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

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

CORRECTED COPY

The FAA is reissuing the August 3, 2015, grant of exemption of Exemption No. 12283. A correction was made to change the approved aircraft from the DJI Phantom Series and the DJI Inspire Series to specific aircraft. This change is made to the Airworthiness Certification section and to Condition No. #1. Below is the amended Exemption No. 12283 that includes the aforementioned change. We made the correction in our records as of August 30, 2015.

August 3, 2015

Exemption No. 12283
Regulatory Docket No. FAA–2015–1924

Mr. Nicholas Schultz
Orlando Production, Inc.
8761 Atwater Loop
Oviedo, FL 32765

Dear Mr. Schultz:

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 9, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Orlando Production, Inc. (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography and cinematography and closed-set motion picture and television 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 the following:

1. DJI Flame Wheel F450
2. DJI Flame Wheel F550
3. DJI Inspire
4. DJI Inspire 1
5. DJI Inspire 2
6. DJI M P330z
7. DJA Matrix
8. DJI Matrice 100
9. DJI Phantom
10. DJI Phantom 1
11. DJI Phantom 2
12. DJI Phantom 2+
13. DJI Phantom 2 Vision
14. DJI Phantom 2 Vision+
15. DJI Phantom Vision +
16. DJI Phantom 3
17. DJI Phantom FC40
18. DJI Spreading Wings S900
19. DJI Spreading Wings S1000
20. DJI Spreading Wings S1000+
21. DJI S800
22. DJI S800 EVO
23. DJI T600
24. 3D Robotics Aero-M
25. 3D Robotics Iris
26. 3D Robotics IRIS+
27. 3D Robotics X8
28. 3D Robotics DIY Quad Kit
29. 3DRobotics Fixed Wing
30. 3DRobotics Multirotor
31. 3DRobotics Quadrotor
32. 3DR Solo
33. 3DR Spektre
34. 3DRobotics Spektre Industrial Multi-Rotor Aerial Vehicle
35. 3D Robotics Solo
36. 3DRobotics X8+
37. 3D Robotics X8-M
38. 3D Robotics Y6

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, Orlando Production, Inc. 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

[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.

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

Conditions and Limitations

In this grant of exemption, Orlando Production, Inc. 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 3D Robotics Aero-M, 3D Robotics Iris, 3D Robotics IRIS+, 3D Robotics X8, 3D Robotics DIY Quad Kit, 3DRobotics Fixed Wing, 3DRobotics Multirotor, 3DRobotics Quadrotor, 3DR Solo, 3DR Spektre, 3DRobotics Spektre Industrial Multi-Rotor Aerial Vehicle, 3D Robotics Solo, 3DRobotics X8+, 3D Robotics X8-M, 3D Robotics Y6, DJI Flame Wheel F450, DJI Flame Wheel F550, DJI Inspire, DJI Inspire 1, DJI Inspire 2, DJI M P330z, DJA Matrix, DJI Matrice 100, DJI Phantom, DJI Phantom 1, DJI Phantom 2, DJI Phantom 2+, DJI Phantom 2 Vision, DJI Phantom 2 Vision+, DJI Phantom Vision +, DJI Phantom 3, DJI Phantom FC40, DJI Spreading Wings S900, DJI Spreading Wings S1000, DJI Spreading Wings S1000+, DJI S800, DJI S800 EVO, and the DJI T600 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 August 31, 2017, unless sooner superseded or rescinded.

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

Enclosures

Orlando Production, Inc.
8761 Atwater Loop
Oviedo, Florida 32765

May 9, 2015

U.S. Department of Transportation, Docket Operations
Attn: Federal Aviation Administration (FAA) Administrator
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue, SE
Washington, DC 20590

Dear Administrator,

Orlando Production Inc. (OPI) would like the Federal Aviation Administration (FAA) to consider this letter as its formal Section 333, Waiver and Exemption. As a leader in the digital photography and cinematic industries. OPI caters to a wide variety of photographic needs required to support of its clients, both private and commercial.

