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

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

August 6, 2015

Exemption No. 12367
Regulatory Docket No. FAA–2015–2035

Mr. Allen M. Gottfried
Electric Head LLC
15 Olivia Way
Jackson, NJ 08527

Dear Mr. Gottfried:

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 18, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Electric Head LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography, motion picture, and research.

See Appendix A for the petition submitted to the FAA describing the proposed operations and the regulations that the petitioner seeks an exemption.

The FAA has determined that good cause exists for not publishing a summary of the petition in the Federal Register because the requested exemption would not set a precedent, and any delay in acting on this petition would be detrimental to the petitioner.

Airworthiness Certification

The UAS proposed by the petitioner is a Parrot BeBop.

The petitioner requested relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*. In accordance with the statutory criteria provided in Section 333 of Public Law 112−95 in reference to 49 U.S.C. § 44704, and in consideration of the size, weight, speed, and limited operating area associated with the aircraft and its operation, the Secretary of Transportation has determined that this aircraft meets the conditions of Section 333. Therefore, the FAA finds that the requested relief from 14 CFR part 21, *Certification procedures for products and parts, Subpart H—Airworthiness Certificates*, and any associated noise certification and testing requirements of part 36, is not necessary.

The Basis for Our Decision

You have requested to use a UAS for aerial data collection[1]. The FAA has issued grants of exemption in circumstances similar in all material respects to those presented in your petition. In Grants of Exemption Nos. 11062 to Astraeus Aerial (*see* Docket No. FAA−2014−0352), 11109 to Clayco, Inc. (*see* Docket No. FAA−2014−0507), 11112 to VDOS Global, LLC (*see* Docket No. FAA−2014−0382), and 11213 to Aeryon Labs, Inc. (*see* Docket No. FAA−2014−0642), the FAA found that the enhanced safety achieved using an unmanned aircraft (UA) with the specifications described by the petitioner and carrying no passengers or crew, rather than a manned aircraft of significantly greater proportions, carrying crew in addition to flammable fuel, gives the FAA good cause to find that the UAS operation enabled by this exemption is in the public interest.

Having reviewed your reasons for requesting an exemption, I find that—

- They are similar in all material respects to relief previously requested in Grant of Exemption Nos. 11062, 11109, 11112, and 11213;
- The reasons stated by the FAA for granting Exemption Nos. 11062, 11109, 11112, and 11213 also apply to the situation you present; and
- A grant of exemption is in the public interest.

Our Decision

In consideration of the foregoing, I find that a grant of exemption is in the public interest. Therefore, pursuant to the authority contained in 49 U.S.C. 106(f), 40113, and 44701, delegated to me by the Administrator, Electric Head 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

[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.

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, Electric Head 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 Parrot BeBop when weighing less than 55 pounds including payload. Proposed operations of any other aircraft will require a new petition or a petition to amend this exemption.

2. Operations for the purpose of closed-set motion picture and television filming are not permitted.

3. The UA may not be operated at a speed exceeding 87 knots (100 miles per hour). The exemption holder may use either groundspeed or calibrated airspeed to determine compliance with the 87 knot speed restriction. In no case will the UA be operated at airspeeds greater than the maximum UA operating airspeed recommended by the aircraft manufacturer.

4. The UA must be operated at an altitude of no more than 400 feet above ground level (AGL). Altitude must be reported in feet AGL.

5. The UA must be operated within visual line of sight (VLOS) of the PIC at all times. This requires the PIC to be able to use human vision unaided by any device other than corrective lenses, as specified on the PIC's FAA-issued airman medical certificate or U.S. driver's license.

6. All operations must utilize a visual observer (VO). The UA must be operated within the visual line of sight (VLOS) of the PIC and VO at all times. The VO may be used to satisfy the VLOS requirement as long as the PIC always maintains VLOS capability. The VO and PIC must be able to communicate verbally at all times; electronic messaging or texting is not permitted during flight operations. The PIC must be designated before the flight and cannot transfer his or her designation for the duration of the flight. The PIC must ensure that the VO can perform the duties required of the VO.

