



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

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

August 11, 2015

Exemption No. 12416  
Regulatory Docket No. FAA-2015-2200

Mr. Clive Tollman  
Digipulse LLC  
641 Wald  
Irvine, CA 92618

Dear Mr. Tollman:

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

By letter dated May 21, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Digipulse LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial video marketing, cinematography, real estate, academic and video production related flight operations.

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 Inspire 1 and Phantom 2.

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<sup>1</sup>. 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, Digipulse 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.

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<sup>1</sup> 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, Digipulse 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 Inspire 1 and Phantom 2 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](http://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 August 31, 2017, unless sooner superseded or rescinded.

Sincerely,

/s/

John S. Duncan

Director, Flight Standards Service

Enclosures



Clive Tollman, Digipulse LLC, Irvine, CA – Section 333 Exemption  
Petition

May 21, 2015

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

Dear Sir or Madam,

I, Clive Tollman, owner of Digipulse, am writing pursuant to the FAA Modernization and Reform Act of 2012 and the procedures contained within 14 C.F.R.11, to request that I, Clive Tollman, owner of Digipulse LLC., a Video Production Company, and owner/operator of 2 small unmanned aircrafts, be exempted from the Federal Aviation Regulations (“FARs”) listed below so that I, Clive Tollman, may safely operate my unmanned aircraft systems (“UAS”) commercially in airspace regulated by the Federal Aviation Administration (“FAA”).

**Applicant:**

Clive Tollman  
Digipulse LLC  
641 Wald, Irvine, CA 92618  
949-233-0613  
[clive@digipulse.com](mailto:clive@digipulse.com)

**Regulations From Which The Exemption Is Requested:**

14 CFR Part 21 subpart H  
14 CFR 45.23 (b)  
14 CFR 91.7 (a)  
14 CFR 91.9 (b) (2)  
14 CFR 91.103

14 CFR 91.109  
14 CFR 91.119 (c)  
14 CFR 91.121  
14 CFR 91.203 (a) and (b)  
14 CFR 91.405 (a)  
14 CFR 91.407 (a) (1)  
14 CFR 91.409 (a) (2)  
14 CFR 91.417 (a) and (b)

**Extent of Relief and Why:**

**14 CFR Part 21 subpart H**

The UAS's to be operated carry neither pilot nor passenger and carry no explosive materials or flammable liquids. Given the size, weight, speed, and limited operating area associated with the aircraft to be utilized, I request exception. In the restricted environment and under the conditions proposed operation will be at least as safe, or safer, than a conventional aircraft operating with an airworthiness certificate without said restrictions.

**14 CFR 45.23 (b)**

Due to the size of these UAS's it does not have a cockpit, cabin, or pilot station on which to market certain words or phrases. Lettering would be very difficult to place on such a small aircraft and dimensions would need to be smaller than required minimum.

**14 CFR 91.7 (a)**

As there will be no airworthiness certificate for the aircraft, should this exemption be granted, no FAA regulatory standard will exist for determining airworthiness. Given the size of the aircrafts for maintenance and use of safety check list prior to each flight an equivalent level of safety will be provided.

**14 CFR 91.9 (b) (2)**

Given the size and configuration, the UAS's have no ability to carry a flight manual on the aircraft. There is no room, capacity, or pilot on board to adequately carry flight manual. An equivalent level of safety will be maintained by keeping the flight manual at ground control point where the pilot will have immediate access to it.

**14 CFR 91.103**

As FAA approved flight manuals will not be provided for the aircraft an exemption will be needed. Normal procedures including but not limited to; reviewing weather, flight battery requirement, landing and takeoff distances, along with all of those found in attachment "DJI Pilot Training" (See Appendix D). An equivalent level of safety will be provided by preflight protocol to properly match the machine.

**14 CFR 91.109**

UAS and remotely piloted aircraft do not have fully functional dual controls. Flight control is achieved through the use of a control box that communicates with the aircraft via radio communications. The equivalent level of safety provided because neither a pilot nor passenger will be carried in the aircraft, and by the speed and size of the aircraft.

**14 CFR 91.113 (a) and (b)**

I can achieve an equivalent level of safety as achieved by current regulations because my UAS's do not carry pilot nor passenger. While helpful, a pilot's license will not ensure remote control piloting skills.

**14 CFR 91.121**

The UAS may not have a barometric altimeter, but instead does have a GPS altitude read out. An equivalent level of safety is achieved by the operator receiving live flight data monitoring and confirming current altitude along with altitude of launch site shown on GPS altitude indicator.

