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

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

September 3, 2015

Exemption No. 12744
Regulatory Docket No. FAA−2015−1829

Mr. Gerald Svoronos
Icarus Aerial Media Inc.
34 Frostfield Place
Melville, NY 11747

Dear Mr. Svoronos:

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 7, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Icarus Aerial Media Inc. (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography, cinematography, and search and rescue operations.

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

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

Airworthiness Certification

The UAS proposed by the petitioner is a DJI Phantom 3.

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, Icarus Aerial Media 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. 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, Icarus Aerial Media 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 DJI Phantom 3 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 September 30, 2017, unless sooner superseded or rescinded.

Sincerely,

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

Enclosures

5.7.15

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Melville, NY 11747
Tel. 516-315-0234

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

To Whom it may concern:

Pursuant to the FAA Modernization and Reform Act of 2012 and the procedures contained in 14 C.F.R. 11, to request that Icarus Aerial Media Inc., an owner and operator of small unmanned aircraft, be exempted from the Federal Aviation Regulations ("FARs") listed below so that Icarus Aerial Media Inc. may operate its small lightweight unmanned aircraft systems ("UAS") commercially in airspace regulated by the Federal Aviation Administration ("FAA"); as 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. The conditions identified and proposed by the applicant are drawn from Order 8900.1 CHG 0, Volume 3, Chapter 8-Issue a Certificate of Waiver Aerial Photography and Video.

As identified and described herein, Gerald Svoronos, and his company Icarus Aerial Media Inc., is an experienced and avid RC model flyer for over twenty (20) years. Mr. Svoronos is a degreed Architect and is experienced with Construction progress photography. Icarus Aerial Media Inc. has fully equipped its small unmanned aircraft for aerial photography and cinematography, primarily for use in Real Estate Advertisement, Construction progress photography and Construction Inspections. Though given their stability and maneuverability, they may be used for other cinematography, by law enforcement personnel, search and rescue and by other first responders.

To date, Icarus Aerial Media Inc. has not performed any commercial services in Aerial photography on locations within the United States to ensure it is in compliance with any applicable FARs. It, like other applicants, has done so despite Judge Patrick G. Geraghty's decision in the Raphael Pirker matter and his reasoning that no FARs prohibit the use of small unmanned aircraft or lightweight UASs like those flown by other peer companies.

Icarus Aerial Media Inc. exemption request would permit its operation of lightweight, unmanned “in line of sight” UASs (DJI Phantom 3 or Similar) in tightly controlled and limited airspace. Predetermined, specifically marked areas of operation, cordoned off locations and corresponding enhancements to current safety controls will allow Icarus Aerial Media Inc. to operate within current safety parameters and new ones being implemented. As identified, similar lightweight, remote controlled UASs are legally operated by amateurs with no flight experience, safety plan or controls in place to prevent catastrophe. Icarus Aerial Media Inc. Utilizes a pre-flight safety and flight plan system.

Icarus Aerial Media Inc. respectfully requests the grant of an exemption allowing it to operate lightweight, remote controlled UAS's. The Specific Sections of Title 14 of the Code of Federal Regulations.

Requests Exemption are:
14 CFR 21; 14 C.F.R. 45.23(b); 14 CFR 61.113 (a) & (b); 14 C.F.R. 91, et seq.; 14 CFR 407 (a)(1); 14 CFR 409 (a)(2); and, 14 CFR 417 (a) & (b).
Exemption Request Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 C.F.R. 45.23(b);14 CFR Part 21;14 CFR 61.113 (a) & (b); 91.7 (a);91.9 (b) (2);91.103(b); 91.109;91.119; 91.121; 91.151(a);91.203(a) & (b);91.405 (a); 91.407(a) (1); 91.409 (a) (2);91.417 (a) & (b).

The Extent of Relief Icarus Aerial Media Inc. Seeks and the Reason It Seeks Such Relief:
Icarus Aerial Media Inc. submits this application in accordance with the Reform Act, 112 P.L. 95 §§ 331-334, seeking relief from any currently applicable FARs operating to prevent Icarus Aerial Media Inc. contemplated commercial 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. Icarus Aerial Media Inc. lightweight UASs (DJI Phantom 3 or similar) meet the definition of "small unmanned aircraft" as defined in Section 331 and therefore the integration of Icarus Aerial Media Inc. lightweight UASs are expressly contemplated by the Reform Act. Icarus Aerial Media Inc. would like to operate its lightweight UASs 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 Icarus Aerial Media Inc. Icarus Aerial Media Inc. UASs utilizes four counter-rotating propellers for extreme balance, control and stability. They each weigh less than 55 pounds, including cinematic or other equipment.

Each of Icarus Aerial Media Inc. small unmanned aircraft (DJI Phantom 3 or similar) are designed to primarily hover in place and operate at less than a 50 knot maximum speed. They are capable of vertical and horizontal operations but operate only within the line of sight of the remote control pilot. Utilizing battery power and not combustible fuels, flights generally last between five and twenty minutes. Icarus Aerial Media Inc. does not operate its UASs with less than twenty five percent battery capacity. Safety systems in place include a GPS mode that allows Icarus Aerial Media Inc. UASs to hover in place if communication with the radio control pilot is lost and then slowly descend the UAS at twenty five percent battery capacity. Further, Icarus Aerial Media Inc. fleet is programmed, in some instances, to slowly follow a predetermined set of waypoints to return to a safety point if communications are lost. Icarus Aerial Media Inc. does not operate its UASs near airports and generally does not operate them near populated areas. The UAS operating software and GPS navigation systems do not allow any of the Icarus Aerial Media Inc. UAS vehicles to operate near airports or restricted fly zones. The failsafe software will disable the UAS vehicles from taking off and also limit the UAS systems from operating within specific GPS preset no-fly zones.

