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

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

August 11, 2015

Exemption No. 12439
Regulatory Docket No. FAA–2015–0810

Mr. John F. Riley
P.O. Box 588
Blue Hill, ME 04614−0588

Dear Mr. Riley:

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

By letter posted to the public docket on March 27, 2015, you petitioned the Federal Aviation Administration (FAA) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct commercial aerial videography.

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. However, the FAA received one individual comment to the petition. In granting this exemption, the FAA has determined that the proposed operations can safely be conducted under the conditions and limitations of this exemption. As with exemptions issued to Aeryon Lab, Astraeus Aerial, Clayco, Inc., and VDOS Global, LLC, failure to comply with the document's conditions and limitations is grounds for immediate suspension or rescission of the exemption.

Airworthiness Certification

The UAS proposed by the petitioner are the Aeronavics Skyjib 8, DJI Phantom 2 Vision +, and 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 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.

[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.

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, Mr. John F. Riley 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, Mr. John F. Riley 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 Aeronavics Skyjib 8, DJI Phantom 2 Vision +, and 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.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

PETITION FOR EXEMPTION
TITLE 14, CODE OF FEDERAL REGULATIONS

Petitioner: John F. Riley
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Blue Hill, ME 04614-0588

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Exemption from Sections of 14 CFR: part 21; §§ 45.23(b); 61.113 (a) and (b); 91.9(b)(2); 91.103; 91.109; 91.119; 91.121; 91.151(a); 91.203(a) and (b); 91.405(a); 91.407(a)(1); 91.409(a)(2); and 91.417(a) and (b).

Extant of relief: Petitioner desires exemption from the above named regulations for the purpose of conducting commercial aerial videography using Unmanned Aerial Systems (UAS) with Global Positioning System (GPS) control and stabilization.

The petitioner supports its request with the following information:
The petitioner provides the following information: 1. Unmanned Aircraft Systems (UAS); 2. UAS Pilot in Command (PIC) Requirements; 3. UAS Operating Parameters; 4. Public Interest and Safety; 5. Summary.

1. Unmanned Aircraft System:
The UAS proposed for use by the petitioner are airframes provided by Aeronavics.com (Aeronavics) and DJI.com (DJI), used in conjunction with DJI hardware/software controllers, data signal processing, and GPS stabilization and navigation electronics. Radio Control (RC) transmitters, propellers, electric motors, and batteries are provided by various manufacturers worldwide. Aeronavics is located at 226 Okete Road, Raglan, 3295 Waikato, New Zealand; and DJI (Da-Jiang Innovations Science and Technology Co. Ltd.) is located at, Shenzhen, Guangdong Province, China. Please be advised that most Unmanned Aerial Systems (UAS) are modular (plug-in and replaceable parts that are commonly used in UAS), and that DJI hardware/software for controllers, data links, and GPS navigation are the most commonly used programmable electronics for navigation and control in UAS usage.
The systems have the size, weight, speed, and limited operating area associated with the aircraft to be utilized by the applicant, an exemption from 14 CFR part 21 § 91.203 (Airworthiness Certificates), 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 the FAA Modernization and Reform Act of 2012 (PL 112-95). If these UAS are operated without an airworthiness certificate in the restricted environment and under the conditions and limitations proposed by the petitioner it will be at least as safe, or safer, than a conventional aircraft (fixed wing or rotorcraft) operating with an airworthiness certificate issued under 14 CFR part 21, Subpart H and not subject to the proposed conditions and limitations.
The UAS to be operated under this request are less than 55 lbs (20 lbs. or less typically) fully loaded, flying at speeds of no more than 50 knots, carrying neither a pilot nor passenger (part 21 § 61.113), carrying no explosive materials or flammable liquid fuels, and operates exclusively within a secured area. In addition, the UAS have integrated safety features built into the design of the UAS, as