**14 CFR 91.203 (a) and (b)**

Similar to, 14 CFR 91.9 (b) (2), given the size and configuration, the UAS has no ability to carry certificate and registration documents on the aircraft. There is no room, capacity, or pilot on board to adequately such documents. An equivalent level of safety will be achieved by keeping these documents, to the extent they are applicable to the UAS, at the ground control point where pilot has immediate access to them.

**14 CFR 91.405 (a), 14 CFR 91.407 (a) (1), 14 CFR 91.409 (a) (2), 14 CFR 91.417 (a) and (b)**

Given these sections only apply to aircraft with an airworthiness certificate, these sections do not apply to this applicant. As a safety precaution, operator will perform preflight inspections and ensure UAS is in working condition before initiating each flight.

These are in accordance with FAA Publication: Public Guidance for Petitions for Exemption Filed under Section 333 (Rev. 9/25/14). The petitioner submits this application in accordance with the Reform Act, 112 P.L. 95 §§ 331-334, seeking relief from any currently applicable FARs operating to prevent the petitioner from contemplated Commercial Videography encompassing Aerial Video Marketing, Cinematography, Real Estate, Academic and other Video Production related flight operations within the national airspace system (NAS). The Reform Act in Section 332 provides for such integration of civil unmanned aircraft systems into our national airspace system as it is in the public's interest to do so. The petitioner's ultra light weight UAS's meets the definition of "small unmanned aircraft" as defined in Section 331 and therefore the integration of Petitioners ultra lightweight UAS's is expressly contemplated by the Reform Act. Petitioner would like to operate his ultra lightweight UAS's prior to the time period by which the Reform Act requires the FAA to promulgate rules governing such craft.

I, Clive Tollman, have several years of USA experience as well as a Videography background and vested interest in the industry. I can provide direct experience and valuable information to develop requirements and protocols for formal regulation that can be administered regarding various applications related to UAS aerial video and photography.

The Reform Act guides the Secretary in determining the types of UAS's that may operate safely in our national airspace system. Considerations include: The weight, size, speed and overall capabilities of the UAS's; Whether the UAS will be operated near airports or heavily populated areas; and, Whether the UAS will be operated by line of sight. 112 P.L. 95 § 333 (a). Each of these items reflects in favor of an exemption. Both my UASs utilize four (4) counter-rotating propellers for balance, control and stability. Our UAS's are equipped with GPS and auto return safety technology. Weighing less than fifteen (15) pounds (far below the max. 55-pound limit); including camera with gimbal. I always fly line of sight below 300ft away from populated areas and Airports, Hospitals or Heliports. Prior and during every flight we adhere to strict pre flight and in flight protocols (see appendix C).

## **Safety:**

I, Clive Tollman, consider safety as foremost with each flight. Both my DJI Inspire 1 and DJI Phantom 2 V1 are designed to hover in place via GPS and operate per in flight protocol in less than a 13-knot (15 mph) wind. Built in safety systems include a GPS mode that allows our UAS to hover in place when radio controls are released. With three modes to choose from, we utilize the *Safe Mode* for aerial videography/photography. This is the safest, most reliable and stable mode to prevent accident and hazard. When pilot communication is lost UAS is designed to slowly descend to point of take off. We are constantly on alert for any manned aircraft (Police/Medical helicopters, etc.) and prepared to land/abort immediately to the nearest and safest ground point should a manned aircraft approach our location or we suspect manned aircraft may approach near our location. Flights generally last between ten (10) to fifteen (15) minutes, with an altitude under three hundred (300) feet. Altitude and distance limits are set within the firmware (see appendix a and b). Also programmed into the firmware are early battery warnings starting at 30% battery power remaining. Typically we land our UAV's at no lower than 40% battery remaining for further safety precautions.

## **How Clive Tollman Digipulse LLC Request Will Benefit the Public As A Whole:**

1. As the UAV industry and technology takes the world by storm the public **safety** as well as the safety of our National Airspace is at hand. I, Clive Tollman, owner of Digipulse LLC and operator of multiple UAV's takes in Safety as a highest priority. In order to ease the tension of the unknown it is companies like Digipulse that will help educate and train both public and new UAV users on the **safety, regulations, uses and applications, and common sense related to do's and don'ts**. There is limited manpower and as the industry expands its companies like Digipulse and pilots like myself that will **assist the FAA** in a safely integrating UAV's into the sky.
2. Other obvious benefits within the Video Production industry is the decreased need for manned helicopters to capture aerial videography in turn **reducing the risk of life** in the air and on the ground. In addition the mentioned quadcopters produce **less noise and air pollution** then convention methods of aerial videography.

