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

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

August 20, 2015

Exemption No. 12538
Regulatory Docket No. FAA−2015−1523

Mr. Rocky Babcock
1506 Providence Cove Court
Byron Center, MI 49315

Dear Mr. Babcock:

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 letters posted to the public docket on May 8, July 2, and July 16, 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 Inspire 1.

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. Rocky Babcock 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, Mr. Rocky Babcock 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 Inspire 1 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

# Rocky Babcock - Exemption/Rulemaking

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

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## Content

I am filing this submission for exemption from CFR part 21. I would like to petition for the use of a DJI Inspire 1 UAS for aerial photography, videography and surveying for personal and commercial use. All such operations during which time the UAS is used will include willing participants or where barriers are present to protect bystanders in the event of a crash or debri from the UAS. These operations seek to be suitable as safe alternatives to manned aircraft operations which are exponentially larger and carry fuel as well as operators and will be conducted as safely as possible. If there is any inclination of damage to the aircraft, property or individuals there will be no use of the UAS.

Operations of the UAS will include a standard pre-flight checklist and inspection of surroundings. These steps will include

1 - Make Sure Batteries Are Fully Charged Both in transmitter and aircraft batteries
2 - Power On Transmitter
3 - Power On aircraft
4 - Load DJI App
5 - Exit Storage Mode
6 - Power Off A/C
7 - Attach Camera
8 - Install Aircraft Props & Prop locks
9 - Allow Aircraft To Accumulate Itself to Outside Temperature If Necessary
10 - Power On Aircraft
11 - Calibrate Compass
12 - Calibrate IMU
13 - Set Fail Safe Height
14 - Set Return To Home
15 - Power up motors and allow to warm up
16 - Verify GPS lock via Pilot App
17 - Verify Transmitter and Aircraft Connection
17- Verify surroundings are clear

The specifications for the DJI Inspire 1 are as follows:

**Aircraft**

Model T600
Weight (Battery Included)
2935 g

Hovering Accuracy (GPS mode)
Vertical: 0.5 m

**ID:** FAA-2015-1523-0001

## Document Informatic

**Date Posted:**
May 8, 2015

Show More Details

## Submitter Informatic

**Submitter Name:**
Rocky Babcock

**Mailing Address:**
1506 Providence Cove Court

**City:**
Byron Center

**Country:**
United States

**State or Province:**
MI

**ZIP/Postal Code:**
49315

## Comments

0

Comments Received

## Docket Informatior

*This document is contained in*
FAA-2015-1523

**Related Dockets:**
None

**Related RINs:**
None

Horizontal: 2.5 m

Max Angular Velocity
Pitch: 300/s
Yaw: 150/s

Max Tilt Angle
35

Max Ascent Speed
5 m/s

Max Descent Speed
4 m/s

Max Speed
22 m/s (ATTI mode, no wind)

Max Flight Altitude
4500 m

Max Wind Speed Resistance
10 m/s

Max Flight Time
Approximately 18 minutes

Motor Model
DJI 3510

Propeller Model
DJI 1345

Operating Temperature Range
-10 to 40 C

Diagonal Distance
559 to 581 mm

Dimensions
438x451x301 mm

**Gimbal**

Model
ZENMUSE X3

Output Power (with camera)
Static: 9 W
In Motion: 11 W

Operating Current
Station: 750 mA
Motion: 900 mA

Angular Vibration Range
0.03

Mounting
Detachable

Controllable Range
Pitch: -90 to +30

**Related Documents:**
None

* This count refers to the total comment/submissions received this *document*, as of 11:59 PM yesterday. Note: Agencies revie submissions, however some agencies may choose to redact withhold, certain submissions (c portions thereof) such as those containing private or proprietary information, inappropriate langu or duplicate/near duplicate examples of a mass-mail campa This can result in discrepancies between this count and those displayed when conducting searches on the Public Submiss document type. For specific information about an agency's p submission policy, refer to its website or the Federal Register document.

Pan: 320

Mechanical Range
Pitch: -125 to +45
Pan: 330

Max Controllable Speed
Pitch: 120/s
Pan: 180/s

**Camera**

Name
X3

Model
FC350

Total Pixels
12.76M

Effective Pixels
12.4M

Image Max Size
4000x3000

ISO Range
100-3200 (video)
100-1600 (photo)

Electronic Shutter Speed
8s 1/8000s

FOV (Field of View)
94

CMOS
Sony EXMOR 1/2.3

Lens
20mm (35mm format equivalent)f/2.8 focus at
9 Elements in 9 groups
Anti-distortion

Still Photography Modes
Single shoot
Burst shooting: 3/5/7 frames
Auto Exposure Bracketing (AEB): 3/5 bracketed frames at 0.7EV Bias
Time-lapse

Video Recording Modes
UHD (4K): 4096x2160p24/25, 3840x2160p24/25/30
FHD: 1920x1080p24/25/30/48/50/60
HD: 1280x720p24/25/30/48/50/60

Max Bitrate of Video Storage
60 Mbps

Supported File Formats
FAT32/exFAT
Photo: JPEG, DNG
Video: MP4/MOV (MPEG-4 AVC/H.264)

Supported SD Card Types
Micro SD
Max capacity: 64 GB. Class 10 or UHS-1 rating required.

