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

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

August 18, 2015

Exemption No. 12501
Regulatory Docket No. FAA−2015−1258

Mr. John P. Creed
8009 Cooke Road
Elkins Park, PA 19027

Dear Mr. Creed:

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 posted to the public docket on April 28, 2015 and additional information dated July 11, 2015, you petitioned the Federal Aviation Administration (FAA) for an exemption. The petitioner requested to operate an unmanned aircraft system (UAS) to conduct aerial photography, videography, and inspection.

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 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, Mr. John P. Creed 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.

Conditions and Limitations

In this grant of exemption, Mr. John P. Creed is hereafter referred to as the operator.

[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.

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 August 31, 2017, unless sooner superseded or rescinded.

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

Enclosures

regulations.gov
Your Voice in Federal Decision-Making

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This Other document was issued by the **Federal Aviation Administration** (FAA)

For related information, **Open Docket Folder**

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ID: FAA-2015-1258-0001

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John P Creed
8009 Cooke Rd
Elkins Park, Pa. 19027
April 22, 2015
U.S. Department of Transportation
Docket Management System
1200 New Jersey Ave., SE
Washington, D.C. 205909

To whom it may concern,
This is an Exemption Request Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 CFR Part 21, 45.27 (a), 45.29 (3) (c)(d)(e)(f)(g)(h), 61.113 (a) & (b), 91.103, 91.105, 91.109, 91.119, 91.121, 91.151, 91.405, 91.407, 91.409, 91.417.

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R. Part 11, I am personally preparing this document to request exemption from the above mentioned items to allow for the operation of a lightweight Unmanned Aircraft Systems (UAS) for use as a video and still imaging and inspection tool for my business in Home Improvements and related services.

The exemption would pertain to the DJI Phantom 2 + Vision quad copter (UAS) with zenmuse and gimbal/camera attached (part of the original sales package). This is a lightweight quad copter that would operate at a height of no more than 400 feet and speeds less than 87 knots (100mph). As this tool would be used to take video and still images for inspection and Home Improvement projects, high rates of speed are unnecessary. Visual line of site (VLOS) rules would apply in all applications and proposed scenarios. A personal safety implementation would be to operate the system at or better than optimal weather conditions. The best safety feature of this system is that when the controls are released, the unit remains stationary until the PIC rein-gages the controls. It has a return home button that when utilized, the on board GPS system communicates with the control unit and safely returns the unit to its original lift off site. This unit would be operated with a 2 man team at all times, 1 to control the system (PIC) and the other as spotter and visual guide. The operation of this tool would not pose a threat to NAS or security and would never be flown in active air space or near any airport. Since the system requires no fuel, oil or a manned flight crew or any payload at any time there is no risk to the public, the operator or its team. This system would actually protect the public and contractors from future injury by eliminating the need for extension ladders and high reaching ground based equipment for Home

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Date Posted:
Apr 28, 2015

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Submitter Name:
John Creed

Mailing Address:
8009 Cooke Rd

City:
Elkins Park

Country:
United States

State or Province:
PA

ZIP/Postal Code:
19027

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This document is contained in
FAA-2015-1258

Related Dockets:
None

Related RINs:
None

Related Documents:
None

Improvement or insurance inspections, thus eliminating or lessening insurance claims as a whole. This would result in lower pricing for many industries and would serve the public well. This system would never be used for anything other than work related items.

I have had experience flying with these and other models and have some flight experience myself. I have always been extremely interested in flying and took a course once. I have over 120 hours of flight simulator experience as well as flying right seat on numerous occasions, both in state, over open ocean and cross country, with my brother who is a very experienced pilot. My brother and I would take his boat to and from Florida every 7 months from Massachusetts and my experience from my Navigation course at Massachusetts Maritime Academy has served me well both on the water and in the air as I was always the navigator that would assist my brother in flight. He and I believed that electronic equipment is essential but that a backup plan, a compass and a map never hurt. I try to follow these things I have learned over the years and take great pride in the fact that safety is always first. I look forward to continuing my aviation education in the years to come.

It is my greatest hope that the use of UAS will increase in the future as long as it is properly regulated. I do not feel that usage of these craft for delivery purposes, as a whole, are necessary but in emergency situations I see a great benefit. A man who worked for me last summer had his son run away into a large park one evening. They asked the police for help and they kept a look out. They asked for a helicopter search but none was provided. The boy, Steven Salazar Jr, was found dead a week later not far from his home in Philadelphia. That has haunted me ever since. I know now that my time and my UAS will always be available to assist when a child goes missing. I see a great potential future in this industries infancy and firmly believe that these systems could actually save lives. Is there any greater good to the public?