3. Digipulse will be **creating Jobs** and contributing to the overall local economy as our services are expanded into the UAV arena.
4. Digipulse will be able to capture footage that otherwise used to be impossible or too costly. This cost savings and **new perspective** will open up **opportunities to learn** more about our communities and businesses in a way we could have never imagined.

### **Summary:**

For the reasons stated below I, Clive Tollman, respectfully request the grant of an Exemption allowing me to operate ultra lightweight, remote controlled UAS's for the purpose of producing dynamic videography/cinematography promoting economic growth for the local community while educating the public on the correct and safe way of UAS integration into the national airspace.

Lastly 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.

As described herein I, Clive Tollman, am experienced in flying quadcopters and hexacopters currently referred to as Drones and owner of a well-established insured Video Production Company (Digipulse LLC) based out of Irvine, California. Digipulse has been in business for over a decade providing video services to an array of clients. I currently own and fly a DJI Inspire 1 Quadcopter and DJI Phantom 2 V1 Quadcopter ([see appendix A for Inspire and Appendix B for Phantom 2 V1](#)) with over 200 hours combined flight time on the listed UAV's. I, Clive Tollman, submit this 333 Exemption with intent and desire to add and utilize this technology for the purpose of continuing to produce dynamic content and accommodate the request of our existing and future client base seeking to utilize this revolutionary technology and the unbelievable perspective this technology is

flown Multirotors for over five (5) years without incident.

Committed to safety with each flight. My exemption request would permit operation of ultra lightweight, UAS(s) for commercial use in tightly controlled and limited airspace. Predetermined in areas away from general public, airports, heliports and vehicular. Furthermore I, Clive Tollman, believe that based on my experience and reputation within the video production community is in a unique position to assist the FAA in developing operational and safety protocols for lightweight UAS's as they are integrated into the National Airspace. Currently this seems to be a major issue as the drone industry explodes and the uneducated take to the skies. I, Clive Tollman, have personally instilled safety protocols and controls to avoid and prevent public hazard, as well as manned aircraft hazards/catastrophe. This will act to further safety protocols exclusive to lightweight UAS's specific to the Video Production Industry. Currently, similar lightweight, remote controlled UAS's are legally operated by unmonitored amateur hobbyists with no safety plan or controls in place to prevent catastrophe. I, Clive Tollman, will continue to record flight data and other information gained through permitted flight operations to share with the FAA through any required FAA reports to assist with future protocol and safety regulation.

Granting my request comports with the Secretary of Transportation's (FAA Administrator's) responsibilities and authority to not only integrate UAS's into the National airspace system, but to "...establish requirements for the safe operation of such aircraft systems [UAS's] in the national airspace system" under Section 333(c) of the Reform Act specific to the use of UAS's for Cinematography/Photo purposes. Further I, Clive Tollman, will conduct my operations in compliance with the protocols described herein or as otherwise established by the FAA.

As set forth herein, Clive Tollman owner of Digipulse LLC seeks an exemption pursuant to 14 C.F.R. § 11.61 and Section 333 of the FAA Modernization and Reform Act of 2012 (FMRA), which will permit safe operation of the DJI Inspire 1 UAS and DJI Phantom 2 V1 UAS commercially, without an airworthiness certificate, for the limited purpose of conducting aerial video and photography over certain areas of the United States. By granting this Petition, the FAA Administrator will be fulfilling the Congressional mandate of the FAA Modernization and Reform Act of 2012, while also advancing the interests of the public, by allowing Clive Tollman owner of Digipulse LLC to safely, efficiently, and economically operate the

In accordance with the Federal Aviation Regulations and the FAA Modernization and Reform Act of 2012, Section 333, Clive Tollman owner of Digipulse LLC seeks Exemption Request Section 333 of the FAA Reform Act of the Federal Aviation Regulations from 14 CFR Part 21, 14 C.F.R. 91.109, 14 CFR 91.405 (a), 14 C.F.R. 45.23(b), 14 C.F. R. 91.119, 14 CFR 407 (a) (1), 14 CFR 61.113 (a) & (b), 14 C.F.R. 91.121, 14 CFR 409 (a) (2), 14 C.F.R. 91.7 (a), 14 CFR 91.151 (a), 14 CFR 417 (a) & (b), 14 CFR 91.9 (b) (2), 14 CFR 91.203 (a) & (b), 14 C.F.R. 91.103

Dated: May 21, 2015

Respectfully submitted,

Clive Tollman  
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