7. This exemption and all documents needed to operate the UAS and conduct its operations in accordance with the conditions and limitations stated in this grant of exemption, are hereinafter referred to as the operating documents. The operating documents must be accessible during UAS operations and made available to the

Administrator upon request. If a discrepancy exists between the conditions and limitations in this exemption and the procedures outlined in the operating documents, the conditions and limitations herein take precedence and must be followed. Otherwise, the operator must follow the procedures as outlined in its operating documents. The operator may update or revise its operating documents. It is the operator's responsibility to track such revisions and present updated and revised documents to the Administrator or any law enforcement official upon request. The operator must also present updated and revised documents if it petitions for extension or amendment to this grant of exemption. If the operator determines that any update or revision would affect the basis upon which the FAA granted this exemption, then the operator must petition for an amendment to its grant of exemption. The FAA's UAS Integration Office (AFS−80) may be contacted if questions arise regarding updates or revisions to the operating documents.

8. Any UAS that has undergone maintenance or alterations that affect the UAS operation or flight characteristics, e.g., replacement of a flight critical component, must undergo a functional test flight prior to conducting further operations under this exemption. Functional test flights may only be conducted by a PIC with a VO and must remain at least 500 feet from other people. The functional test flight must be conducted in such a manner so as to not pose an undue hazard to persons and property.

9. The operator is responsible for maintaining and inspecting the UAS to ensure that it is in a condition for safe operation.

10. Prior to each flight, the PIC must conduct a pre-flight inspection and determine the UAS is in a condition for safe flight. The pre-flight inspection must account for all potential discrepancies, e.g., inoperable components, items, or equipment. If the inspection reveals a condition that affects the safe operation of the UAS, the aircraft is prohibited from operating until the necessary maintenance has been performed and the UAS is found to be in a condition for safe flight.

11. The operator must follow the UAS manufacturer's maintenance, overhaul, replacement, inspection, and life limit requirements for the aircraft and aircraft components.

12. Each UAS operated under this exemption must comply with all manufacturer safety bulletins.

13. Under this grant of exemption, a PIC must hold either an airline transport, commercial, private, recreational, or sport pilot certificate. The PIC must also hold a current FAA airman medical certificate or a valid U.S. driver's license issued by a state, the District of Columbia, Puerto Rico, a territory, a possession, or the Federal government. The PIC must also meet the flight review requirements specified in 14 CFR § 61.56 in an aircraft in which the PIC is rated on his or her pilot certificate.

14. The operator may not permit any PIC to operate unless the PIC demonstrates the ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption, including evasive and emergency maneuvers and maintaining appropriate distances from persons, vessels, vehicles and structures. PIC qualification flight hours and currency must be logged in a manner consistent with 14 CFR § 61.51(b). Flights for the purposes of training the operator's PICs and VOs (training, proficiency, and experience-building) and determining the PIC's ability to safely operate the UAS in a manner consistent with how the UAS will be operated under this exemption are permitted under the terms of this exemption. However, training operations may only be conducted during dedicated training sessions. During training, proficiency, and experience-building flights, all persons not essential for flight operations are considered nonparticipants, and the PIC must operate the UA with appropriate distance from nonparticipants in accordance with 14 CFR § 91.119.

15. UAS operations may not be conducted during night, as defined in 14 CFR § 1.1. All operations must be conducted under visual meteorological conditions (VMC). Flights under special visual flight rules (SVFR) are not authorized.

16. The UA may not operate within 5 nautical miles of an airport reference point (ARP) as denoted in the current FAA Airport/Facility Directory (AFD) or for airports not denoted with an ARP, the center of the airport symbol as denoted on the current FAA-published aeronautical chart, unless a letter of agreement with that airport's management is obtained or otherwise permitted by a COA issued to the exemption holder. The letter of agreement with the airport management must be made available to the Administrator or any law enforcement official upon request.

17. The UA may not be operated less than 500 feet below or less than 2,000 feet horizontally from a cloud or when visibility is less than 3 statute miles from the PIC.

18. If the UAS loses communications or loses its GPS signal, the UA must return to a pre-determined location within the private or controlled-access property.

19. The PIC must abort the flight in the event of unpredicted obstacles or emergencies.

20. The PIC is prohibited from beginning a flight unless (considering wind and forecast weather conditions) there is enough available power for the UA to conduct the intended operation and to operate after that for at least five minutes or with the reserve power recommended by the manufacturer if greater.

21. Air Traffic Organization (ATO) Certificate of Waiver or Authorization (COA). All operations shall be conducted in accordance with an ATO-issued COA. The exemption holder may apply for a new or amended COA if it intends to conduct operations that cannot be conducted under the terms of the attached COA.