OPI has assembled a uniquely qualified aerial imaging team with extensive qualifications to ensure quality and safe small Unmanned Aircraft System (sUAS) operations. The team's qualifications include over 20 years of cinematic and photographic imaging and 15 years of experience in FAA Part 61, 65, and 141 pilot training, maintenance, and commercial flight operations.

Understanding the overwhelming demand for aerial photography and now more accessible with the advent of Unmanned Aerial Systems (UAS), OPI has positioned itself to provide and answer this need in a safe and professional manor.

Orlando Production Inc. commends the Federal Aviation Administration's (FAA) for its recent action in publishing the proposed sUAS rule. OPI understands that until the new rule becomes law that the FAA still needs to ensure the safety of the NAS (National Airspace System) for all users. This collective goal is the motivation for OPI to employ subject matter experts (SME's) from both the aviation and photography industries. Furthermore, OPI's aerial sUAS division will adopt industry accepted "best practices" as its processes and procedures to allow for safe and successful sUAS operations.

At this time, OPI has invested in professional grade sUAS platforms, as well as, imaging and sensing devices in an effort to provide its clients with a variety aerial services. In doing so, OPI will only employ qualified Pilot/Observer operators who are familiar with Federal Aviation Regulations (FAR) and the guidance and/or restrictions provided for in the approval of this exemption.

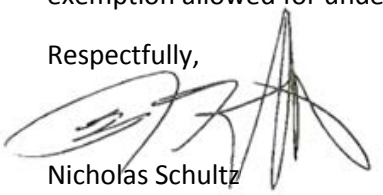
Furthermore, DroneLife.com sited a Bloomberg report stating that Amazon has sold more than 10,000 devices per month in 2014. With over 1 million UAS platforms in operation today, OPI is looking to provide the safety of proven aviation operational standards to meet the demand for private and commercial imaging while ensuring UAS operations are also conducted within the legal guidelines that this exemption will provide.

Orlando Production, Inc.
8761 Atwater Loop
Oviedo, Florida 32765

It is the sincere hope of Orlando Production, Inc. and its staff, that the Administrator grant this exemption as it believes it has met the congressional mandate to “operate safely in the National Airspace System.”

Please find attached OPI’s regulatory compliance of title 14 CFR §11.81 regarding the petition for an exemption allowed for under Public Law 112-95 §333.

Respectfully,



Nicholas Schultz
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Director of Aerial Operations
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C: 321-438-2672
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Orlando Production, Inc.
8761 Atwater Loop
Oviedo, Florida 32765

Information Supporting Orlando Production, Inc., Petition for Exception, Public Law 112-95 §333 - Special Rules for Certain Unmanned Aircraft Systems, as Specified in 14 C.F.R. §11.81

A. Mailing address and other contact information:

Orlando Production, Inc.
Attn: Nicholas Schultz
8761 Atwater Loop
Oviedo, FL 32765
C: 321-438-2672
Nick@OrlandoProduction.com

Orlando Production, Inc.
Attn: William Shanley
8761 Atwater Loop
Oviedo, FL 32765
C: 407-765-8210
Bill@OrlandoProduction.com

B. The specific section or sections of 14 C.F.R from which Orlando Production, Inc. (OPI) seeks exemption:

OPI seeks exemption from applicable title 14 Code of Federal Regulations (CFRs) relevant to small Unmanned Aircraft System (sUAS), as defined by the FAA, operations. The below list, includes but is not limited to, regulations limiting sUAS operations.

1. 14 CFR Part 21, Subpart H: Airworthiness Certificates.
2. 14 CFR 91.203(a) & (b) Civil aircraft: Certifications required.
3. 49 USC § 44711 Prohibitions and exemption
4. 14 CFR 45.23 Display of Marks; General and 45.29 Size of Marks.
5. 14 CFR 91.9 Civil Aircraft Flight Manual, Marking, and Placard Requirements.
6. 14 CFR 91.119 Minimum Safe Altitudes.
7. 14 CFR 91.121 Altimeter Settings.
8. 14 CFR 91.151 Fuel Requirements for Flight in VFR Conditions.
9. 14 CFR Subpart E (91.401 - 91.417) - Maintenance, Preventive Maintenance, and Alterations.
10. FAA Notice 8900.227 Paragraph 16(c) (4) PIC Medical and Paragraph 16(e)(1) Observer Medical.

