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

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

August 19, 2015

Exemption No. 12522
Regulatory Docket No. FAA−2015−0685

Mr. Greg Priest
3874 Camellia Drive
Mobile, AL 36693

Dear Mr. Priest:

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 July 21, 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 surveying.

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 F550.

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 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. Greg Priest 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. Greg Priest 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 F550 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

Petition for exemption section 333

Greg Priest
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Re: Exemption Request Section 333 of the FAA Reform Act and Part 11 of the Federal Aviation Regulations from 14 CFR 61.113 (a) & (b) 14 CFR 91.9 (b) (2) 14 C.F.R. 91.103 14 C.F. R. 91.119 14 C.F.R. 91.121 14 CFR 91.151 (a) 14 CFR 91.405 (a) 14 CFR 407 (a) (1) 14 CFR 409 (a) (2) 14 CFR 417 (a) & (b)

Pursuant to Section 333 of the FAA Modernization and Reform Act of 2012 (the Reform Act) and 14 C.F.R. Part 11, Mobile Drones "Greg Priest"., operator of Small Unmanned Aircraft Systems ("sUASs") equipped to conduct aerial photography and videography for the real estate industry, hereby applies for an exemption from the listed Federal Aviation Regulations ("FARs") to allow commercial operation of its sUASs, 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 333.1

I would like to use a small hex copter, in my startup business for Aerial real estate photography and land survey. In the course of operating my hex copter I have been contacted by individuals inquiring the availability of my equipment to video property or properties they have listed on various real estate sites. I see the future of UAS based businesses growing rapidly, and would like to be a part of this growing aviation sector.

Current aerial video and photography projects require the hire of full size aircraft at a considerably higher level of risk and cost. The equipment I will be using weighs less than 5lbs and has various safety systems and overrides that in the event of loss of signal, guarantee that the aircraft return to the point of launch and safely land. Also, the equipment weighs considerably less than traditional aircraft and crew.

As a former student pilot who worked toward my private pilot license, this allows me to get back into aviation in a new technology that I also hope will led to my eventual private pilot certification. As a student pilot I logged more than forty hours in small single engine aircraft. I understand the safety procedures and how important check lists and well maintained aircraft are for public safety. When I fly my UAS I always abide by all FAA regulations. I take this as a future business very seriously.

The equipment I am using is maintained to the highest standards. I do preflight checks on batteries, airframe, motors and all equipment associated with my aircraft. I do limit my flights to below 400 feet AGL and within line of sight. My UAS is equipped with an auto pilot system in the event of loss of signal or loss of sight. The UAS is also equipped with an FPV camera that can be used in the event there is an emergency situation or disorientation. Please consider granting this exemption I would greatly appreciate the consideration.

Sincerely

Greg Priest

Regulations from which the exemption is requested: 14 CFR 61.113 (a) & (b) 14 CFR 91.9 (b) (2) 14 C.F.R. 91.103 14 C.F. R. 91.119 14 C.F.R. 91.121 14 CFR 91.151 (a) 14 CFR 91.405 (a) 14 CFR 407 (a) (1) 14 CFR 409 (a) (2) 14 CFR 417 (a) & (b)

sUASs operated by Mobile Drones "Greg Priest" weigh less than 10 pounds, including the payload (i.e. camera, lens, and gimbal). They operate at speeds of no more than 35 knots, can hover, and can simultaneously move vertically and horizontally. Mobile Drones "Greg Priest" will only operate its sUASs in line of sight and will operate only within the secure area described in the FOPM. Such operations will insure that the sUAS will "not create a hazard to users of the national airspace system or the public."

The small size of UASs and the restricted secure environment within which they will operate, Mobile Drons UAS operations adhere to the Reform Act's safety requirements. Additionally, due to the size of the UASs, permission from relevant property owners or other applicable parties, and the limited areas in which they will operate, approval of this application presents no national security issues.

Based on the substantial level of safety surrounding the proposed operations, and the significant public benefit (enhanced safety), reduction in environmental impacts, the grant of the requested exemption is in the public interest. Accordingly, Mobile Drones "Greg Priest" respectfully requests that the FAA grant the requested exemption.

Aircraft And Equivalent Level Of Safety

The operating limitations proposed by Mobile Drones "Greg Priest" provide for at least an equivalent or higher level of safety because operations further enhance safety of aerial image collection using conventional aircraft.

The limitations and conditions include:

• The sUASs will weigh less than 10 pounds DJI F550.

• Flights will be operated within line of sight of a pilot and/or observer.

