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

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

August 10, 2015

Exemption No. 12396
Regulatory Docket No. FAA–2015–1543

Ms. Cassie Elwonger
Realtor
3920 Rogers Avenue
Fort Smith, AR 72903

Dear Ms. Elwonger:

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 May 11, 2015, you petitioned the Federal Aviation Administration (FAA) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial videography and 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 is a Parrot Bebop.

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, Ms. Cassie Elwonger is granted an exemption from 14 CFR §§ 61.23(a) and (c), 61.101(e)(4) and (5), 61.113(a), 61.315(a), 91.7(a), 91.119(c), 91.121, 91.151(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b), to the extent necessary to allow the petitioner to operate a UAS to perform aerial data collection. This exemption is subject to the conditions and limitations listed below.

Conditions and Limitations

In this grant of exemption, Ms. Cassie Elwonger is hereafter referred to as the operator.

[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.

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 Parrot Bebop 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 August 31, 2017, unless sooner superseded or rescinded.

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

Enclosures

Cassie Elwonger
Realtor
3920 Rogers Ave
Fort Smith, AR 72903
479-651-5716

Docket ID: FAA-2014-0481

To whom it may concern at the FAA:
My name is Cassie Elwonger. I am a 43 year old Realtor and a mother of three children. As a mother of two boys I have been given a lot of experience is flying UAS(s). As a Realtor I would like to offer a wonderful enhancement to my real estate clients by using a Parrot Bebop UAS for aerial videography and photography.
My petition is basically going to shadow that of Mr. Trudeau. After reading over his grant of exemption, he has described basically everything I wish to do. The Parrot Bebop user manual, a link to the UAS is attached. Thank you for considering my petition.

To the Federal Aviation Authority (FAA),
I hereby request exemption from part 21, subpart H; and Sections 45.23(b), 61.113(a) and (b), 91.7(a), 91.9(b)(2), 91.103(b), 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 Federal Regulations (14 CFR).
I support my request with the following information:
I plan to operate a UAS, Parrot Bebop, which is comprised of an unmanned aircraft and a transportable ground station. The Parrot Bebop is referred to as a quad-copter with a maximum gross weight of about 420 grams. It is equipped with four rotors that are driven by electric motors powered by a battery. The UAS at a maximum airspeed of 22 m/s. The Parrot Bebop has a built in high definition camera as well as 2.0 onboard computer with a dual core CPU, and quad-core GPU. Making its connection and navigation system reliable. I plan to operate the UAS over various cities in Arkansas to enhance academic community awareness and augment real estate listing videos and photographs. I make the following representations of operational enhancements which I propose to abide by to ensure this exemption will provide a level of safety at least equal to existing rules:
• I will only operate in reasonably safe environments that are controlled, are away from power lines, elevated lights, airports and actively populated areas; and I will conduct extensive preflight inspections and protocols, during which safety carries primary importance.
I state that given the size, weight, speed, and limited operating area associated with the aircraft to be utilized, an exemption from 14 CFR part 21, Subpart H (Airworthiness Certificates) and § 91.203 (a) and (b) (Certifications required), subject to certain conditions and limitations, is warranted and meets the requirements for an equivalent level of safety under 14 CFR part 11 and Section 333 of P.L. 112-95 (Section 333).
I request an exemption from § 45.23 Marking of the aircraft because this UAS will not have a cabin, cockpit or pilot station on which to mark certain words or phrases. Further, I state that two-inch lettering is difficult to place on such a small aircraft with dimensions smaller than the minimal lettering requirement. The Parrot Bebop is bright blue and very recognizable while in flight.
I state that an exemption from §§ 91.405(a), 91.407(a)(1), 91.409(a)(2) and 91.417(a) and (b) Maintenance inspections may be required and should be granted since they only apply to aircraft with an airworthiness certificate. However, I state that as a safety precaution I will perform a preflight inspection of this UAS before each flight as outlined in my operating documents. UAS Pilot in Command (PIC) I assert that under § 61.113 (a) and (b) private pilots are limited to noncommercial operations, and

further indicate that the risks of operating a UAS are far less than the risk levels inherent in the commercial activities outlined in 14 CFR part 61, et seq., thus I request an exemption from § 61.113 Private Pilot Privileges and Limitations: Pilot in command.

Regarding UAS operational training, I have flown numerous practice flights in remote areas as a hobbyist and to get familiar with characteristics of my UAS' performance.