C. The extent of relief, and the reason for relief:

Orlando Production, Inc. is requesting relief from multiple regulatory constraints under title 14 CFR Parts 21, 45, 61, 65, 91 as well as other UAS regulatory guidance under FAA Notice 8900.227, Public Law 112-95, Title 49 United States Code (USC), with regards to Unmanned Aircraft System (UAS) operations, more specifically sUAS commercial operations.

OPI would like, with the permission of the Administrator, to provide sUAS aerial imaging and sensing with the intended use to include but not limit the following:

- Aerial services including

- Photography
- Cinematography
- Survey

Detailed below is a list of operational safeguards OPI believes are essential for safe operations of which many have been previously approved by the Administer for similar sUAS operations. In addition, OPI will not commence sUAS operation that will create an undue hazard to users of the national airspace system (NAS), the public, or pose a threat to national security.

OPI has published and/or adopted the following documents to be an integral part of its sUAS operations.

- OPI Flight Operations Manual (Flight Ops Manual)
    - Motion Picture and Television Operations Manual (MPTOM)
    - DJI Published
        - User Manuals
        - Maintenance Manuals
        - Propeller Locks Manuals
        - Safety Guidelines
        - Flight Battery Safety Guidelines
        - Release Notes
        - Lightbridge (optional)
            - Lightbridge User Manual
    - OPI Published
        - Pilot's Operating Manual (POH)/Aircraft Flight Manual (AFM)
            - Spreading Wings S1000+
    - Mission Planner/Firmware
        - User Manuals
        - Planning Manuals

Furthermore, OPI will ensure all operations are in compliance with these documents and/or other more recent and relevant documents that OPI determines will improve the safety and crew resource management (CRM) of the OPI aerial team.

OPI believes the this request is consistent with the congressional mandate in Section 333 of the FAA modernization and Reform Act of 2012 and will allow OPI to operate sUAS in a legal, safe, and publicly beneficial way which exceed the standards currently permitted for recreational use.

D. The reasons why granting Orlando Production, Inc.'s request would be in the public interest; that is, how it would benefit the public as a whole:

By the granting of this exemption the public will benefit from the worldwide well-publicized benefits of UAS operations which include:

- Public safety

- United States infrastructure
    - Bridges inspection
    - Building inspection
    - Utility inspection
        - Power
        - Communication
- Unimproved Property Imaging
    - Agricultural
        - Surveying
        - Crop Inspection
- Improved Property Imaging
    - Commercial and Residential
    - Structural inspection
    - Exterior appliance inspection
- Economic Development Benefits
- Marketing

The benefits of sUAS operations is exhaustive and the uses of these devised will allow public, private, and personal entities to benefit from the expertise OPI has to offer while mitigating the physical safety hazards of the current legally approved imaging methods as well as the cost reduction made possible by sUAS platforms.

OPI is confident that the granting of this exemption will allow OPI to continue providing a high quality solutions for its client base while minimizing the risk of accidents and/or damage to persons or property. The positive impacts will be felt by the families of our employees, the improved safety of our neighbors, and our community as a whole.

E. The reasons why granting the exemption would not adversely affect safety, or how the exemption would provide a level of safety at least equal to that provided by the rule from which Orlando Production, Inc. seeks the exemption:

As documented above, OPI's sUAS operational procedures will provide a level of safety that far exceeds the level of safety currently required by the FAA for hobbyist and manufacturers of model aircraft. The following operating procedures will apply during all sUAS operations under this exemption.