• Maximum flight time for each operational flight will be no more than 20 minutes. Flights will be terminated at no less than 30% battery power reserve should that occur prior to the 20 minute limit.

• Flights will be operated at an altitude below 400 feet AGL, and not more than 200 feet above an elevated platform from which filming is planned.

• Minimum crew for each operation will consist of the sUAS Pilot and the Visual Observer.

• A sUAS pilot will be Pilot in Command (PIC).

• The sUAS will only operate within a confined secure area as defined in the FOPM. Page 2 of 6

• A briefing will be conducted for planned sUAS operations prior to each day's flight. All personnel performing duties within the boundaries of the safety perimeter are required to attend.

• The operator will obtain consent of all persons involved in the filming and ensure that only consenting persons will be allowed within 500 feet of the flight operation.

• The Pilot and observer must be trained in sUAS operations and have received current information on the particular sUAS to be operated as required by the FOPM DJI F500 with NAZA M V2.

• The Observer and pilot will be able to communicate by two way radio at all times

• Written and/or oral permission from the relevant property holders will be obtained prior to flight operations.

• If the sUAS loses communications or loses its GPS signal, the sUAS will have the capability to return to the point of launch using the RTL safety future of the flight controller

14 C.F.R. § 61.113(a) and (b): Private Pilot Privileges and Limitations:

Pilot in Command Sections 61.113 (a) and (b) limit private pilots to non-commercial operations. Because the sUAS will not carry a pilot or passengers, the proposed operations can achieve the equivalent level of safety of current operations by requiring the PIC operating the aircraft to have a private pilot's license rather than a commercial pilot's license to operate a sUAS. Unlike a conventional manned aircraft, a sUAS is remotely controlled by a ground-based operator. The operational area is controlled and restricted, and all flights are planned and coordinated in advance. The level of safety exceeds that provided by a single individual holding a commercial pilot's certificate operating a conventional aircraft. The risks associated with the use of a sUAS are so diminished from the level of risk associated with commercial operations contemplated by Part 61 allowing sUAS use by a sport pilot as the PIC exceeds the present level of safety sought by 14 C.F.R. §61.113 (a) and (b).

14 C.F.R. § 91.103:

Preflight Action Section 91.103 requires each pilot to preflight an aircraft before flight Page 3 of 6 to insure the safety of flight. As FAA approved rotorcraft flight manuals will not be used, an exemption is requested. However, an equivalent level of safety will be provided. The PIC will take all actions, including reviewing weather, flight battery requirements, landing and takeoff distances, and aircraft performance data before commencement of flight.

14 C.F.R. §91.119(c): **Minimum Safe Altitudes**

Section 91.119 establishes safe altitudes for operation of civil aircraft. Section 91.119 provides, in pertinent part, that: "except when necessary for takeoff or landing, no person may operate an aircraft below the following altitudes: .....

(c) Over other than congested areas. An altitude of 500 feet above the surface, except over open water or sparsely populated areas. In those cases, the aircraft may not be operated closer than 500 feet to any person, vessel, vehicle, or structure."

Because Mobile Drones "Greg Priest" requests authority to operate at altitudes no higher than 400 AGL, and not more than 200 above an elevated platform from which filming is planned, an exemption is needed to allow such operations. Except for the limited conditions stated in the FOPM, the sUAS will never operate higher than 400 AGL. It will, however, be operated in a restricted area within a security perimeter, where buildings and people will not be exposed to operations without their pre-obtained consent.

The equivalent level of safety will be achieved given the size, weight, and speed of the sUAS as well as the location where it is operated. No flight will be taken without the permission of property owners or local officials. Because of the advance notice to the property owners and participants in the filming activity, all affected individuals will be informed of the planned flight operations. Compared to flight operations for conventional aircraft, any risk associated with the proposed sUAS operations is far less than conventional aircraft operating at or below 500 AGL. In addition, the low-altitude operations and lite weight of the DJI F550 will ensure separation between a sUAS and conventional aircraft.

14 C.F.R. §91.121: Altimeter Settings

Section 91.121 requires each person operating an aircraft to maintain cruising altitude by reference to an altimeter that is set "...to the elevation of the departure airport or an appropriate altimeter setting available before departure." As a sUAS may not have a barometric altimeter, but instead a GPS altitude data, an exemption is needed.

An equivalent level of safety will be achieved by the operator, pursuant to the FOPM and Safety Check list, confirming the altitude of the launch site shown on the GPS altitude indicator before flight.