UAS Operating Parameters

I will abide by the following additional operating conditions under this exemption:

• operate my UAS below 200 feet and within a radius distance of 1000 feet from the controller to both aid in direct line of sight visual observation; 1
• operate the UAS for 3-7 minutes per flight;
• land my UAS prior to the manufacturer's recommended minimum level of battery power;
• operate my UAS only within visual line of sight (VLOS);
• use the UAS' global positioning system (GPS) flight safety feature whereby it hovers and then slowly lands if communication with the remote control pilot is lost;
• conduct all operations under my own personal and flight safety protocols (including posting a warning sign reading: "Attention Aerial Photography in Progress – Remain Back 150 feet") contained in the operating documents and will actively analyze flight data and other sources of information to constantly update and enhance my safety protocols;
• always obtain all necessary permissions prior to operation; and
• have procedures in place to abort flights in the event of safety breaches or potential danger.

I state that § 91.7(a) prohibits the operation of an aircraft without an airworthiness certificate. I assert that since there is currently no certificate applicable to my operation, this regulation is inapplicable.

I state that § 91.9(b)(2) requires an aircraft flight manual in the aircraft, however since there are no pilots or passengers on board his aircraft and given its size, this regulation is inapplicable. I further indicate an equivalent level of safety will be achieved by maintaining a safety/flight manual with the UAS ground station. I state that § 91.119 prescribes safe altitudes for the operation of civil aircraft, but that it allows helicopters to be operated at lower altitudes in certain conditions. I state that I will not operate his UAS above the altitude of 200 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. I assert that given the size, weight, maneuverability, and speed of my UAS, an equivalent or higher level of safety will be achieved. I am extremely cautious when operating my UAS as I do not want to be unsafe as well as I do not want to damage my UAS as it is expensive.

I indicate that § 91.121 Altimeter settings is inapplicable since my UAS utilizes electronic GPS.

Public Interest

I state that aerial videography and photography for geographical awareness and for real estate marketing has been around for a long time through manned fixed wing aircraft and helicopters, but for small real estate companies and average homeowners the expense has been cost-prohibitive. At this time only high end Realtors or luxury homeowners can afford to absorb such expense. Granting this exemption to me would allow me to provide this extra service to all homeowners and business owners who otherwise would not be able to afford such enhancements to their real estate marketing.

Further, I would like to indicate my small UAS will pose no threat to the public given its small size and lack of combustible fuel when compared to larger manned aircraft. I would also like to state that the operation of my UAS will minimize ecological damage and promote economic growth by providing information to companies or individuals looking to relocate or build in Arkansas.

Thank you for considering my request.

Cassie Elwonger

To the Federal Aviation Authority (FAA),

I hereby request exemption from part 21, subpart H; and Sections 45.23(b), 61.113(a) and (b), 91.7(a), 91.9(b)(2), 91.103(b), 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 Federal Regulations (14 CFR).

I support my request with the following information:

I plan to operate a UAS, the DJI Inspire 1, which is comprised of an unmanned aircraft and a transportable ground station. The Inspire 1 is referred to as a quad-copter with a maximum gross weight of about 3 kilograms. It is equipped with four rotors that are driven by electric motors powered by a battery. The UA has a maximum airspeed of 22 m/s. The quad has a built in high definition camera. I plan to operate the UA over various areas near Great Mills, Maryland to enhance academic community awareness and augment real estate listing videos and photographs. I make the following representations of operational enhancements which I propose to abide by to ensure this exemption will provide a level of safety at least equal to existing rules:

• I will only operate in reasonably safe environments that are strictly controlled, are away from power lines, elevated lights, airports and actively populated areas; and

• I will conduct extensive preflight inspections and protocols, during which safety carries primary importance.

I state that given the size, weight, speed, and limited operating area associated with the aircraft to be utilized, an exemption from 14 CFR part 21, Subpart H (Airworthiness Certificates) and § 91.203 (a) and (b) (Certifications required), subject to certain conditions and limitations, is warranted and meets the requirements for an equivalent level of safety under 14 CFR part 11 and Section 333 of P.L. 112-95 (Section 333).

I request an exemption from § 45.23 Marking of the aircraft because his UA will not have a cabin, cockpit or pilot station on which to mark certain words or phrases. Further, I state that two-inch lettering is difficult to place on such a small aircraft with dimensions smaller than the minimal lettering requirement. Regardless of this, I state that I will mark his UAS in the largest possible lettering by placing the word “Experimental” on its fuselage as required by § 45.29(f) so that he or anyone assisting him as a spotter will see the markings.