described in the UAS operating parameters, to ensure the safety of persons and property within and surrounding the limited operating area. In the event the UAS loses communications, its GPS signal, or reaches 15% battery power, the UAS will have the capability to automatically return to the takeoff/PIC location within the limited operating area. Software for the controller could be coded for use by a particular unit so as to prevent interference or hijacking (part 21 § 91.109). Controllers also have the capability to abort a flight in the event of unpredicted obstacles or emergencies. Distance from the PIC can be limited with DJI UAS software and the flights can be contained in the restricted secure flight areas, as well as preventing flights in restricted areas such as class B airspaces.
UAS have been proven to have stable flight under severe gusty wind conditions (up to 40 knots). Wind shear accidents can be of minimal impact when using a UAS with low mass and soft propellers such as UAS, though through diligent weather planning, avoidance is the best course.
The UAS will have no airworthiness certificate, and an exemption may be needed from 14 CFR § 45.23 as the UAS will have no entrance to the cabin, cockpit, or pilot station on which the word "experimental" can be placed. Given the size of the UAS, the two-inch lettering will be impossible. An equivalent level of safety will be provided by the UAS having flashing lights to draw attention to their operation.
The maintenance requirements in the pertinent sections of 14 CFR, part 91 are only applicable to aircraft with an airworthiness certificate in accordance with part 43, therefore the petitioner has developed an as needed maintenance process for the UAS affected by this exemption. The petitioner intends to follow any manufacturers' recommended instructions and procedures when those maintenance procedures exist for certain components of its UAS (§ 91.9, 91.405, 91.407, 91.417).

2. UAS Pilot In Command (PIC) Requirements
The petitioner has a commercial pilot's certificate and has experience in manned aircraft photo reconnaissance and videography. The petitioner asserts that safe flying of UAS will be enhanced by using a PIC that has a pilot's certificate and is well versed in commercial flight procedures. It is hoped that any fears for commercial aircraft safety can be assuaged by the use of a commercially rated UAS pilots. Though some have said knowledge of airspace regulations and dexterity in the control and operation of the UAS acquired from actual operation of the aircraft will be the most important factors in establishing an equivalent level of safety, another layer of safety in flying UAS comes with the fact that a commercially rated pilot would be especially safe since that pilot could lose their privileges in flying manned aircraft.
Any PIC incapacitation during operations will be addressed by loss of communication time out software and automatic navigation return to base/takeoff point activation. The petitioner believes a current medical certificate of any class would be adequate for the safe flying of UAS. This would allow the continuation of a pilot's career beyond the 65 year old age limit.
The petitioner has over a year experience flying UAS and the skill or ability to safely operate an unmanned aerial vehicle, operating at 400 feet AGL or lower, within strictly controlled pre-approved airspace. The petitioner has further experience in the motion picture industry with training in use of Panavision cameras. The petitioner has further experience working with his son who works as a television production director. They have worked together with the latest video equipment and software. The petitioner has made a 'not for profit' documentary using UAS under the guidance of FAA UAS advisories and rules and calling attention to such operations to the local Flight Standards District Office (FSDO) of the FAA.

3. UAS Operating Parameters
The aircraft will be operated within a secure environment, which no one will be allowed to enter unless they are part of the production, have been fully briefed of the risks prior to operation of the UAS, and have consented to the risks associated with being in the operating area. Should there be a

mishap, the UAS being flown pose significantly less of a threat than the helicopters and fixed wing aircraft now being employed because they are a fraction of the size, carry no flammable fuel, and do not carry crew or passengers. From experience, this is in contrast to conventional aircraft that are flown to the site, carry flammable fuel, carry passengers and crew, and operate in a much larger area.

The UAS batteries are self monitored for safe usage, overheating, and return to starting point when discharged to 30%, and are limited to how many times they can be charged safely before proper disposal. Flight control software will be constantly updated as required and will provide feedback to the manufacturer for maintenance, design, and safety updating (§ 91.405, 91.407, 91.409, 91.417).

All UAS flights will be operated within visual line of sight (VLOS) of a pilot and/or observer, and that the UAS flights will be limited to a maximum altitude of 400 feet AGL (§ 91.119). The operator will ensure that only consenting production personnel will be allowed within 100 feet of the UA operation, but this radius may be reduced to 30 feet based upon an equivalent level of safety determination, with the advance permission of the local Flight Standards District Office (FSDO) and any needed NOTAM publish in an adequate time period. The petitioner asserts that an equivalent level of safety can be achieved given the size, weight, and speed of the UAS, as well as the location where it is operated. The UAS will be operated within a safe operating perimeter, the boundaries of which will be determined by production personnel and the UAS PIC based on the site-specific filming activities and speed of the UAS required for the operation, and coordinated with the jurisdictional FAA FSDO and local government officials as applicable.

