Forests, and non-navigable airspace using nonintrusive recording devices; and (3) operation in otherwise unrestricted U.S. States and Territories. All proposed operations would be conducted under controlled conditions in airspace that is: (1) limited, (2) predetermined, and (3) access controlled

ATAC Global requests relief from the following regulations:

FAA rule which we seek exemption below in bold:

Part 21 prescribes the procedural requirements for issuing and changing design approvals, productions approvals, airworthiness certificates, and airworthiness approvals.

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Section 45.23(b) prescribes that when marks include only the Roman capital letter “N” and the registration number is displayed on limited, restricted or light-sport category aircraft or experimental or provisionally certificated aircraft, the operator must also display on that aircraft near each entrance to the cabin, cockpit, or pilot station, in letters not less than 2 inches nor more than 6 inches high, the words “limited,” “restricted,” “light-sport,” “experimental,” or “provisional,” as applicable.

ATAC Global description of the exemption we seek below:

ATAC Global UAS will have no airworthiness certificate; an exemption may be needed from 14 CFR § 45.23 as the UA will not have a cockpit or cabin. Given the size of the UAS, the 2-inch lettering will be impossible. The petitioner asserts that an equivalent level of safety will be provided by having the UA marked with the word “experimental”

on the fuselage in compliance with 14 CFR § 45.29(f), in a location where the pilot, observer, and others working with the UA will see the identification.

FAA rule which we seek exemption below in bold:

Section 61.113(a) and (b) prescribes that—

(a) no person who holds a private pilot certificate may act as a pilot in command of an aircraft that is carrying passengers or property for compensation or hire; nor may that person, for compensation or hire, act as pilot in command of an aircraft.

(b) a private pilot may, for compensation or hire, act as pilot in command of an aircraft in connection with any business or employment if:

(1) The flight is only incidental to that business or employment; and

(2) The aircraft does not carry passengers or property for compensation or hire.

ATAC Global description of the exemption we seek below:

Given the size, weight, and speed of the UA, as well as the location where it is operated and the fact that the UAS will not carry a pilot or passengers on board, as a result the proposed operations can achieve a very high level of safety, also, additional safety measures are in place by requiring PIC to complete 50 hours of onsite with an additional 10 hours of online instruction before becoming operational. Also, UAS flights will be limited to below 500feet AGL.

FAA rule which we seek exemption below in bold:

Section 61.113(a) and (b) prescribes that—

(a) no person who holds a private pilot certificate may act as a pilot in command of an aircraft that is carrying passengers or property for compensation or hire; nor may that person, for compensation or hire, act as pilot in command of an aircraft.

(b) a private pilot may, for compensation or hire, act as pilot in command of an aircraft in connection with any business or employment if:

(1) The flight is only incidental to that business or employment; and

(2) The aircraft does not carry passengers or property for compensation or hire.

Section 91.7(a) prescribes that no person may operate a civil aircraft unless it is in an airworthy condition.

ATAC Global description of the exemption we seek below:

Currently, no such certificate exists in the applicable in the form contemplated by FAA regulations. As a result, this regulation is inapplicable

FAA rule which we seek exemption below in bold:

Section 91.9(b)(2) prohibits operation of U.S.-registered civil aircraft unless there is available in the aircraft a current approved Airplane or Rotorcraft Flight Manual, approved manual material, markings, and placards, or any combination thereof.

ATAC Global description of the exemption we seek below:

The UAS carries no pilot and given the size of the UA, carrying these documents aboard the UAS is not possible. However, these documents will remain at the ground control point where the pilot flying the UAS will have immediate access to them.

FAA rule which we seek exemption below in bold:

Section 91.103(b) prescribes that a pilot shall for any flight, become familiar with runway lengths at airports of intended use, and takeoff and landing distance information.

ATAC Global description of the exemption we seek below:

UAS operator will thoroughly cover all preflight actions including reviewing weather, battery requirements, landing and takeoff distances, and aircraft performance data before initiation of flight using appropriate checklists.

FAA rule which we seek exemption below in bold:

Section 91.109(a) prescribes, in pertinent part, that no person may operate a civil aircraft (except a manned free balloon) that is being used for flight instruction unless that aircraft has fully functioning dual controls.

