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

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

July 21, 2015

Exemption No. 12103
Regulatory Docket No. FAA–2015–0956

Mr. Chad Copeland
CopelandRED LLC
1808 40th Avenue East
Seattle, WA 98112

Dear Mr. Copeland:

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 March 26, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of CopelandRED LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography for the use in public periodicals, motion picture and television industry for controlled and closed set filming.

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 are a FreeFly Systems Alta, Cinestar: Octocopter, Hexacopter, and Quadcopter; and CopelandRED LLC Delta Wing Aircraft.

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] and closed set motion picture and filming. 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, CopelandRED 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 and closed set motion picture and filming. This exemption is subject to the conditions and limitations listed below.

[1] Aerial data collection includes any remote sensing and measuring by an instrument(s) aboard the UA. Examples include imagery (photography, video, infrared, etc.), electronic measurement (precision surveying, RF analysis, etc.), chemical measurement (particulate measurement, etc.), or any other gathering of data by instruments aboard the UA.

Conditions and Limitations

In this grant of exemption, CopelandRED 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 FreeFly Systems Alta, Cinestar: Octocopter, Hexacopter, and Quadcopter; and CopelandRED LLC Delta Wing Aircraft 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 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 July 31, 2017, unless sooner superseded or rescinded.

Sincerely,

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

Enclosures

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March 26, 2015

Shell Docket FAA-2007-0001

U.S. Department of Transportation, Docket Operations
West Building Ground Floor, Room w12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

To Whom It May Concern:

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R. Part 11, CopelandRED LLC, research and developer and operator of Small Unmanned Aircraft Systems equipped to conduct aerial photography for the use in public periodicals (ie: National Geographic, Outside Magazine), motion picture and television industry for controlled and closed set filming, hereby applies for an exemption for the listed Federal Aviation Regulations to allow commercial operation of its UAS's, so long as such operations are conducted within and under the conditions outlined herein or as may be established by the FAA as required by Section 333.

As described more fully below, the requested exemption would permit the operation of small UAS under controlled conditions in airspace that is 1) limited 2) predetermined 3) controlled as to access and 4) would provide safety enhancements to the already safe operations in the film and television industry presently using conventional aircraft. Approval of this exemption would thereby enhance safety and fulfill the FAA Administrator's responsibilities to "establish requirements for the safe operation of such aircraft systems in the NAS." Section 333(c) of the Reform Act.

The name and address of the applicant is:

CopelandRED LLC
Attn: Chad CopelandRED
Ph: 425.301.2110
Email: chad.copeland@me.com
Address: 1808 40th Ave E, Seattle, WA 98112

Regulations from which the exemption is requested:

14 CFR Part 21, 14 C.F.R. 45.23(b), 14 CFR 61.113 (a) & (b), 14 C.F.R. 91.7 (a), 14 CFR 91.9 (b) (2), 14 C.F.R. 91.103, 14 C.F.R. 91.109, 14 C.F. R. 91.119, 14 C.F.R. 91.121, 14 CFR 91.151 (a), 14 CFR 91.203 (a) & (b), 14 CFR 91.405 (a), 14 CFR 407 (a) (1), 14 CFR 409 (a) (2), 14 CFR 417 (a) & (b)

This exemption application is expressly submitted to fulfill Congress' goal in passing Section 333(a) through (c) of the Reform Act. This law directs the Secretary of Transportation to consider whether certain unmanned aircraft systems may operate safely in the national airspace system (NAS) before completion of the rulemaking required under Section 332 of the Reform Act. In making this determination, the Secretary is required to determine which types of UASs do not create a hazard to users of the NAS or the public or pose a threat to national security in light of the following:

- The UAS's size, weight, speed, and operational capability;

- Operation of the UAS in close proximity to airports and populated areas; and

- Operation of the UAS within visual line of sight of the operator.

Reform Act § 333 (a). Lastly, if the Secretary determines that such vehicles "may operate safely in the national airspace system, the Secretary shall establish requirements for the safe operation of such aircraft in the national airspace system." *Id.* § 333(c) (emphasis added).

The Federal Aviation Act expressly grants the FAA the authority to issue exemptions. This statutory authority by its terms includes exempting civil aircraft, as the term is defined under §40101 of the Act that includes UASs, from the requirement that all civil aircraft must have a current airworthiness certificate.

