



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

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

June 25, 2015

Exemption No. 11910
Regulatory Docket No. FAA–2015–1333

Mr. Thomas Goodall
210 Via Nada
San Clemente, CA 92672

Dear Mr. Goodall:

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 April 29, 2015, you petitioned the Federal Aviation Administration (FAA) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial cinematography and photography of golf courses, special events, and real estate.

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 the 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 collection¹. The FAA has issued grants of exemption in circumstances similar in all material respects to those presented in your petition. In Grants of Exemption Nos. 11062 to Astraesus Aerial (*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, Thomas Goodall 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, Thomas Goodall 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 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.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 July 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan

Director, Flight Standards Service

Enclosures

I, Thomas Goodall, have been flying UA's for 4 years, my most recent experience is with the Inspire 1 built by DJI. I have been flying as a Hobbyist and now ready to bring my skills to a professional level for three reasons; Cinematography for Golf Courses, Special Events and Real Estate. In doing so I consider all safety precautions and regulations as foremost with each flight.

I seek exception from 14 C.F.R. 21, subpart H; 14 C.F.R. 45.23(b); 14 C.F.R. §§ 61.113 (a) & (b); 14 C.F.R. § 91.7 (a); 14 C.F.R. § 91.9 (b)(2); 14 C.F.R. § 91.103(b); 14 C.F.R. § 91.109; 14 C.F.R. § 91.119; 14 C.F.R. § 91.121; 14 C.F.R. § 91.151(a); 14 C.F.R. §§ 91.203(a) and (b); 14 C.F.R. § 91.405 (a); 14 C.F.R. § 91.407 (a)(1); 14 C.F.R. § 91.409 (a)(2); 14 C.F.R. § 91.409 (a) (2); and, 14 C.F.R. §§ 91.417 (a) & (b) to commercially operate.

Golf Course Cinematography:

I, Thomas Goodall, considers safety and regulations as foremost with each flight. My small unmanned aircraft is designed to hover in place via GPS and operate in less than a 24 knot (15 mph) wind. For safety, stability and fear of financial loss I will not fly in winds exceeding 16 kph (10 mph) nor will I fly my UA faster than 30 mph nor go over 200 feet from ground, far safer then the 400 foot limit. Built in safety systems include a GPS mode that allows my UAS to hover in place when radio controls are released. With three modes to choose from, I utilize the Smart Mode for aerial videography/photography. This is the safest, most reliable and stable mode to prevent accident and hazard. When pilot communication is lost the UAS is designed to slowly descend to point of take off. I do not operate my UAS near airports, Hospitals nor Police heliports, I am also prepared to land/abort immediately to the nearest and safest ground point that I have planned ahead of take off.

Aerial footage of Golf Courses would help give the public a geographical awareness of the course before playing. It helps Golfers improve their game when they have the ability to map out landing zones. Also using my UA avoids the high risks in the use of a helicopter with fuel and persons on board.

After consent of the Golf Course I, Thomas Goodall operating the Dji Inspire 1, would first observe the flight area for any mobile phone base stations, radio transmission towers, power lines or any other electromagnetic interference that could disrupt flight. I would scan the area for any large buildings or trees that may affect with GPS accuracy or flight. I then would make sure the weather is flight ready to avoid wind speed exceeding 10m/s , snow, rain and smog also to be sure the UA and battery performance is subject to safe air density and temperature. For safety, stability and fear of financial loss I will not operate unless perfect conditions are present. I make sure I am in the 5 mile radius of any airports and to stay under 400 feet from ground.

Next I would then coordinate a safe fly time where all Persons and property are in safe distance from my UA during take off and flight.

Lastly I would go through my normal maintenance and pre-flight Checklist;

1. Remote controller, aircraft battery, and mobile device are fully charged.

2. Propellers are mounted correctly and firmly.
 3. Micro-SD card has been inserted if necessary.
 4. Gimbal is functioning as normal.
 5. Motors can start and are functioning as normal.
- DJI Pilot app connected to the aircraft. 6.

then following up with flight test procedures;

1. Place the aircraft on open, flat ground with battery indicators facing towards me.
2. Power on the remote controller and your mobile device, then the Intelligent Flight Battery.
3. Launch the DJI Pilot App and enter the Camera page.
4. Wait until the Aircraft Indicator blinks green. This means the Home Point is recorded via GPS
5. calibrate the compass flight location.
6. Push the throttle up slowly to take off
7. Shoot photos and videos using the DJI Pilot app.
8. To land, hover over a level surface and gently pull down on the throttle slowly to descend.
9. After landing, execute the CSC command or hold the throttle at its lowest position for 3 seconds or more until the motors stop.
10. Turn off the Intelligent Flight Battery first, followed by the Remote Controller.

Special Event cinematography:

Capturing those perfect moments during a special event is important. Capturing it with aerial cinematography will help give the host a professional recording to relive their special moments without the dangers and expenses of a **manned fixed wing aircraft or helicopter**.