22. All aircraft operated in accordance with this exemption must be identified by serial number, registered in accordance with 14 CFR part 47, and have identification (N−Number) markings in accordance with 14 CFR part 45, Subpart C. Markings must be as large as practicable.

23. Documents used by the operator to ensure the safe operation and flight of the UAS and any documents required under 14 CFR §§ 91.9 and 91.203 must be available to the PIC at the Ground Control Station of the UAS any time the aircraft is operating. These documents must be made available to the Administrator or any law enforcement official upon request.

24. The UA must remain clear and give way to all manned aviation operations and activities at all times.

25. The UAS may not be operated by the PIC from any moving device or vehicle.

26. All Flight operations must be conducted at least 500 feet from all nonparticipating persons, vessels, vehicles, and structures unless:
    a. Barriers or structures are present that sufficiently protect nonparticipating persons from the UA and/or debris in the event of an accident. The operator must ensure that nonparticipating persons remain under such protection. If a situation arises where nonparticipating persons leave such protection and are within 500 feet of the UA, flight operations must cease immediately in a manner ensuring the safety of nonparticipating persons; and
    b. The owner/controller of any vessels, vehicles or structures has granted permission for operating closer to those objects and the PIC has made a safety assessment of the risk of operating closer to those objects and determined that it does not present an undue hazard.

    The PIC, VO, operator trainees or essential persons are not considered nonparticipating persons under this exemption.

27. All operations shall be conducted over private or controlled-access property with permission from the property owner/controller or authorized representative. Permission from property owner/controller or authorized representative will be obtained for each flight to be conducted.

28. Any incident, accident, or flight operation that transgresses the lateral or vertical boundaries of the operational area as defined by the applicable COA must be reported to the FAA's UAS Integration Office (AFS−80) within 24 hours. Accidents must be reported to the National Transportation Safety Board (NTSB) per instructions contained on the NTSB Web site: www.ntsb.gov.

If this exemption permits operations for the purpose of closed-set motion picture and television filming and production, the following additional conditions and limitations apply.

29. The operator must have a motion picture and television operations manual (MPTOM) as documented in this grant of exemption.

30. At least 3 days before aerial filming, the operator of the UAS affected by this exemption must submit a written Plan of Activities to the local Flight Standards District Office (FSDO) with jurisdiction over the area of proposed filming. The 3-day notification may be waived with the concurrence of the FSDO. The plan of activities must include at least the following:
    a. Dates and times for all flights;
    b. Name and phone number of the operator for the UAS aerial filming conducted under this grant of exemption;
    c. Name and phone number of the person responsible for the on-scene operation of the UAS;
    d. Make, model, and serial or N−Number of UAS to be used;
    e. Name and certificate number of UAS PICs involved in the aerial filming;
    f. A statement that the operator has obtained permission from property owners and/or local officials to conduct the filming production event; the list of those who gave permission must be made available to the inspector upon request;
    g. Signature of exemption holder or representative; and
    h. A description of the flight activity, including maps or diagrams of any area, city, town, county, and/or state over which filming will be conducted and the altitudes essential to accomplish the operation.

31. Flight operations may be conducted closer than 500 feet from participating persons consenting to be involved and necessary for the filming production, as specified in the exemption holder's MPTOM.

Unless otherwise specified in this grant of exemption, the UAS, the UAS PIC, and the UAS operations must comply with all applicable parts of 14 CFR including, but not limited to, parts 45, 47, 61, and 91.

This exemption terminates on August 31, 2017, unless sooner superseded or rescinded.

Sincerely,

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

Enclosures

May 18, 2015

United States Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
West Building Ground Floor Room W12-140
Washington, DC 20590

Re: Exemption Request Pursuant To Section 333 of the FAA Reform Act of 2012

Dear Sir or Madam:

I am writing pursuant to the FAA Modernization and Reform Act of 2012 (the "Reform Act") and the procedures contained in 14 C.F.R. 11, to request that Electric Head, LLC, owned and operated by Allen M. Gottfried and as owners and operators of small unmanned aircraft be exempted from the Federal Aviation Regulations ("FARs") listed below so that Electric Head, LLC may operate its small unmanned aircraft/lightweight unmanned aircraft systems)"UAS") commercially in airspace regulated by the Federal Aviation Administration ("FAA").

