



Federal Aviation Administration

September 4, 2015

Exemption No. 12768 Regulatory Docket No. FAA-2015-2569

Mr. Randall Newman Princess Delivery Express, LLC P.O. Box 841276 Pearland, TX 77584

Dear Mr. Newman:

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 June 3, 2015, you petitioned the Federal Aviation Administration (FAA) on behalf of Princess Delivery Express, LLC (hereinafter petitioner or operator) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial imaging, monitoring, inspection, videography, and photography.

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 2.

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 collection¹. 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, Princess Delivery Express, LLC is granted an exemption from 14 CFR §§ 61.23(a) and (c), 61.101(e)(4) and (5), 61.113(a), 61.315(a), 91.7(a), 91.119(c), 91.121, 91.151(a)(1), 91.405(a), 91.407(a)(1), 91.409(a)(1) and (2), and 91.417(a) and (b), to the extent necessary to allow the petitioner to operate a UAS to perform aerial data collection. 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, Princess Delivery Express, 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 DJI Phantom 2 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

Federal Aviation Administration Exemption
Petition for Exemption under Section 333
FAA Modernization and Reform Act of 2012
Public 112-95 Feb. 14, 2012, Section 333
Submitted by: Princess DeliveryExpress, LLC. (Randall Newman)

Date: 6/3/2015

Dear Sir or Madam:

Attached please find Princess DeliveryExpress, LLC request for an exemption from the listed Federal Aviation Regulations to allow commercial operation of its Small Unmanned Aircraft Systems ("UAS") for aerial imaging for aerial advertising; safety, monitoring, inspecting and/or recording of secured and controlled environment construction sites; proposed development sites; inspections of property and videography/photography for realty advertisements and property listings. This exemption request is exclusively for the use of the UAS manufactured by DJI, DJI Phantom 2. Also please find the link to the DJI Phantom 2 UAS Manual ("Manual"), which outlines the operating requirements, and technical specifications for the DJI Phantom limitations, 2 system. http://www.dji.com/product/phantom-2/download

We have reviewed this Manual and in conjunction with the requirements outlined in this document we have found it to be acceptable for UAS operations on our project sites. Thank you for your time and consideration, and please let me know if you have any questions.

Sincerely,

Randall Newman Princess DeliveryExpress, LLC

Intended UAS Use

To record video and capture pictures of client's homes/properties for the use in real estate marketing materials, property development, property investigation and documentation by the use of light weight UASs in the following areas of commerce:

- Realty and Advertising Selling/leasing properties, enhancing advertising campaigns, and increasing production of marketing materials. Evaluating value by documenting assets and deficits especially in hard to access areas as an alternate to conventional large, heavy, combustible fuel bearing and manned vehicles are currently used.
- Photo/Videography of rural contracted outdoor recreational activities on private and public use lands (Prior Permission and coordination Only). Princess DeliveryExpress, LLC has a significant amount of interest in taking video and photos for advertising in our local area. Utilizing the UAS will offer a significant improvement to the agency with regards to both safety and cost. Using a 6 lb. UAS compared to a gas turbine helicopter or aircraft will offer a considerable safety margin as well as cost savings advantage.
- Property inspections Especially roofing inspections, especially tile roofs, are susceptible to added damage from an investigator walking on the roof to complete his initial inspection. A sUAS could do the work and record the inspection findings without the probability of additional roof damage or personnel injury from falls. This service would be valuable to companies like: Roofing contractors, Insurance adjusters, property owners, renters, etc.
- Construction defect investigations Site investigation and findings specifically for building exteriors would be greatly enhanced by the use of a UAS. It can be very expensive to safely find and document exterior construction defects on multiple story building, a UAS could inspect, find and record information that would be otherwise only be accessible by ladders or scaffolding. Also A UAS would be a much safer way to do this type of high and/or difficult access investigation.
- Site investigation Such as steep hillside or bluff. Recording the visual condition of existing hillsides or bluffs that would otherwise be very difficult to access and record. It would also be less intrusive to environmentally sensitive areas.
- Site development Creating high resolution scalable overhead photography of a property would be valuable to engineers, architects, designers and landscape architects in evaluating the best use for developing a property and the potential effects that such development might have. Development of existing properties for remodeling or renovation especially commercial building where equipment is located on the roof would also benefit from HD photos that document the equipment and its location. Currently Google Maps are useful for such endeavors but only with a very low resolution overhead photo of such properties.
- Developers and Construction Companies To record and document the overall progress of large developments and to observe and document job site safety.
- Landscape maintenance To record landscape health and irrigation proficiency on large properties such as condominiums, apartment complexes, malls, golf courses or even public parks and recreation areas.
- There are many other areas that a UAS would be a safer, accurate and less expensive alternative to current commercial services but Princess DeliveryExpress, LLC would be specifically interested in the areas mentioned above.