CopelandRED LLC's UASs are rotorcraft, weighting 55 or fewer lbs. including payload. They operate, under normal conditions at a speed of no more than 87 knots and have the capability to hover, and move in the vertical and horizontal plane simultaneously. Such operations will insure that the UAS will "not create a hazard to users of the national airspace system or the public."

Given the small size of the UASs involved and the restricted sterile environment within which they will operate, the applicant falls squarely within that zone of safety (an equivalent level of safety) in which Congress envisioned that the FAA must, by exemption, allow commercial operations of UASs to commence immediately. Also due to the size of the UASs and the restricted areas in which the relevant UASs will operate, approval of the application presents no national security issue. Given the clear direction in Section 333 of the Reform Act, the authority contained in the Federal Aviation Act, as amended; the strong equivalent level of safety surrounding the proposed operations, and the significant public benefit, including enhanced safety, reduction in environmental impacts, including reduced emissions associated with allowing UASs for movie and television operations, the grant of the requested exemptions is in the public interest. Accordingly, the applicant respectfully requests that the FAA grant the requested exemption without delay.

AIRCRAFT AND EQUIVALENT LEVEL OF SAFETY

The applicant proposes that the exemption requested herein apply to civil aircraft that have the characteristics and that operate with the limitations listed herein. These limitations provide for at least an equivalent or even higher level of safety to operations under the current regulatory structure because the proposed operations represent a safety enhancement to the already safe movie and television filming operations conducted with conventional aircraft.

These limitations and conditions to which CopelandRED LLC agrees to be bound when conducting commercial operations under an FAA issued exemption include:

1. The UAS will weigh less than 55 lbs and not exceed a GS above 87 knots.
2. Flights shall be operated within VLOS of pilot and VO.
3. FPV shall only be used through a monitor. The use of FPV goggles is not authorized.
4. The PIC shall perform a preflight inspection of the UAS and ground station prior to each flight as outlined in the POH.
5. Any maintenance conducted on a production UAS that includes the avionics, power distribution, motors or a change of radio control hardware shall perform a Functional Check Flight (FCF) prior to a production-flying mission as outlined in the UAS maintenance manual. The certified maintenance technician shall make an entry in the maintenance log that an FCF was completed and the UAS is Full Mission Capable (FMC) as outlined in the maintenance manual.
6. Maximum total flight time for each operational flight will be 30 minutes. Flights will be terminated at 25% battery power reserve should that occur prior to the 30 minute limit.
7. CopelandRED LLC has established an approved aircraft manual (POH) that addresses the aircraft and component overhaul, replacement and inspection of parts. A manufacturers aircraft manual does not exist for the Cinestar aircraft.
8. Flights will be operated at an altitude of no more than 400 feet AGL.
9. Minimum crew for each operation will consist of the UAS Pilot/Camera Operator and VO.
10. UAS pilot will be an FAA licensed airman with at least a private pilot certificate and a third class medical and a current BFR as outlined in the SOP's. VO shall third class medical and have passed the VO certification course established by CopelandRED LLC.
11. Airman flying UAS for commercial purposes must have logged a minimum of 50 take-off and landings, 25 hours PIC in UAS type aircraft. The PIC shall, within the preceding 90 days, performed a minimum of three take-offs and landings, and flown the same make and model for a minimum of 5 hours prior to a production flight. The POH covers three models. Cinestar: Octocopter, Hexacopter and Quadcopter.
12. UAS pilot will be the PIC and shall use the radio-based telemetry at the ground station to read aircraft systems status. (**Speed**, **Altitude AGL**, GPS position, Heading and distance from home.)
13. The UAS will only operate within a controlled area as defined in the Manual.
14. A "Flight Profile Briefing" will be conducted prior to each flight. All production personnel performing duties within the boundaries of the safety perimeter shall be a part of the briefing. Communication devices such as hand held radios; cell phones and visual depictions are acceptable means for conducting the briefing as athletes and crew may be on a route.
15. The operator shall file an FAA Form 7711-1, or its equivalent, as modified in light of the requested exemption, with the appropriate FSDO.