Primary uses will be low altitude aerial photography for use on websites, print pieces and HD aerial videography for promotional and client use in a variety of productions but not limited to Real Estate, Music Videos, Commercials, Independent Films, Construction, and more.

Allen Gottfried has operated and without incident a variety of UAS on many occasions for non-commercial purposes. The UAS utilizes battery power, not combustible fuels. Flight time ranges between five and twenty minutes depending on battery used. The UAS has GPS functionality to hover in place as well as a return to home function in case of loss of contact with the radio. The firmware and controller software will disable the UAS from taking off and also limit the UAS system from operating within specific GPS preset no-fly zones.

Electric Head, LLC exemption request would permit its operation of lightweight, unmanned (piloted by remote control) and comparatively inexpensive UASs in tightly controlled and limited airspace.

Electric Head, LLC will conduct its operations in compliance with the protocols described herein or as otherwise established by the FAA.

For the reasons stated below, Electric Head, LLC respectfully request the grant of an exemption allowing it to operate lightweight, remote controlled UASs.

1. Contact Information:

Allen M. Gottfried
15 Olivia Way
Jackson, NJ 08527
Tel: 732-903-4418
email:
Allengot@gmail.com

2. The Specific Sections of Title 14 of the Code of Federal Regulations from Which We Request Exemption is:

14CFR 21:
14 C.F.R. 45.23 (b):
14 CFR 61m113 (a) & (b):
14 C.F.R. 91, et seq.:
14 CFR 407 (a) (1): 14
CFR 409 (a) (2):
14 CFR 417 (a) & (b). U.S
Dep't of Trans.

3. The Extent of Relief Electric Head, LLC Seeks and the Reason It Seeks Such Relief:

Electric Head, LLC submits this application in accordance with the Reform Act, 112 P.L. 95§§ 331-334, seeking relief from any currently applicable FARs operating in cinematic, research and other flight operations within the national airspace system. The Reform Act in Section 332 provides for such integration of civil unmanned aircraft systems into our National airspace system as it is in the public's interest to do so. Our lightweight UAS meets the definition of "small unmanned aircraft" as defined in Section 331 and therefore the integration of our lightweight UAS is expressly contemplated by the Reform Act. We would like to operate our lightweight UAS prior to the time period by which the Reform Act requires the FAA to promulgate rules governing such craft.

The Reform Act guides the Secretary in determining the types of UASs that may operate Safely in our national airspace system. Considerations include:

- The weight, size, speed and overall capabilities of the UAS:
- Whether the UAS will be operated near airports or populated areas: and,
- Whether the UAS will be operated by line of sight.

112 P.L. 95 § 333 (a). Each of these items militates in favor of an exemption for Electric Head, LLC.

Our UAS utilizes four counter-rotating propellers for extreme balance, control and stability. It weighs less than 5 pounds, including battery and all equipment. This small unmanned aircraft is designed to primarily hover in place and operate at less than a 50 knot maximum speed. It is capable of vertical and horizontal operation but operate only within the line of sight of the remote control pilot.

Utilizing battery power, flights generally last between five and twenty minutes. We do not operate the UAS with less than twenty five percent battery capacity.

Safety systems in place include a GPS mode that allows the UAS to hover in place or return to takeoff location if communication with the radio control pilot is lost. We generally do not operate the UAS near airports or near populated areas unless contracted and cleared and authorized by such business. To date, we have only operated the UAS in a non-commercial manner. Additionally, Electric Head, LLC carries a $1-Million General Liability Insurance policy if in the unlikely case where any unforeseen accidents should occur.

Our operation of this small unmanned aircraft will not "create a hazard to users of the national airspace system or the public." 112 P.L. 95 § 333 (b). Given the small size and weight of the UAS, combined with its operation in designated and well-controlled fly zones, which falls within Congress's contemplated safety zone when it promulgated the Reform Act and the corresponding directive to integrate UASs into the national airspace system. Indeed, our UAS will not pose any threat to the general public or national security.

The FAA has the authority to issue the exemption sought by Electric Head, LLC pursuant to the Federal Aviation Act, 85 P.L. 726 (1958), as amended (the "Act").