ATAC Global description of the exemption we seek below:

Flight control is accomplished through the use of a radio transmitter that communicates with the aircraft via a receiver in the UA Therefore, there are no dual flight controls. Additionally, there is no pilot or passengers in the UAS and the small size and safe speeds are added safety measures

FAA rule which we seek exemption below in bold:

Section 91.119 prescribes that, except when necessary for takeoff or landing, no person may operate an aircraft below the following altitudes:

1. (a) Anywhere. An altitude allowing, if a power unit fails, an emergency landing without undue hazard to persons or property on the surface.
2. (b) Over congested areas. Over any congested area of a city, town, or settlement, or over any open air assembly of persons, an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet of the aircraft.
3. (c) Over other than congested areas. An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure.
4. (d) Helicopters, powered parachutes, and weight-shift-control aircraft. If the operation is conducted without hazard to persons or property on the surface—
 1. (1) A helicopter may be operated at less than the minimums prescribed in paragraph (b) or (c) of this section, provided each person operating the helicopter complies with any routes or altitudes specifically prescribed for helicopters by the FAA; and
 2. (2) A powered parachute or weight-shift-control aircraft may be operated at less than the minimums prescribed in paragraph (c) of this section.

ATAC Global description of the exemption we seek below:

91.119 allows safe altitudes for the operation of civil aircraft, but that it allows helicopters to be operated at lower altitudes in certain conditions. ATAC Global will not operate UAS above the altitude of 500 feet above ground level (AGL) and will also only operate in safe areas away from the public and traffic, thus “providing a level of safety at least equivalent to or below those in relation to minimum safe altitudes.” Because of the size, weight, maneuverability, and speed of the UAS, an equivalent or higher level of safety will be achieved. Also, No flight will be taken without the permission of the property owner.

FAA rule which we seek exemption below in bold:

Section 91.121 requires, in pertinent part, each person operating an aircraft to maintain cruising altitude by reference to an altimeter that is set “...to the elevation of the departure airport or an appropriate altimeter setting available before departure.”

ATAC Global description of the exemption we seek below:

Altimeter settings is inapplicable since the UAS utilizes electronic GPS with a barometric sensor.

FAA rule which we seek exemption below in bold:

Section 91.151(a) prescribes that no person may begin a flight in an airplane under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing and, assuming normal cruising speed, (1) during the day, to fly after that for at least 30 minutes [emphasis added].

ATAC Global description of the exemption we seek below:

The limitations on the UAS's proposed flight area and the location of its proposed operations within a predetermined area, a longer timeframe for flight in daylight or night VFR conditions is reasonable. We believe an equivalent level of safety can be achieved by limiting flights to 45 minutes or not less than 15 percent of battery power, whichever occurs first. Also, ATAC Global UAS has preprogrammed setting that enables the UAS to return to original take off location when signal is lost and or battery becomes too low adding an additional safety measure

FAA rule which we seek exemption below in bold:

Section 91.203(a) prohibits, in pertinent part, any person from operating a civil aircraft unless it has within it (1) an appropriate and current airworthiness certificate; and (2) an effective U.S. registration certificate issued to its owner or, for operation within the United States, the second copy of the Aircraft registration Application as provided for in § 47.31(c).

ATAC Global description of the exemption we seek below:

The UAS carries no pilot and given the size of the UA, carrying these documents aboard the UAS is not possible. However, these documents will remain at the ground control point where the pilot flying the UAS will have immediate access to them.

FAA rule which we seek exemption below in bold:

Section 91.203(b) prescribes, in pertinent part, that no person may operate a civil aircraft unless the airworthiness certificate or a special flight authorization issued under § 91.715 is displayed at the cabin or cockpit entrance so that it is legible to passengers or crew.

ATAC Global description of the exemption we seek below:

The UAS carries no pilot and given the size of the UA, carrying these documents aboard the UAS is not possible. However, these documents will remain at the ground control point where the pilot flying the UAS will have immediate access to them.

FAA rule which we seek exemption below in bold:

Section 91.405(a) requires, in pertinent part, that an aircraft operator or owner shall have that aircraft inspected as prescribed in subpart E of the same part and shall, between required inspections, except as provided in paragraph (c) of the same section, have discrepancies repaired as prescribed in part 43 of the chapter.

ATAC Global description of the exemption we seek below:

This is only applicable to aircraft with an airworthiness certificate. ATAC Global will keep routine and preflight maintenance records, which will be accomplished by the operator, who will keep a log of any performed maintenance. The operator is most familiar with the UAS and best suited to maintain it in an airworthy condition to provide an equivalent level of safety and will do so prior to each flight. Should a mechanical issue arises, the UAS can land immediately, and given its small size, it poses minimal risk to persons or property.

FAA rule which we seek exemption below in bold:

Section 91.407(a)(1) prohibits, in pertinent part, any person from operating an aircraft that has undergone maintenance, preventive maintenance, rebuilding, or alteration unless it has been approved for return to service by a person authorized under § 43.7 of the same chapter.