Operating Temperature Range
0 to 40 C

**Remote Controller**

Name
C1

Operating Frequency
922.7~927.7 MHz (Japan Only)
5.725~5.825 GHz
2.400~2.483 GHz

Transmitting Distance (outdoor and unobstructed)
2 km

EIRP
10dBm@900m, 13dBm@5.8G, 20dBm@2.4G

Video Output Port
USB, mini-HDMI

Power Supply
Built-in battery

Charging
DJI charger

Dual User Capability
Host-and-Slave connection

Mobile Device Holder
Tablet or Phone

Max Mobile Device Width
170mm

Output Power
9 W

Operating Temperature Range
-10 to 40 C

Storage Temperature Range
Less than 3 months: -20 to 45 C
More than 3 months: 22 to 28 C

Charging Temperature Range
0-40 C

Battery
6000 mAh LiPo 2S

**Charger**

Model
A14-100P1A

Voltage
26.3 V

Rated Power
100 W

**Battery (Standard)**

Name
Intelligent Flight Battery

Model
TB47

Capacity
4500 mAh

Voltage
22.2 V

Battery Type
LiPo 6S High voltage battery

Energy
99.9 Wh

Net Weight
570 g

Operating Temperature Range
-10 to 40 C

Storage Temperature Range
Less than 3 months: -20 to 45 C
More than 3 months: 22 C to 28 C

Charging Temperature Range
0 to 40 C

Max Charging Power
180 W

**Battery (Additional)**

Name
Intelligent Flight Battery

Model
TB48

Capacity
5700 mAh

Voltage
22.8 V

Battery Type
LiPo 6S

Energy
129.96 Wh

Net Weight

670 g

Operating Temperature Range
-10 to 40 C

Storage Temperature Range
Less than 3 months: -20 to 45 C
More than 3 months: 22 to 28 C

Charging Temperature Range
0 to 40 C

Max Charging Power
180 W

**Vision Positioning**

Velocity Range
Below 8 m/s (2 m above ground)

Altitude Range
5-500 cm

Operating Environment
Brightly lit (lux > 15) patterned surfaces

Operating Range
0-250 cm

US Department of Transportation

Federal Aviation Administration

800 Independece Ave, SW

Washington, DC 20591

Dear Exemption Manager,

In reference to docket number FAA-2015-1523. It has been brought to my attention that there has bene a request for additional information posted under ID FAA-2015-1523-0002. This letter requested the following additional information:

- The reasons why granting the request would be in the public interest; that is, how it would benefit the public as a whole.
- The reasons why the exemption would not adversely affect safety or how the exemption would provide a level of safety at least equal to that provided by the rule form which you seek exemption.
- Any additional information, views, or arguments available to support your request.

Section 1: The reasons why granting the request would be in the public interest and how it would benefit the public as a whole.

Granting this request for exemption would further communicate the importance of UAS safety throughout the general public. While many hobbyists do not have plans for safety nor do they know the rules of airspace governed by the FAA there is a need to grant exemptions to individuals, such as myself, who plan to strictly adhere to all rulemaking procedures set forth by the FAA and follow these rules. I plan to understand any and all rules as it pertains to the hobby and my particular aircraft.

For example, an amateur photographer or videographer may be approached to take video or pictures for events such as sporting events, races, or simply for a new vantage point a business would like to show to the public without knowing the rulings for this procedures necessary for safe operation. I intend to operate my UAS in a safe manner as previously described in the original docket and promote the safe flying of a UAS for commercial use as I plan to use the UAS for monetary compensation for individuals or businesses looking to get pictures which include but are not limited to; pictures of their business, pictures of land, or pictures of any operations being performed.

This operation also includes any videography that will be performed for compensation in order to promote a brand or survey operations such as a work zone or construction project with new products which companies seek to promote. This may also include aerial videography, which companies choose to promote action sports with the strict consideration of using my particular UAS and how it will operate.

Section 2: The reasons why the exemption would not adversely affect safety or how the exemption would provide a level of safety at least equal to that provided by the rule form which you seek exemption.

Granting exemption would not adversely affect safety of individuals, wildlife or other structures. The UAS will remain clear of all objects and structures as well as persons by obtaining a minimum range of safety from the FAA or otherwise specifically requesting written consent for a person or structure to be within the safe operating range of the UAS. Additionally any necessary barriers or buffers will be in place in order to ensure safe operating distances are met by the UAS operator (Rocky Babcock). This does not include closed set filming or photography but will pertain to recreational areas or private land or public areas as requested by an individual or business.