4. How this Request Will Benefit the Public As A Whole:

Granting this exemption request furthers the public interest. Congress has already pronounced that it is in the public's interest to integrate commercially flown UASs into the national airspace system, hence the passing of the Reform Act. Electric Head, LLC conduct research into safe UAS operations every time it flies its UAS. Flight data, visual inspections, recorded observations and flight analyses are compiled to further enhance current safety protocols. Allowing us to log more flight time directly relates to our research and our ability to further enhance current safety measures.

Our UAS is battery powered and creates no emissions. If our UAS crashes there is no fuel to ignite and explode. The impact of our lightweight UAS is negligible when compared to a full size aircraft.

Granting this request will also allow small business owners, independent filmmakers and homeowners to be able to afford high quality aerial images and video that they would otherwise have no access to due to several factors, cost being the biggest.

5. Reasons Why Electric Head, LLC Exemption Will Not Adversely Affect Safety

- Our UAS weighs less than 5 pounds complete with all mounted equipment and battery:

- We only operate our UAS below 400 feet:

- Our UAS only operates for 5-20 minutes per flight:

- We land our UAS when it reaches 25% battery power:

- Our remote control pilot operates the UAS by line of sight:

- Our remote control pilot has video backup and GPS override should sight of the UAS be lost.

Additional Notes:
The potential loss of life is diminished as no people on board.
There is no fuel on board a UAS and thus the potential for fire or explosions is greatly diminished.
The small size and extreme maneuverability of our UAS allows our remote control pilot to avoid hazards.

6. Summary:

A. 14 C.F.R. 21 and 14 C>F>R> 91: Airworthiness certificates and Manuals.

14 C.F.R. 21, Subpart H, entitled Airworthiness Certificates, sets forth requirements for procurement of necessary airworthiness certificates in relation to FAR § 91.203(a)(1). The size, weight and enclosed operational area of Electric Head, LLC UAS permits exemption from Part 21 because Electric Head, LLC

UAS meets an equivalent level of safety pursuant to Section333 of the Reform Act. The FAA is authorized to exempt aircraft from the airworthiness certificate requirement under both the Act (49 U.S.C. § 44701 (f) and Section 333 of the Reform Act. Both pieces of legislation permit the FAA to exempt UASs from the airworthiness certificate requirement in consideration of the weight, size speed, maneuverability and proximity to areas such as airports and dense populations. Electric Head, LLC UAS meets or exceeds each of the elements.

14 C.F.R. 91.7(a) prohibits the operation of an aircraft without an airworthiness certificate. As no such certificate will be applicable in the form contemplated by the FARs, this Regulation is inapplicable.

14 C.F.R § 91.9(b) (2) requires an aircraft flight manual in the aircraft. As there are no pilots or passengers, and given the size of the UASs, this Regulation is inapplicable. An equivalent level of safety will be achieved by maintaining a manual at the flight operations center. The FAA has previously issued
exemptions to their regulation in Exemption Nos 8607, 8737, 8738, 9299, 9299A, 9565, 9565B, 10167, 10167A, 10602, 10700 and 32827.

14C.F.R. § 91.121 regarding altimeter settings is inapplicable insofar as Electric Head, LLC utilizes
electronic global positioning systems and internal gyroscopes to provide spatial coordination.

14 C.F.R. § 91.203 (a)) and (b) provides for the carrying of civil aircraft certifications and registrations. They are inapplicable for the same reasons described above. The equivalent level of safety will be achieved by maintaining such certifications and registrations at Electric Head, LLC flight operations center.

B. 14 C.F.R § 45.23: Marking of the Aircraft.

Applicable Codes of Federal Regulation require aircraft to be marked according to certain specifications. Electric Head, LLC UAS is, by definition, unmanned. It therefore does not have a cabin, cockpit or pilot station on which to mark certain words or phrases. Further, two-inch lettering is difficult to place on such small aircraft. Regardless, Electric Head, LLC will mark its UAS in the largest possible lettering by placing the word "EXPERIMENTAL" on its fuselage as required by 14 C.F.R. § 45.29(f) so that the pilot, technician, spotter and others working with the UAS will see the markings. The FAA has previously issued exemptions to this regulation through Exemptions Nos. 8738, 10167, 10167A and 10700.