With respect to preflight actions, the petitioner notes it may need an exemption from 14 CFR § 91.103, because it will not have approved rotorcraft flight manuals. The petitioner asserts that an equivalent level of safety will be achieved by the PIC taking all preflight actions as set by the manufacturer of the UAS and the pilot's own operating safety procedures to comply with insurance requirements including reviewing weather, flight battery requirements, landing and takeoff distance clearances, adequate GPS signal acquisition, and aircraft performance data acquisition on the controller before initiation of flight (§ 91.7 and 91.103 will be adhered to). Additionally, the petitioner will require a briefing to be conducted prior to each day's filming regarding planned UAS operations, and all personnel who will be performing duties within the boundaries of the safety perimeter will be required to attend.

With respect to the fuel requirements, the petitioner notes that, in order to meet the 30 minute reserve requirements in 14 CFR § 91.151, UAS flights would have to be limited to approximately zero minutes. The petitioner argues that, given the limitations on the UA's proposed flight area and the location of its proposed operations within a predetermined area, a longer time frame for flight in daylight or night VFR conditions is reasonable. The petitioner believes that an equivalent level of safety can be achieved by limiting flights to 25 minutes or 30% of battery power, whichever occurs first.

The petitioner requests an exemption from 14 CFR § 91.121, as its UAS have GPS altitude readouts instead of a barometric altimeter. The petitioner asserts that an equivalent level of safety will be achieved. Specifically, the altitude information will be provided to the UAS PIC via a digitally encoded telemetric data feed. Prior to each flight, a zero altitude initiation point will be established and confirmed for accuracy by the PIC.

The PIC will monitor air traffic when needed through an FCC approved portable transceiver and headset/ microphone combination capable of communication with control towers and manned aircraft in the vicinity of the operations area (only certified pilots would be allowed to do so).

4. Public Interest and Safety

Given the small size of the UAS involved and the restricted secure environment within which it will operate, its proposed operation falls within that zone of safety in which Congress envisioned that the FAA must, by exemption, allow this commercial operation of UAS to commence immediately. Also, due to the size of the UAS and the restricted areas in which the UAS will operate, approval of the application presents no national security issue. UAS systems the petitioner will use can be programmed in multiple ways to provide security and safety. The petitioner points out that given the clear direction in Section 333, the strong equivalent level of safety surrounding the proposed operations, and the significant public benefit, including enhanced safety, reduction in environmental impacts, and including reduced emissions associated with allowing UAS for movie and television operations, granting the requested exemptions is in the public interest.

The petitioner's use of UAS for documentary or educational videography will add to the public's knowledge base, allow for the public to experience video views of points of interest heretofore not available, and further constitutional rights to free speech.

If privacy issues are to be addressed, it is the petitioner's opinion that UAS operations are exceedingly less invasive than cell phone cameras with internet capabilities or satellite photometry.

It is the petitioner's experience that birds tend to stay away from UAS operations and that in conventional manned aircraft that is not the case. This furthers less environmental damage such as bird strikes and aircraft accidents.

In certain public areas the petitioner has seen kite flying allowed that is inherently less controllable and as dangerous, if not more so, than UAS operations.

5. Summary

The petitioner requests an exemption for himself, John F. Riley, from Title 14, Code of Federal Rules pertaining to the safe, commercial usage of unmanned aerial systems (UAS) in controlled secured video production areas. Exemption from Sections of 14 CFR: part 21; §§ 45.23(b); 61.113 (a) and (b); 91.9(b)(2); 91.103; 91.109; 91.119; 91.121; 91.151(a); 91.203(a) and (b); 91.405(a); 91.407(a)(1); 91.409(a)(2); and 91.417(a) and (b) are requested. The petitioner supports his request with the following information 1. Unmanned Aircraft Systems (UAS); this section describes the UAS maximum capabilities and the failsafe and abort safety mechanisms that are programmed into the UAS; 2. UAS Pilot In Command (PIC) Requirements; this section describes the pilot asking for the exemptions and his experience and knowledge base, description of safe flight duties and preparation, and comments on how UAS PIC should be commercially rated pilots of any age and with any medical certificate class and how this would provide better security and safety in any UAS operation; 3. UAS Operating Parameters; this section describes the operating procedures that will be carried out to meet regulations and provide safety in operations, secure environment, and procedures when working with the local FSDO and local government authorities; 4. Public Interest and Safety; this section addresses some of the advantages of UAS operations, especially the advantage for the public being privy to the exceptional views UAS videos provide.