ATAC Global description of the exemption we seek below:

This is only applicable to aircraft with an airworthiness certificate. ATAC Global will keep routine and preflight maintenance records, which will be accomplished by the operator, who will keep a log of any performed maintenance. The operator is most familiar with the UAS and best suited to maintain it in an airworthy condition to provide an equivalent level of safety and will do so prior to each flight. Should a mechanical issue arises, the UAS can land immediately, and given its small size, it poses minimal risk to persons or property.

FAA rule which we seek exemption below in bold:

Section 91.409(a)(2) prescribes, in pertinent part, that no person may operate an aircraft unless, within the preceding 12 calendar months, it has had an inspection for the issuance of an airworthiness certificate in accordance with part 21 of this chapter.

ATAC Global description of the exemption we seek below:

This is only applicable to aircraft with an airworthiness certificate. ATAC Global will keep routine and preflight maintenance records, which will be accomplished by the operator, who will keep a log of any performed maintenance. The operator is most familiar with the UAS and best suited to maintain it in an airworthy condition to provide an equivalent level of safety and will do so prior to each flight. Should a mechanical

issue arises, the UAS can land immediately, and given its small size, it poses minimal risk to persons or property.

FAA rule which we seek exemption below in bold:

Section 91.417(a) and (b) prescribes, in pertinent part, that—

(a) Each registered owner or operator shall keep the following records for the periods specified in paragraph (b) of this section:

(1) Records of the maintenance, preventive maintenance, and alteration and records of the 100-hour, annual, progressive, and other required or approved inspections, as appropriate, for each aircraft (including the airframe) and each engine, propeller, rotor, and appliance of an aircraft. The records must include—

(i) A description (or reference to data acceptable to the Administrator) of the work performed; and

(ii) The date of completion of the work performed; and

(iii) The signature, and certificate number of the person approving the aircraft for return to service.

(2) Records containing the following information:

(i) The total time in service of the airframe, each engine, each propeller, and each rotor.

(ii) The current status of life-limited parts of each airframe, engine, propeller, rotor, and appliance.

(iii) The time since last overhaul of all items installed on the aircraft which are required to be overhauled on a specified time basis.

(iv) The current inspection status of the aircraft, including the time since the last inspection required by the inspection program under which the aircraft and its appliances are maintained.

(v) The current status of applicable airworthiness directives (AD) and safety directives including, for each, the method of compliance, the AD or safety directive number and revision date. If the AD or safety directive involves recurring action, the time and date when the next action is required.

(vi) Copies of the forms prescribed by § 43.9(d) of this chapter for each major alteration to the airframe and currently installed engines, rotors, propellers, and appliances.

(b) The owner or operator shall retain the following records for the periods prescribed:

(1) The records specified in paragraph (a)(1) of this section shall be retained until the work is repeated or superseded by other work or for 1 year after the work is performed.

(2) The records specified in paragraph (a)(2) of this section shall be retained and transferred with the aircraft at the time the aircraft is sold.

(3) A list of defects furnished to a registered owner or operator under § 43.11 of this chapter shall be retained until the defects are repaired and the aircraft is approved for return to service.

ATAC Global description of the exemption we seek below:

The above is only applicable to aircraft with an airworthiness certificate. Prior to each flight, the UAS will undergo a routine preflight maintenance, which will be carried out by the pilot in command, who will keep a log of any performed maintenance to be certain that the UAV is airworthy. The operator is most familiar with the UAS and best suited to maintain it in an airworthy condition to provide an equivalent level of safety. Additionally, if a mechanical issue arises, the UA can land immediately, and given its small size, it poses minimal risk to persons or property.

ATAC Global Conclusion

Public Interest

Given the small size of the UAS involved and the limited environment within which it will operate, its proposed operation falls squarely within that zone of safety. Also, because of the size of the UAS and the restricted areas in which the UAS will operate, the fact that there are no passengers, no fuel, as well as the extensive training and continuing education (annual) that the operator goes through prior to operations serves as additional safety, which will benefit the public.

Granting the requested exemptions is in the public interest because of (1) the strong equivalent level of safety surrounding the proposed operations, and (2) the significant public benefit, including enhanced safety and reduction in environmental impacts (such as reduced emissions associated with allowing UAS for photography and inspection operations).

ATAC Global has trained many law enforcement personal and also first responders for over two decades. Our willingness and ability to carry out these same standards, which

have proven tremendous success into the UAS industry can have a safe and meaningful initiative.