The FAA has the authority to issue the exemption to Icarus Aerial Media Inc. pursuant to the Federal Aviation Act, 85 P.L. 726 (1958), as amended (the "Act"). Commercial and Public Benefits Granting Icarus Aerial Media Inc. exemption request furthers the public interest. First, 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. Second, Icarus Aerial Media Inc. conducts research into safe UAS operations every time it flies one of its UASs. Flight data, visual inspections, recorded observations and flight analyses are compiled to further enhance current safety protocols. Allowing Icarus Aerial Media Inc.to log more flight time directly relates to its research and its ability to further enhance current safety measures.

The public has an interest in reducing the danger and emission associated with current aerial cinematic capture methods, namely, full size helicopters. Icarus Aerial Media Inc. UASs are battery powered and create no emissions. If an Icarus Aerial Media Inc. UAS crashes there is no fuel to ignite and explode. The impact of Icarus Aerial Media Inc. lightweight UASs is far less than a full size helicopter, notwithstanding the statistically noteworthy safety record of full size helicopters used in motion picture capture. The public's interest is furthered by minimizing ecological and crash impacts by permitting motion picture capture through Icarus Aerial Media Inc. Services lightweight UASs.

Progression of the arts and sciences has been fundamental to our society since its inclusion in the United States Constitution. Indeed, Congress mandated the integration of UASs into our national airspace system, in part, to achieve progression in this noteworthy, and inevitable, field. Permitting Icarus Aerial Media Inc.to immediately fly within the United States furthers these goals. Whether it is the advancements in publicly usable technologies or advancements in equipment available to law enforcement personnel I first responders that does not cost millions of dollars, granting Icarus Aerial Media Inc. exemption request substantially furthers the public's interest in ways known and currently unknown.

Reasons Why Icarus Aerial Media Inc. Exemption Will Not Adversely Affect Safety Or How The Exemption Will Provide a Level of Safety At Least Equal To Existing Rule:
Icarus Aerial Media Inc. exemption will not adversely affect safety. Quite the contrary, for the reasons stated, supra, permitting Icarus Aerial Media Inc.to log more flight time in FAA controlled airspace will allow Icarus Aerial Media Inc.to innovate and implement new and as of yet undiscovered safety protocols. In addition, Icarus Aerial Media Inc. submits the following enhanced safety protocols to current aerial photography capture techniques:

Safety protocols:

- Icarus Aerial Media Inc. UASs weigh less than 55 pounds complete with 4k Resolution Motion picture quality Camera.
- Icarus Aerial Media Inc. only operates its UASs below 200 feet;
- Icarus Aerial Media Inc. UASs only operate for 5-25 minutes per flight;
- Icarus Aerial Media Inc. lands its UASs when they reach 25% battery power;
- Icarus Aerial Media Inc. remote control pilots operate UASs by Visual Line of Sight (VLOS) and will operate under daytime VFR conditions;
- Icarus Aerial Media Inc. remote control pilots have video backup should they somehow lose sight of the UAS;
- Icarus Aerial Media Inc. UASs have GPS flight modes whereby they hover and then slowly land if communication with the remote control pilot is lost or battery power is below25%;
- Icarus Aerial Media Inc. actively analyses electronic flight data and other sources of information to constantly update and enhance safety protocols;
- Icarus Aerial Media Inc. only operates in secured areas that are strictly controlled, are away from airports and highly populated areas;
- Icarus Aerial Media Inc. conducts extensive inspections of equipment prior to flight, during which safety carries primary importance; maneuverability and speed of Icarus Aerial Media Inc. UASs, an equivalent level of safety will be achieved.

Icarus Aerial Media Inc. will not operate within 5NM of an airport having an operational control tower or:

- 3 NM from an airport with a published instrument flight procedure, but not an operational tower
- 2 NM from an airport without a published instrument flight procedure or an operational tower
- 2 NM from a heliport with a published instrument flight procedure

Summary

Icarus Aerial Media Inc. seeks an exemption from the following Regulations: 14 C.F.R. 21, subpart H; 14 C.P.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; 14 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.P.R. § 91.409 (a)(2); 14 C.P.R. § 91.409 (a)(2); and, 14 C.P.R. §§ 91.417 (a) & (b) to commercially operate its fleet of small unmanned vehicles and lightweight unmanned aircraft vehicles in Construction progress video/ photography and Real Estate video/photography, to conduct its own research and to develop economic platforms for law enforcement and or search and rescue operations.

Granting Icarus Aerial Media Inc. request for exemption will reduce current risk levels and thereby enhance safety. Currently, Aerial Construction and Real Estate photography's use of larger aircraft running on combustible fuel. Icarus Aerial Media Inc. craft do not contain potentially explosive fuel, are smaller, lighter and more maneuverable than conventional motion picture aircraft. Further, Icarus Aerial Media Inc. operates at lower altitudes and in controlled airspace.

Icarus Aerial Media Inc . will be analyzing flight data and other information in compiling 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 Icarus Aerial Media Inc. UASs and therefore the likelihood of death or serious bodily injury is significantly limited. Icarus Aerial Media Inc. operation of its UASs, weighting less than 55 pounds and traveling 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.

I thank you for your attention to this matter. If you should have any questions, please do not hesitate to contact me.

Sincerely,

Gerry Svoronos

Gerald Svoronos