16. The operator will obtain consent of all persons involved in the filming and ensure that only consenting persons will be allowed within 100 feet of the flight operation.
17. The operator will submit a written Plan of Activities to the FSDO three days prior to the proposed shoot.
18. Pilot and VO will maintain currency as outlined in the CopelandRED LLC SOP's.
19. PIC and VO will establish and maintain verbal communication during each flying mission.
20. CopelandRED LLC will obtain written and/or oral permission from the relevant property holders prior to flight operations.
21. All required permission and permits shall be obtained from local, territorial, state, county or city jurisdictions, including local law enforcement, fire, or other appropriate governmental agencies.
22. If the UAS loses communications, the PIC and VO will walk toward the aircraft until communications can be established. In the even that communications can not be established, the flight control has been programmed to "Return to Home" position and land within 2 minutes or a battery percentage remaining of 30%. In the event that GPS becomes unavailable, the aircraft will be landed as soon as practical and an entry in the maintenance log will be made. (GPS not required for Mikorkopter Avionics to maintain safety of flight.)
23. If an unsafe condition persists, all UAS operations will be aborted until resolved.

14 C.F.R. Part 21, Subpart H: Airworthiness Certificates 14 C.F.R. 91.203 (a) (1)
As per CopelandRED LLC aircraft POH for the Cinestar Aircraft, we meet the requirements of the exemption. UAS to be operated shall be less than 55 lbs, unmanned, will not carry explosive or flammable items and operates within the confines of CopelandRED LLC SOP's and aircraft POH.

14 C.F.R. 45.23 (b): Aircraft Marking
All CopelandRED LLC aircraft, for the use of production, shall be marked with a serial number and company identification. Labels will be a height of one inch. (ie: RED003, CopealndRED LLC, 425.301.2110)

14 C.F.R. 61.113 (a) & (b): Private Pilot Privileges and Limitations: Pilot in Command
CopelandRED LLC observes previous exemptions to a commercial pilot certificate and therefore requests the same exemption.

14 C.F.R. 91.7(a): Civil aircraft airworthiness
CopelandRED LLC shall only fly aircraft signed off as "Airworthy" as outlined in the company SOP's and aircraft POH.

14 C.F.R. 91.9 (b) (2): Civil Aircraft Flight Manual in the Aircraft
CopelandRED LLC shall have, at the ground station, a digital POH for the aircraft being flown.

14 C.F.R. 91.103: Preflight Action
The PIC will complete a preflight inspection prior to each flight as outlined in the POH.

14 C.F.R. 91.109: Flight Instruction
CopelandRED LLC shall, in accordance with the company Standard Operating Procedures (SOP's), utilize airman that meet the standards of this exemption and company training program. We observe the exemption provided and granted by other applicants.

14 C.F.R. 91.119: Minimum Safe Altitudes
CopelandRED LLC will comply at all times the requirement to fly below 400 feet MSL. We observe the exemption provided and granted by other applicants.

14 C.F.R. 91.121: Altimeter Setting
Prior to motor start, the PIC shall accomplish a Flight Control/Navi/GPS calibration that sets the GPS "Home" location, zero altitude, and heading as outlined in the POH. As observed in previously granted exemptions, this complies.

14 C.F.R. 91.151 (a): Fuel Requirements for Flight in VFR Conditions
CopelandRED LLC will limit flights to 30 minutes or 25% remaining battery power, whichever happens first as outlined in the SOP's. We observe the exemption provided and granted by other applicants.

14 C.F.R. 91.203 (a) & (b): Carrying Civil Aircraft Certification and Registration
As outlined in the POS, CopelandRED LLC will maintain a digital copy of all pertinent documents that will be kept at the base station during operations. We observe the exemption provided and granted by other applicants.

14 C.F.R. 91.405 (a); 407 (a) (1); 409 (a) (2); 417 (a) & (b): Maintenance Inspections
CopelandRED LLC has developed a maintenance program for company UAS type aircraft. We require an FAA certified A&P mechanic to certify the UAS for flight. All maintenance actions and will be recorded in the aircraft maintenance log. All maintenance personnel shall follow UAS guidance IAW REDUASMTX (document). We observe the exemption provided and granted by other applicants.

CopelandRED LLC will comply with all current and future directives provided by the FAA with regard to UAS operations.