Since the quad copter has no flight crew, fuel or would carry passengers or payloads at any time I would seek relief from the above mentioned Regulations from 14 CFR.
I have sent the following attachment to assist in your evaluation;
1) DJI Phantom 2 + Vision Pilot Training Guide
2) DJI Phantom 2 + Vision Quick Start Guide

Please feel free to mail, email or call me at any time if you have any questions
Sincerely,
John P Creed
Owner/operator John P Creed Painting & Home Repairs
Rotogistics
215-627-4610
jpcpainting@gmail.com

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View Attachment:

John P Creed
8009 Cooke Rd
Elkins Park, Pa. 19027
July 11, 2015

US Department of Transportation
Docket Management Facility
West Building Ground Floor
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

To whom it may concern,
In response to your letter for the request for additional information, dated July 1, 2015, I have prepared this document in the hope that I have supplied the items you have asked for in order to grant me an exemption to operate UAS's for aerial data collection.

I seek relief and/or Exemption of Section 333 of the FAA Reform Act and part 11 of the Federal Aviation Regulations from 14 C.F.R. Part 21 Subpart H ,§§ 45.23, 45.27 (a), 45.29 (3) (c)(d)(e)(f)(g)(h), 61.23 (a)(c), 61.113 (a)(b), 91.7, 91.9, 91.103, 91.105, 91.107, 91.109, 91.119 (c), 91.121, 91.151 (a) (1), 91.405 (a), 91.407 (a) (1), 91.409 (a) (1) & (2), 91.417 (a) & (b)

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 and 14 C.F.R. Part 11, I am personally preparing this document to request exemption from the above mentioned items to allow for the operation of a small lightweight Unmanned Aircraft Systems s (UAS) for use as a video and still imaging, data collection and inspection tool for my business in Home Improvements and Media services. I seek relief because existing regulations would be an unnecessary burden to my business and the exemption would be in the public interest.
The FAA has the authority to grant exemptions from operating rules and regulations and the Secretary of Transportation has this authority based on section 333 of Public Law 112-95 in reference to the operation of UAS.

Exemptions sought from 14 CFR:

Part 21 Subpart H

This regulation requires the issuance of an Airworthiness Certificate for an aircraft operating in the National Air Space (NAS). The fact that my s(UAS) craft will operate in limited capacity and area and at a height no greater than 400 feet AGL, this situation meets the requirement of an equivalent level of safety under Part 11 and section 333 of the Reform Act. Since the FAA has the authorization to grant exemptions based on the size, weight, speed, capabilities and proximity to airports and populated areas and given these criteria in relations to larger, manned aircraft, it is clear that the UAS will operate with a safety level greater than conventional aircraft.

Part 45 Identification and Registration Markings
§§ 45.23, 45.27 (a), 45.29 (3) (c)(d)(e)(f)(g)(h)

With an exemption granted and given the size and operational restrictions for the UAS, an Airworthiness Certificate would not be required as (1) No ample space for registration markings and (2) no cabin or fuselage exists and the craft would not carry passengers or fuel and (3) the UAS is not a fix winged craft or rotorcraft §that meets size requirements.

Part 61 Medical Certificates
§§ 61.113 (a)(b), 61.23 (a)(c)
These regulations require pilots of manned aircraft to hold a medical certificate. Also private pilot privileges or Pilot in Command (PIC), limit private pilots to non-commercial operations. Since the UAS, given the size , weight and limitations, would not be carrying fuel or passengers and therefor would pose a decreased threat level as compared to manned aircraft. Based on these facts that the UAS will operate in a limited airspace, at minimal speeds less than 87 knots and 400 feet AGL (above ground level) or less and in non-congested airspace or near any airports the craft can safely be operated without a commercial pilots license.

Part 91 General Operating and Flight Rules
§§ 91.105, 91.107
Since the UAS is a small craft that does not carry or need a crew, passengers or have a cabin these rules would not be applicable.

§ 91.109 Flight Instruction
This rule states that no person can operate a civil aircraft that is utilized for flight instruction without the presence of dual controls. Since the UAS is not piloted and does not carry passengers flight instruction would not take place and is not possible. The craft is operated remotely by a hand held radio frequency control unit by a single person with a spotter and visual guide on ground level. This situation makes the operation of the UAS at a far greater level of safety than conventional manned aircraft.

§§ 91.119 (c), 91.121, 91.151 (a) Minimal Safe Altitudes; Altimeter Settings; Fuel Requirements for Flight in VFR Conditions
Since the UAS will operate at a height no greater than 400 feet AGL, does not have an altimeter (height and range of craft are regulated by GPS from ground control unit) and does not carry fuel and can only operate during daylight hours with VLOS (Visual Line of Sight) these regulations would not be applicable. Given the fact that the UAS does not carry fuel and is battery operated with a maximum flight time of 25 minutes a 30 minute additional fuel capacity past destination point would not apply and since it would not fly in commercial air space it would not follow conventional aircraft VFR conditions.