Specific Section of 14 CFR Seeking specific exemption from:

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); 91.20 3(a) & (b); 91.405 (a); 91.407(a) (1); 91.409 (a) (2); 91.417 (a) & (b).

Dear Sir or Madam:

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 (the Reform Act) and 14 C.F.R. Part 11, Lloyd & Associates, a design/build and construction firm, hereby applies for an exemption from the listed Federal Aviation Regulations ("FARs") to allow commercial operation of its Small Unmanned Aircraft Systems ("UAS") for aerial imaging for safety and monitoring of secured and controlled environment construction sites, so long as such operations are conducted within and under the conditions outlined herein or as may be established by the FAA as required by Section 333. As detailed in this document and the link to Flight Manual, the requested exemption would permit the operation of UAS under controlled conditions in airspace that is 1) limited 2) predetermined 3) controlled as to access and 4) would provide safety enhancements to the already best practices safety protocols followed by Princess DeliveryExpress, LLC at each one of its project sites. Approval of this exemption would thereby enhance safety and fulfill the Secretary of Transportation's (the FAA Administrator's) responsibilities to "...establish requirements for the safe operation of such aircraft systems in the national airspace system." Section 333(c) of the Reform Act.

The name and address of the applicant is:

Princess DeliveryExpress, LLC

Randall Newman PH: 713-614-4001

Email: randy@rhnewman.com Address: PO Box 841276

Regulations from which the exemption is requested:

14 C.F.R. Part 21

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

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) & (b)

STATUTORY AUTHORITY FOR EXEMPTIONS

The Federal Aviation Act expressly grants the FAA authority to issue exemptions. This statutory authority includes exempting civil aircraft, as the term is defined under §40101 of the Act, including UAS, from the requirement that all civil aircraft must have a current airworthiness certificate. The Administrator may grant an exemption from a requirement of a regulation prescribed under subsection (a) or (b) of this section or any sections 44702-44716 of this title if the Administrator finds the exemption in the public interest. 49 U.S. C. §44701 (f) See also 49 USC §44711(a); 49 USC §44704; 14 CFR §91.203(a)(1). Section 333(b) of the Reform Act assists the Secretary in determining whether UAS may operate in the National Airspace System (NAS) without creating a hazard to the user, the public, or a threat to national security. In making this determination, the Secretary must consider:

- The UAS's size, weight, speed, and operational capability;
- Whether the UAS operates within the visual line of sight of the operator
- Whether the UAS operates outside of highly populated areas and away from close proximity to

airports Reform Act §333(a). If the Secretary determines that a UAS "may operate safely in the national airspace system, the Secretary shall establish requirements for the safe operation of such aircraft in the national airspace system." Id. §333(c).

Princess DeliveryExpress, LLC UASs are multi-rotor vehicles, weighting 10 or fewer lbs. including payload. They operate under normal conditions at a speed of no more than 50 knots and have the capability to hover, and move in the vertical and horizontal plane simultaneously. The UAS will operate only in the pilot's visual line of sight at all times and will operate only within the recommendations described in the DJI Flight Manual. Such operations will insure that the UAS will "not create a hazard to users of the national airspace system or the public." Reform Act Section 333 (b). Given the small size of the UAS involved and the restricted and sterile environment within which they will operate, our application falls squarely within the zone of safety (an equivalent level of safety) in which Congress envisioned that the FAA must, by exemption, allow commercial operations of UAS to commence immediately. Also due to the small size of the UASs and the low altitudes and restricted areas in which our UAS will operate, approval of the application presents no national security issue. Given the clear direction in Section 333 of the Reform Act, the authority contained in the Federal Aviation Act, as amended; the strong equivalent level of safety surrounding the proposed operations, and the significant public benefit, including enhanced safety, the grant of the requested exemptions is in the public interest. Accordingly, Princess DeliveryExpress, LLC respectfully requests that the FAA grant the requested exemption without delay.