I state that an exemption from §§ 91.405(a), 91.407(a)(1), 91.409(a)(2) and 91.417(a) and (b) Maintenance inspections may be required and should be granted since they only apply to aircraft with an airworthiness certificate. However, I state that as a safety precaution I will perform a preflight inspection of his UAS before each flight as outlined in my operating documents.

UAS Pilot in Command (PIC)

I assert that under § 61.113 (a) and (b) private pilots are limited to noncommercial operations, however I can achieve an equivalent level of safety as achieved by current regulations because my UAS does not carry any pilots or passengers. Further, I state that, while helpful, a pilot license will not ensure remote control piloting skills. I further indicate that the risks of operating a UAS are far less than the risk levels inherent in the commercial activities outlined in 14 CFR part 61, et seq., thus I request an exemption from § 61.113 Private Pilot Privileges and Limitations: Pilot in command.

Regarding UAS operational training, I state I have flown numerous practice flights in remote areas as a hobbyist simulating flights for future commercial use to gain familiarization with the characteristics of his UAS' performance under different temperature and weather conditions. I further state that he practices computerized simulated flights to maintain adequate skills and response reflex time.

In a supplemental request to the FAA, I request consideration of a 120 day temporary airman certificate in accordance with § 63.13, to allow time to obtain a private pilot certificate or to allow the FAA time to establish minimum UAS airman certification standards.

UAS Operating Parameters

I will abide by the following additional operating conditions under this exemption:

• operate my UAS below 300 feet and within a radius distance of 1000 feet from the controller to both aid in direct line of sight visual observation; 1

• operate the UAS for 3-7 minutes per flight;

• land my UAS prior to the manufacturer's recommended minimum level of battery power;

• operate my UAS only within visual line of sight (VLOS);

• use the UAS' global positioning system (GPS) flight safety feature whereby it hovers and then slowly lands if communication with the remote control pilot is lost;

• conduct all operations under my own personal and flight safety protocols (including posting a warning sign reading: "Attention Aerial Photography in Progress – Remain Back 150 feet") contained in the operating documents and will actively analyze flight data and other sources of information to constantly update and enhance my safety protocols;

• contact respective airports if operations will be within 5 miles to advise them of my estimated flight time, flight duration, elevation of flight and other pertinent information;

• always obtain all necessary permissions prior to operation; and

• have procedures in place to abort flights in the event of safety breaches or potential danger.

I state that § 91.7(a) prohibits the operation of an aircraft without an airworthiness certificate. I assert that since there is currently no certificate applicable to my operation, this regulation is inapplicable.
I state that § 91.9(b)(2) requires an aircraft flight manual in the aircraft, however since there are no pilots or passengers on board his aircraft and given its size, this regulation is inapplicable. I further indicate an equivalent level of safety will be achieved by maintaining a safety/flight manual with the UAS ground station.
I state that § 91.119 prescribes safe altitudes for the operation of civil aircraft, but that it allows helicopters to be operated at lower altitudes in certain conditions. I state that I will not operate his UAS above the altitude of 300 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. I assert that given the size, weight, maneuverability, and speed of my UAS, an equivalent or higher level of safety will be achieved.
I indicate that § 91.121 Altimeter settings is inapplicable since my UAS utilizes electronic GPS with a barometric sensor.
Public Interest
I state that aerial videography and photography for geographical awareness and for real estate marketing has been around for a long time through manned fixed wing aircraft and helicopters, but for small business owners, its expense has been cost-prohibitive. Granting this exemption to myself would allow me to provide this service at a much lower cost.
Further, I would like to indicate my small UAS will pose no threat to the public given its small size and lack of combustible fuel when compared to larger manned aircraft. I would also like to state that the operation of my UAS will minimize ecological damage and promote economic growth by providing information to companies or individuals looking to relocate or build in the Southern Maryland region.
(end of petition)
I would like to conclude by saying thank you for your consideration and time reading this over. This has been a dream of mine since quadcopters became available to the public. I have only flown as a hobby to not break any laws until with hopes to become commercial. I see nothing but positive coming from it from top to bottom. The state of Maryland makes money from the sale of real estate. The realtor would have an advantage because of a much clearer view of properties. The consumer gets a better look at things. I get to pursue hopefully a career and be a pioneer in a virtually new field of photography. All along, the way the federal government collects taxes from all of us. The economy benefits with very little risk of accidents and/or damages from flying over the usually vacant areas of real estate. Thank you again.
Very respectfully,
Bryan W. Swann