§§ 91.405 (a), 91.407 (a) (1), 91.409 (a) (1)(2), 91.417 (a)(b) Maintenance Required; Operation After Maintenance; Inspections; Maintenance Records
This regulation would require maintenance of conventional aircraft to meet stipulations pertaining to Part 43. Since these apply to aircraft with an Air Worthiness Certificate it would not apply to the UAS. Maintenance would be performed as needed after inspections prior to and directly after each flight and as suggested by the manufacturer. Given the fact that the UAS would not be carrying a payload (other than camera) is lightweight and carries no fuel (battery powered) and has far fewer working parts than commercial aircraft, maintenance is minimal and can be done much safer.

National Security, Serving the Public Interest and Public Safety

It is for the greater good to the public, as a whole, to allow for the operation of small UAS for data collection, video and still imagery and inspections. Current standards and practices used for these actions involve the use of larger and more conventional manned aircraft which carry fuel and a larger payload and if mechanical failure were to occur would pose a greater threat to the public than UAS's. It is also common knowledge that the use of ladders and other items for inspections have led to countless injuries and accidents that could have been avoided with the assistance of UAS's. By utilizing UAS for these actions and data gathering it best serves The Public Interest by reducing injuries and accident and would also assist in lowering of liability and insurance claims and Hospital visits. A greater item that both serves the public interest and public safety is the fact that the UAS's leave a small carbon footprint and has no harmful emissions and thus helps protect the environment and the public well-being. UAS's will be operated in a controlled environment. In limited space, away from the general public, on private property with the client signing an agreement to proceed with the use of the UAS on his or her property. It will be safely operated at an altitude not to exceed 400 feet AGL (Above Ground Level) with a PIC and visual spotter at all times. It will be operated in fair weather conditions and only during daylight hours. The UAS has a maximum flight time of 25 minutes and no flight would exceed 20 minutes or with 25% remaining battery life (battery life is monitored remotely for every flight). The UAS will not be operated in the NAS of commercial flight paths nor will it operate near or around any airport, thus poses no threat to National Security. Because the UAS will be flown at low altitudes and low speeds and is lightweight and carries no fuel or payload or passengers the situation commands a far greater level of safety than commercial craft and thus serves Public Safety.

Safe Operation of UAS's

Proper preparation and thought went into a procedural plan to operate UAS's safely and efficiently to be utilized for data collection. Steps and protocols will be adhered to at all times. No operation will involve a threat to public safety or National Security. No operation will take place if proximity to the public is too close and will be cancelled or rescheduled to a time where there will be no safety issues. Everyone will be trained to be operators and visual spotters so that everyone has the knowledge to operate and safely bring down the UAS if any problems should occur. All operators will train with flight simulators and General Aviation knowledge to understand pitch, yaw and attitude of craft so as to better understand technical data and the standards of flight. No operation will commence unless a 2 person team is on site. All operations will be done at a height of no greater than 400 feet AGL, at low speeds less than 30 knots, with a PIC and visual spotter and the craft will have VLOS (Visual Line of Sight) at all times. Because the UAS is the DJI Phantom 2+ it has a "return home" feature that will safely return the craft to its lift off point should any problem occur. Another safety feature of the UAS is that when the remote control device is not engaged the craft will hover until it is directed to move in any particular fashion so if by chance the remote was dropped the craft would hover until re-engaged. UAS's are small, lightweight and slow moving tools that leave a tiny carbon footprint, carries no dangerous fuels, leaves no emissions or toxic fumes is far safer than conventional aircraft, poses no threat to National Security, and Serves the Public Interest and Public Safety.

In Summary

I have asked for exemptions under Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 CFR Part 21, Subpart H
§§ 45.23, 45.27 (a), 45.29 (3) (c)(d)(e)(f)(g)(h)
Continuation of Requested Exemptions
§§ 91.105, 91. 107, 91.109, 91.119 (c), 91.121, 91.151 (a), 91.405 (a), 91.407 (a) (1), 91.409 (a) (1)(2), § 91.417 (a) (b)

Similar situations with other people seeking exemptions have been granted with similar craft. I feel I have satisfied and met the conditions and criteria provided in Section 333 of the Reform Act and ask that the FAA grant the above listed exemptions I have requested as soon as possible.

Sincerely,

John P Creed

Owner/operator John P Creed Painting & Home Repairs

Rotogistics

215-627-4610

jpcpainting@gmail.com