1. The below chosen sUAS(s) will not exceed the operational weight or maximum gross takeoff weight (MGTOW) as defined by the FAA and currently limited to a MGTOW of 55 pounds.
    i. DJI
        a. Phantom Series
        b. Inspire Series
        c. Spreading Wings S1000+
            a. Optional
                - DJI Lightbridge (Advanced Datalink System)

2. Approved airframes will not exceed an airspeed of 87 knots (100 miles per hour) or "maximum never-exceed speed (V_{NE})" published and/or recommended by the airframe manufacturer, whichever is lower.
3. sUAS operations will not exceed the reported absolute altitude of 400 feet or 50 feet above and 50 feet laterally from the highest point of the target structure.
4. All sUAS Pilot in Command (PIC) will operate with visual line of sight (VLOS) at all times where the VLOS will be human unaided vision by any devise other than corrective lenses as specified on the PIC's FAA-issued airman medical certificate or U.S. driver's license.
5. Operations requiring the use of Visual Observers (VO)
   i. All sUAS operations not employing geo-fencing technology, where geo-fencing technology is a technology that utilizes the onboard GPS with software to create a virtual boundary around the target structure
   ii. All operations operating more than 50 feet laterally of a target structure and/or a reported absolute altitude over 200 feet
   iii. All operation where individuals not associated with the operation are within the vicinity
6. Visual Observer requirements
   i. The sUAS 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. The PIC must have all available information required to ensure successful flight. This information must be accessible during sUAS operations.
   i. All available information must include the following, at a minimum:
      a. All documents needed to operate the sUAS 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.
      b. 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.
      c. 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.
      d. 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 sUAS 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. The PIC must hold a certificate issued under 14 CFR Part 61.

    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 Colombia, Puerto Rico, a territory, a possession, or the Federal government.
14. OPI will 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 including evasive and emergency maneuvers and maintaining appropriate distances from persons, vessels, vehicles and structures.
    i. OPI will only utilize a PIC who has completed standardized training and has a minimum of 25 hours of documented flight experience in sUAS operations and at least 5 hours on each device type and category prior to any exempted commercial operation.
    ii. 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 sUAS in a manner consistent with how the sUAS 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. sUAS operations may not be conducted during night, as defined in 14 CFR § 1.1. All operations must be conducted under visual meteorological conditions (VMC).
16. The unmanned aerial vehicle UAV may not operate at or above a reported absolute altitude of 500 feet within 3 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Directory (A/FD) or for airports without a 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 will be made available to the Administrator or any law enforcement official upon request.
    i. The UAV may operate above a reported absolute altitude of 500 feet providing OPI has gained prior written approval from the air traffic authority responsible for the restricted airspace.
17. The UAV 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 UAV loses communications or loses its GPS signal, the UAV 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 UAV 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. 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.
22. 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.
23. The UAV must remain clear and give way to all manned aviation operations and activities at all times.
24. The UAS may not be operated by the PIC from any moving device or vehicle.
25. All flight operations must be conducted at least 200 feet from all nonparticipating persons, vessels, vehicles, and structures unless:
    i. Barriers or structures are present that sufficiently protect nonparticipating persons from the UAV and/or debris in the event of an accident. The operator must ensure where nonparticipating persons leave such protection and are within 200 feet of the UAV, flight operations must cease immediately in a manner ensuring the safety of nonparticipating persons; and
    ii. 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.

26. 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.
27. 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.
28. Closed-set motion picture and television filming and production OPI will observe and abide by all procedures as is contained in a motion picture and television operations manual (MPTOM).
29. For flight operations closer than 200 feet from participating persons consenting to be involved and necessary for the filming production will be conducted in accordance with and as specified in OPI's MPTOM.

F. Additional information and view:

Orlando Production, Inc. would ask that the Administrator consider all previously awarded exemptions as supporting arguments to this exemption request.

Additionally, due to file size limitations of the FAA electronic comment/request system, OPI will provide, upon request, detailed specifications, operational procedures, and optional equipment documentation.

OPI would like to thank the FAA for its consideration as our team awaits a positive outcome to this request.

Should the Administrator require any additional information or clarification please do not hesitate to contact myself or Mr. William Shanley directly.

Respectfully,

Nicholas Schultz
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