Recording Special Events would be taken care of delicately with my UA. Firstly I, Thomas Goodall, would observe the flight area for any mobile phone base stations, radio transmission towers, power lines or any other electromagnetic interference that could disrupt flight. I would scan the area for any large buildings or trees that may affect with GPS accuracy or flight. lastly make sure the weather is flight ready to avoid wind speed exceeding 10m/s , snow, rain and smog also to be sure the UA and battery performance is subject to safe air density and temperature. Second go through the PRE FLIGHT CHECKLIST/maintenance and FLIGHT TEST PROCEDURES as normal in a secure area safe from persons and property. Thirdly capturing film from a safe distance from persons and property avoiding all crowds and hazards.

Real Estate:

Aerial cinematography in the housing market has been around for a long time through manned fixed wing aircraft and helicopters. For small budget real estate companies and average homeowners the expense of

such aerial videography is cost prohibitive. Only large companies and high end Realtors or luxury homeowners can afford to absorb such expense. Depriving non-luxury homeowners and lower budget Realtors from a valuable marketing tool. Also using my UA avoids the high risks in a helicopter with fuel and persons on board.

To make sure the operation will be safely conducted Firstly I, Thomas Goodall, would observe the flight area for any mobile phone base stations, radio transmission towers, power lines or any other electromagnetic interference that could disrupt flight. I would scan the area for any large buildings or trees that may affect with GPS accuracy or flight. I'd make sure the weather is flight ready to avoid wind speed exceeding 10m/s , snow, rain and smog also to be sure the UA and battery performance is subject to safe air density and temperature. Second go through the PRE FLIGHT CHECKLIST/maintenance and FLIGHT TEST PROCEDURES in a secure area safe from persons and property. Thirdly capturing film from safe distance from persons and property avoiding all hazards.

Its length x height x width dimensions without the propellers attached are 44 x 30 x 45cm (17.3 x 11.8 x 17.7in).

weight: **Weight (Battery Included)** 2935 g

Compliance: The Remote Controller is compliant with both CE and FCC regulations. stated on page 24 in DJI Inspire 1 flight manual attachment.

Operating Frequency	922.7MHz~927.7 MHz 5.725~5.825 GHz;2.400~2.483 GHz
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This device complies with part 15 of the FCC Rules. stated on page 62 of the DJI Inspire flight manual.

the design and operational characteristics of the Inspire 1:

Three positioning modes;

-GPS and vision positioning and uses GPS for positioning.

-Vision positioning is available but GPS is not

-Neither GPS or vision positing is working and its only using its barometer for positing return to home are where you last record point of take off. There are three cases that will trigger RTH procedure; they are Smart RTH, Low Battery RTH and Failsafe RTH.

Press and hold the button to start the Return to Home (RTH) procedure. Then the LED around the RTH Button will blink white to indicate the aircraft is entering RTH mode. The aircraft will then return to the last recorded Home Point. and to cancel it Press this button again and you will regain the control of the aircraft.

Smart RTH:

you may control the aircraft's orientation to avoid collision during the Smart RTH. Press the Smart RTH button once to start the process, press the Smart RTH button again to exit Smart RTH and regain the control.

Low Battery RTH:

The low battery level failsafe is triggered when the DJI Intelligent Flight Battery is depleted to a point that may affect the safe return of the aircraft. Users are advised to return home or land the aircraft immediately when these warnings are shown. DJI Pilot app will advise user to return the aircraft to the Home Point when low battery warning is triggered. Aircraft will automatically return to the Home Point if no action is taken after 10 seconds countdown. User can cancel the RTH by pressing once on the RTH button. The thresholds for these warnings are automatically determined based on the current aircraft altitude and its distance from the Home Point. Aircraft will land automatically if the current battery level can only support the aircraft to land to the ground from the current altitude. User can use the remote controller to control the aircraft's orientation during the landing process.

The Battery Level Indicator is displayed in the DJI Pilot app, and is described below

Failsafe RTH:

Failsafe RTH is activated automatically if remote controller signal (including video relay signal) is lost for more than 3 seconds provided that Home Point has been successfully recorded and compass is working normally. Return home process may be interrupted and the operator can regain control over the aircraft if a remote controller signal is resumed.

Max Height & Radius limit flying height and distance:

The user may change these settings in the DJI Pilot App. Once complete, your Inspire 1 will fly in a restricted cylinder that is determined by these settings. The tables on page 45 in the flite manual attachment show the details of these limits.

On the DJI Inspire 1 as a default a “warning zone” has been set around safety zones. When you fly within 320 feet of the 5 mile radius of the restricted flying zone a warning message will appear on the DJI Pilot App. and there is a graph to show in detail on page 47 of Dji inspire 1 flight manual attachment. That includes for category A areas and category B areas, big and small airports.

Respectfully Submitted,

Thomas Goodall,

210 Via Nada, San Clemente, CA.