As previously stated, recreational hobbyists that attempt to provide services like this may not have required documentation or the necessary pre-flight checklist as well as knowledge of the rules set forth by the FAA. In order to maximize safety all FAA rules will pertain to any and all UAS operations performed by myself via the DJI Inspire 1 aircraft. I seek to find the right rules and guidelines to safely operate the Inspire 1 in a manner appropriate for any weather conditions or terrain in order to provide the safety of any standing structures or people in the surrounding area.

Section 3: Any additional information, views, or arguments available to support your request.

As a recreational hobbyist of 5 years in the radio controlled industry, I have a working knowledge of various parts, systems, and necessary safety knowledge for the operation of the Inspire 1 for commercial use. I began flying small helicopters and progressed to larger, acrobatic helicopters that I continue to use to this day. This began my interest in these hobbies and much of my personal life involves repairing, operating and troubleshooting various small to mid-size helicopters strictly for recreational use.

Upon receiving the gift of the DJI Inspire 1 I have been approached by various individuals interested in any services I may provide with the UAS but I have turned down all inquiries as they would not be considered recreational and would fall under the commercial use category.

As far as safety is concerned, I am currently a large part, in my professional career, in charge of the safety operations of my current company as well as my previous company. I have been in the safety regulation side of daily operations of various companies coming on to 4 years now, and understand the importance of safety as it pertains to any commercial situation. I do possess a knowledge and inclination to act within safety guidelines as I understand how disastrous not following any particular procedure may be.

The primary reason for my request for exemption doe include safety. I have been approached to gather information, video and pictures of a traffic control work zone. There is a style of sheeting called ‘Diamond Grade’ sheeting for traffic drums seen in construction zones. The Michigan Department of Transportation is interested in making this sheeting, which is the highest reflectivity you can get for this type of product, a requirement for all road construction projects. The company that wants this information wants to show a work area where this sheeting is being used and draw comparisons to show how much more visible this sheeting is to motorists than current sheeting required by the MDOT.

This is not something that will be provided by myself until I have the required exemption to do so. These operations would not include any flight over any passing vehicles but would be performed any required distance away from people, vehicles and other structures which the Inspire 1 could cause harm.

Additionally I have been approached to provide videography and photography services for companies in order to take pictures of their inventory contained in their outdoor, enclosed yard areas. With these particular instances in mind I would like to gain exemption in order to offer my services for compensation as requested by companies or individuals.

I do seek to be as safe as possible in my operations and do understand the rules of the airspace. I intend to be a hobbyist (currently) that exemplifies a working knowledge of commercial use of the UAS and provide services in a safe and professional manner while adhering to the rules of the FAA.

I thank you for your consideration and look forward to hearing back from you.

Sincerely,

Rocky Babcock

Rocky Babcock seeks relief from the following specific sections of Title 14 of the Code of Federal Regulation:

**61.23**
**Medical Certificates: Requirement and duration**

**61.101(e)(4) and (5)**
**Recreational pilot privileges and limitations**

**61.113(a)**
**Private pilot privileges and limitations: Pilot in Command**

**61.315(a)**
**What are the privileges and limitations of my sport pilot certificate?**

**91.7(a)**
**Civil aircraft airworthiness**

**91.119(c)**
**Minimum safe altitudes: General**

**91.121**
**Altimeter settings.**

**91.151(a)(1)**
**Fuel requirements for flight in VFR conditions**

**91.405(a)**
**Maintenance required.**

**91.407(a)(1)**
**Operation after maintenance, preventive maintenance, rebuilding, or alteration.**

**91.409(a)(1) and (2)**
**Inspections**

**91.417(a) and (b)**
**Maintenance records.**

Rocky Babcock submits this request in accordance with the Reform Act, 112 P.L. 95 §§ 331-334 pursuing abatement from any current applicable FARS operating before me. I do intend to use the UAS for compensation for areal photogrophy, videogrphay and surveying provided for intended individuals or groups that wish to utilize my services.

The Inspire 1 meets the classification requirements in the Reform Act in Section 332 pertaining to civil unmaned aircraft in to national airspace.  The Inspire 1 also meets the definition of ‘small unmanned aircraft’ as defined in section 331.

Public Interest

Please also consider the public interest as it pertains to fuel emissions. Additionally the UAS runs on battery power and does not emit fumes or run on gases are potentially harmful to the environment. The operation of this UAS removes human exposure to these situations as it pertains to full size helicopters that may be used for photography or videography. If a UAS such as the Inspire 1 does lose control and crashes there is no flammable gas that may explode.

Equivalent Level of Safety

An equivalent level of safety will be obtained by the operator per the Operator Manual and User Guide. A data log will supplement safety along with automatic tracking of flight time and distances to gauge when maintenance will be required. The operator will make sure all systems are functioning properly prior to all flights.

If any issues arise the UAS will immediately land where it is able to do so safely. The ability to land in otherwise difficult or impossible areas where a helicopter may be unable to land will create less risk than a traditional rotorcraft which performs the same operation.