14 C.F.R. §91.151(a): Fuel Requirements for Flight in VFR Conditions

Page 4 of 6 Section 91.151(a) prohibits an individual from beginning "a flight in an airplane under VFR conditions unless (considering wind and forecast weather conditions) there is enough fuel to fly to the first point of intended landing, and, assuming normal cruising speed – (1) During the day, to fly after that for at least 30 minutes . . . ." The typical battery powering the Mobile Drones "Greg Priest" sUASs provides less than 20 minutes of powered flight. To meet the 30-minute reserve requirement in 14 CFR §91.151, sUAS flight would not be possible. Given the limitations on the sUAS's proposed flight area and its proposed operations within a predetermined location, a longer time frame for flight in daylight VFR conditions is reasonable. Furthermore, operating the sUASs in a tightly controlled area where only people, property owners, or official representatives who have signed waivers will be allowed, less than 30 minutes of reserve fuel does not engender the type of risk that §91.151(a) was intended to address.

Mobile Drones "Greg Priest" believes that safety can be achieved by limiting flights to 15 minutes or 30% of battery power, whichever occurs first. This restriction would be more than adequate to return the sUAS to the point of launch from anywhere in its limited operating area.

14 C.F.R. §91.405 (a); 407 (a) (1); 409 (a) (2); 417(a) & (b): Maintenance Inspections

These regulations require that an aircraft operator or owner shall "have that aircraft inspected as prescribed in subpart E of this part and shall between required inspections, except as provided in paragraph (c) of this section, have discrepancies repaired as prescribed in part 43 of this chapter...," and others shall inspect or maintain the aircraft in compliance with Part 43. Given that these sections and Part 43 apply only to aircraft with an airworthiness certificate, these sections will not apply to Mobile Drones "Greg Priest" operations.

Maintenance will be accomplished by the operator. An equivalent level of safety will be achieved because the DJI F550s are limited in size, will carry a small payload and operate only in restricted areas for limited periods of time. If mechanical issues arise, the sUAS can land immediately and will be operating from no higher than 400 feet AGL. As provided in the FOPM, the operator will ensure that the sUAS is in working order prior to flight, perform any required maintenance, and keep a log of any maintenance performed. Moreover, the operator is the person most familiar with the sUAS and best suited to maintain it in an airworthy condition.

Summary for Publication Pursuant to 14 C.F.R. Part 11,

The following summary is provided for publication in the Federal Register, should it be determined that publication is needed: Mobile Drones "Greg Priest" seeks an exemption from the following rules:

14 C.F.R. §§ 61.113(a) and (b); 91.103; 91.119(c); 91.121; 91.151(a); 91.405(a); 91.407(a)(1); 91.409(a)(2); and 91.417(a) and (b) to operate Page 5 of 6 commercially a small unmanned vehicle (55 pounds or less) in commercial image acquisition operations.

As established by the sUAS exemptions already granted by the FAA, allowing commercial operations of sUASs in agriculture, real estate, inspection, S & R, and film industries will enhance safety by reducing risk. Conventional survey, agricultural, mapping, inspection, and film operations, using turbine aircraft, operate at low altitudes and present the risks associated with aircraft that weigh around 4,000 pounds, and which carry large amounts of Jet A fuel. Such aircraft must also fly to and from the target location. In contrast, a sUAS weighing fewer than 55 pounds and powered by batteries eliminates virtually all of that risk given the small size and lack of combustible fuel. The sUAS is carried, and not flown, to target site. The DJI F550 sUAS carries no passengers or crew and, therefore, will not expose them to the risks associated with manned flights.

The operation of sUASs conducted in the strict conditions outlined in the FOPM will provide an equivalent level of safety supporting the grant of the exemption requested herein. The sUASs operate at slow speeds, close to the ground, and in a secure environment. As a result, they are far safer than conventional operations conducted with turbine helicopters flying near the ground and people.

Privacy

All flights will occur over private or controlled access areas with the property owner's prior consent and knowledge. Recognizable images will only be recorded of people who have given their consent or otherwise have agreed to be in the area where active image acquisition will take place.

Satisfaction of the criteria provided in Section 333 of the Reform Act of 2012 (size, weight, speed, operating capabilities, proximity to airports and populated areas and operation within visual line of sight and national security) provide more than adequate justification to grant Mobile Drones "Greg Priest" requested exemption, allowing for Mobile Drones "Greg Priest" sUAS commercial operations for the listed industries pursuant to the included FOPM.

I can be reached at (251)680-6830 or gpriest65@gmail.com if further information is needed.

Thank you.