C. 14 C.F.R. § 61.113: Private Pilot Privileges and Limitations: PIC. Pursuant to 14 C.F.R.§§ 61.113 (a) & (b) private pilots are limited to non-commercial operations. Electric Head, LLC can achieve an equivalent level of safety as achieved by current regulations because Electric Head, LLC UAS does not carry any pilots or passengers. Furthermore, while helpful, a pilot license will not ensure remote control piloting skills. The risks attendant to the operation of Electric Head, LLC UAS is far less than the risk levels inherent in the commercial activities outlined in 14 C.F.R.§ 61, et seq. Thus, allowing Electric Head, LLC to operate its UAS

with a private pilot as the pilot in control will exceed current safety levels in relation to 14 C.F.R. § 61.113 (a) & (b).

D. 14 C.F.R. 91.119: Minimum Safe Altitudes.

14 C.F.R. § 91.119 prescribes safe altitudes for the operation of civil aircraft. It allows helicopters to be operated at lower altitudes in certain conditions. Electric Head, LLC will never operate at an altitude greater than 400 AGL. Electric Head, LLC will, however, operate its UAS in cordoned off areas with security perimeters, providing a level of safety at least equivalent to those in

relation to minimum safe altitudes. Given the size, weight, maneuverability and speed of Electric Head, LLC UAS, an equivalent level of safety will be achieved.

E. 14 C.F.R. 91.405 (a) (2); 417 (a) & (b): Maintenance Inspections.
The above cited Regulations require, amongst other things, aircraft owners and operators to "have aircraft inspected as prescribed in subpart E of this part and shall between required inspection, except as provided in paragraph © of this section, have discrepancies repaired as prescribed in part 43 of this chapter...."

These Regulations only apply to aircraft with an airworthiness certificate. Therefore, they will not apply to Electric Head, LLC should its requested exemption be granted. Electric Head, LLC conducts as extensive maintenance program that involves regular software updates and curative measures for any damaged hardware. Therefore, an equivalent level of safety will be achieved.

F. Summary
Electric Head, LLC seeks an exemption from the following Regulations: 14 C.F.R. 21, subpart H; 14 C.F.R. 45.23(b); 14 C.F.R. §§ 61.113 (a) & (b); 14 C.F.R. § 91.7 (a); 14 C.F.R § 91.9 (b)(2); 14 C.F.R.§ 91.103(b); 14 C.F.R.§ 91.109; 14 C.F.R. § 91.119; 14 C.F.R. § 91.121; C.F.R. § 91.151 (a); 14 C.F.R. §§ 91.203(a) and (b); 14 C.F.R. § 91.405 (a); 14 C.F.R. § 91.407 (a) (1); 14 C.F.R. § 91.409 (a)(2);14 C.F.R. § 91.409 (a)(2);and 14 C.F.R.§§ 91.417 (a) & (b) to commercially operate its lightweight unmanned aircraft in motion picture or photography operations and to conduct its own research. Granting Electric Head, LLC request for exemption will reduce current risk levels and thereby enhance safety. Currently motion picture image capture relies primarily on the use of larger aircraft running combustible fuel. Electric Head, LLC aircraft does not contain potentially explosive fuel, is smaller, lighter and more maneuverable than conventional motion picture aircraft. Electric Head, LLC operates at lower altitudes and in controlled airspace. Electric Head, LLC has been analyzing flight data and other information in compiling novel safety protocols and the implementation of a flight operations manual that exceeds currently accepted means and methods of safe flight. There are no people on board Electric Head, LLC UAS and therefore the likelihood of death or serious bodily injury is significantly limited. Electric Head, LLC operation of its UAS, weighing less than 5 pounds and travelling at speeds lower than 50 knots in cordoned off areas will provide at least an equivalent level of safety as that achieved under current FARs.

Accordingly, Electric Head, LLC respectfully requests that the FAA grant its exemption request without delay. The FAA has the authority to issue the exemption sought by Electric Head, LLC pursuant to the Federal Aviation Act, 85 P.L. 726(1958), as amended (the "Act").

In closing, Electric Head, LLC would like to state that it would be very easy to ignore the FAA and operate a UAS commercially without applying for any consideration from them. We have seen and spoken with several people who are already doing so. We hope the simple fact that someone such as ourselves who operate a very small business and will be operating a UAS on a very small scale is applying for this exemption shows how serious we are about safety and doing things properly. Thank you for your time and consideration.

Respectfully submitted,

Allen M. Gottfried

Owner, Electric Head, LLC
www.electricheadonline.com