PUBLIC INTEREST

This exemption application is expressly submitted to fulfill Congress' goal in passing Section 333(a) through (c) of the Reform Act. This law directs the Secretary of Transportation to consider whether certain unmanned aircraft systems may operate safely in the NAS before completion of the rule making required under Section 332 of the Reform Act. By granting an exemption the FAA will fulfill Congress's intent of allowing UAS to operate with significant safety precautions in low risk environments. The use of UAS on a construction or inspection site can significantly reduce the risk to workers of falls while inspecting, surveying, or monitoring site progress. UAS can inspect, photograph, and collect data on hard to get to areas that otherwise would require worker inspection. Falls are the leading source of workplace fatality and injury on construction sites', and reducing falls through UAS use for site imaging could save workers lives. Additionally, UAS could replace the use of helicopters and small aircraft to monitor sites. The UAS we propose to fly in this application are under five pounds, and carry no combustible material on board, as opposed to the much larger conventionally powered small aircraft. Shifting to UAS from helicopters presents a marked safety increase for our workers and the public.

Lastly, UAS reduce the environmental impact by dramatically decreasing the energy used for aerial imaging and data collection over a construction site. Our UAS use rechargeable lithium ion batteries, as opposed to fossil fuels burned in operation of small aircraft that are many hundreds of times heavier.

EQUIVALENT LEVEL OF SAFETY

Princess DeliveryExpress, LLC proposes that the exemption requested herein apply to civil aircraft that have the characteristics and that operate with the limitations listed herein. These limitations provide for at least an equivalent or even higher level of safety to operations under the current regulatory structure because the proposed operations represent a safety 1 "Commonly Used Statistics", Occupational Safety & Health Administration. Available at: https://www.osha.gov/oshstats/commonstats.html enhancement to the already safe protocols followed on construction sites and imaging and surveying operations conducted with helicopters and other

conventional aircraft. Princess DeliveryExpress, LLC will be bound by the following limitations when conducting its UAS operations under an FAA issued exemption:

- 1. The UAS will be less than 10 pounds.
- 2. Flights will be operated within visual line of sight of a pilot.
- 3. Maximum total flight time for each operational flight will be 30 minutes. The UAS calculates battery reserve in real time, and will return to its ground station with at least 20% battery power reserve should that occur prior to the 30 minute limit.
- 4. Flights will be operated at an altitude of 200 feet AGL, never exceeding 400 feet AGL.
- 5. Crew for each operation will consist of the UAS pilot who will keep the UAS within his visual line of sight at all times and a spotter when required.
- 6. The UAS pilot will be trained in flight, operations, and safety procedures as detailed in this document and as detailed in the DJI Manual.
- 7. The UAS will only operate within a confined areas as defined in this document. This document and the DJI Manual also requires the establishment of a Security Perimeter for the flight operations area.
- 8. A briefing will be conducted in regard to the planned UAS operations prior to each day's production activities. It will be mandatory that all personnel who will be performing duties within the boundaries of the safety perimeter be present for this briefing.
- 9. All onsite personnel will consent to the UAS flyover on site by waiver, and the operator will obtain additional verbal or written consent of all persons who will be allowed within 100 feet of the flight operation.
- 10. The pilot will have been trained in operation of UAS generally and received up-to-date information on the particular UAS to be operated as required by this document.
- 11. Written and/or oral permission from the relevant property holders will be obtained.
- 12. All required permissions and permits will be obtained from territorial, state, county or city jurisdictions, including local law enforcement, fire, or other appropriate governmental agencies.
- 13. If the UAS loses communications or loses its GPS signal, it will have capability to return to a predetermined location within the Security Perimeter and land.

DESCRIPTION OF SPECIFIC REGULATIONS 14 CFR Part 21, Subpart H: Airworthiness Certificates 14 C.F.R. §91203(a)(1) Subpart H, entitled Airworthiness Certificates, establishes the procedural requirements for the issuance of airworthiness certificates as required by FAR §9 1.203 (a) (1). Given the size and limited operating area associated with the aircraft to be utilized by Princess DeliveryExpress, LLC, an exemption from Part 21 subpart H meets the requirements of an equivalent level of safety under Part 11 and Section 333 of the Reform Act. The Federal Aviation Act (49 U.S.C. 44701 (f)) and Section 333 of the Reform Act both authorize the FAA to exempt aircraft from the requirement for an airworthiness certificate, upon consideration of the size, weight, speed, operation al capability, and proximity to airports and populated areas of the particular UAS. Our small UAS will be operated at low speed in a controlled environment, at least five miles from an airport and more than three miles from any city or densely populated area.